



## EACB position papers for the year 2016

Dates	Position papers
05/01/16	EACB provides input to the ESMA Consultation on Indirect Clearing under EMIR and MIFIR
06/01/16	EACB provides input to the EC Public consultation on covered bonds in the European Union
22/01/16	EACB Comments on Draft EBA GL on the definition of default (Art. 178 CRR)
29/01/16	EACB Comments on ECB draft Regulation on the collection of granular credit and credit risk data (AnaCredit)
03/02/16	EACB provides input to the EC Call for Evidence: EU regulatory framework for financial services
04/02/16	EACB provides input to the ESAs Consultation Paper on PRIIPs Key Information Documents
05/02/16	EACB comments on BCBS consultative paper on Capital treatment for “simple, transparent and comparable” securitisations
08/02/16	EACB comments on IASB ED Applying IFRS 9 Financial instruments with IFRS 4 Insurance contracts
12/02/16	EACB Comments on BCBS Consultative Document on TLAC holdings
15/02/16	EACB provides input to the EBA Discussion Paper on future draft RTS on Strong Authentication under PSD2
07/03/16	EACB's letter to EU Commission on EBA Opinion on the Application of the Proportionality Principles in the Area of Remuneration
09/03/16	EACB Comments on the Commission Proposal on European Deposit Insurance Scheme
11/03/16	EACB Comments on EBA draft GL on ICAAP - ILAAP information
11/03/16	EACB Comments on BCBS second CP on Revisions to the Standardised Approach for credit risk
18/03/16	EACB answer to the Commission Green Paper on retail financial services
23/03/16	EACB Draft Position on EBA Consultation Paper on Draft Guidelines on Remuneration Policies and Practices Related to the Sale and Provision of Retail Banking Products and Services
01/04/16	EACB comments on the EBA draft amendments to the ITS on reporting to include prudent valuation into COREP



## EUROPEAN ASSOCIATION OF CO-OPERATIVE BANKS

### The Co-operative Banking Difference

11/04/16	TWG response to the Eurosystem's consultative report: Eurosystem's vision for the future of Europe's financial market infrastructure – RTGS services – consultative report
11/04/16	EACB response to the ESMA Consultation on Guidelines on transaction reporting, reference data, order record keeping & clock synchronisation under MIFID II/ MIFIR
18/04/16	EACB response to ECB consultation on recognition of IPS for prudential purposes
19/04/16	EACB position on the EC legislative proposal for the Prospectus Regulation
07/06/16	EACB comments on BCBS consultation on the SMA for operational risk
07/06/16	EACB's letter to BCBS on proposals for constraints on the use of internal model approaches
05/07/16	EACB Answer to the questionnaire for the public consultation on the evaluation and review of the E-Privacy Directive
06/07/16	EACB Comments on BCBS Consultative document 'Reducing variation in credit risk-weighted assets – constraints on the use of internal model approaches'
13/07/16	EACB Comments on DG FISMA Trading Book
13/07/16	EACB draft Addendum to the ECB Guide on Options and Discretions (O&Ds) available in Union law
19/07/16	EACB position on the EC proposal for a securitisation Regulation and a proposal to amend the CRR regarding the capital treatment of securitisations
07/07/16	EACB position on the EC proposal for a securitisation Regulation and a proposal to amend the CRR regarding the capital treatment of securitisations
12/07/16	EACB letter to Esther de Lange MEP on European Deposit Insurance Scheme
20/07/16	EACB Comments on BCBS Consultative document-Prudential treatment of problem assets– definitions of non-performing exposures and forbearance
04/08/16	EACB Answer to the EBA Discussion Paper on innovative use of consumer data by financial institutions
11/08/16	EACB Comments on EBA draft GL on LCR disclosure to complement the disclosure of liquidity risk management under Article 435 CRR
30/08/16	EACB Comments on EBA Public Consultation on the Interim Report on MREL Framework
02/09/16	EACB Comments on EBA Public Consultation on Report on the Appropriate Target Level Basis for Resolution Financing Arrangements under BRRD
07/09/16	EACB Response to the consultation on the Distributed Ledger Technology Applied to Securities Markets



## EUROPEAN ASSOCIATION OF CO-OPERATIVE BANKS

### The Co-operative Banking Difference

08/09/16	EACB Response to the ESMA consultation Paper on the clearing obligation for financial counterparties with a limited volume of activity
29/09/16	EACB Comments 'An organic approach to proportionality'
29/09/16	EACB comments on the EBA draft Guidelines (GL) on disclosure requirements under Part Eight CRR
30/09/16	ESMA Call for evidence on Asset segregation and custody services - EACB comments
12/10/16	EACB response to EBA PSD2 consultation
24/10/16	European Commission consultation on the Review of the EU macro-prudential policy framework - EACB comments
26/10/16	EACB Comments on EBA draft GL on credit institutions' credit risk management practices and accounting for expected credit losses
26/10/16	EACB Comments on EBA draft GL on Connected Clients under Article 4(1)(39) CRR
17/11/16	ECB consultation on Draft Guidance to banks on non performing loans
07/12/16	EACB answer to EBA Consultation on professional indemnity insurance of TPPs (Art 5.4 PSD2)
22/12/16	EACB response to the EBA consultation on Technical Standards on standardised terminology and disclosure documents under the PAD

All the position papers can be downloaded on the EACB Website :

[www.eacb.coop](http://www.eacb.coop)

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**EACB AISBL** – Secretariat - Rue de l'Industrie 26-38 - B-1040 Brussels

Tel: (+32 2) 230 11 24 - Fax (+32 2) 230 06 49

Enterprise 0896.081.149 - Lobbying register 4172526951-19

[www.eacb.coop](http://www.eacb.coop) - e-mail : [secretariat@eacb.coop](mailto:secretariat@eacb.coop)