



EUROPEAN CENTRAL BANK
BANKING SUPERVISION

PUBLIC CONSULTATION

Draft ECB Regulation on the exercise of options and discretions available in Union law

Draft ECB Guide on options and discretions available in Union law

Template for comments

Institution/Company

private

Contact person

Mr Ms

First name

Martien

Surname

Lubberink

E-mail address

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Telephone number

[REDACTED]

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 (Regulation and/or Guide)
- 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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Template for comments

Name of Institution/Company **Martien Lubberink**

Country **NL**

Comments

Regulation	Guide	Issue	Article	Comment	Concise statement why your comment should be taken on board
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Non-deduction of insurance companies	CRR 49.1	Amendment	Art 49.1.(b) requires that the entity is included in the same supplementary supervision under Directive 2002/87/EC. However, the inclusion may not imply active or controlled supervision, which makes that Art 49.1 loses its bite.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	ibid	CRR 49.1	Amendment	From the methods 1, 2 or 3 of Annex I to Directive 2002/87/EC, only method 1 shall be allowed.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	AT1 Trigger	CRR	Amendment	The write-down trigger in Article 54.1. (a) should be set at



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			54.1.(a) 54.4.(a)		7% (up from 5.125%). A temporary write-down should be ruled out.
<input type="checkbox"/>	<input type="checkbox"/>			Choose one option	
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