

GIAJ comments on the IAIS consultation on Stakeholder Engagement and Consultation Policy (SECP)

Questions	Comments
	We welcome the clarification of the IAIS principles for stakeholder engagement through the four principles. While we believe that ensuring "Diversity, equity
	and inclusion (DEI)" is extremely important as an IAIS principle, we hope that various positions of different stakeholders should be considered during
	discussions, as they may have differing interests.
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	In addition, regarding "Equal access", we welcome the assurance that all IAIS stakeholder engagements offer an option to join virtually. However, because
	there are many benefits of in-person meetings (such as more active exchanges of views than virtual meetings), we would like to ask the IAIS to strike a
	balance between in-person and virtual meetings, for example, by continuing to ensure opportunities for in-person meetings and by taking into account time
	differences when holding virtual meetings.
	We understand that the scope of public consultation includes revisions to existing supervisory standards and supporting materials. If a document clarifying
	the revised parts by showing comparison between the existing and proposed texts is provided along with the consultation draft, it would further enhance our
	understanding and facilitate the consultation process.
	In addition, we would like to request that the IAIS consider the time of online public background sessions and public discussion sessions in order to facilitate
	participation from different time zones around the world. For example, the possibility of holding two sessions on the same topic at two different times could
2	be considered. In view of the IAIS' resources and participants' better understanding, we suggest that presentation materials and explanatory videos be
	shared in advance, and that public discussion sessions be focused solely on Q&As with participants. The IAIS could set rules to share such materials and
	videos at least one week prior to the event, and to post recordings of the Q&A sessions promptly after they are held.
	When setting the schedule for public consultations, the timing of annual monitoring (e.g., ICS data collection, IIM) and public holidays in member
	jurisdictions should be taken into account so as not to impose an excessive burden on stakeholders. This will enable smooth exchange of information for
	both supervisors and supervised parties.
	We believe that the Annual Conference and the Global Seminar, as well as meetings held by the IAIS on an ad hoc basis depending on the importance of
4	the topics or discussions, play an important role in increasing the transparency of the IAIS' activities.



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	In order to ensure the participation of a wide range of stakeholders, we request that, in principle, meetings be held in a hybrid format. Although it is expected
	that opportunities for face-to-face meetings may become less frequent in the future to reduce carbon footprints, in view of transparency for stakeholders as
	well as the other three principles, it is important to ensure that a wide range of stakeholders continue to have the opportunity to participate in person.
	Outreach activities towards stakeholders on topics under consideration within the IAIS in the early and mid-stages of the document development process
	would allow for discussion from a variety of perspectives and produce a more useful and effective outcome for a greater number of stakeholders. This may
	also increase the transparency of the discussion.
	It is also important to ensure transparency of speeches and remarks made by the Secretary General, the ExCo Chair, ExCo members, and WG Chairs, etc.
	at external meetings in their capacity as IAIS members. We request that the IAIS consider posting such interactions (which we believe are not always all
	included in the IAIS Newsletters) more broadly on the IAIS website.
5	The FSB issues a press release with a summary of the discussion after plenary meetings. The IAIS could also consider issuing press releases outlining the
	discussions at ExCo meetings, etc.
6	We appreciate the opportunity to submit inputs towards the principles of stakeholder engagement. We hope that the IAIS will continue to provide such
	opportunities so that we can make timely and meaningful contributions.