

Template for comments

Public consultation on the Review of the ECB Regulation on supervisory fees

Institution/Company

Nederlandse Waterschapsbank N.V.

Contact person

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

General comments

Nederlandse Waterschapsbank N.V. ("NWB Bank") is a leading financial services provider that offers bespoke short-term and long-term finance arrangements on favourable terms. Our services are geared exclusively to the Dutch public sector.

We serve local authorities, such as water authorities and municipal and provincial authorities, as well as government-backed institutions. Most of our clients are societal organisations, such as institutions engaged in social housing, healthcare, education and activities related to water and the environment. Like our clients, the shareholders of NWB Bank are Dutch public-sector parties.

NWB Bank funds its operations on the international money and capital markets on the back of a robust financial position and ratings from Moody's (Aaa) and Standard & Poor's (AAA). Our solid status and financial expertise allow us to raise ample funds on favourable terms in the international financial markets. Furthermore, NWB Bank has a very low cost structure.

NWB Bank is a public limited liability company, whose shares have been owned by public authorities since it was established in 1954. NWB Bank is an "ordinary" public limited liability company, which means that its shareholders have significant powers, such as the power to appoint the Members of the Managing Board and the Members of the Supervisory Board.

We govern our Bank on the basis of robustness and transparency – the Managing Board never loses sight of the interests of all our stakeholders. Read more about our corporate governance.

The Bank's key legal charter is constituted by its Articles of Association. Among other aspects, they set out provisions on the Bank's object, capital and shares, governance, Supervisory Board and shareholders.

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Please enter all your feedback in this list.

When entering your feedback, please make sure:

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

Deadline:

ID	Article of the regulation	Page	Type of comment	Detailed comment	Concise statement why your comment should be taken on board
1	10.3	15	Amendment	Exclude promotional loans in the Total Assets measure	In order to realign the actual time spent on supervision and the nature of the bulk of the assets (promotional loans) of NWB Bank the promotional loans should be excluded from the measure base for total assets. This will assist in the creation of a level playing field by acknowledging the different nature of promotional banks versus commercial banks and create consistency with the total exposure measure as used in other parts of the legislation (Commission Delegated Regulation 2015/63, proposed CRR2 article 429a).
2	10.3	15	Amendment	Standardized method should be used by all banks for the purposes of reporting the total risk exposure measure	As acknowledged in the comments the measurement of the total risk exposure amount differs between banks. Even though banks that apply internal models require additional oversight, the contribution of these banks is also lower due to a, in general, lower exposure amount originating from these models in comparison with the standardized method. To improve comparability the standardized method should be used by all banks for this purpose.
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