



*European Association of Co-operative Banks
Groupement Européen des Banques Coopératives
Europäische Vereinigung der Genossenschaftsbanken*

**Committee of European
Banking Supervisors**

Brussels, 9th November 2009
HG/VH/B2/09-215

cp29@c-eps.org

**CONSULTATION PAPER ON THE EXTENSION OF CEBS'S SUPERVISORY
DISCLOSURE FRAMEWORK (CP 29)**

Dear Sir/Madam,

The European Association of Co-operative Banks (EACB) welcomes the opportunity to comment on the consultation paper on CEBS's guidelines on the Extension of the Supervisory Disclosure Framework.

Please find our remarks on the following pages. Do not hesitate to contact us should you have any questions.

Yours sincerely,

Hervé Guider
General Manager

Volker Heegemann
Head of Legal Department

Rue de l'Industrie 26-38 • B-1040 Brussels

Tel: (+32 2) 230 11 24 • Fax (+32 2) 230 06 49 • e-mail : secretariat@eurocoopbanks.coop
European Commission Register of Interest Representatives Identification Number 4172526951-19
www.eurocoopbanks.coop • e-mail : secretariat@eurocoopbanks.coop



General Remarks:

The EACB appreciates and supports CEBS effort for implementing and developing a common European framework for supervisory disclosure.

The EACB believes that extending the supervisory disclosure framework could help to harmonize the European implementation practices; and would contribute to improve the quality of the supervision, allowing national supervisory authorities to better assess their supervisory practices by comparing them with other national supervisory practices.

Furthermore, this extension will also contribute to bring transparency of supervision practices across Europe.

Specific Remarks:

Pillar II

The EACB believes that supervisory disclosure is especially important in the context of Pillar 2. In that sense we support CEBS intention to change the Supervisory Review Process' Template making the SREP disclosure more granular.

A more granular disclosure of the SREP, would allow institutions to get a better overview on the approaches of supervisors from different countries.

The EACB also finds useful the disclosure of the Risk Assessment Systems (RAS), as it would provide valuable information to institutions on how the supervisors organize and conduct their assessment of the institution risk profile.

National Discretions

The EACB welcomes the inclusion of the proposed national discretions as it would allow institutions to compare information on national implementation. This measure would help to provide transparency although we would suggest the inclusion of the interpretation of these national discretions. Currently, with the two-level approach it might happen that for some countries this interpretation is provided through their national websites, while in other countries there is not or it is not sufficient. So it could be useful to include under CEBS level not only the national discretion but also a common framework for its interpretation.