

Sahamati/Circular/FairUse/2025-04/01

Dated: April 30, 2025

To,
Live and Live-enabled entities, TSPs

Subject: Implementation of Fair Use Templates – Roles, Responsibilities, and Timeline for FIUs and AAs

As part of our participatory governance efforts to ensure Fair Use of the Account Aggregator (AA) ecosystem, we would like to share the expectations from various stakeholders (FIU, AA and FIPs), which were the outcome of detailed deliberations in the [User Councils](#), [Fair Use Committee](#), and the [Governing Council](#).

Based on these outcomes, Sahamati has published [13 \(thirteen\) Fair Use Templates](#) over the last several months, covering all significant use cases that are currently active in the AA Ecosystem.

We have previously informed all FIUs about the Fair Use Templates via two circulars¹, requesting them to ensure the implementation(s) of the relevant fair use template(s). We appreciate that many FIUs have adopted these templates in their implementation(s). That said, a considerable number of FIUs have yet to align their implementation of the templates.

In this context, we would like to highlight that:

Starting June 1, 2025, all AAs have agreed to implement an automated rule engine to check incoming consent requests against the fair use templates and reject the ones that do not meet the prescribed templates.

In the spirit of ecosystem collaboration and to continue using the AA Framework seamlessly, it is expected that FIUs adhere to fair use templates immediately.

The ecosystem governance committees have agreed on the following roles of FIUs and AAs in fair use implementation, which is critical in ensuring consumer protection and promoting an orderly growth in the AA Ecosystem.

FIUs (and their TSPs) – Primary Entities responsible for implementing fair use templates

¹ Sahamati/Circular/Fairuse/2024-05/01 dated May 19, 2024, and Sahamati/Circular/FairUse/2025-02/02 dated February 13, 2025

- FIUs are best positioned to adopt and embed the Fair Use Templates into their consent and data access processes.
- It was commonly agreed that FIUs should align their implementation(s) with these templates with immediate effect to ensure predictability and clarity across the ecosystem.
- Doing so is expected to drive responsible usage of the AA ecosystem and also simplify downstream validation responsibilities for AAs and FIPs.

The commonly agreed [Fair Use Guidelines for FIUs](#) to support implementation have been published here. These guidelines do not modify or override ReBIT API specs.

Accordingly, we urge all FIUs to ensure adoption and implementation of the relevant fair use template(s) at their end, by May 15, 2025. This would avoid rejection of any deviant requests by the AAs, which is scheduled to commence from May 31, 2025.

AAs – Primary checkers of the incoming consent requests wrt to their adherence to Fair Use Templates

- AAs have agreed that from May 31, 2025, they shall validate each consent and FI request in real time against the relevant Fair Use Templates.
- This approach, developed through collaborative discussions in the AA and FIU Councils, and further reviewed by the Fair Use Committee, aims to bring consistency and transparency to user consent flows.
- Accordingly, AAs have agreed that from May 31, 2025, all consent and FI requests which deviate from the existing fair use templates shall be rejected, with an appropriate response.
- Further, AAs have also agreed to share appropriate reports with the ecosystem on the status of adoption of fair use templates by FIUs.

The [Fair Use Guidelines for AAs](#) are available here. These guidelines do not, in any manner, modify or override ReBIT API specs.

Next Steps:

- All FIUs should review their existing processes to align with the relevant Fair Use Template(s) without delay.
- All AAs should complete the development and testing of the rules for Fair Use implementation and be ready to go live by May 31, 2025.
- Sahamati expects all TSPs and AAs of the FIUs to ensure that their FIU clients are compliant with the fair Use templates.

We once again thank all FIUs and AAs for their continued partnership and shared ownership in shaping a trustworthy, user-consent-driven AA ecosystem.



For any clarifications or to contribute further to this effort, please write to us at fairuse@sahamati.org.in.

Regards,
Sahamati Fair Use Team