

30 March 2016

Mr Steve Davies  
General Manager, Banking Statistics  
Australian Prudential Regulation Authority  
GPO Box 9836  
Sydney NSW 2001  
Email: [statistics@apra.gov.au](mailto:statistics@apra.gov.au)

Dear Mr Davies

On behalf of our member banks, building societies and credit unions, thank you for the opportunity to comment on APRA's discussion paper *Publication of ADI liquidity statistics*.

COBA welcomes the proposal to publish an expanded set of minimum liquidity holding (MLH) and liquidity coverage ratio (LCR) statistics. The publication of industry-level and segment-level statistics enhances understanding of APRA-regulated institutions, aids public policy discussion and supports decision making by policy makers and market analysts.

However, we are concerned that the proposed changes will widen an existing gap in APRA's statistics in relation to 'Mutual ADIs'.

Mutual ADIs are ADIs operating under a mutual corporate structure in accordance with *ASIC Regulatory Guide 147 Mutuality – Financial Institutions*. Whether an institution is a credit union, building society or mutual bank, it operates under the same principles of mutuality, and shares the sector's unique focus on customers.

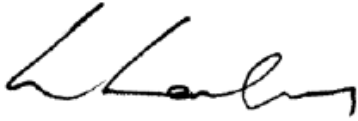
We request an expansion of the statistics reported for mutual ADIs to the same level of disclosure as other segments. The current Quarterly Authorised Deposit-taking Institution Performance (QADIP) publication does not include consolidated liquidity, capital adequacy or asset quality statistics for the mutual ADI sector. However, these figures are clearly reported, or will be reported after the proposed changes, for credit unions and building societies.

The introduction in 2013 of the mutual ADIs segment into the QADIP statistical publication was a welcome step. Improved data disclosure provides additional benefits without increasing the costs of collecting data. For example, when COBA uses APRA data for policy or benchmarking purposes, our members receive an additional benefit from their data while not increasing their reporting burden. Greater disclosure of already collected information, within confidentiality principles, increases the value of this data.

More comprehensive reporting will create a more complete picture of the mutual ADI sector for policy makers and researchers. We are happy to work with APRA about any issues arising from enhanced disclosure.

Please do not hesitate to contact me on 02 8035 8448 or Mark Nguyen on 02 8035 8443 to discuss any aspect of this submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'L. Lawler', written in a cursive style.

**LUKE LAWLER**  
**Head of Public Affairs**