

Mizuho Financial Group

- It was meaningful that many financial institutions participated in the CIRR Virtual Meeting the other day. We were able to share various information and opinions on cybersecurity operations under the situation of corona infection expansion, which has been one of the biggest concerns common to all financial institutions at present, We highly appreciate that you offered that opportunity.
- With regard to “Effective Practices for Cyber Incident Response and Recovery”, 46 practices are organized in line with the actual operational situation, and it seems to be very useful for examining our organization's current incident response posture with the practices.
- While we welcome the diversity of options added to several cyber security frameworks already in place, such as NIST CSF entrenched as the global standard, we would like to avoid situations where national authorities require implementation of these CIRR practices as a baseline requirement in addition to existing requirements. Already, national regulators (especially in Asia) have diversified their requirements for cybersecurity, and our company is no exception in struggling to respond to all of them. In response to this situation, there is a movement within financial institutions to harmonize assessment items and regulatory requirements, integrated in a new framework represented by the FSSCC Profile, and our company is paying close attention to this movement. We hope CIRR would be in line with the FI's harmonization needs so that we could take advantage of CIRR even more.
- Please note that there are many questions in the Consultative Document and it is difficult for us to answer them, so we would like to leave feedback in the form of the above comments.