



6<sup>th</sup> October 2021

President, Association of Legal Professionals and Advocates (Cayman)  
President, Alternative Investment Management Association (Cayman)  
President, Blockchain Association of the Cayman Islands  
Chief Executive Officer, Cayman Finance  
President, Cayman Islands Association of Financial Advisors  
President, Cayman Islands Bankers Association  
President, Cayman Islands Company Managers Association  
President, Cayman Islands Compliance Association  
President, Cayman Islands Directors Association  
President, Cayman Islands Fund Administrators Association  
President, Cayman Islands Insurance Association  
President, Cayman Islands Legal Practitioners Association  
President, Cayman International Reinsurance Companies Association  
Chief Executive Officer, Cayman Islands Institute of Professional Accountants  
President, CFA Society of the Cayman Islands  
President, Insurance Managers Association of Cayman  
President, Recovery and Insolvency Specialists (Cayman) Association  
President, Society of Trust and Estate Practitioners (Cayman Islands)

Dear Heads of Private Sector Associations

**Re: Private Sector Consultation Paper: Revised Basel III Framework: Rules and Guidelines on Liquidity Risk Management for Banks**

The Cayman Islands Monetary Authority ("the Authority") forwards herewith for comments the proposed:

***Revised Basel III Framework: Rules and Guidelines on Liquidity Risk Management for Banks***

A Private Sector Consultation Paper ("PSCP") is being forwarded along with the proposed revised measure to provide the relevant Associations with the consultation documents as required by the Monetary Authority Act (2020 Revision). Please refer to the PSCP for further details on the Background, Purpose and Rationale of the revised measure, and Significant Costs and Benefits.

If your association has comments, please forward a consolidated response on its behalf, on or before **Wednesday, November 10, 2021**.

Before proceeding with the proposed revised measure, the Authority shall have regard to any representations made by the private sector associations only. Feedback submitted by individuals, entities, or other bodies, unless acting on behalf of private sector associations, will not be accepted by the Authority. Representations from private sector associations must be submitted as a consolidated document, and a listing of the entities which provided feedback should be included. Private sector associations should ensure that conflicting positions are resolved prior to submission

to the Authority. Where positions conflict within or across associations, the Authority will consider all available information in taking a decision, which will be at its sole discretion.

To ensure that all responses are given due consideration, it is important that private sector associations make clear reference to the sections of the measure being commented on, and that responses are unambiguous, clearly articulated and based on fact. The consultation process is not designed to address complaints or grievances. Feedback of this nature should be submitted through the established complaints process.

In cases where the feedback proposes to change a policy position of the Authority or substantially amend any requirement of the draft measure, information to support the position of the association must be provided. The table below provides an example of the Authority’s expectation with regard to feedback for the proposed measures.

Reference	Example of a Helpful Comment	Examples of Comments needing more Support
Rule 4.2 <sup>1</sup>	<p>In Rule 4.2 the current text omits the fair value measurement of liabilities. Also, as defined it is not asymmetrical with the Market Price definition and thus scenarios exists that fall into neither category.</p> <p><b>Suggested wording:</b>  <i>Hard-to-Value Securities means an asset or liability for which there is no Market Price which is required to be measured at fair value pursuant to 5.2</i></p>	<ul style="list-style-type: none"> <li>× This is not what is done in other jurisdictions.</li> <li>× I don’t think we should do this.</li> <li>× CIMA is not considering the position of the experts.</li> </ul>

The consultation document will be posted to the Authority’s website at [www.cima.ky](http://www.cima.ky).

We look forward to your responses. If you have any queries, please contact Paul McAllister, Chief Policy and Development Officer at [PaulMcAllister@cima.ky](mailto:PaulMcAllister@cima.ky).

Yours sincerely,



Cindy Scotland  
 Managing Director, CIMA

<sup>1</sup> This example is not reflective of the content of the proposed measures.