



EUROPEAN CENTRAL BANK
BANKING SUPERVISION

Template for comments

Public consultation on amendments to the supervisory fees framework (2019)

Institution/Company

European Association of Public Banks

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

,See detailed comments.

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:	6 June 2019
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ID	Article of the Regulation	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
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1	Art.10(3)a	6	Amendment	It is suggested to amend point i of article 10(3)a by replacing "total assets;and" by "total exposure measure; and" .	As stated by the ECB, the fee factors should be based on objective criteria and should be related to a supervised entity's importance and risk profile, including its risk-weighted assets. The risk-weighted assets are indeed covered by the total risk exposure fee factor. For the overall risk profile however, the EAPB suggests not to use the " total assets" but the "total exposure measure" instead. This is a measure that is already being used for prudential purposes, and even in conjugation with the TRE as a set of double criteria (in the TLAC-requirements and MREL Pillar 2). This measure would therefore be more suited than the measure of total assets which has so far mainly been employed for accounting purposes. Moreover, as both the TRE and the "total exposure measure" are available through the COREP, only one source of information would have to be used, thereby reducing complexity as well as the administrative burden.		
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