Submission to the Australian Government's Productivity Commission Interim Report
Data Transfer Initiative
September 12, 2025

Introduction

The Data Transfer Initiative (DTI) is a U.S.-based non-profit organization dedicated to empowering individuals through simpler, faster, and more secure data transfers at scale. Born out of the 2018 Data Transfer Project—a consortium of major technology companies—DTI has supported the development of widely used portability tools such as Google Takeout, Meta's Transfer Your Information tool, and Apple's Data & Privacy features. Today, DTI not only builds open-source tools but also develops frameworks and partnerships that turn data portability principles into practice. We serve as a neutral convener and expert resource for policymakers, regulators, and industry, while working to reduce complexity for both providers and users.

The Value of Data Portability

Our work on data portability aligns closely with the Interim Report's Draft Recommendation 2.1, which emphasizes the creation of new pathways for access and data sharing that focus on high-value, low-cost opportunities. When implemented securely and at scale, portability ensures that users, businesses, and economies can unlock greater value from the data we collectively generate. By enabling people to choose where and how to transfer their personal data, portability ensures that individuals—not just companies—benefit from value creation.

Our recent Global Vision Paper outlines a roadmap for strengthening the ecosystem, including public education campaigns, metrics to track user experience, incentives for entrepreneurs, and recognition for businesses prioritizing portability. Data portability also advances competition, innovation, user agency, online safety, and responsible AI governance.

Drawing on our global data portability work, we recommend data portability initiatives that:

- Support user-centric portability projects that deliver meaningful benefits to users (*e.g.*, photos, playlists, conversation histories);
- Promote trust frameworks and registries that reduce costs and protect users;
- Encourage innovation in AI portability while balancing user agency with proprietary protections;
- Invest in public awareness and measurement through educational campaigns and identifying metrics;
- Foster collaboration across industry, civil society, and governments to build secure, interoperable, and future-proof infrastructure; and
- Build on existing solutions in an effort to promote international alignment.

Building Trust

A data portability ecosystem cannot thrive without trust. The Interim Report recognizes this wisely: “The productivity benefits of data access and use can only be realised if there is trust that the party providing access to the data has the right to do so, trust that the system of access is safe and secure; and trust that the party accessing the data will handle the data safely.” Yet in practice, regulatory frameworks around the world have failed to provide clear requirements for how services should establish mutual authorization and protect user intent during transfers. To fill this gap, DTI has developed a Trust Model and is piloting a Data Trust Registry that streamlines verification, reduces duplication, and establishes globally applicable criteria. A shared trust framework promotes neutrality, consistency, and efficiency—benefiting both companies and users. We encourage the Commission to go further than in the Interim Report, beyond acknowledgment of the universal trust problem, and look for ways to support trust infrastructure, such as the registry DTI is building.

AI

The Interim Report properly recognizes the significance of AI in the landscape; DTI takes no position on the specific recommendations outlined in the Report. Instead, we wish to emphasize that data portability plays a critical role in the governance of AI. Just as users expect photos or playlists to be transferable across services, they should expect the same for AI conversation histories and other personal data. Ensuring that users can take their data, their digital memories, with them aligns markets with good societal outcomes. Done properly, portability in AI can enhance personalization and competition while safeguarding proprietary system details. This balance ensures portability empowers users and promotes innovation, competition, and growth, without undermining privacy or business investment.

Conclusion

Data portability is a critical driver of value for individuals, businesses, and society. We appreciate the Commission’s consideration of the above issues and look forward to continued engagement and conversations on how to advance user-centric data portability frameworks that maximize value, build trust, and support innovation across the digital ecosystem.