

The IADI are requesting comments on the following questions:

1. Does the revised version of the Core Principles adequately promote a holistic view of the financial safety-net and effective interaction among deposit insurance, resolution, and supervision, while acknowledging the different architectures and diverse institutional structures of deposit insurance systems across jurisdictions?

The Core Principles were enhanced with additional essential criteria related to this objective to set this as a baseline requirement for an effective deposit insurance system.

CP 11 was enhanced and focused on ongoing coordination and communication with other financial safety-net participants and the coordination of plans, policies and procedures.

CP 17 was enhanced to reflect the importance of financial safety-net cooperation, coordination and information sharing.

CP 18 was enhanced to focus on the need for formal cooperation, coordination and information sharing arrangements between deposit insurers and, with other financial safety-net participants of the institutions' home and host jurisdictions as needed.

2. Does the revision provide sufficient clarity on the interaction between deposit insurance and resolution to effectively achieve the public policy objectives of depositor protection and financial stability?

CP16 (New) was included and provides clearer rules for when deposit insurance funds can support resolution, including legal safeguards, cost limits, and audit expectations.

3. Are the revised Core Principles sufficiently forward-looking and aspirational to address emerging risks, trends, and challenges in the global financial sector, while remaining practical for implementation?

CP 4 (New) was included to ensure risks to continue critical operations are minimized.

The revised principles include aspirational "additional criteria" and acknowledge new risks like fintech, digitalization, Climate Change and ESG. This helps encourage systems to go beyond the baseline minimum criteria for compliance.

*In my opinion more guidance needs to be given on these new risks. They are mentioned as new and emerging risk areas that should be considered, however more guidance could be provided on effectively managing them and some essential baseline requirements should be provided.*

4. Does the updated framework ensure that the Core Principles remain adaptable to technological advancements in deposit-taking and protection systems, while maintaining a technology-neutral approach?

The CP remains tech-neutral while recognizing the impact of digital banking, fintech, and third-party dependencies. No specific technology is recommended.