



25 September 2020

Senior Manager, Data Strategy and Frameworks
Data Analytics and Insights
Australian Prudential Regulation Authority
GPO Box 9836
Sydney NSW 2001

By email: DataConsultations@apra.gov.au

Dear Sir/Madam,

**Proposed changes to modernised Economic and Financial Statistics (EFS)
reporting standards and guidance**

The Australian Financial Markets Association (AFMA) welcomes the opportunity to make comment on APRA's changes to reporting standards and guidance. AFMA's foreign ADI membership has not conveyed to AFMA any material issue with the changes as presented, however clarification is sought on a small number of the changes, as tabled hereunder.

Form	Issue	Clarification sought
ARF 747.0 – ABS RBA Deposits Stocks, Flows and Interest Rates - Added new column <i>interest rate band</i> to Item 1	The interest rate band for each deposit will be the band that accords to the interest rate on that deposit. The interest rate bands start at zero per cent and move outward in 0.25 per cent increments. The interest rate bands are: <ul style="list-style-type: none"> • 0 <= and < 0.25 per cent; • 0.25 <= and < 0.50 per cent; and, • etc 	Can APRA clarify the treatment of negative interest rates (should these eventuate) in the proposed interest rate band given the zero per cent floor?
ARF 730.0 – ABS/RBA Statement of Financial Performance Rates	Item 9. Expected Credit Loss (ECL) related to off balance sheet loan related items	Is it expected that that ECL related to off balance sheet loan related items (i.e. commitments) be reported in item 9.1.?
ARF730.1 – ABS/RBA Fees Charged	Paragraphs 6 & 9 appear to be contradictory in respect of the first reporting period. Para 6 applies for reporting periods ending on or after 31 March 2021, whereas in Para 9 the information required by this Reporting Standard must be provided in respect of each year ended 30 June by an ADI or RFC to which this Reporting Standard applies under Paragraphs 4 or 5.	Clarification is sought as to whether the reporting period commences 31 March 2021 or 30 June 2021.

APRA's clarifications on these points are welcomed.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Murray Regan', written in a cursive style.

Murray Regan

Director Markets and Rates