To the Reserve Bank of Australia,

The team leading Project Artesian welcomes the opportunity to contribute to the Reserve Bank of Australia's Review of Payments System Regulation.

Project Artesian is a public-interest research and proof initiative for Australia's financial system. It brings institutions together to generate evidence on questions that no participant can resolve independently and to translate validated findings into practical market and policy options.

Artesian is making this submission because the consultation's question about AI agents in e-commerce points to a wider transition in financial authority. Payment systems have automated instructions for decades. The emerging change is that software can interpret an objective or context, choose between alternatives, prepare or initiate an instruction, and act within a delegated mandate. Choices about merchants, payment methods, providers, currencies, timing and risk are beginning to move into the software decision layer above the payment rails.

Many contributors to this consultation will bring deep expertise in Australia's established payments system. This submission deliberately focuses on an area where expertise at the technological frontier, combined with analysis of its whole-of-system implications, remains underrepresented.

The Artesian definition of this wider category is **AI-mediated finance**: financial activity in which software interprets intent or context, makes consequential selections, prepares or initiates an instruction, or acts within delegated authority. AI agents in e-commerce are one immediate expression. The implications extend further as AI systems begin interacting with programmable money and assets.

Our central concern is where delegated software action meets money. Tokenisation digitises value whilst AI delegates action. Their convergence connects identity, authority, choice, evidence, liability, settlement and recourse in ways no institution can resolve independently.

Australia begins from a position of strength, with trusted payment infrastructure, capable institutions and a proven record of public-private coordination. The opportunity is to extend those strengths into the software decision layer, remaining open for business with the world while retaining the capacity to set, verify and enforce the conditions governing Australian-dollar activity.

The policy window is open now. International protocols and commercial practices are forming, Australia's account-to-account payments roadmap is being developed, and AI-mediated use cases are entering live trials. This submission seeks to widen the frame, explain the emerging shift in financial authority, and propose proportionate action Australia can begin taking while those defaults remain open to influence.

Kate Cooper Founder, Project Artesian

Response to Questions 6, 14 and 19

Governing AI-mediated payments in an open Australian economy

Executive summary

Recommendation

The RBA should recognise AI-mediated payment activity as an emerging payments-policy priority, develop candidate trust and interoperability outcomes with relevant authorities and industry, and support a rapid evidence-to-action workstream to test those outcomes before commercial and technical defaults become entrenched.

AI agents in e-commerce are an immediate payments-policy issue. They also reveal a wider transition in financial authority.

Payment systems have processed automated instructions for decades. The emerging change is that software can interpret an objective or context, choose between alternatives, prepare or initiate an instruction, and increasingly act within a delegated mandate. Consequential choices about merchants, payment methods, providers, currencies and timing are beginning to move into the software decision layer above the payment rails.

At an AI-mediated checkout, three interests may collide: the payer's preferences, the merchant's routing and cost interests, and the agent or platform's commercial incentives. The central competition question is therefore broader than whether an agent supports a particular card network:

> *Whose mandate governs payment selection, which constraints must the agent respect, and can the resulting choice be reconstructed?*

AI-mediated payments could lower search and operating costs, improve switching, increase competition between payment methods and automate routine activity. Those gains will scale only when unrelated institutions can independently verify and rely on the resulting action.

A technically valid payment message establishes that an instruction can be processed. It does not, by itself, establish that the software was entitled to create it. AI-mediated activity therefore requires a privacy-preserving authority and evidence envelope that establishes, or securely references:

- The identity and role of the actor.
- The mandate under which it acted.
- Its current authority and limits.
- The material factors governing payment selection.
- The evidence required to accept, refuse or reconstruct the action.
- The settlement outcome.
- Liability, reversal and recourse.

Asset tokenisation deepens the issue. Tokenisation changes what can move and how it can settle. AI changes who or what can decide and act. Their convergence creates the prospect of software selecting, initiating and managing activity using programmable money and assets.

The National Outcome

The RBA's immediate remit is AI-mediated payment activity.

The wider convergence belongs within the response to Question 19 because it could affect the future design, resilience and sovereignty of Australia's payments system.

Australia begins from a position of strength with The New Payments Platform (NPP) demonstrating that the RBA and industry can define shared national outcomes and build world-class infrastructure.

Project Acacia has established both the potential of tokenised finance and the need for sustained public-private coordination. The new account-to-account payments vision positions the system as a trusted national asset operating in the public interest.

The next task is to extend that capability into the software decision layer.

> *To remain globally competitive, Australia must be open for business with the world: globally interoperable, easy for trusted participants to enter, and governed through Australian public-interest outcomes that remain enforceable.*

Australian payment sovereignty is the practical capacity to set, verify and enforce the conditions under which Australian-dollar activity occurs across both payment infrastructure and the software decision layer. Australia could retain domestic payment rails yet lose practical choice if global agents cannot discover them, do not understand them, or systematically prefer other rails, providers or units of account. Making Australian payment options machine-readable, trusted and globally interoperable is therefore both an economic opportunity and a sovereignty requirement.

Recommendations

1. Define and prioritise AI-mediated payment activity
The RBA should adopt a functional taxonomy based on the role performed by software, the party for whom it acts and the authority delegated to it. AI-mediated payment activity should be included in the RBA's end-2026 regulatory priorities.

2. Develop candidate trust and interoperability outcomes
The RBA should work with relevant authorities and industry to define outcomes-based, machine-readable conditions governing payment choice, authority, evidence, settlement and recourse across cards and account-to-account payments.

3. Support a rapid evidence-to-action workstream
Australia should test those candidate conditions through a time-bound, independently coordinated and technically expert programme across conventional and programmable Australian-dollar infrastructure. The resulting evidence should be published and each validated output allocated to the appropriate enduring institution.

Acting now does not require premature regulation or a predetermined institutional structure. It means defining the activity, developing provisional outcomes and testing them while Australia can still influence the rules, protocols and commercial practices taking shape around it.

About the submitter, interests and evidence status

About the Humanware Institute and Project Artesian



The Humanware Institute studies and builds the layer of judgement, governance, and policy that determines whether AI performs safely and as intended inside payments and financial infrastructure.

We call this layer humanware. It sits alongside software (the models and agents) and hardware (the compute and devices) as a distinct, engineerable layer of the stack, and it is the layer that decides whether an AI system in a critical payment function is actually accountable to a human.

Project Artesian is the Institute's applied-systems initiative for Australia's financial system.

It's currently focussed on bringing institutions together to research and prove the shared rules, controls and evidence required for trusted adoption of tokenised Australian-dollar value and AI-mediated financial activity.

Project Artesian was initiated by Kate Cooper, founder of the Humanware Institute. Kate has more than two decades of experience across government, technology, banking, digital assets and institutional transformation in Australia and internationally including ten years leading transformation and innovation within Westpac and NAB. Her work spans successive technology waves and major regulated institutions. She is currently working at the intersection of blockchain and artificial intelligence. She established the Humanware Institute to build the human and institutional systems required to govern AI responsibly.

Independence of recommendations

The recommendations in this submission are institution-neutral. They do not propose Humanware Institute or Project Artesian as the coordinator of any future workstream. Any coordinating role should be determined independently based on the scope, governance and evidence requirements established by the relevant authorities.

Status of closed-session evidence

This response contains evidence from a closed-session with industry, government, regulation, infrastructure, law and technology that took place in August 2026. The session involved 24 invited participants, anonymous Slido polls received 15–18 responses per question; exact wording, options and rankings appear in the appendix. All findings are anonymous and directional.

As the group was selected and non-representative, the findings identify emerging hypotheses rather than industry consensus. Government and regulatory attendance does not imply endorsement. The views and recommendations are those of the Humanware Institute alone.

1. Response to Question 6: AI agents in e-commerce

Question 6

> *Are there competition, efficiency and/or financial safety issues relating to the use of AI agents for payments in e-commerce? If so, are there any regulatory actions that the RBA should consider?*

Yes. AI agents can reduce search costs, automate routine activity, improve access and make payment competition more dynamic. They can also move consequential choice, authority and control functions into software. The policy question is whether the resulting action can be understood, verified and governed by every institution required to process, settle, refuse or remediate it.

The RBA should recognise AI-mediated payment activity as a distinct policy priority, establish a functional taxonomy, develop candidate minimum trust and interoperability outcomes and test those outcomes before detailed prescription.

1.1 When automation becomes delegated agency

The relevant distinction is between ordinary automation and delegated agency.

Ordinary automation executes a pre-specified instruction, such as a scheduled direct debit or a rules-based API call. AI-mediated activity can interpret an objective or context, compare alternatives, select a path and adapt its action. The shift begins before full autonomy. Competition issues can arise when software recommends or selects. Authority and liability issues become material when it prepares or initiates. Operational and resilience questions intensify when it executes repeatedly, across many users, within delegated limits.

For this submission:

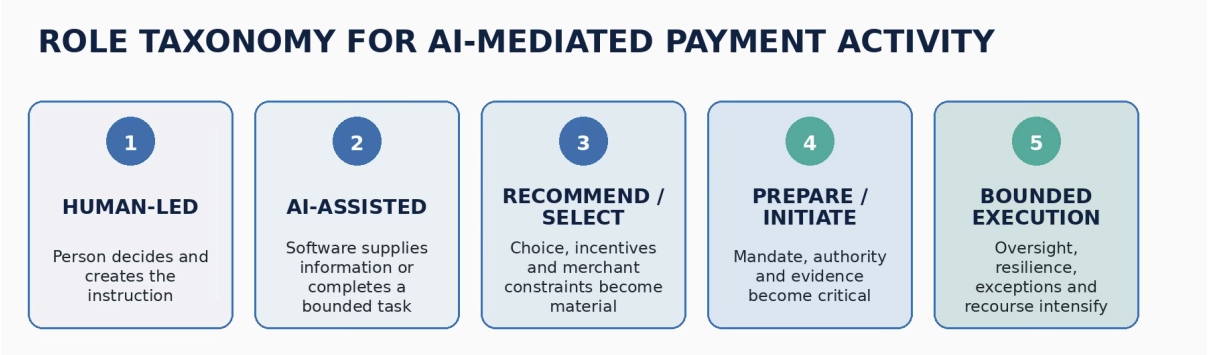
> **AI-mediated financial activity** *is financial activity in which an AI system interprets objectives or context and recommends, prepares, initiates, executes or evidences an action on behalf of a person or institution.*

> **AI-mediated payment activity** *is the subset that intersects with payment selection, initiation, processing, settlement or remediation.*

The RBA should use a five-stage role taxonomy:

1. **Human-led:** a person makes the decision and creates the instruction.
2. **AI-assisted:** software supplies information or completes a bounded task.
3. **AI-recommended or selected:** software compares options and proposes or selects an outcome; a person decides whether to proceed.
4. **AI-prepared or initiated:** software prepares or initiates an action subject to confirmation or an existing control.
5. **Mandate-bounded execution:** software acts within defined authority and limits while people supervise outcomes, exceptions and recourse.

Figure 1. Role taxonomy for AI-mediated payment activity. Competition issues can emerge before full autonomy.



The taxonomy describes the role performed by software at a point in time.

Maturity should be assessed separately as different risks emerge at different stages.

The Financial Conduct Authority's Mills Review *(published on 6 July 2026)* reaches a compatible conclusion: *financial services are moving from human-led interactions towards continuous and delegated activity, with accuracy and reliance questions giving way to consent, accountability, auditability and redress as autonomy increases.*

One further distinction matters: **Know Your Actor**

Technical and policy work increasingly focuses on how AI agents are identified and authenticated. Some industry initiatives describe this as “Know Your Agent”.

Financial activity requires an additional layer of accountability: Know Your Actor.

Know Your Agent establishes which software agent is acting. Know Your Actor establishes the role it occupies, on whose behalf it is acting, the mandate and limits governing its actions, and the entity ultimately accountable for the outcome.

A consumer agent, merchant agent, platform agent and financial-institution agent may perform similar technical actions while carrying different mandates, incentives and responsibilities. Regulation and scheme design should therefore make it possible to identify:

- The principal for whom the agent acts.
- The agent provider.
- The active software instance.
- The transactional role being performed.
- The mandate, authority and limits governing the action.
- Any intermediary whose commercial incentives influence the result.
- The entity to which accountability and recourse ultimately return.

The core test is:

> *Can every AI-mediated financial action be connected to an identifiable role, a valid principal, a current mandate, defined limits and an accountable entity?*

Identifying the agent is necessary, **knowing the actor makes responsibility traceable**.

1.2 Competition: three mandates meet at checkout

At an AI-mediated checkout, three interests can collide:

1. **The payer's mandate:** price, convenience, rewards, protections, preferred providers and other instructions.
2. **The merchant's mandate:** accepted methods, routing rights, fraud settings, settlement preferences and cost controls.
3. **The agent or platform's incentives:** commercial partnerships, default providers, technical integrations, bundled services and revenue arrangements.

The central competition question is:

> *Whose mandate governs payment selection, which constraints must the agent respect, and can the resulting choice be reconstructed?*

An agent could improve competition by comparing cards and A2A options dynamically, lowering switching costs and choosing the method that best fits the payer's and merchant's legitimate constraints. It could also narrow choice through self-preferencing, opaque ranking or exclusive integration. A payment option that is technically available but invisible or unintelligible to an agent will be commercially unavailable in practice.

The RBA has already identified three immediate issues:

1. Merchant choice of payment method and debit network
2. Additional merchant fees
3. Disputes concerning intent and liability (RBA 2026a)

Any future regulatory or scheme response should ensure that the material basis of payment selection can be reconstructed, while protecting proprietary model reasoning. A proportionate response should require enough transparency to determine:

- which party the agent was acting for at each stage;
- which payment methods, rails and providers were considered;
- which merchant constraints and routing choices applied;
- which material commercial incentives affected selection;
- the total material cost to payer and merchant; and
- why the selected method prevailed.

The required transparency is a reconstructable record of the decision factors that materially affected a regulated payment outcome, while proprietary model reasoning remains protected.

The RBA can begin evidence collection through its existing industry engagement.

Trial participants should be asked to report the methods presented and selected, merchant routing choices, incremental agent-related fees, material incentives, failed or disputed transactions and fraud outcomes. This would establish whether the identified concerns are emerging in practice and where intervention may be proportionate.

Australian payment options should also become machine-readable. Agents need consistent information about availability, acceptance, total cost, protections, authentication, settlement characteristics, dispute treatment and recourse. That would make Australian rails easier for global agents to discover and select on fair terms.

1.3 Efficiency: mutual acceptance is the scaling test

AI-mediated payments can reduce search, administration and reconciliation costs. They could also improve access and personalisation. BIS experiments have already shown a general-purpose AI agent performing high-level intraday liquidity-management tasks, including maintaining buffers, prioritising payments and balancing settlement speed against liquidity use, while also underscoring the need for safeguards and further research (Aldasoro and Desai 2025).

The institutional scaling test is mutual acceptance:

> *Can an institution with no prior relationship to the software independently verify enough about the action to accept, refuse or remediate it?*

Without common evidence, each new agent, bank, merchant, provider or rail will require bespoke bilateral integration and manual reconstruction. That recreates friction at the point where automation promises to remove it. Shared semantics and verifiable evidence can support straight-through processing, lower market-entry costs and make legitimate agent activity easier to accept across institutions.

The efficiency opportunity therefore depends on a thin shared trust layer. It should reuse existing identity, authentication, payment-message and credential infrastructure wherever possible. Its job is to allow institutions to verify the result without forcing every participant to understand or trust the underlying AI model.

1.4 Financial safety: authority must travel with the action

Agentic payment systems bring adaptive and probabilistic decision-making into infrastructure designed for deterministic processing and finality. The International Monetary Fund (IMF) identifies this as a central architectural tension and separates the problem into intent, authorisation and settlement (Davidovic and Tourpe 2026).

For Australia, the practical requirement is an authority and evidence envelope. An AI-mediated payment should carry, or securely reference, enough verifiable information to answer:

- What system acted, for whom and through which provider?
- What was it authorised to do, within which value, counterparty, time, product and risk limits?
- Was the authority current, and how could it be revoked, paused or escalated?
- Which material selection constraints and incentives applied?
- What evidence supports the instruction and subsequent decisions?
- What form of money moved, when did settlement become final and what can each institution rely upon?
- Who can refuse, investigate, reverse, remediate and bear loss?

The envelope should be privacy-preserving. Only the minimum necessary information should be disclosed. Verification may occur through attestations, credentials or secure references. An institution should be able to establish authority without receiving the person's or organisation's complete mandate, private data or model history.

The same design should support failure. An effective system needs stop authority, revocation, exception handling, evidence preservation, dispute resolution and recourse. It should cover manipulation, impersonation, substituted payment details, exceeded authority, duplication, partial completion and a mismatch between the payer's intent and the delivered outcome.

2. Response to Question 14: standardisation and interoperability

Question 14

> *What regulatory action, if any, should the RBA take to promote more standardisation and interoperability across cards and A2A payments?*

The RBA should promote standardisation of the information required to compare, select, verify and remediate payments across cards and A2A rails, while preserving meaningful differences between those rails.

AI-mediated payment selection and initiation should become a design scenario in the emerging A2A payments roadmap. The roadmap should test whether an agent can discover card and A2A options, respect merchant and payer constraints, understand their different protections and settlement characteristics, choose transparently, and failover safely when the preferred rail is unavailable.

This is not a proposal to make cards and A2A payments technically identical, nor a complete response to every cross-rail interoperability barrier. It proposes a common information and evidence layer for circumstances in which software compares, selects or moves between the rails.

2.1 Standardise common meaning, not identical products

The Issues Paper correctly observes that standardisation can lower complexity, support switching and enable failover, while excessive standardisation can constrain innovation (RBA 2026a). The target should therefore be a common choice, authority and outcome interface rather than identical products or technical architectures.

The minimum cross-rail interface should make the following fields consistently interpretable by authorised machines and relevant institutions:

Table 1. Candidate minimum cross-rail choice, authority and outcome interface.

Domain	Minimum outcome
Option and roles	Identify the payment method, rail, providers, agent role and principal.
Availability and acceptance	State whether the method is available to the payer and accepted by the merchant.
Cost and incentives	Disclose material payer and merchant costs and incentives affecting selection.
Merchant choice	Represent routing rights, accepted methods and other legitimate merchant constraints.
Payer authority	Establish confirmation requirements, mandate status, value limits and other current constraints.
Protection and fraud treatment	Identify authentication, fraud allocation and material payer or merchant protections.
Settlement	State expected timing, status, finality and relevant form of money.
Dispute and recourse	Identify reversal, investigation, remediation and liability arrangements.
Failover	Identify available alternatives and the conditions for rerouting or human escalation.

The interface could be expressed through machine-readable schemas and attestations, drawing on existing standards.

A material change in cost, protection or finality during failover should trigger confirmation or escalation. The first output should be an outcomes specification and a set of test cases. Technical standards should follow the evidence.

2.2 An authority and evidence envelope across rails

The authority and evidence envelope should operate across cards and A2A payments. It would allow a receiving or processing institution to verify the current authority behind an instruction while each rail preserves its own economics, protections and finality model.

This supports four RBA objectives at once:

- **Competition:** agents can compare options on consistent information and merchant choice remains visible.
- **Efficiency:** providers integrate to a common outcome interface instead of rebuilding bilateral evidence for each agent and rail.
- **Financial safety:** institutions can refuse or remediate actions when authority or evidence is insufficient.
- **Resilience:** failover decisions can preserve the mandate, evidence and protection status as activity moves between rails.

For relevant AI platforms or providers beyond the RBA's formal reach, the RBA can define payment-system outcomes, incorporate the scenario into A2A governance and consultations, work through Treasury and the Council of Financial Regulators, and encourage implementation through scheme rules, standards bodies and market guidance. Question 19 expressly invites options beyond the RBA's formal PSRA powers.

3. Response to Question 19: a wider payments priority

Question 19

> *Are there any other issues relating to payments that the RBA should consider prioritising to promote competition, efficiency and financial safety in the payments system? Are there regulatory options outside of the RBA's formal powers under the PSRA to address the issues outlined in this paper? Are there issues in the broader payments system that have implications for the design and implementation of the RBA's payments system regulation?*

The RBA should prioritise the convergence of delegated software agency and programmable value as a wider payments-system design issue.

The proposed priority is not regulation of AI models, tokenised assets or financial activity generally. It is the payment-system interface: the conditions under which delegated software action can select, initiate and evidence Australian-dollar payments across existing and programmable forms of value.

AI agents in e-commerce are the first visible expression.

The broader category is AI-mediated financial activity. Tokenisation changes what can move and how it can settle, AI changes who or what can decide and act. Together, they could change the authority, control and dependency architecture surrounding Australian-dollar activity.

3.1 The convergence

The emerging system can be understood through a simple matrix:

Table 2. Human and software initiation across conventional and programmable value.

	Conventional money and assets	**Programmable or tokenised money and assets**
Human initiated	Traditional finance	Tokenised finance
Software initiated	Agentic payments over existing rails	AI-mediated finance using programmable value

The lower-right quadrant carries the greatest design uncertainty. Software may select products, counterparties, infrastructure, payment pathways, settlement assets or units of account, and then initiate activity using programmable forms of value.

Project Acacia has already demonstrated the relevance of interoperability, programmable platforms, different forms of public and private digital money, and coordinated experimentation (RBA and DFCRC 2026).

The next question is how authority, evidence and recourse operate when software participates in the decision and action layer above that infrastructure.

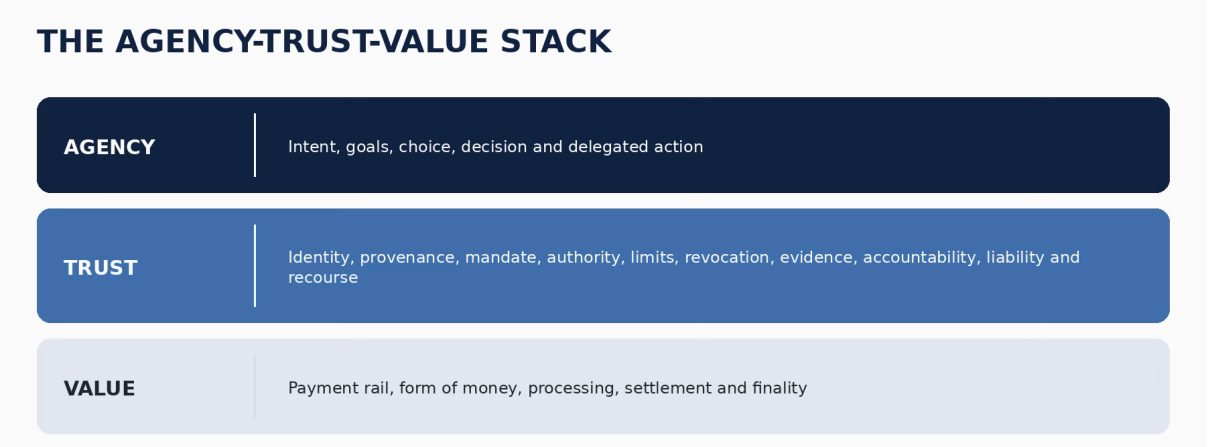
This is an analytical inference and a research hypothesis, rather than a claim that current e-commerce agents present systemic risk.

The policy value lies in testing the control architecture before commercial practices and global protocols become embedded.

3.2 The Agency-Trust-Value Stack

The system question can be organised into three layers:

Figure 2. The Agency-Trust-Value Stack for AI-mediated payments.



Australia has strong value rails. The emerging requirement is a verifiable trust layer between delegated software agency and settlement.

The stack also clarifies institutional roles. The RBA's direct interest lies in payment systems and in the trust conditions required for software-mediated activity to interact safely with those systems. ASIC, APRA, AUSTRAC, the ACCC and Treasury have adjacent responsibilities concerning advice, markets, prudential responsibility, financial crime, competition and the wider regulatory perimeter.

A shared taxonomy and evidence base would allow those boundaries to be allocated deliberately.

3.3 Australia begins from strength

Australia has already demonstrated the ability to define national outcomes and coordinate infrastructure delivery. The NPP provides simply addressed, data-rich payments with near real-time funds availability, 24 hours a day, supported by individual settlement through the RBA's Fast Settlement Service. It arose from strategic objectives set by the RBA and an industry-led build (RBA 2026b).

The July 2026 A2A vision provides another foundation. It describes a trusted system that supports resilience, competition, innovation and productivity, underpinned by clear, collaborative and adaptable governance, and operating as a national asset in the public interest (A2A Payments Roundtable 2026).

Project Acacia extends the precedent into tokenised wholesale markets. Its final report identifies strong potential alongside coordination, interoperability, legal and scaling challenges, and establishes a multi-stream programme across regulators, industry and the RBA (RBA and DFCRC 2026).

The opportunity is to extend these strengths into the software decision layer. Australia's payments strategy already links strong infrastructure with global participation, investment, innovation and the need to overcome coordination barriers (The Treasury 2023). Australia can become one of the easiest trusted jurisdictions in which global firms, capital and AI systems transact in Australian dollars.

Australia, open for business with the world.

That means globally interoperable infrastructure, transparent entry for trusted participants, machine-readable Australian payment options and clear Australian public-interest outcomes that remain enforceable.

3.4 Payment sovereignty in an open economy

Australian payment sovereignty is the practical capacity to set, verify and enforce the conditions under which Australian-dollar activity occurs across both payment infrastructure and the software decision layer, while remaining globally interoperable.

Sovereignty increasingly sits partly above the rails. Australia can retain domestic payment infrastructure while global agents and protocols shape which rails, currencies and providers are visible or preferred. This is a question of practical agency, contestability and resilience, rather than a case for a domestic walled garden. Project Acacia similarly concluded that scaling Australian tokenised markets requires a safe and seamless experience for international investors (RBA and DFCRC 2026).

Every proposed standard, protocol or institutional response should pass four tests:

1. **Australian agency:** Can Australian institutions set and enforce the conditions governing Australian-dollar activity?
2. **Contestability:** Can agents discover and select Australian rails, providers and forms of money on transparent terms?
3. **Global interoperability:** Can trusted international participants enter through open standards?
4. **Operational resilience:** Can Australian institutions observe, interrupt and remediate activity when something fails?

3.5 Why action should begin now

The urgency rests on the current policy window:

- Human-in-the-loop agentic commerce trials are underway;
- International technology companies and payment networks are shaping protocols and acceptance rules;
- The Australian A2A roadmap is now being designed;
- Project Acacia has created active post-project workstreams for tokenised money and infrastructure;
- The RBA will publish its regulatory priorities by the end of 2026; and
- International regulators and standard setters are already framing delegated financial activity as a distinct policy problem.

The IMF notes that agentic AI can shift payments from human-initiated instructions to agent-mediated decisions, with implications for authorisation, liquidity, settlement, compliance and resilience (Davidovic and Tourpe 2026).

The Financial Conduct Authority (FCA) has recommended monitoring the transition to autonomous models and enabling foundations for agentic finance (FCA 2026). The Financial Stability Board (FSB) identifies third-party dependencies, provider concentration, market correlation, cyber risk and model governance as AI-related vulnerabilities that warrant monitoring (FSB 2025).

The relevant lesson from the 2008 GFC is institutional response time, not equivalence of risk. Australia's response was decisive for its era, but it operated across days and weeks.

AI can compress decision and propagation times and strengthen correlated responses when multiple systems act on similar signals (Adrian 2026). The design question for the next era is therefore:

> *Can Australian institutions see, understand, interrupt and remediate machine-mediated financial activity at the speed at which it can propagate?*

That capability should be established through evidence and testing before a crisis supplies the test.

3.6 Directional evidence from an Australian closed session

On 5 August 2026, Project Artesian convened a closed session with 24 senior participants from financial institutions, government, regulators and the technology ecosystem. Anonymous polling provided a directional test of the issues identified in this submission.

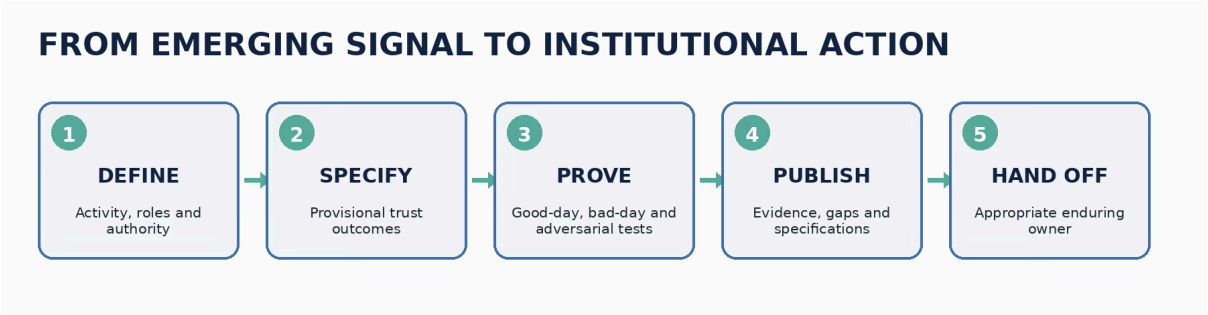
Participants ranked **software using programmable money and assets** as the scenario with the greatest disruptive potential to the Australian financial system by 2030. When asked which pressure points matter most if financial activity begins moving at machine speed, **responsibility and authority ranked first**, followed by how control and accountability travel across infrastructure and what evidence another institution can rely upon.

The sample was purposive, small and non-representative. The results do not establish industry consensus or institutional endorsement. They provide directional evidence that the questions identified through the international and system analysis in this submission are also being recognised by senior Australian participants.

4. Recommended action pathway

Australia should define the activity, specify provisional trust outcomes, test them under real operating pressure and then determine whether guidance, standards, regulation, infrastructure or market action is warranted.

Figure 3. Recommended evidence-to-action sequence.



Recommendation 1: Define and prioritise AI-mediated payment activity

The RBA should recognise AI-mediated payment activity as a distinct payments-policy priority and adopt a functional taxonomy based on the role performed by software, the party for whom it acts and the authority delegated to it.

Supporting actions:

- adopt a common definition and the five-stage role taxonomy;
- distinguish consumer, merchant, platform and financial-institution agents;
- map current and near-term use cases across retail and wholesale activity, conventional and programmable value, domestic and cross-border settings, and human-confirmed and mandate-bounded action;
- map international protocols, material offshore dependencies and emerging failure modes;
- work through Treasury and the Council of Financial Regulators to allocate adjacent perimeter questions; and
- include AI-mediated payment activity in the regulatory priorities published at the end of 2026.

Output: a common taxonomy, system map and set of priority policy and research questions.

Recommendation 2: Develop candidate minimum trust and interoperability outcomes

The RBA should work with relevant authorities and industry to develop candidate, outcomes-based and machine-readable trust and interoperability conditions for AI-mediated payment actions.

The conditions should cover:

- identity and provenance;
- principal, agent role and provider;
- mandate, authority and current limits;
- revocation, stop authority and human escalation;
- merchant choice, routing and commercial incentives;
- evidence, traceability and auditability;
- payment rail, form of money, settlement and finality; and
- liability, reversal, dispute and recourse.

Supporting actions:

- include AI-mediated payment selection and initiation as a design scenario in the A2A roadmap;
- define the common cross-rail choice, authority and outcome interface set out in Section 2;
- make Australian payment methods, costs, protections and settlement characteristics machine-readable;
- minimise data disclosure and permit verification through attestations and secure references;
- preserve open access, contestability and technology neutrality; and
- develop test specifications before final technical or regulatory prescription.

Output: provisional minimum outcomes and machine-readable test specifications.

Recommendation 3: Support a rapid evidence-to-action workstream

The RBA should support a time-bound, independently coordinated and technically expert workstream that tests the candidate conditions across conventional and programmable Australian-dollar infrastructure, publishes precompetitive evidence and identifies the appropriate enduring owner for each validated output.

Supporting actions:

- establish public-interest research questions, transparent governance, conflict controls and evidence standards;
- include the RBA, relevant regulators, Treasury, AP+, AusPayNet, banks, non-bank payment providers, merchants, consumer and SME representatives, AI firms, identity providers and digital-money participants;
- map existing initiatives so the work complements the A2A roadmap, Project Acacia, the proposed DFMI sandbox and existing standards programmes;
- begin with a bounded Australian-dollar action using recognised Australian infrastructure;
- extend the same model to an action prepared or initiated by software, initially in shadow or controlled mode;
- test good-day, bad-day and adversarial conditions, including disputed intent, exceeded authority, revocation, manipulation, duplication, infrastructure failure and correlated activity;
- publish findings, validated specifications, unresolved gaps and institutional responsibilities; and
- transfer each validated output to AP+, AusPayNet, a regulator, a standards body, a market operator or the market according to function and public-interest fit.

Output: tested operating evidence, validated specifications and an institutional handover map before the RBA's mid-2027 consultation.

4.1 Institutional roles and proportionality

The proposed pathway preserves regulatory independence and avoids duplication.

- **RBA and relevant regulators:** define public-interest questions, clarify boundaries, observe evidence and decide what warrants policy or regulatory action.
- **Treasury and the Council of Financial Regulators:** allocate issues that cross legislative and institutional perimeters.
- **Industry participants:** contribute real infrastructure, transactions, operating controls, use cases and evidence.
- **Consumer, merchant and SME representatives:** test whether the proposed outcomes preserve choice, protection and practical recourse.
- **Independent coordinator:** convene unrelated institutions, run a transparent protocol, retain adverse and unresolved findings, and produce system-level evidence.

The workstream should be temporary and transfer-oriented.

Its evidence should determine the enduring institutional home.That could be an existing operator, regulator, standards body, market mechanism or a separately governed capability.

This submission takes no position on the final model before the evidence is available.

Conclusion

Australia has strong payment rails and a proven capacity for public-private innovation. The next task is to ensure that software can discover and select Australian payment options on fair terms, and that any AI-mediated action entering Australian payment rails carries enough verifiable authority and evidence for participants to accept, refuse or remediate it safely.

The policy window is open. Definition, provisional outcomes and bounded testing can begin now, while market practices and global protocols are still forming.

That is how Australia remains open for business with the world: globally interoperable, easy for trusted participants to enter, and governed through Australian public-interest outcomes that remain enforceable.

Project Artesian's contribution

Project Artesian is delivering a six-month research and proof programme focused on the cross-institution conditions required for trusted AI-mediated financial activity in Australian dollars. Where relevant, its methodology and public-interest findings will be made available to inform the RBA and other authorities. Any engagement by public authorities would be framed as evidence, boundary and technical input only, with institutional positions and regulatory authority remaining fully independent.

Appendix A: Closed-session evidence and methodology

Methodology

Project Artesian convened a closed session in Sydney on 5 August 2026. The 24 attendees were senior participants drawn from financial institutions, government, regulators and the technology ecosystem. Polls were conducted anonymously through Slido during the live presentation. Between 15 and 18 participants answered each question.

The sample was purposive, small and non-representative. Results show the rank order generated in the room and provide directional evidence only. Attendance records participation; the views and recommendations in this submission are Humanware Institute's. The evidentiary set is limited to the two ranking questions because they map directly to the policy argument.

Exact questions and recorded rank order

Question A

Exact wording: "Rank these in order of disruptive potential to the Australian financial system by 2030."

1. Software using programmable money and assets.
2. People using programmable money and assets.
3. Software using today's money.
4. People using today's money.

Question B

Exact wording: "If financial activity begins moving at machine speed, rank which pressure points matter most in your part of the system?"

1. Who is responsible when something goes wrong?
2. Who is authorised to act?
3. How do control and accountability travel across infrastructure?
4. What evidence can another institution rely upon?
5. How do we prevent runs, herding and contagion?
6. How do settlement and finality work?

References

A2A Payments Roundtable (2026), *A2A Payments Roundtable Releases Vision for Account-to-Account Payments in Australia*, Reserve Bank of Australia Media Release 2026-18, 8 July 2026. https://www.rba.gov.au/media-releases/2026/mr-26-18.html

Adrian, T. (2026), *How Central Banks Can Contain Financial Stability Risks as AI Accelerates Change*, IMF Blog, 23 July 2026. https://www.imf.org/en/blogs/articles/2026/07/23/how-central-banks-can-contain-financial-stability-risks-as-ai-accelerates-change

Aldasoro, I. and A. Desai (2025), *AI agents for cash management in payment systems*, BIS Working Papers No. 1310, Bank for International Settlements, 10 November 2025. https://www.bis.org/publ/work1310.htm

Davidovic, S. and H. Tourpe (2026), *How Agentic AI Will Reshape Payments*, IMF Notes No. 2026/004, International Monetary Fund, April 2026. https://www.imf.org/en/publications/imf-notes/issues/2026/04/22/how-agentic-ai-will-reshape-payments-575560

Financial Conduct Authority (FCA) (2026), *AI and the future of retail financial services: The Mills Review*, 6 July 2026. https://www.fca.org.uk/publications/corporate-documents/mills-review

Financial Stability Board (FSB) (2025), *Monitoring Adoption of Artificial Intelligence and Related Vulnerabilities in the Financial Sector*, 10 October 2025. https://www.fsb.org/2025/10/monitoring-adoption-of-artificial-intelligence-and-related-vulnerabilities-in-the-financial-sector/

Reserve Bank of Australia (RBA) (2016), *The Australian Government Guarantee Scheme: 2008-15*, Bulletin, March 2016. https://www.rba.gov.au/publications/bulletin/2016/mar/5.html

Reserve Bank of Australia (RBA) (2026a), *Review of Payments System Regulation 2026: Issues Paper*, 25 June 2026. https://www.rba.gov.au/payments-and-infrastructure/regulatory-reviews/review-of-payments-system-regulation-2026/2026-06/

Reserve Bank of Australia (RBA) (2026b), *The New Payments Platform*, accessed 6 August 2026. https://www.rba.gov.au/payments-and-infrastructure/new-payments-platform/

Reserve Bank of Australia and Digital Finance Cooperative Research Centre (RBA and DFCRC) (2026), *Project Acacia: Exploring the Role of Digital Money in Wholesale Tokenised Asset Markets, Final Report*, May 2026. https://www.rba.gov.au/payments-and-infrastructure/central-bank-digital-currency/pdf/project-acacia-final-report.pdf

The Treasury (2023), *A Strategic Plan for Australia's Payments System*, Australian Government, June 2023. https://treasury.gov.au/publication/p2023-404960