

PUBLIC CONSULTATION
DRAFT ECB REGULATION ON SUPERVISORY FEES
TEMPLATE FOR COMMENTS

Institution/Company Federation of Finnish Financial Services (Finanssialan Keskusliitto ry)	
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Please separate your comments per issue, citing the relevant article of the draft Regulation on supervisory fees where appropriate and indicating whether you are proposing an amendment, clarification or a deletion. If you require more space for your comments, please copy page 2.

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Name of Institution/Company	Federation of Finnish Financial Services (Finanssialan Keskusliitto ry)	Country	Finland
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COMMENTS ON THE DRAFT ECB REGULATION ON SUPERVISORY FEES

Issue	Article	Comment	Concise statement why your comment should be taken on board
Definition of group	Article 3(13)	Clarification	Banking networks subject to CRR 10 art (CRD IV 21 art) should be treated as a group.
The weighting scheme of the fee factors	Article 10	Amendment	The proposed weighting scheme gives a large weight on the size of the balance sheet. This may lead to a situation where the actual fee exceeds the level which is justified by the risks of a bank and the supervisory measures needed in its supervision. This problem can be mitigated by treating derivative liabilities on the basis that full recognition is given to counterparty netting rights positions in calculating total assets. Netting of derivatives would also be in line with the treatment referred into part II.3 item (34) of the proposal, which states that “The total value of the assets of a supervised entity is derived from the “total assets” line on a balance sheet prepared <i>in accordance with EU law for prudential purposes.</i> ”.



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The fee factor calculation on a consolidated basis	Article 10 para 3	Clarification/amendment	<p>According to the proposal, the fee factors are calculated at the highest level of consolidation within participating Member States. The part II.1 item (17) of the proposal states that “<i>All subsidiaries</i> of this supervised entity are considered as belonging to the same supervised group..” It should be clarified that the group perimeter must be the prudential perimeter of banks, i.e. excluding insurance companies for financial conglomerates.</p> <p>It is important to exclude intragroup assets to avoid multiple counting of supervisory fees (the amount of assets could also be used as a national supervisory fee factor in participating country and/or non-participating country). The calculation should therefore eliminate the intragroup liabilities between participating part and non- participating part of the group.</p>
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