



15 July 2022

Mr William Ly  
Lawyer, Market Supervision – Legal & Policy  
Australian Securities & Investments Commission  
Level 5, 100 Market Street  
SYDNEY, NSW 2000

By email: [william.ly@asic.gov.au](mailto:william.ly@asic.gov.au)

Dear Mr Ly,

**Re: Potential expansion of class relief under ASIC Corporations (NZD Denominated Client Money) Instrument 2018/152**

The Australian Financial Markets Association (AFMA) is pleased to write in support of ASIC's proposed potential expansion of class relief under ASIC Corporations (NZD Denominated Client Money) Instrument 2018/152.

AFSL holders receiving and holding any non-ASX 24 NZD client monies report they may risk technical breaches of the s.981B(a) Obligation, for NZD client monies received and held in relation to non-ASX 24 products, without the proposed extension of class relief (or less efficiently by similar individual reliefs).

Extending the relief from ASX 24 futures products quoted in NZD to NZD denominated OTC clearing products is supported as a logical and helpful development. We defer to our members' direct submissions in relation to which other NZD denominated financial products may also benefit from extension of the class relief.

The proposed extension would support closer economic ties with New Zealand by appropriate recognition of the equivalence of the bank regulation arrangements and the close connectivity of the two financial systems.

We trust our comments are of assistance.

Yours sincerely

Damian Jeffree

**Senior Director of Policy**