



EUROPEAN CENTRAL BANK
BANKING SUPERVISION

Template for comments

ECB Guide to the internal liquidity adequacy assessment process (ILAAP)

Institution/Company

Združenje bank Slovenije (The Bank Association of Slovenia)

Contact person

Mr/Ms

First name

Surname

Email address

Telephone number

Please tick here if you do not wish your personal data to be published.

General comments

Please refer to our cover letter.

In addition, we would like to draw your attention to inadequate translations of some words/technical terms into Slovenian language. E.g. the term »sistemom določanja cen za prenos sredstev« in paragraph 23 on p. 9 should in our opinion be replaced with the term "sistemom določanja cen virov sredstev", translation of the word "viable" into »rentabilna« in paragraph 45 on p. 15 should also be replaced, the term nepredvidenih« in paragraph 50 on p. 17 should be replaced with "nepričakovanih", the terms »vzdržne« and »lepljivosti bančnih vlog« in« paragraph 64 on p. 21 should be replaced with "stabilne" and "stabilnosti bančnih vlog", respectively, and finally, the term »upoštevati .obstoječo valutno strukturo likvidnosti« in paragraph 76 on p. 25 should be replaced with "upoštevati relevantno valutno strukturo

Template for comments

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Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate the relevant article/chapter/paragraph, where appropriate;
- you indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline: 4 May 2018

ID	Chapter	Paragraph	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	1- Introduction	13	4	Amendment	We would welcome more specific definition of the proportionality principle; statements such as »it remains the responsibility of individual institutions to implement ILAAP in a proportionate and credible manner« and that »ILAAPs have to be proportionate to the nature, scale and complexity of the activities of the institution« are simply too vague and institutions cannot be assured a priori what the expectations of the ECB for each of them are (considering the nature, scale and complexity of their activities).	As explained in the comment – to provide clear guidance concerning the expectations.	,	Don't publish
2	Principle 2	28-32	10	Amendment	We would welcome further clarification of the interaction and hierarchy between RAF/RAS and ILAAP (perhaps in a separate guideline, given the complexity of the RAF/RAS concept; interconnectedness and/or interdependence (e.g. is ILAAP part of RAF or vice versa) is not clear from the current wording). Alternatively, it might be better to exclude the existing paragraphs of the Guide which relate to RAF/RAS (i.e. paragraphs 8-32 and references in other paragraphs such as 23 and 36) from this Guide as they do not sufficiently clarify the relations with ILAAP, and to publish a separate Guide on the subject of RAF/RAS.	As explained in our comment.	,	Don't publish
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