

Claudia BUCH
Chair of the Supervisory Board

Mr Markus Ferber
Member of the European Parliament
European Parliament
60, rue Wiertz
B-1047 Brussels

Frankfurt am Main, 2 September 2025

Re: Your letter (QZ-015)

Honourable Member of the European Parliament, dear Mr Ferber,

Thank you for your letter which was passed on to me by Ms Aurore Lalucq, Chair of the Committee on Economic and Monetary Affairs, accompanied by a cover letter dated 29 July 2025.

Your letter concerns the supervisory expectations of the European Central Bank (ECB) relating to ex ante funds of institutional protection schemes (IPSs), as laid down in the ECB Guide on options and discretions available in Union law.¹ You refer to the political agreement reached between the Council of the European Union and the European Parliament on the review of the crisis management and deposit insurance (CMDI) framework.²

The Capital Requirements Regulation (CRR) is the legal basis for the ECB's view that setting up a segregated ex ante fund exclusively for IPS purposes is important from a supervisory perspective. In accordance with Article 113(7) of the CRR, institutions in an IPS must obtain permission from the competent authorities – including, where relevant, the ECB – before using the option of assigning a risk weight of 0% to exposures to counterparties that are members of the same IPS. The ECB may grant such permission only if certain conditions are met, including that: “the arrangements ensure that the institutional protection scheme is able to grant support necessary under its commitment from funds readily available to it” (Article 113(7)b). From the

¹ See [ECB Guide on options and discretions available in Union law](#), ECB, July 2025.

² See [“Bank resolution: Council and Parliament strike deal to strengthen the EU crisis management framework”](#), press release, Council of the EU, 25 June 2025.

ECB's standpoint, the ex ante segregation is important for this condition to be met. This view is reflected in the Guide.³

The Guide is based on the current CRR rules, and the ECB regularly reviews it to ensure full alignment with legislative changes. On 25 June 2025 the European Parliament and the EU Council reached a political agreement on the CMDI package. As soon as the related legal acts have been adopted and published in the Official Journal of the European Union, the ECB will assess whether its current view is still appropriate in light of the changes.

Yours sincerely,

[signed]

Claudia Buch

³ Please also see [my answer to your written question No QZ-003](#).