

Gdańsk, 30 August, 2022
30/08/2022

Department on Data Analytics, Reporting and Transparency

EUROPEAN BANKING AUTHORITY

Dear Sir or Madame,


Association of Financial Companies in Poland (ZPF) has been created on October 27th 1999 and currently associates almost one hundred key institutions active on the finance consumer market in Poland (banks, financial advisors and intermediaries, money lending companies, economic information bureaus, debt management companies and insurers). The companies associated in ZPF decided to represent their interest in the form of a trade organization which has the right to present opinions about bills and legal acts, as a social partner of the legislative process. These entitlement is honored by state authorities and administration and thus the ZPF plays active role in polish legislation as a professional organization. ZPF is also member of Eurofinas, the European Federation of Finance House Associations - the voice of the specialized consumer credit providers in Europe, which currently represents 17 Member Associations, in turn bringing together more than 1,200 finance houses, captive companies, specialized and universal banks.

ZPF hereby would like to contribute to the public consultation on ITS on NPL transaction data templates. We would like to stress that we perceive NPL Directive as one of the most important legal act to build unify and strong EU market to tackling non-performing loans.

We welcome the opportunity to answer on draft ITS on NPL transaction data templates. We would like to emphasise our support to the EBA's efforts to build solid regulation on subject matter. We would like to stress that based on our experience it is crucial to ensure as much data on credit exposures as it is possible for credit purchasers for the analysis, financial due dilligance and valuation of creditor's rights under a non-performing credit agreement, or the non-performing credit agreement itself. It will lead to achieve Directive's goals, in particular to complete banking union and further develop a capital market union (CMU).

We will be grateful for taking our responses (attached) into consideration and remain at the EBA's disposal, should the need for further clarification or any form of assistance be required/desired. Feel free to contact me (mzczugan@zpf.pl, mob.: + 48 510 049 177).

Yours sincerely,



Marcin Czuga
President of the Management Board
Association of Financial Companies in Poland