



## Public consultation

Draft guideline on the exercise of options and discretions available in Union law by NCAs in relation to less significant institutions

Draft recommendation on common specifications for the exercise of some options and discretions available in Union law by NCAs in relation to less significant institutions

### Template for comments

Contact details (will not be published)

Institution/Company

Division Bank and Insurance, Austrian Federal Economic Chamber

Contact person

Mr  Ms

First name

Franz

Surname

Rudorfer

E-mail address

██████████

Telephone number

██████████

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

Please make sure that each comment only deals with a single issue.

In each comment, please indicate:

- the document to which the comment refers (guideline and/or recommendation )
- the relevant article/chapter/paragraph, where appropriate
- whether your comment is a proposed amendment, clarification or deletion.

If you require more space for your comments, please copy page 2.

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Name of Institution/Company      Division Bank and Insurance, Austrian Federal Economic Chamber

Country      Austria

### Comments

Guideline	Recommendation	Issue	Article	Comment	Concise statement of why your comment should be taken on board
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Intra-group liquidity outflows or outflow within an IPS	422 CRR	Amendment	Section II, Chapter 6, paragraph 11(iv) of the consolidated ECB's Guide on ONDs for SIs requires a daily mutual report on the liquidity situation: "In order to assess whether the liquidity risk profile of the liquidity receiver is adequately taken into

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account in the liquidity risk management of the liquidity provider, the ECB expects to be shown that the liquidity-providing entity monitors on a regular basis the liquidity position of the counterparty, including its daily liquidity position.”

This periodic monitoring should be reduced to a maximum of mutual disclosure of the reported LCRs. LSIs in an IPS should not be subject to daily supervision of the liquidity position of the central institutions, also considering that this is not feasible due to operational arrangements and IT solutions.

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