

*2020.10.23*

**FBF RESPONSE TO EBA CONSULTATION PAPER ON SPECIFYING THE METHODOLOGY TO BE USED BY RESOLUTION AUTHORITIES TO ESTIMATE THE REQUIREMENT REFERRED TO IN ARTICLE 104A OF DIRECTIVE 2013/36/EU AND THE COMBINED BUFFER REQUIREMENT FOR RESOLUTION ENTITIES AT THE RESOLUTION GROUP CONSOLIDATED LEVEL FOR THE PURPOSE OF SETTING MREL UNDER BRRD ART. 45C(4) (EBA/CP/2020/16)**

*The French Banking Federation (FBF) represents the interests of the banking industry in France. Its membership is composed of all credit institutions authorised as banks and doing business in France, i.e. more than 340 commercial, cooperative and mutual banks. FBF member banks have more than 38,000 permanent branches in France. They employ 340,000 people in France and around the world and serve 48 million customers.*

The FBF and its members welcome the opportunity to respond to the Consultation Paper EBA/CP/2020/16.

1. **General comment**

The RTS mentions that the resolution group perimeter may differ from the prudential perimeter especially in case of groups with a Multiple Point of Entry (MPE) strategy.

Indeed article 12 paragraph 1 requires that resolution authorities delineate the resolution group. As such, another case should be added in the RTS: it is the case where some entities of the group will not be supported in resolution, and as such do not need to be included in the resolution group.