

SUBMISSION ON POLICY ISSUES IDENTIFIED IN THE INTERIM REPORT

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Submission for: My Self

Name of other person, business or organisation:

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Your submission:

Please recommend Glass-Steagall and the Separation of Banks Bill to be implemented to discourage predatory lending by banks that is the root of bubbles and crashes.

Virtually all of the misconduct examined by the royal commission stems from the banks being too-big-to-fail conglomerates of multiple financial services businesses.

If commercial banks were separated from investment banking, they wouldn't be able to do the trading in securities and derivatives on mortgages which made them lower their lending standards and even commit fraud so they could increase their mortgage lending.

Without the incentives to concentrate most of their lending into speculating on the housing bubble, they would have more interest in lending to, and looking after, their small business and farm customers.

If commercial banks were not "vertically integrated" with wealth management, stock broking, insurance and superannuation, they wouldn't be able to fleece customers with financial advice that lures them into buying products and investments from the other businesses that the banks own.

If the banks were broken up, and commercial banks were only allowed to take deposits and make loans, and kept separated from other financial services and speculation, the financial system would be much simpler, and therefore the regulators would be better able to do their job. The banks would not be too big to fail, so APRA would not be able to use "financial stability" as the excuse for allowing the banks to get away with financial murder.

Is the law governing financial services entities and their conduct too complicated?

Yes.

Does it impede effective conduct risk management?

Yes.

Does it impede effective regulatory enforcement?

Yes.

Is the regulatory regime too complex? Should there be radical simplification of the regulatory regime?

Yes.

Are APRA's regulatory practices satisfactory? If not, how should they be changed?

No.

Are APRA's enforcement practices satisfactory? If not, how should they be changed?

No.

Does the conduct identified and criticised in this report call for reconsideration of APRA's prudential standards on governance?

Yes.

APRA's behaviour is not satisfactory. Using the excuse of financial stability it has allowed the banks to engage in practices that maximise their profits, but at the expense of their customers. Ultimately this has become a threat to financial stability, because in seeking to increase their profits from mortgages the banks have inflated a massive housing bubble and incurred a \$40 trillion exposure to dangerous derivatives, all of which is a threat to the financial system.

Do the events that have happened raise any issue about business structures?

Yes.

Do the events that have happened invite consideration of whether structural changes should now be made?

Yes.

Do the events that have happened suggest that manufacturers of financial products should not be permitted to provide, whether by employee or authorised representative, personal financial advice in relation to products of a kind it manufactures?

Yes.

The banks' structure, a.k.a. vertical integration, created the conflicts of interest between serving their customers, and exploiting their customers to maximise profits for shareholders. The banks cannot be trusted to "manage" these conflicts of interest, and relying on more rigorous law enforcement is unrealistic. The conflicts of interest must be removed, by separating commercial banks from all other businesses.

Are changes in law necessary?

Yes.

Should the financial services law be simplified?

Yes.

Should the regulatory architecture change?

Yes.

Is structural change in the industry necessary?

Yes.

The solution is in legislation that is already before Parliament, the [Banking System Reform \(Separation of Banks\) Bill 2018](#), introduced by the Member for Kennedy Bob Katter on 25 June. It will enact a Glass-Steagall separation of commercial banks from investment banking and all other financial business, and bring APRA under much tighter Parliamentary control.