Meeting with Federal Reserve Board Staff and Representatives of the Canadian Government April 22, 2013

Participants: Michael Gibson, Mark Van Der Weide, Jordan Bleicher (Federal Reserve Board)

Jean Boivin and Jeremy Rudin (Department of Finance), Pascale Dugré-Sasseville (Embassy of Canada), Lawrence Schembri (Bank of Canada), Thomas Vice (Canada Deposit Insurance Corporation)

Summary: Representatives of the Canadian Government (the "Representatives") met with staff of the Federal Reserve Board to discuss: (i) the Board's proposal to implement the enhanced prudential standards and early remediation requirements established under sections 165 and 166 of the Dodd-Frank Wall Street Reform and Consumer Protection Act for foreign banking organizations and foreign nonbank financial companies (the "FBO proposal"); (ii) resolution planning and the design of potential long-term or bail-in debt requirements; and (iii) Basel III capital reforms. With respect to the FBO proposal, the Representatives expressed concerns that the proposal might require firms to raise additional capital at the holding company level, particularly if other regions pursue similar approaches, and that the proposed liquidity requirements could have unintended consequences. With respect to long-term or bail-in debt requirements, the Canadian representatives discussed whether such a requirement should result in an obligation for institutions to issue instruments that would be specially designated for loss-absorbency in a resolution scenario. The Representatives also urged the Board to adopt strong capital requirements for counterparty credit risk.