

**EUROPEAN BANKING AUTHORITY : CONSULTATION PAPER ON DRAFT  
IMPLEMENTING TECHNICAL STANDARDS ON DISCLOSURE FOR OWN FUNDS****( EBA/CP/2012/04 )****RESPONSE FROM THE BUILDING SOCIETIES ASSOCIATION****Introduction**

The Building Societies Association (BSA) is pleased to respond briefly to the Authority's consultation EBA/CP/2012/04. The BSA represents mutual lenders and deposit takers in the UK including all 47 UK building societies. Mutual lenders and deposit takers have total assets of over £375 billion and, together with their subsidiaries, hold residential mortgages of nearly £240 billion, 19% of the total outstanding in the UK. They hold more than £250 billion of retail deposits, accounting for 22% of all such deposits in the UK. Mutual deposit takers account for 34% of cash ISA balances. They employ approximately 50,000 full and part-time staff and operate through approximately 2,000 branches.

**General observations**

The CP makes clear in various places that the EBA has closely followed BCBS approaches and templates. While this may maintain consistency and comparability as far as large, internationally active banks are concerned, one result is that small EU credit institutions, including many of our members, are required to make the same extensive scale of disclosures, when in the context of their own business and stakeholder profile, this is not necessary, and adds little value but of course incurs cost. This is particularly true of the immensely complex transitional template. But we recognise that this is one aspect of the generally unsatisfactory way in which small EU credit institutions are often treated when Basel requirements are applied within the EU, and that the EBA has limited, or no, discretion to ameliorate the problem.

**Specific comments**

Given the foregoing general observation, we consider that the draft ITS do cover the ground required under the Regulation, the drafting of the standards is generally clear, and the completion instructions and examples are helpful.

31 July 2012