

NAME OF PERSON COMPILING SUBMISSION: Benjamin April
ORGANISATION: The Banking Association South Africa
SUBMISSION DESCRIPTION: Basel Revised prudential treatment of crypto-asset exposures

NR	REFERENCE IN ACT/BILL/DOCUMENT	COMMENT (Why is it a problem?)	PROPOSED WORDING/COMMENT
1.	60.57 & 60.58	<u>Infrastructure risk add-on.</u> An add-on for the use of distributed ledger technology seems too punitive, given that the technology is supposed to be safer, more transparent, and more efficient than existing technology.	Recommend reduction of the infrastructure risk add-on.
2.	60.9 & 60.10	<u>Classification Condition 1</u> Banks may use the assessments of independent third parties for the purposes of verification of ownership rights for Group 1b cryptoassets (as per section 60.11(4) of paper). The use of independent third parties for the purposes of verification of ownership rights does not seem to be an option for Group 1a crypto assets.	Clarify if the use of independent third parties for verification of ownership rights is an option for Group 1a crypto-assets.