

Sahamati/Circular/FairUse/2025-05/01

Dated: May 08, 2025

To,
Live and Live-enabled FIPs, AAs and TSPs

Subject: Implementation of Fair Use Templates – Roles and Responsibilities for FIPs

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 regard, Sahamati has issued Circular bearing Ref. No. [Sahamati/Circular/FairUse/2025-04/01 dated April 30, 2025](#) to all FIUs and AAs with instructions on implementation of their fair use templates and the checking mechanisms. The said circular requests all FIUs to implement the relevant fair use template(s) by May 15, 2025, while AAs have agreed to implement the checking mechanisms starting June 01, 2025.

Notably, FIPs, as custodians of their users' data, have expressed their intent to act as second-level checkers in due course.

In the circumstances, FIPs may act as a secondary layer of enforcement for Fair Use compliance by following the same rules as AAs, validating consent and data requests against Fair Use templates. Since Fair Use Template IDs are not passed in consent requests, FIPs are expected to follow the same Fair Use rules and matching logic as Account Aggregators (AAs) when evaluating incoming requests.

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

Repository Files for FIPs

1. [FIPs - Fair Use Implementation Guidelines.md](#)
2. [AAs - Consent Request Rules and Rule Matching Guidelines](#) (common for FIPs and FIUs)
3. [AAs - FI-Request Rules and Rule Matching Guidelines](#) (common for FIPs and FIUs)

Further, please note that in order to ensure consistency and predictability in the implementation of the checking mechanisms at FIPs' ends, the FIP Council is deliberating on standardising the communications to customers on rejection of approved consents. Based on the outcome of the deliberations, Sahamati will issue a further circular to share guidance on such common communications to be adopted by FIPs.

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

Regards,
Sahamati Fair Use Team