



CEBS

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cc: European Commission
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**EAPB responses to the
CEBS questionnaire on options and national discretions**

The European Association of Public Banks (EAPB) represents the interests of 27 public banks, funding agencies and associations of public banks throughout Europe, which together represent some 100 public financial institutions. The latter have a combined balance sheet total of about EUR 3,500 billion and represent about 190,000 employees, i.e. covering a European market share of approximately 15%.

The issue of national discretions and options in the CRD is very important for our members. The EAPB acknowledges CEBS' and the European Commission's efforts to reduce the number of national discretions and options in the CRD in order to enhance convergence. We very much appreciate that CEBS involves the industry in the discussions and welcome CEBS' consultation in this regard.

Nevertheless, we urge CEBS and the Commission to make amendments to the current framework in a balanced way, given that banks have just implemented or are in the process of implementing the CRD. Any changes will result in significant additional adaptation costs.

The EAPB, in order to provide CEBS with a common industry view, contributed to the response to the questionnaire submitted by the European Banking Industry Committee

(EBIC). As you will notice, we have been able to reach agreement among the different banking associations on a large number of provisions.

However, for those national discretions and options where an agreement within EBIC could not be reached, the EAPB submits herewith the consolidated responses of its members.

As you will notice, we suggest for many of the options and national discretions to rather transform them into general rules instead of removing them from the CRD. We take the view that the transformation into a general rule would contribute to the general aim of enhancing convergence and establishing a level-playing field.

We are confident that CEBS will act very cautiously in proposing any changes to the current rules. The close contact to the industry in the process of identifying possible changes to the current framework by CEBS and the Commission is very much welcome. We would appreciate upholding this interaction.

If you have any questions please do not hesitate to contact us.

With best regards,

A handwritten signature in black ink, appearing to read 'Schoppmann', written in a cursive style.

Henning Schoppmann
EAPB

A handwritten signature in black ink, appearing to read 'Hemetsberger', written in a cursive style.

Walburga Hemetsberger
EAPB