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The Secretariat
of the Basel Committee on Banking Bank
for International Settlements
CH-4002 Basel
Switzerland
Via Email: basselcommittee@bis.org

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Dear Sir/Madam

Comment on the BCBS Consultative Document Net Stable Funding Ratio disclosure standards

We welcome the opportunity to comment on the public disclosure templates for the Net Stable Funding Ratio and would appreciate further clarity on the following three aspects.

In Section 1, paragraph 7 states:

> *"The disclosure requirements set out in this document are applicable to all internationally active banks on a consolidated basis but may be used for other banks and on any subset of entities of internationally active banks to ensure greater consistency and a level playing field between domestic and cross - border banks"*

The wording of the paragraph provides for disclosure of the NSFR to apply at the level of consolidation. This could be interpreted by the investor that there is fungibility across jurisdictions and therefore reliance can be placed on the consolidated number.

The NSFR common disclosure template in Section 2, paragraph 14 introduces a "no maturity" column without providing weightings from the final NSFR text. The term "no maturity" would naturally apply to perpetual products; however there are products without a specific contractual maturity date such as overnight deposits payable on demand or deposits that require a minimum notice period before repayment, that on any reporting day, a minimum remaining contractual period can be determined for purposes of performing the NSFR calculation and therefore should be included in the appropriate category e.g. <6 months. If this column is for information purposes only and has no direct impact on the NSFR calculation a footnote to clarify would be useful.

The South African regulator has elected to provide banks with the ability to access a contractual committed liquidity facility with the Central Bank to meet the liquidity coverage ratio. Is there an expectation that there would be any quantitative or qualitative disclosure of this facility in the NSFR and how would this be achieved?

I hope that our response to your consultative process will assist in your deliberations.

Should you require any further information please do not hesitate to contact me.

Yours faithfully

M Brits

Mark Brits
Senior General Manager – Prudential Division