

1 September 2014

Mr Pat Brennan
General Manager
Policy Development
Policy, Statistics and International
Australian Prudential Regulation Authority
GPO BOX 9836
Sydney NSW 2001

Dear Mr Brennan,

Consequential changes to APRA Prudential Standards due to Prudential Standard CPS 220
Risk Management

With reference to your letter and media release of 28 August 2014, I note that APRA intends to remove the “Risk Management Systems” section of APS310 Audit Related Matters.

Over the last two months, China Construction Bank Sydney Branch has spent a large amount of resources in preparing to comply with the two Prudential Standards APS310 Audit and Related Matters and CPS220 Risk Management. For example, conducting gap analysis between APS310 and CPS220, and re-writing the Branch’s Risk Management Systems descriptions to include the new requirements of CPS220.

China Construction Bank Sydney Branch would like to suggest that future release of cross industry Prudential Standards should be better reviewed and implemented so as to avoid consequential changes later.

Yours sincerely,



Leslie Leong
Chief Risk Officer
China Construction Bank Sydney Branch