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## 中国银行业监管协调与合作研究

A Study on the Coordination and Cooperation  
in China's Banking Supervision

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## 内 容 摘 要

30 年来，中国实施非均衡的发展战略，采取政府主导型的强制性制度变迁方式，由易到难，分地区、分领域，稳步推进银行体制改革，使中国由“大一统”的银行体制演进为多元化的商业银行体制，以及银行、证券、保险“三足立”的分业监管格局。随着金融全球化和世界金融业务综合化、全能化趋势的发展，决定了中国的金融制度和金融发展不可能脱离于国际金融制度和体系之外。加入 WTO 以来，更多外资银行的机构、产品、理念进入中国，这也使得中国商业银行有更好的机会加快学习、吸收和借鉴国外金融产品的步伐，从而使部分业务突破了传统的分业经营体制。然而，现行的以机构监管为基点的分业监管体制，不仅抑制了商业银行金融创新的力度，而且加大了金融监管当局之间的协调成本，同时也影响跨国银行监管合作的质量，容易导致监管真空或过度监管，在一定程度上降低了银行监管的效率。

基于上述原因，作者尝试建立一个银监会与其他银行监管协调与合作主体为研究对象的理论分析框架。论文以银监会为落脚点，围绕银行监管的协调与合作这条主线，遵循一般理论、具体分析到对策建议的研究思路，展开论述。论文重点从银行监管国内协调和国际合作两个视角进行研究，具体分析银监会与国内和国际银行监管主体协调与合作过程中存在的困难和问题。在此基础上，作者引入成本收益分析和博弈分析，对监管主体国内协调和国际合作的成本收益及合作意愿进行研究。最后，论文尝试构建银行监管协调与合作适度性评价指标，并尝试给出建立有效的银行监管协调与合作机制的路径。

本论文的可能创新点：一是首次构建银行监管协调与合作的适度性评价指标体系；二是率先提出银行监管协调与合作的 5C 理念。三是尝试建立网络化的金融监管协调与合作机制。四是从更宽的视角分析银行监管协调与合作存在的困难和问题，并建立了银行监管协调与合作的成本收益和博弈分析框架；五是尝试用新资本协议和国际会计准则两个视角分析银行监管协调与合作中存在的不足，并从监管标准和会计标准两个方面提出银行监管当局应采取的主要行动和策略。

**关键词：**银行监管；协调与合作；对策研究

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## **Abstract**

China has implemented un-equilibrium development strategy, adopted government oriented, compulsory transitional way of institution and gradually and steadily reformed the banking system according to regions, fields for 30 years. Thus, China's banking system formed a diversified commercial banking system and a separate regulation system which supervises bank, stock and insurance respectively.

Financial globalization and the development of world financial service integration and as well as the all-around trend determine that China's financial system and development can not detach from international financial system. Since China entered into WTO, more and more institutions, productions and opinions from foreign banks have been springing up which provide domestic commercial banks a good chance to learn, absorb and use foreign financial products more quickly so as to make their services break the boundary of traditional separate operation. However, the prevalent separate regulation system based on organizations not only prevents the speed of financial innovation, but also enlarges the coordination cost between regulation institutions and influences the multinational cooperation of banking regulation which can easily lead to regulation vacuum or excess regulation so that reduce the efficiency of banking regulation to certain extent.

Due to the above reasons, the author tries to set up a theoretical framework which analyses coordination and cooperation between the CBRC and other regulation organizations. The paper sets the CBRC as its basis, focuses on bank regulation, and abides by the traditional research outline from general theory to detailed analysis to policy suggestions. The emphasis is on the research of domestic coordination and international cooperation. The difficulties and problems that CBRC and other regulation organizations face in the process of coordination and cooperation are probed precisely. Then the author introduces cost-revenue and game analysis, and talks about the cost and revenue of the regulation subjects' domestic coordination and international cooperation and their coordination willness. Finally, the paper puts forward the indicators of moderation assessment and tries to provide an effective approach for

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coordination and cooperation in banking supervision and regulation.

The paper's innovations may involve: First, indicators system of appropriation assessment; Second, 5C idea brought forward for coordination and cooperation in banking supervision and regulation; Third, Set up financial network regulation coordination mechanism;Forth,the analysis of difficulties and problems existed in coordination and cooperation of bank regulation in China from a wider perspective and a framework established which includes cost-revenue and game analysis in regard to the coordination and cooperation; Fifth, analysis of defects existed in banking regulation coordination and cooperation from the New Basel Capital Accord and IAS perspective respectively and major actions and strategies are suggested from regulation and accounting standard aspects.

**Keywords:** Banking Supervision and Regulation; Coordination and Cooperation;  
Policy Research

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