implement daily sourcing of the required indicators would be an extremely costly IT and resource burden for banks which would not currently be related to any business or risk management requirement and would take place during an already challenging economic environment. While market risk-driven indicators are available on a daily basis (e.g., trading), they are normally used for operational purposes. Other indicators such as those related to exposures and liquidity risk are only available on a monthly basis (e.g., leverage exposures, assets under custody).

We also suggest that window-dressing behaviour is best addressed at the jurisdictional level and that supervisory discussions should take place with the few banks engaged in this type of activity without burdening all banks involved in the G-SIB assessment exercise by requiring them to report indicators based on daily averages. Banks are already investing

Application of new requirements to a subset of indicators only

We do not support application of the new requirements to a subset of indicators only. We agree with the Committee that limiting higher-frequency averaging to only a few indicators would introduce inconsistencies between the indicators and could skew window-dressing incentives towards those indicators for which lower-frequency averaging is required.

Implementation date

The Committee's proposed implementation date of 1 January 2027 (i.e., starting from the end-2026 G-