

To:

Senate Economics Legislation
Committee
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Parliament House
Canberra ACT 2600
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23 February 2026

Re: Inquiry into the Corporations Amendment (Digital Assets Framework) Bill 2025

Coinbase Global, Inc. together with Coinbase Australia, Pty. Ltd. and its other subsidiaries, (**Coinbase**) welcomes the opportunity to provide this detailed submission to the Senate Economics Legislation Committee (the **Committee**) on the Inquiry into the Corporations Amendment (Digital Assets Framework) Bill 2025 (the **Bill**).

Coinbase started in 2012 with the idea that anyone, anywhere, should be able to send and receive Bitcoin easily and securely. The passing of this Bill will secure that for Australians, as it focuses on the protection of their assets by the entities they trust. Prioritising this Bill's fast passage is critical to consumer protection and the development of the digital asset industry in Australia.

We support the Bill for passage in its current form, though encourage the Committee to use this inquiry to reflect on the issue of debanking and its effect on individuals and businesses in Australia. The Bill, unfortunately due to necessity, provides a specific mitigator to one symptom of debanking, though with some additions could address this issue for the wider financial sector, allowing for competition to once again become a feature of the Australian financial landscape.

We commend the Committee on opening this inquiry. We look forward to continuing to engage with this work and encourage the Committee to contact us if we can be of further help.

Yours sincerely,



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Introduction

We commend the Government on the Bill and its prioritisation for passage through parliament. The Bill ensures that consumer's digital assets are protected when held on their behalf while avoiding re-characterising commodity-like tokens as financial products.

As the world's largest publicly listed digital asset platform (**DAP**) we have staked our reputation on being the most trusted and reputable way to access digital assets. This comes with our full commitment to the fit-for-purpose regulation of DAPs to ensure consumers are protected. As part of this commitment Coinbase has participated in the process leading up to this Bill since 2022, providing submissions and attending roundtables related to consultations on [Crypto Asset Secondary Service Providers](#), Token Mapping and [Regulating Digital Asset Platforms](#). Our Global head of Policy, Faryar Shirzard also testified before the Australian Senate Economics Legislation Committee regarding the Digital Assets (Market Regulation) Bill 2023 proposed by Senator Bragg.

Most recently, we participated in the consultation for the [Exposure Draft](#) of this Bill, providing a submission as well as attending roundtables and bi-laterals with Treasury. We thank Treasury for their time and efforts in addressing industry concerns with the bill, providing key changes and clarifications to:

- Definitions of possession and control
- Access to global liquidity; and
- The public digital token infrastructure and wrapped tokens exemptions

We recommend the fast passage of this Bill through the Parliamentary process as it is currently proposed. It protects consumers, gives more clarity to innovators, and importantly brings Australia into step with global regulations. The long, highly collaborative process that has been undertaken with successive governments, treasury and regulators since the Inquiry into Australia as a Digital Economy in 2021 has created strong support for the current version of this Bill across the industry, government, regulators and broader stakeholders.

While given the opportunity of the inquiry process to improve upon this Bill we would like to make two recommendations to the Committee to make Australia's digital asset more competitive, both local and globally,:

- **Address the issue of debanking** by adding requirements for AFS licenses to provide basic accounts and facilitate transactions for fellow AFS licensees and their clients.

- **Enable global recognition** by allowing ASIC to designate equivalent jurisdictions from which passporting of licences will be recognised.

We would like to commend the Parliament, Treasury, ASIC, as well as the Ministers, Senators and MPs that have given their time to this legislative reform. We have been honored to be treated as an integral part of its creation contributing our experience from regulatory processes globally.

Recommendations

Address debanking

The withdrawal of banking services, commonly referred to as "debanking", has evolved from an operational anomaly into a systemic feature of the Australian financial landscape. Debanking practices have targeted fintechs, blockchain businesses and their users, the very same actors that can provide much needed competition to Australia's payments sector.

Australian banks are removing banking access from businesses and consumers via two common practices:

- *Unilateral Closures*: Abruptly shutting down accounts or refusing services to specific individuals, businesses, and even entire industry sectors.
- *Transaction Restrictions*: Halting, limiting, or freezing transfers, regularly targeting use or acquisition of digital assets via DAPs.

The practice is so pervasive that the Bill recognises it, containing provisions to limit its effects on licenced DAPs. The fact that the discretionary actions of the banks are so damaging and widespread that they are changing how Australian laws need to be written should give cause for grave concern.

While Coinbase recommends a broader approach to addressing the issue of debanking, especially of consumers, in Australia by legislating the recommendations by the Council of Regulators, we recognise that the required breadth of legislation to achieve this is out of scope for this inquiry and would likely require amendments to multiple acts. We do however, recommend that the Committee consider addressing the anti-competitive nature of debanking financial services business in Australia. This could be achieved by two measures:

- Not allowing AFS licencees to deny basic services to other AFS licensees, except where this would reasonably be expected to divulge proprietary information; and

- Not allowing AFS licensees to limit client transfers to other AFS licensees.

These two measures would begin to address the issues faced by fintechs, blockchain businesses and their users – ultimately bringing competition to the financial services landscape, and open Australia to the productivity gains that can be delivered by these challengers. The AFS regime carries significant regulatory burden to act efficiently honestly and fairly, and the majority of AFS licencees are also subject to AUSTRAC oversight for AMLCTF regulations, which are becoming more robust throughout 2026. As the DAP Bill and the uplift to the AMLCTF Act come into effect, banks' concerns regarding the risk profile of businesses related to crypto become even more unfounded.

Enable global recognition

Digital assets are borderless by design, operating on decentralised networks unimpeded by the geographic or temporal constraints of the traditional financial system. This market structure has driven expectations of Australian consumers, as they are able to access global liquidity, 24/7/365 just by downloading an app. To keep pace with this new paradigm, Australia must have a competitive regime that actively attracts business and allows Australian businesses to thrive globally. This will not only encourage investment in Australia but also provide Australian businesses the opportunity to expand globally through mutual recognition frameworks.

To ensure Australia can achieve its ambition to become a leading digital economy, we recommend empowering ASIC to designate equivalent jurisdictions from which passporting of licences will be recognised. Recognition of aligned global licencing regimes is common across other Australian financial products and services and would be a good addition to this legislation.