

## Template for comments

### ECB Guideline on the supervisory approach by national competent authorities to coverage of non-performing exposures held by less significant supervised entities

#### Institution/Company

Self

#### Contact person

##### Mr/Ms

Mr

##### First name

Syamantak

##### Surname

Saha

##### Email address

[syamsaha@aol.com](mailto:syamsaha@aol.com)

##### Telephone number

9.19433E+11

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#### General comments

The volatility of global financial markets is a serious concern for global prosperity. Whilst jurisdictions may have any economic agenda, a connected world determines that global prosperity is universal and a complete disconnection from a connected network for economic entities is depleting of sustainable global development.

Yet, jurisdictions do have their own economic agenda that it may determine independently and through its own democratic and working parliaments that may affect its current policies in order to ensure safety and prosperity. The non-performing assets of Less Significant Institute poses this important issue of post-implementation of policy regulations and its impact on current economic factors. Whilst the ECB has indeed taken strong measures to bring stability to markets, it so presents now, that the world financial economy may not be quite upto the levels acquired, and that elements of financial features may remain in global markets that are gradually frozen or unavailable in the EU financial landscape. Certain global standards such as Basel 3, that is a requirement yet to be met by most larger financial economies, may already be compliant in most ECB regimes. Yet, simple concepts of Basel 3, such as Tier 1 and Tier 2 Capital is still missing a universal global definition. What is Tier 1 Capital is defined by the type of asset held, as opposed to the issuing entity, and when the issuing entity itself is a questionable existence, as in cases of non-compliant AI Companies, then such injected financial assets irrespective of Tier 1 or 2 becomes irrelevant. Hence, as in this example, the frozen or non-performing assets of such low quality issuer, becomes a root cause for universally accepted Basel integrity, leading to a requirement to check the validity of issuing entity for the assets that are frozen or non-performing.

Certainly, a better and further understanding of Asset Quality than going by global Basel 3 standard, is required at EU single financial market to appropriately determine what should be a regular outcome for such NPEs. Regarding supervision, it would be unclear during implementation to find a solution without collecting further data on why and how the questioned assets are becoming an outstanding issue for global markets. If it were reasons such as unlawful activities of the issuing entity such as for non-compliant AI Companies, the path of action would be different to the Assets of a Company who is a victim of Climate Change. Yet, both are not the same, and clarity is required to differentiate

Hence, whilst understanding of the risk assessed approach of ECB for asset transactions within the Single Market, a further Metadata on the Issuing Entity is required to determine whether or not it is acceptable for further ECB insurances.

For the importance of global financial market stability, it is requested that the ECB provide further directions on Entity Classification of Non-Performing Assets held by NSI, and thereafter provide further statements on the category of Issues that are to be still frozen and those that may be allowed to go through, although with certain conditions as maybe applied as per current Single market requirements.

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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: 27 October 2025

ID	Article	Paragraph	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1						Saha, Syamantak	Publish
2						Saha, Syamantak	Publish
3						Saha, Syamantak	Publish
4						Saha, Syamantak	Publish
5						Saha, Syamantak	Publish
6						Saha, Syamantak	Publish
7						Saha, Syamantak	Publish
8						Saha, Syamantak	Publish
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