16 April 2010

Dear Secretariat,

Consultative proposals to strengthen the resilience of the banking sector

The Australian Bankers’ Association (ABA) welcomes the opportunity to comment on the Committee’s consultative proposals to strengthen the resilience of the banking sector, announced on 17 December 2009.

Please find attached our submissions on the Committee’s consultative documents, *Strengthening the resilience of the banking sector* and *International framework for liquidity risk measurement, standards and monitoring*.

There has been very extensive member bank engagement and consultation on the drafting of these submissions, with detailed analysis of all aspects of the Committee’s proposals, the position of Australian banks, and the possible impact of the proposed reforms on the economy as a whole.

The ABA looks forward to opportunities for further engagement and consultation on these critical proposals, with the Committee and with Australian regulators.

Yours sincerely

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Steven Münchenberg