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| European Banking Authority | 8 august 2016 |
| Consultation statement on the Consultation Paper to the "Draft Guidelines on LCR disclosure to complement the disclosure of liquidity risk management under Article 435 of Regulation (EU) No 575" |

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| The Association of Local Banks, Savings Banks and Cooperative Banks in Denmark (LOPI) would like to thank for the opportunity to comment on the above referred Consultation Paper which were submitted for consultation by EBA May 11, 2016.  In addition to this consultation statement we would also like to refer to the consultation statement submitted by EBF. LOPI has in corporation with The Danish Bankers Association participated in providing the Danish input to this consultation statement. There are however two specific issues that are of great importance for small and medium-sized Danish banks. Based on this LOPI would like to submit a supplementary consultation statement.  The first issue relates to the fact that the suggested approach for calculating the average values in the LCR disclosure template is based on daily observations. The requirement of daily observations is extremely administratively burdensome and a completely unnecessary requirement for small and medium-sized banks with a simple liquidity risk profile and low liquidity risks.  The consideration that the data can be displaced a quarter does not ease the administratively burden as it is the daily statement of the LCR that is problematic and not the temporal aspect in relation to the reference date.  In addition, many small and medium-sized banks have a simple liquidity structure which is often combined with a very high liquidity surplus. Based on these facts the banks typically have a good overview of their liquidity and are assured that their liquidity is sound such that they are able to live up to the LCR at any point in time without full daily LCR statements.  Only in the rare cases where either the excess liquidity is scarce or the market is subject to major disruptions, which may affect the calculation of excess liquidity, we find it appropriate to report the excess liquidity on a daily basis.  We therefore suggest that the smaller and medium-sized banks - also seen from a proportionality principle - are to be exempt from the requirement of daily statements of the LCR, if they can demonstrate to competent authorities that they are able to calculate the LCR on a daily basis, if it proves necessary.  The above will also be in line with Article 414 of the European Parliament and Council Regulation (EU) no. 575/2013 (CRR), which states that the institution alone must report LCR daily in times when the institution failed to meet the LCR requirement.  The second issue is in regards to the extensive level of details in Annex II. It can be discussed how relevant information at this level of detail is to small and medium-sized banks with low liquidity complexity.  It is therefore suggested that these banks can "settle" with disclosure the "Total adjusted value" as stated in Annex II series 21-23.  Yours sincerely  Søren Mølgård Søren Krarup |