



Australian Banking  
Association

19 July 2023

General Manager  
Policy  
Australian Prudential Regulation Authority  
GPO Box 9836  
SYDNEY NSW 2001  
Australia

By email: [REDACTED]

Dear General Manager,

## Minor amendments to prudential framework for ADIs

The ABA is grateful for the opportunity to respond to the consultation on a number of minor framework updates to the prudential framework. The ABA and its member banks are supportive of APRA's new process to seek more frequent consultations on minor and small amendments to the prudential framework. This process is a welcomed component of APRA's strategic initiative to modernise the prudential architecture and allows for changes to be to the prudential framework in a timely manner.

The ABA would like APRA to also consider as part of its minor updates allowing:

- Sufficient time for ADIs to review the proposals and respond to APRA. This may vary depending on the numbers and complexity of the proposals;
- Consideration of where updates may need to be made to other prudential standards, due to cross referencing in the framework;
- Consideration of impacts to regulatory reporting and Pillar 3 disclosures; and
- Sufficient time to implement the regulatory changes.

Regards

[REDACTED]

Emma Penzo  
Head of Economic Policy

[About the ABA](#)



## Australian Banking Association

The Australian Banking Association advocates for a strong, competitive and innovative banking industry that delivers excellent and equitable outcomes for customers. We promote and encourage policies that improve banking services for all Australians, through advocacy, research, policy expertise and thought leadership.