

Public consultation on the contributions of credit institutions to resolution financing arrangements launched

Fields marked with * are mandatory.

More information: on this consultation on the protection of personal data regime for this consultation

Respondent identification

Name of the individual filling out this form: (First / Last name)*

Name of the individual filling out this form: (First / Last name)*

Silvano Galeota

Email address of individual filing out the questionnaire:

silvano.galeota@sella.it

Are you filling out this form for?*

- yourself as an individual
- credit institution
- investment firm
- organisation
- public authority

Please specify the name of that (credit institution/investment firm/organisation/public authority):*

Groupement Européen de Banques

Address of the (credit institution/investment firm/organisation/public authority): (street name, city, postal code, country)*

Avenue du Pantheon, 74, 1081 Brussels, Belgium

If applicable, balance sheet size of your credit institution/investment firm/organisation in EUR billion: (below EUR 300 million, above EUR 300 million but below EUR 500 million, above EUR 500 million but below EUR 1 billion, above EUR 1 billion but below EUR 10 billion, above EUR 10 billion but below EUR 100 billion, above EUR 100 billion but below EUR 500 billion, above EUR 500 billion)

If applicable, name of the group the (credit institution/investment firm/organisation) is associated with:

Address of the group the (credit institution/investment firm/organisation) is associated with: (if applicable) (street name, city, postal code, country)

Business type of the institution/organisation:*

- savings bank
- commercial bank
- cooperative bank
- non-profit organisation
- other

Please specify

If applicable, balance sheet size of the aforementioned group in EUR billion: (below EUR 300 million, above EUR 300 million but below EUR 500 million, above EUR 500 million but below EUR 1 billion, above EUR 1 billion but below EUR 10 billion, above EUR 10 billion but below EUR 100 billion, above EUR 100 billion but below EUR 500 billion, above EUR 500 billion 100 billion, above EUR 100 billion but below EUR 500 billion, above EUR 500 billion)

The group itself, as a EEIG, is below 300 million. But single members are between 1 billion and 100 billion.

Is your organisation registered in the EU Transparency Register? (If your organisation is engaged in activities falling within the scope of the register and is not registered, [we invite you to register here](#), although it is not compulsory to be registered to reply to this questionnaire)**

- yes
- no

If so, please indicate your Register ID number:*

448805113968-65

Do you agree to the publication of your response (only published responses would be considered)?*

- yes
- yes, but without my name and address
- no

1. The calculation of contributions

Do you favour calculating the contributions based on:*

- individual level data
- consolidated level data

2. Methodology: Application of the principle of proportionality

Do you agree that small credit institutions should be treated in a special way, compared to what they would pay on the basis of a general formula that would apply to all credit institutions?*

- yes
- no
- no opinion

3. The weight of the flat contribution

Should the flat part be the most prominent part of the contributions or should the risk-adjusted part be the most prominent part of the contributions?*

- The flat part should be the most prominent part of the contributions
- The risk-adjustment part should be the most prominent part of the contributions
- no opinion

4. The individual risk indicators

Do you agree with the following indicators for assessing the risk profile of each credit institution/group? In addition, please indicate the importance (high/low) which you would attribute to each risk pillar and to each risk indicator within each risk pillar. Note: a (+) or (-) indicates whether the contributions would increase (+) or decrease (-) if the value of the indicator increases or decreases.

	I agree with the indicator	High importance	Low importance
a) Risk pillar: Risk exposure:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• (i) RWA/Total Assets (+)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• (ii) Capital ratio (-)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• (iii) Leverage Ratio: Tier 1 Capital over Total Exposure Measure (-)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• (iv) Ratio of bail-in-able funds available in excess of the minimum requirement for own funds and eligible liabilities (-)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Risk pillar: Stability and variety of the sources of funding:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• (i) Loan-to-Deposit Ratio: all loans except loans to credit institutions/deposits (+).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• (ii) Liquidity Coverage Ratio	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Risk pillar: Importance of an institution to the stability of the financial system or economy:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• (i) Total Consolidated Assets at Euro Area level/Euro Area GDP (Member State GDP for credit institutions in Member States not participating in the Banking Union) (+)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• (ii) Exposure to other credit or financial institutions when compared with the overall financial sector (+)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5. Other comments

Any other comments 400 character(s) maximum

“A general equilibrium model should be considered: smaller banks are beneficiaries of financial stability just as other taxpayers; and the response to crisis already added taxes and compliance costs for them.

Risk indicators should always consider that RWA based measures are biased and favour banks using AIRB models.

The Loan/Depo ratio does not always reflect quality and stability of deposits.”

Your input has been taken into account.

We thank you very much for your contribution.

The results of the consultation will be published on the consultation page after expiration of the deadline.

Case Id: b3d7e3a0-74e4-4bc8-b71f-92ec3f4ff9d9