

Comments

Consultation paper on draft implementing technical standards on joint decisions on prudential requirements in accordance with Article 20 of Regulation (EU) No 575/2013 (Capital Requirements Regulation – CRR)

Contact:

Dr. Olaf Achtelik

Telephone: +49 30 2021-2323

Email: o.achelik@bvr.de

Berlin, 2 October 2014

The **German Banking Industry Committee** is the joint committee operated by the central associations of the German banking industry. These associations are the Bundesverband der Deutschen Volksbanken und Raiffeisenbanken (BVR), for the cooperative banks, the Bundesverband deutscher Banken (BdB), for the private commercial banks, the Bundesverband Öffentlicher Banken Deutschlands (VÖB), for the public-sector banks, the Deutscher Sparkassen- und Giroverband (DSGV), for the savings banks finance group, and the Verband deutscher Pfandbriefbanken (vdp), for the Pfandbrief banks. Collectively, they represent more than 2,000 banks.

Coordinator:

National Association of German
Cooperative Banks

Schellingstraße 4 | 10785 Berlin | Germany

Telephon: +49 30 2021-0

Telefax: +49 30 2021-1900

www.die-deutsche-kreditwirtschaft.de

Comments on standards on joint decisions on prudential requirements in accordance with Art. 20 CRR EBA/CP/2014/13

I. General comments

The German Banking Industry Committee appreciates the present opportunity to comment on the draft technical implementing technical standards on on joint decisions on prudential requirements in accordance with Article 20 CRR. Please find our comments below.

II. Specific comments

Q1: Do you agree with the proposed home-host cooperation process for assessing the completeness of the applications?

No comment.

Q2: Do you have any alternate proposals about the period during which the consolidating supervisor should forward the application to the other relevant competent authorities for assessing completeness, and the period during which the consolidating supervisor should communicate to the applicant the result of this assessment?

The two periods mentioned above seem reasonable. Additionally, the period, during which the joint decision must be implemented into respective national permissions, should be defined. We suggest that this implementation should be accomplished within 6 weeks of the reaching the joint decision.

Q3: Do you have any suggestions about aspects, other than those already covered in Article 5 of the proposed Regulation, which need to be discussed and agreed between the consolidating supervisor and the relevant competent authorities while planning the joint decision process?

No comment.

Q4: Do you have any suggestions about the elements of the joint decision document as per Article 7 to ensure that a fully reasoned joint decision is communicated to the applicant?

No comment.

Q5: Do you have suggestions about any aspects of or details that should be included in the joint decision process of granting permission for material extensions or changes to internal models?

No comment.

Yours sincerely,
on behalf of the German Banking Industry Committee
National Association of German cooperative banks



Gerhard Hofmann



Dr. Olaf Achtelik