

Sydney

Level 15, 255 Pitt Street
Sydney NSW 2000 Australia
GPO Box 3698
Sydney NSW 2001
www.challenger.com.au

Telephone 02 9994 7000
Facsimile 02 9994 7777

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Mr Neil Grummitt
General Manager, Policy Development
Policy, Statistics and International Division
APRA Prudential Regulation Authority
GPO Box 9836
Sydney NSW 2001

By email: riskmanagement@apra.gov.au

Dear Neil

I refer to APRA's letter of 8 May 2014 setting out clarifications of certain matters raised in submissions in respect of draft Prudential Practice Guide CPG220 Risk Management.

Challenger supports APRA's proposals to clarify the definition of the term "ensure" and apply a materiality threshold to the Risk management declaration.

We recommend that similar changes are implemented in respect of Prudential Standards covering superannuation funds. Given there is no equivalent definitions standard for superannuation, this would require changes to individual standards or a similar definitions standard being developed for superannuation.

If you have any questions, please feel free to contact me.

Regards,



Tony Bofinger
Chief Financial Officer and Appointed Actuary