

Freedom of Information Request

Fireblocks Procurement (Project Acacia)

To: The FOI Officer, Reserve Bank of Australia

FOI Request Statement

This is a formal application under the *Freedom of Information Act 1982* for access to documents held by the Reserve Bank of Australia.

Definitions

- “Fireblocks” includes Fireblocks Inc, Fireblocks Ltd, Fireblocks Australia Pty Ltd, and any related entity or brand name
- “Document” has the meaning in s 4(1) of the FOI Act

Documents Requested

I seek access to documents relating to Project Acacia and the Reserve Bank's selection of and contractual arrangements with Fireblocks from January 2020 to present, specifically:

1. Procurement and Vendor Selection Process

- Request for Tender (RFT), Request for Proposal (RFP), Request for Quotation (RFQ), or other approach-to-market documentation, including conditions for participation, mandatory evaluation criteria disclosure, and records demonstrating whether an open tender or limited tender process was conducted (and if limited tender, justification citing exceptions under Commonwealth Procurement Rule 10.3)
- Evaluation plan, evaluation methodology, scoring frameworks, completed evaluation scoresheets, and value-for-money assessments comparing Fireblocks against competing providers and alternative approaches
- Delegate approval brief, procurement recommendation, or other documentation of the approval decision and basis for value-for-money conclusions

- Probity plans, probity adviser reports, and conflict-of-interest registers for evaluation participants
- Vendor presentations, proposals, capability statements, and tender responses submitted by Fireblocks and other parties
- Risk assessments, security assessments, risk-treatment plans, and any documents discussing vendor lock-in, exit strategies, migration costs or interoperability issues associated with Fireblocks or custodial/wallet infrastructure used in Project Acacia
- AusTender Contract Notice and related contract reporting documentation

2. Contractual and Commercial Arrangements

- All agreements between the RBA and Fireblocks (including service agreements, contracts, statements of work, framework agreements, MOUs, and master services agreements), together with any schedules, appendices, or attachments to those agreements
- Any confidentiality, data-hosting, service-level or security schedules attached to those agreements
- Pricing structures, service level agreements, performance metrics, governance arrangements, and relationship management frameworks
- Contract variations, amendments, extensions, or modifications made since the original agreement
- Terms and conditions relating to data custody/security, IP rights, confidentiality, termination/exit arrangements, and liability/insurance requirements
- Documents showing the total amount paid to Fireblocks to date, broken down by invoice or milestone
- Budget forecasts, cost-benefit analyses or business-case spreadsheets that estimate future expenditure or savings attributable to the Fireblocks arrangement

Contact Details

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Request for Fee Waiver/Reduction

I seek a waiver or reduction of any charges under section 29(4)-(5) of the *Freedom of Information Act 1982* on public-interest grounds: the records relate to the expenditure of public money on emerging critical payments infrastructure. The information sought would contribute to public understanding of:

- The RBA's procurement and risk-management processes for critical financial infrastructure
- Transparency in government decision-making regarding financial system modernisation and related public expenditures

As Project Acacia involves developing infrastructure that may underpin Australia's future digital payments system, public scrutiny of the procurement and risk management processes serves the broader public interest in financial system stability and accountability.

Request for Consultation

If any part of the request risks a refusal under section 24, please contact me under section 24AB to discuss narrowing the scope.

Additional Notes

I understand that some commercial information may be subject to exemptions under sections 47 and 47G of the FOI Act. Where possible, I request that redacted versions of documents be provided rather than complete refusal of access.

I also acknowledge that documents containing information obtained in confidence from Fireblocks may be subject to exemption under section 47C, but request consideration of whether the public interest in disclosure outweighs the need for confidentiality.

4 August 2025

Gerard Kelly