



EUROPEAN CENTRAL BANK
BANKING SUPERVISION

Template for comments

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

Institution/Company

Finance Finland

Contact person

Mr/Ms

First name

Surname

Email address

Telephone number

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General comments

Template for comments

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

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	Scope and proportionality	1.2	4	Clarification	We understand the guidelines are principally aimed at SI banks, as is stated under "scope and proportionality". We see it necessary to formulate under the same chapter how the local authorities should apply the guidelines on LSIs that are out of scope of these ECB guidelines. The risk is that by letting this matter to the hands of local NCAs, different jurisdictions will result in different level of granularity regarding ICAAP and ILAAP processes, and thus would create an unlevel playing field for LSI banks. Some NCAs might apply the guidelines directly as-is to LSIs, whereas some might not apply these at all.	To ensure level regulatory playing field across member states by clarifying how different NCAs should interpret the guidelines, and how bindingly they should be applied on LSIs.	,	Don't publish
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