

ANNUAL REPORT

2024

The voice of | **2,400** local and retail
banks | **90** million members | **227**
million customers in the EU

European Association of Co-operative Banks A.I.S.B.L.

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Priscille Szeradzki
President of the European
Association of Co-operative Banks

As we reflect on 2024, Europe has seen significant shifts. First, the outcomes of European elections, which ushered in new leadership for both the European Parliament and the European Commission, pushed a different kind of agenda to the forefront. We have also seen the launch of the Draghi Report in September, which revealed a concerning decline in Europe's competitiveness relative to other major global economies. Add to that the change in the geopolitical landscape and it is no surprise that the political priorities of the European Commission have changed. Simplification and competitiveness are now the name of the game; without undermining environmental transition objectives.

Strengthening Europe's competitiveness cannot be achieved without addressing the competitiveness of the banking and financial systems, which are crucial for economic support, financial stability, and Europe's strategic autonomy. And the new European Commission, which took office in December, has placed competitiveness at the forefront of its agenda.

PRESIDENT'S ADDRESS

Cooperative banks must play a central role in the solution. As key players in Europe's economic fabric, cooperative banks need a regulatory framework that enables them to harness finance as a tool for innovation, environmental transition and growth. We must ensure a competitive and diverse banking sector that supports both pan-European and locally oriented activities. This requires a regulatory environment where different business models, including cooperative banks, can thrive. It is critical that this focus on competitiveness is properly understood, considering the real hurdles businesses – including the banking sector – face today.

To address these challenges, we must prioritise investment, foster innovation, and sustain productivity. In all these areas, cooperative banks have a vital role to play. Policy measures must be swift and efficient, avoiding lengthy delays that hinder progress. New ideas and approaches are required to meet the broader goals of simplifying Europe's frameworks, enhancing its strategic autonomy, and advancing the climate and digital transitions with a focus on social inclusion.

At the heart of our work is a vision for cooperative banking that is deeply rooted in society, with human interests at its core. Cooperative banks are founded on strong values: customer ownership, proximity to rural communities, and a member-focused business model. These principles make us pillars of stability, committed to long-term action, and capable of delivering on our promises to customers, members, and European society. Now that Europe must rely more on itself, this contribution is gaining increasing importance.

Cooperative banks provide concrete answers to the challenges of our time. As Europe contends with pressing issues such as the energy crisis, technological change, climate change and heightened geopolitical risk, cooperative banks are uniquely positioned to foster stability and drive competitiveness. As retail banks, we hold important market shares in many

European countries and are a pillar for financing private households and SMEs. We ensure financial inclusion, often in areas where no other banks exist. Cooperative banks are a key link in financing inclusive transitions.

When building Europe's agenda for simplification and competitiveness, many of the EACB messages of 2024 remain valid.

A key theme is preventing rules that discriminate against certain business models, despite their viability. The implementation of Basel reforms, revisions to governance rules, and evolving ESG frameworks highlight the need for less prescriptive regulations. Cooperative banks, with their democratic governance and risk-sharing models, require frameworks that respect their diversity and foster innovation without compromising their core principles. The EACB remains focused on advocating for balanced regulations that enhance competitiveness, such as those related to the digital euro and instant payments.

While new technologies create exciting possibilities, they also demand careful regulation to ensure the stability and accessibility of financial services. Cooperative banks have demonstrated time and time again that they represent an innovative force with important impact. Our strength is our inclusive approach to innovation, allowing all customers to embrace its opportunities thanks to our multichannel approach. Having said that, key proposals, such as the FiDA Regulation, digital euro, and Retail Investment Strategy, contain a number of provisions that threaten the socially inclusive and local-economy-oriented approach of cooperative banks. These provisions need to be reconsidered to maintain a level playing field, based on market lead developments, which foster innovation and prioritise European initiatives that reinforce independence and competitiveness in our digital future. Europe should not be running after an Anglo-Saxon product-oriented banking approach that would only favour non-European players.

At the same time, in debates on numerous regulatory projects, from the Crisis Management framework to the Retail Investment Strategy, we must ensure that our business model, cooperative group structures and specific governance are not seriously affected.

In 2024, we were invited to share our thoughts on supporting the agricultural and food sectors,

which face critical challenges in their transition to sustainability. Cooperative banks, with our strong ties to rural communities, are well-positioned to assist these industries, and we continue to advocate for policies and legislative frameworks that enable our sector to provide the necessary financial support for these entrepreneurs.

Looking ahead, the 2025 UN International Year of Cooperatives presents an opportunity to reflect on our achievements and mobilise for the future. It will be a time to celebrate the pivotal role of cooperative banks in empowering individuals, strengthening communities, and contributing to Europe's financial stability and competitiveness.

As President of the EACB, I am immensely proud of our collective achievements this year. I extend my deepest gratitude to the EACB Secretariat, our members, and all stakeholders for their unwavering commitment and expertise. Together, we are shaping a resilient, diverse, and inclusive financial ecosystem for Europe.

The road ahead will undoubtedly present challenges, but with cooperation at our core, we are well-equipped to overcome them and seize the opportunities of tomorrow. Our values, such as democracy, are not just a legacy of the past; they are a blueprint for a more inclusive and resilient future. Cooperative banks have been a cornerstone of Europe's past and are well-equipped to shape its future. So let's make sure this model is understood and valued, not overlooked and depreciated. Let's continue to support this model, not just for what it has achieved, but for the promises it holds for generations to come. Let us continue to build on our collective strength, ensuring that the cooperative banking model remains a cornerstone of Europe's sustainable future.



Nina Schindler
Chief Executive Office

Dear readers,

2024 was indeed a year of important political developments in the EU. In Brussels, the transition to a new European Parliament and Commission sparked intense discussions on boosting Europe's competitiveness and simplifying the legislative framework. At this pivotal juncture, the EACB helped shape the vision for the new term. A dedicated taskforce examined the combined impact of regulatory proposals on retail and cooperative banks, such as the Retail Investment Strategy (RIS), Financial Data Access (FiDA), the Digital Euro, and Digital Identity (DI). These efforts culminated in a report with key recommendations for strengthening the European retail banking sector, laying the foundation for the EACB Manifesto. This flagship document promotes policies spanning sustainable finance to securitisation, aimed at unlocking cooperative banking capital to fund Europe's ambitions.

Throughout the year, the EACB upheld its reputation as a trusted interlocutor, providing high-quality

CEO'S FOREWORD

technical input with over fifty position papers and joint letters on a wide range of regulatory files. In the digital space, it underscored the far-reaching implications of the FiDA and Artificial Intelligence (AI) frameworks, reinforcing Europe's ambition to lead the global tech race. In this context, tackling fraud across the digital value chain became even more critical. The Secretariat also made its voice heard in Anti Money Laundering (AML) negotiations, ensuring cooperative banks remain well-positioned to combat financial crime. Other crucial topics included sustainability reporting and modifications in creditor hierarchy within the Crisis Management and Deposit Insurance (CMDI) review. The digital euro project, also a high-priority issue, and its potential impact on deposits, lending and market competition, rallied members around the project. Additionally, the EACB facilitated member reflections on the future of the capital markets union, highlighting the essential role of cooperative banks in financing Europe's sovereignty and transition challenges.

2024 was also a time to reaffirm cooperative banks' deep-rooted commitment to their clients and their historic ties with the agri-food sector. As the sole financial services representative in the Commission's Strategic Dialogue on the Future of Agriculture, I had the privilege of advocating for a regulatory framework that enables banks to finance the green and digital transitions of Europe's farmers and agriculture. Our proposals, including a pan-EU benchmarking system and enhanced public-private partnerships for sustainable finance, were reflected in the dialogue report, framing the Commission's work plan.

Building on its policy work, the EACB sought to provide additional value for its members. Around the elections, a newsletter was launched to spotlight core political developments, including the EU's new policy programmes and the spinning institutional personnel carousel. The team also actively engaged with the incoming EU leadership to share perspectives on the

new mandate's direction.

Recognising the extended foothold of EACB membership, the association organised the first-ever Global Cooperative Banking Forum in Berlin, fostering dialogue between members and regulators on financial stability, climate and ESG risks and non-financial reporting from a global perspective. Our commitment to keeping the flags flying for the cooperative banking business model remained steadfast. The ongoing work of our EACB Cooperative ID Forum promoted cooperative banks' specificities and needs, supporting initiatives like the *Apropos Coop Banking* online seminar, which explored the unique resilience of cooperative banks in crises, and a joint event with cross-sector cooperatives at the European Parliament. Additionally, we steered an EU-wide campaign for market diversity, including a communication toolbox for members backed by data-driven proof points, displaying the unique contributions of cooperative banks to regional cohesion, the social fabric of communities, and economic prosperity.

Looking back, I can only echo the Chair's pride and extend my sincere gratitude to the entire EACB Secretariat team and over two hundred experts whose dedication has driven the association's successes. A special thank you to Interim President Daniel Quinten for his leadership in shaping our sector's positioning ahead of the elections, laying the groundwork for a seamless transition of the Presidency to Priscille Szeradzki. As we move forward against the backdrop of the United Nations 2025 International Year of Cooperatives, I look forward to cooperating closely with the strong network of EACB members during another year of impactful advocacy for the cooperative sector in EU financial services legislation.

COOPERATIVE BANKING IN EUROPEAN UNION

FACTS & FIGURES

Banks owned by members
financing the local economy

227 million customers
2.400 cooperative banks

Half of the EU/UK/CH banks



90 million members

In cooperative banks, customers of local banks can become members of the cooperative and play an active role in the governance at the local and/or central level.

730.000 employees
of European cooperative banks



36.200
Branches



€5.3 trillion
deposits



€9.6 trillion
assets



Source: The EACB key figures compiled by EACB and Tilburg University
Complete infographics available on EACB website

ABOUT THE EACB

THE ASSOCIATION

The European Association of Co-operative Banks (EACB) represents, promotes, and defends the common interests of its 27 member institutions and cooperative banks located in 22 countries worldwide.

As the world's largest cooperative banking association, the EACB advocates for almost 2,400 small, regional and large member banks at European and international levels.

An international non-profit association based in Brussels, the EACB is recognised by regulators and supervisors as the voice of cooperative banks, especially at an EU level.

WHAT IS THE EACB?

As the official representative of cooperative banking to European and international institutions, the EACB is committed to providing a high-quality, credible voice for cooperative banks in Europe and globally. It is fully engaged in the European regulatory process and produces comprehensive policy resources for cooperative banks worldwide.

The Association emphasises the way that the special values and unique characteristics of the cooperative banking model enhance the diversity and plurality of the European banking industry for the benefit of Europe's citizens, small and medium enterprises, and local economies.

Fully dedicated to its members and in line with fundamental cooperative values, the EACB gives members the right to get involved in the decision-making process, regardless of their size or country.

The EACB supports the Code of Conduct on lobbying of the European Commission and is registered in the EU transparency register book (Transparency Book Register 4172526951-19).

WHO SUPPORTS THE EACB?

The high-level expertise and professionalism of its Secretariat, working hand in hand with more than 400 national experts actively involved in the EACB's specific technical Working Groups, allows the EACB to achieve its key missions, such as making relevant contributions to consultations of European and international institutions, European Parliament committees, expert panels and other relevant hearings.

WHAT IS THE EACB'S ADDED VALUE?

With a broad range of staff expertise on cooperative banks, the EACB provides its members and stakeholders with information and assessments to increase their awareness and knowledge of European regulatory issues. It helps keep them up to speed with legislative and regulatory developments. It is also a valuable platform from which members can defend and promote their banking model and exchange good practices.

THE EACB'S APPROACH TO THE FUTURE OF COOPERATIVE BANKING: CREATION OF AN ENVIRONMENT FOR INNOVATIVE, SUSTAINABLE AND DIVERSE BANKING MARKETS

The Draghi Report of September 2024 highlighted a significant decline in Europe's competitiveness compared to China and the US, presenting a critical challenge for the EU. The new legislative mandate must focus on reigniting European competitiveness, reinforcing the EU's international standing, safeguarding common values and sovereignty, as well as steering societies toward a dynamic, sustainable, and inclusive future.

To compete with other global economies, Europe will require substantial investments to foster sustainable growth, support a balanced green transition, drive digital transformation, and reinforce economic security and defence efforts. These investments exceed the capacity of the public sector and must be met by the private sector, combining bank and capital market financing.

This calls for strong, diverse banks capable of serving both pan-European and local projects. The 2023 report

by the high-level Group on the future of Cohesion Policy indicates that over 60 million EU citizens live in regions with lower GDP per capita than in 2000, and 75 million live in regions with stagnating growth. Nearly a third of the EU population lives in areas that have fallen behind economically over the last two decades. Alongside pan-European banking champions, strong local and regional banks are essential to meet the needs of these communities.

The cooperative banking sector is committed to being part of the solutions to these challenges. Cooperative banks strengthen Europe's regional economies, enhance financial and capital markets, support strategic autonomy, and contribute to financing Europe's sustainable and digital objectives. As key players in the EU Social Economy Action Plan, cooperative banks wish to highlight several crucial issues.

1. A regulatory environment supportive of the cooperative business model

The positive impact of the cooperative banking model – its governance, local presence, internal safeguards, and solidarity mechanisms – is often underestimated. Despite their proven track record in mitigating risks and promoting financial stability, regulators often push cooperative groups to centralise. However, their success lies in decentralisation. Cooperative banks have created competitive group structures that distribute tasks between central bodies, common service providers, and local/regional banks.

Diversity in business and governance models enhances stability through better risk diversification and offers consumers more choices. Regulation that pushes towards a single banking model harms diversity, undermines competition, and threatens financial stability. The local presence of cooperative banks, especially in underbanked areas, prevents financial exclusion and fosters social cohesion, contributing to broader social stability.

The regulatory framework should take care not to inadvertently disrupt the cooperative business model but rather recognise the values that cooperative institutions carry and allow them to operate accordingly.

2. The need for simplification and a more holistic approach towards financial regulation

With their diligent implementation of the regulatory framework, their work on standardisation of business processes, their innovation capacity and their ambitions to support the green transition, cooperative banks have contributed significantly to the integration of European markets. However, we believe that the regulatory framework has reached a stage that requires reflection before pushing further.

Over the past 15 years, regulation has constantly increased, becoming more detailed and more invasive. While intended to ensure stability, security, and innovation, regulation has become overly risk-averse, prescriptive, and burdensome, limiting commercial freedom and innovation. With regulation being developed in silos, the combined impact on the market is overlooked. The EACB supports the Commission's initiative to simplify the regulatory framework over the next 5 years. It would, however, ask that a specific simplification exercise be undertaken with respect to the regulatory framework for financial services. When considering simplification of the legislative framework that is applicable to financial services, the following needs to be considered:

- Start with a review of legislative proposals still under consideration.
- When it comes to regulation already implemented, start with a review of the sustainable finance framework.
- More generally, look at reducing the amount of level 2 measures and be sure – when developing legislation – to measure not just the impact of a particular regulatory element but also that of other requirements addressing the same stakeholders.

3. How to progress with the Savings and Investment Union

The Capital Markets Union (CMU) has been central to the EU's strategy to enhance cross-border capital flows and deepen financial market integration since 2015. European capital markets, however, develop much slower than those in other world economies. A revision of the CMU objectives and targets is urgently needed to revitalise Europe's capital markets. Cooperative banks are therefore receptive to current reflections on the design of a comprehensive "Savings and Investment Union" (SIU) aimed at attracting investments, strengthening market competitiveness, and empowering citizens and local economies to promote the participation of retail investors.

Cooperative banks can contribute to SIU objectives by leveraging their strength as financiers of the real economy and SMEs and their access to retail customers, also counting on their strong solvency position. In this context, a review of the EU's securitisation framework and the way equity financing is weighted for prudential purposes would be supported. At the same time, a streamlining of requirements is needed when it comes to the intricate overlaps between micro and macroprudential tools, and any double counting of risk should be avoided to ensure more efficient use of capital.

Turning retail customers into retail investors, on the other hand, requires lowering barriers to investment. These are to be found in an overly complex disclosure framework, the cost of investment advice (where charged separately) and the need for investment education.

4. Cooperative banks in a digitalised world

In the last 15 years, the financial services landscape has dramatically shifted, with non-European financial and digital players gaining market power. These players often focus on short-term profits, targeting lucrative European customers or assets abroad. In contrast, cooperative banks prioritise the long-term financial wellbeing of Europeans, counteracting this trend while maintaining human connections amidst sweeping digitalisation.

However, cooperative banks face challenges from legislative proposals that limit their ability to offer services at fair prices, pushing them into a utility provider role and weakening their competitiveness. To overcome these obstacles, cooperative banks would like to see regulators taking a more hands-off approach, acting as facilitators enabling the development of sovereign pan-European solution building, for instance, on the instant payment framework. The disruptive and counterproductive effects of public sector solutions, such as the digital euro, should be carefully considered.

Finally, it is important to recognise that as digitalisation grows, so does the complexity of the financial value chain and the risk of emerging fraud. A comprehensive fraud prevention approach involving public-private partnerships, information sharing and the involvement of all ecosystem actors is crucial, alongside efforts to mitigate the constraints of GDPR and national data protection laws.



THE COOPERATIVE DIFFERENCE

Cooperative banks are important contributors to growth for Europe's economies, supporting the prosperity of businesses and citizen wellbeing. They are an integral part of regions and communities and thereby a key component of a diverse, rich financial services sector.

This makes cooperative banks an important financial actor for Europe and Europeans. They provide banking services to 227 million people and account for nearly 20% of retail banking services in Europe.

Many of Europe's best known and most trusted banking brands are cooperatives. They are the main credit providers to households in terms of mortgages and consumer loans and are also some of the largest lenders to SMEs, where they provide a third of total financing.

WHAT MAKES THE COOPERATIVE BANKING MODEL DIFFERENT?

Member ownership:

Cooperatives unite behind a core purpose to act as customer champions, anchored in their member ownership. This unique and defining feature of cooperatives is at the centre of their strategic thinking and operational delivery, and benefits customers.

Cooperative banks deliver a high level of customer service and a long-term view of the client relationship. Combined with their typically dense branch networks and regional or local structure, this results in higher perceived proximity and trust from customers.

Maximisation of member benefit/surplus within a long-term relationship:

Cooperative banks are owned by their members, who are also their customers, including households, local entrepreneurs, craftsmen and farmers.

The principal purpose of cooperative banks is to deliver value to their members/customers by providing the highest quality products at the best prices. There are 90 million members of European cooperative banks, representing 1 in 5 European Union citizens.¹

Cooperative banks prioritise customer service and long-term stability ahead of maximising short-term profits; they are strongly anchored in their communities and good corporate citizens, and members participate in governance.

"One person - one vote" democratic governance, with a bottom-up approach:

In contrast to other types of banks, customers and members are systematically represented in the

governance structures of cooperative banks and play an important role in the governance processes of the bank (i.e. membership councils, general assemblies, etc.).

Cooperative banks abide by the seven international cooperative [principles](#), which enshrine the values of the cooperative movement. In a market where trust is generally low, cooperative banks provide an alternative to other types of banks by consistently focusing on the needs of customers rather than shareholders.

Resilience:

Cooperatives accumulate capital through retained earnings as a result of their ownership and capital structure. This contributes to mitigating risk by creating reserves in good times and maintaining a substantial safety buffer in leaner periods.

Cooperatives consistently represent some of the better capitalised financial institutions in Europe. The capital base can be considered as an inter-generational benefit that has been passed from member to member over many decades of trading.

Strong commitment to social values:

Cooperative banks have a long tradition of commitment to social values and solidarity. They were originally created in the 19th century in Europe to fight against the financial exclusion of social groups and alleviate the plight of rural populations and craftsmen. Because they are focused on the people and places they serve, cooperative banks make a positive contribution to wider society.

¹ One in five inhabitants of the 13 countries in the assessment conducted by the University of Tilburg and the EACB. Link: [The performance of European cooperative banks in 2022 - a snapshot](#)

Many cooperative banks are locally based and have a particular focus on and expertise in the local community. This reduces powerful centralising tendencies in the financial system. Cooperative banks play a special role in fostering local and regional development.

They fulfil a vital economic role by providing access to finance to customers in regions which would typically not be served by other players in the credit sector due to decisions based on profitability criteria alone.

Many cooperative banks have reinforced their “community role” by continuing to lend to their members and local businesses when certain shareholder banks have tended to withdraw from depressed markets in order to deleverage or re-allocate resources elsewhere. This has provided a lifeline to many areas, especially outside major cities.

Cooperative banks are also consistent and strong supporters of cultural and sporting events that are important to their communities.

Connected to customers and regional society:

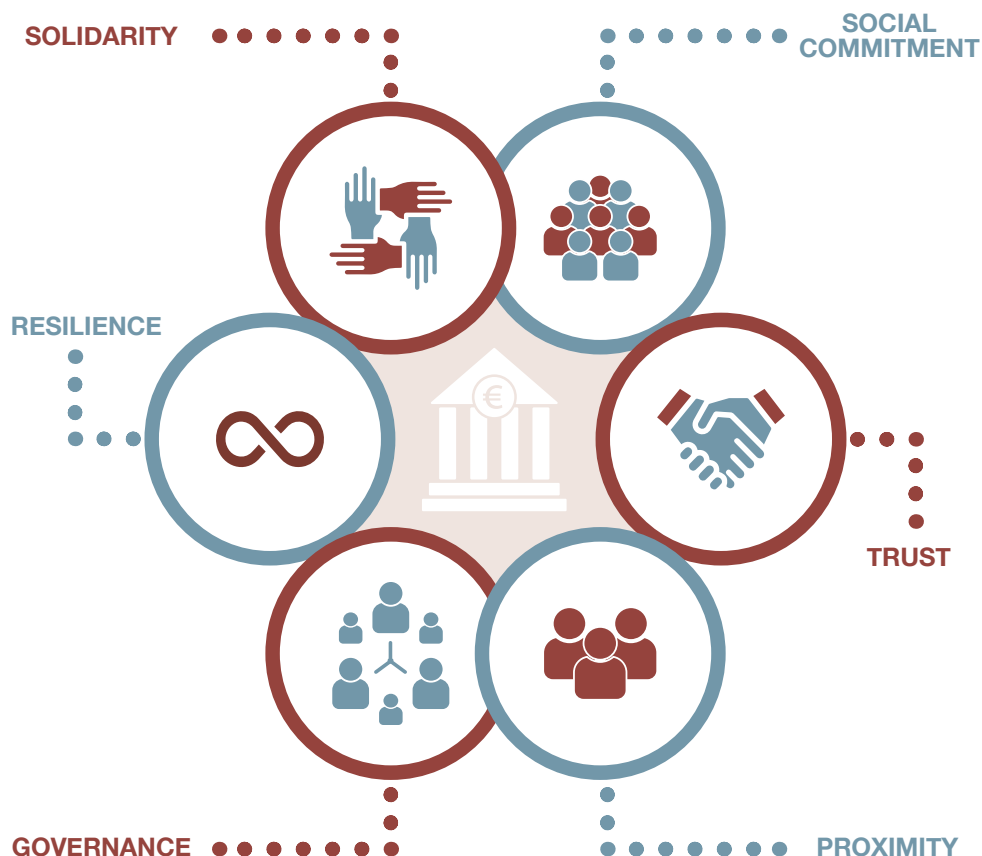
Cooperative banks contribute positively to the strength of regional economies. They are some of the main taxpayers in their local areas and are often the largest local corporate lenders. On average they represent a one third market share in SME financing.

In France, Germany and the Netherlands, cooperative banks’ market share in loans to SMEs ranges between 30% and 70%.

Cooperative banks operate 46,500 local branches with a dense presence in rural areas. Many have strong ties to agricultural industries, having grown out of farming and fishing cooperative movements, and are therefore specialised in these types of financing.

In addition, they provide substantial support for local activities through the cooperative dividend, which allocates significant resources to their stakeholders.

WHAT MAKES THE COOPERATIVE BANKING MODEL DIFFERENT?



ACTIVITIES OF EACB WORKING GROUPS

COOPERATIVE BANKS IN THE SINGLE MARKET

BANKING REGULATION

EACB policy messages

- 1 In 2024, competitiveness and growth rose to the forefront of the political agenda in Europe. To enable Europe to grow, a smart new policy approach is needed where banks are positioned as facilitators in financing the economy, while preserving financial stability.
- 2 Implementation of the technical elements of the Basel reforms in the EU will ensure that level 2 regulatory products can be implemented in a pragmatic manner, avoid gold-plating, take into account adequate timelines, and preserve the overall balance of the primary legislation. For 2025 the EACB encourages the Commission to look closely at the suggestions made by the EACB.
- 3 Cooperative banks play a key role as a stabilising force for the European banking market and it is key for Europe to ensure a global level playing field between banks and other entities.

“ Statement from Mike VELTHAAK,
Chairman of the EACB Working Group & Advisor to
the Board, Rabobank

In addition to being marked by significant geopolitical developments and the inauguration of a new European Commission, 2024 also commemorates the 10th anniversary of Single European Banking Supervision (SSM) and the final implementation of Basel rules into EU legislation. As competition and economic growth become central to the political agenda, this period presents an opportunity for banks to position themselves as key facilitators of economic financing, addressing areas where Europe lags behind. This can be achieved while maintaining financial stability and simplifying the increasingly complex banking regulatory framework.

Encourage banks to finance European competitiveness while preserving financial stability

Banks play a crucial role in the EU economy by providing a safe place for consumers to store their money. Additionally, European banks finance approximately 70% of the EU economy, with the remaining portion funded by capital markets. Although the new European Commission will encourage Europeans to save less and invest more through the Savings and Investment Union, we should recognise that this transition will require significant effort and time. Meanwhile, banks must continue to ensure safety for consumers while also facilitating economic competitiveness by lending to the European economy. Balancing these dual roles of safety and lending, taking into account the current prudential framework, will be a key topic of discussion between the EACB and the European Commission in 2025.

Focus on CRR3-CRD6 implementation

The revised CRR3-CRD6 framework became law in June 2024, entering into force as of January 2025, with several transitional mechanisms in place. Our Banking Regulation Working Group engaged with policymakers multiple times in 2024 to discuss the wave of regulatory mandates to be delivered as of 2025 and subsequent years. These products range from revised supervisory reporting and disclosure frameworks, to critical elements for the operationalisation of the new credit, operational, and market risk requirements. We stressed the importance of preserving the spirit of the level 1 regulation and avoiding any gold-plating.

Among others aspects, we advocated for pragmatic solutions in the area of [reporting](#) and [Pillar 3](#) obligations, considering both the transitional arrangements in place and the generally tight timeline before requirements go live. We also engaged on the development of the upcoming [Pillar 3 Data Hub](#) (P3DH), which will represent a major novelty in the way public disclosures reach the market.

It was also key to argue for solutions that reflect the economic reality of transactions when addressing [equity investments](#), [ADC exposures to residential property](#) and the treatment of [off-balance sheet items and Unconditionally Cancellable Commitments](#) – that represent a key financing tool for many customers – as well as the composition of the [Business Indicator](#) to calculate the operational risk charge. When it comes to the expectations substantiating the [CRD requirements on environmental risks](#), banks should be allowed to progress on their learning curve, before setting out the implications in terms of SREP process and supervisory actions.

Walking the implementation path also meant participating in technical EBA roundtables on issues like the interaction of Pillar 2 Requirements with the Output Floor, prudential consolidation and the P3DH for smaller institutions. Work on the mandates will remain central to working group efforts in the coming months.

Work to implement the banking package will continue to be one of the key topics in 2025, and should be carried out bearing in mind the issue of a level playing field, as mentioned above and in line with recent statements made by European leaders. In this approach, promoting the continuation of the main

transitional measures of CRR3 (notably on the financing of residential real estate and unrated companies) will be a key issue.

Supervision, horizontal efforts, and international developments

Our longstanding bilateral and industry engagement with supervisors continued steadily, taking part in the dialogue with the ECB on the SREP cycle, stress test, and on issues such as risk data aggregation. In the same vein, we engaged with the EBA on issues like the draft methodology for the 2025 stress test.

In a horizontal effort with other EACB Working Groups, we worked on mandates under the [Digital Operational Resilience Act \(DORA\)](#) and for the review of the EU securitisation framework. The latter is the first action under the banner of the Savings and Investments Union to relaunch and deepen EU capital markets.

Looking at international developments, we closely followed the Basel Committee's activities. We [responded](#) to the recalibration of shocks for interest rate risk in the banking book (IRRBB), arguing for realistic technical adjustments. IRRBB is a major theme for cooperative banks and remains under further scrutiny both in the EU and at a global level as a follow-up to 2023 market turmoil; we expect discussions on the topic to continue in the coming year. We also provided detailed input on issues related to the [identification of G-SIBs](#) as well as principles for the [sound management of third-party risk](#).

Looking ahead, we will continue to argue for a regulatory framework that is fit for purpose, pragmatic and streamlined as new regulatory projects materialise.



04/12/2024	<u>EACB comments on European Commission's consultation on review of the EU securitization framework</u>
09/11/2024	<u>EACB comments on EBA Draft ITS on IT solutions for public disclosures by institutions, other than small and non-complex institutions</u>
07/10/2024	<u>EACB comments on the Basel Committee's Consultative Document on Principles for the sound management of third-party risk</u>
17/09/2024	<u>EACB comments on EBA Draft 2025 Stress test methodology and templates</u>
07/08/2024	<u>EACB comments on EBA Draft Guidelines on ADC exposures to residential property under CRR3</u>
07/06/2024	<u>EACB comments on the Basel Committee's revised assessment framework for Global systemically important banks</u>
04/06/2024	<u>EACB comments on the EBA draft RTS on off-balance sheet items and UCC considerations</u>
21/05/2024	<u>EACB comments on the EBA draft technical standards determining the Business Indicator under the new Operational Risk framework</u>
18/04/2024	<u>EACB comments on EBA Draft Guidelines on the management of ESG risks</u>
27/03/2024	<u>EACB comments on EBA Discussion Paper Pillar 3 Data Hub Processes and Possible Practical Implications</u>
27/03/2024	<u>EACB comments on the Basel Committee's recalibration of shocks for interest rate risk in the banking book</u>
14/03/2024	<u>EACB comments on the EBA draft ITS on Pillar 3 disclosures (CRR3)</u>
14/03/2024	<u>EACB comments on the EBA draft ITS on supervisory reporting concerning output floor, credit risk, market risk and leverage ratio</u>
12/03/2024	<u>EACB comments on the second set of ESAs technical standards and Guidelines under DORA</u>

RECOVERY, RESOLUTION AND DEPOSIT PROTECTION

EACB policy messages

- 1 Revisions to the crisis management and deposit protection framework went well beyond focused and targeted technical adjustments. The profound changes under negotiation could weaken deposit guarantee schemes and would make the resolution framework more bureaucratic, costly and burdensome for institutions. Furthermore, the ability of contractual cooperative solidarity mechanisms to perform preventive measures could be affected. Revision of the crisis management and deposit protection framework should instead safeguard and reinforce customer trust in the stability and resilience of EU banks, and remain pragmatic and effective.
- 2 When making resolvability operational, authorities must remain mindful of legal specificities and organisational arrangements of cooperative banks. There can be no one-size-fits-all model for recovery and resolution; preserving the diversity of business models on the European banking landscape is essential.
- 3 Operational requirements in the area of reporting and MREL calibration should recognise the progress made in achieving resolvability. It is key to set clear expectations, avoid duplications and calibrate requirements in a way that is mindful of options available to banks.

“ Statement from Johannes REHULKA,
Chairman of the EACB Working Group & Managing
Director, Association of Austrian Raiffeisenbanks,
RBI

Discussions on the resolution toolbox and deposit protection took centre stage in 2024, also on the trail of the debate that stemmed from the 2023 market turmoil.

The work of the Recovery, Resolution and Deposit Protection Working Group was dominated by negotiations surrounding the legislative package for the review of the Crisis Management and Deposit Insurance (CMDI) framework. We continued to assess and communicate around the implications that the proposals would have from the perspective of different legal systems and organisational structures.

The need to refocus the CMDI negotiations

In a thorough assessment of the co-legislators' position and their potential implications for cooperative banks, we noticed that several elements remain concerning and difficult to reconcile with the original objective of streamlining the framework. Rather, interventions on the creditor hierarchy, the bridge the gap solutions envisaged and certain aspects of the public interest

assessment (including the definition of the regional dimension) would expand the costs for banks and deposit guarantee schemes, potentially affecting customer trust and market dynamics.

We proceed in our intensive efforts to establish an EACB position in view of the Trilogue negotiations, with a view to consolidating and promoting the diverse priorities of members in the comprehensive package of measures.

We also communicated our concerns to co-legislators about progressing on a common EDIS in this phase: with the CMDI negotiations still open, carefully assessing the impact and implications that this additional layer would have appears unrealistic.

It will also be key to remain engaged and vigilant to align the outcome of the review with the broad objective of relaunching competitiveness.

Dialogue with the Single Resolution Board and the EBA resolution mandates

We also continued our technical dialogue with the SRB, exchanging views in particular on the new cycle of reporting for liquidity in resolution. This joint SRB-ECB exercise remains of primary importance for supervisors, and we reaffirmed the need for expectations and

reporting requests that are clear, fit for purpose, and workable in practice, also from a timing perspective. In light of the SRB's efforts to move towards the operationalisation of resolution, we addressed the consultation on the future of the MREL policy, underlining that while no fundamental overhaul appears necessary, it would be appropriate to review the MREL calibration to take into account the progress made with resolution planning in recent years, the establishment and financing of the SRF, and the potential use of transfer strategies.

From the standpoint of level 2 regulatory developments, in a horizontal effort with other EACB Working Groups, we addressed relevant technical standards under the Digital Operational Resilience Act (DORA), focusing in particular on [subcontracting ICT services](#) when it comes to critical functions.

We also established detailed comments on the EBA draft technical standard dedicated to the provision of [information for the purposes of resolution plans](#) under BRRD. We welcomed the EBA's efforts to perform a comprehensive review in order to foster further harmonisation, build on good practices and address shortcomings identified in the current framework. We also supported the aim to relieve entities from parallel data collections, and from duplications and overlapping data points. However, the draft ITS does not seem fully aligned with the stated aims as it suffers from a certain ambiguity around the resolution authority's discretion in determining the scope of reporting. This is detrimental to IT efficiency and data planning and counters the idea of improving overall harmonisation and efficiency.

Our efforts for a resolution framework and operational requirements that are mindful of legal specificities, market diversity, and effective arrangements will continue in 2025.

EACB position papers



- 29/10/2024** | [EACB comments on EBA draft ITS on the provision of information for the purposes of resolution plans](#)
- 12/03/2024** | [EACB comments on the ESAs draft RTS on subcontracting ICT services supporting critical or important functions](#)
- 09/02/2024** | EACB comments on the SRB Public consultation on the future of MREL policy

CORPORATE GOVERNANCE AND COMPANY LAW

EACB policy messages

- 1 The EU supervisory approach should not only allow, but protect specific governance frameworks such as those of cooperative banks, which have proven to be resilient, stable and inclusive. A one-size-fits-all approach will in the long term erase diversity in the EU financial sphere, hindering stability as well as the democratic principle. Robust oversight should not equate undue interference.
- 2 Policymakers should strive to streamline the regulatory framework and work to make it more stable and efficient, rather than resorting to regulatory and normative inflation. The multiplication of parallel and sometimes contradictory requirements, and their often uncertain character, creates undue complexity, legal risks and unnecessary red tape, which ultimately harms the competitiveness of EU players.
- 3 Cooperative banks are deeply committed to supporting a sustainable and inclusive economy. To better accompany the economy in this way, any new due diligence requirements imposed on banks in addition to the wide array of existing safeguards should be practicable, clearly defined and proportionate.

“ **Statement from Elisabeth DELAHOUSSE,**
Chairwoman of the EACB Working Group & Head of
EU Affairs, Fédération Nationale du Crédit Agricole

Throughout the year, the Corporate Governance Working Group (CGWG) has been actively addressing critical topics within internal corporate governance and financial regulation. Our contributions have spanned legislative reviews, advocacy efforts, and strategic consultations, ensuring that cooperative banks' unique perspectives are effectively represented in ongoing policy discussions.

One of our key focuses has been the **Corporate Sustainability Due Diligence Directive**. During the Trilogue discussions, we closely monitored developments and successfully advocated for the exclusion, as for other sectors, of financial institutions' downstream activities from the Directive's scope. This outcome aligns with our goal of ensuring that the regulation reflects the practicalities and limitations of the financial sector while advancing due diligence objectives. The CGWG will now monitor calls for evidence and consultations regarding the possible future inclusion of financial services within the scope of the Directive, similarly to the **Deforestation Regulation**. The omnibus directive for simplification should be a useful tool to reconsider the need for a

potential revision of the directive.

In parallel, we monitored the next steps following the review of the **Capital Requirements Directive** and in particular the implementation of the numerous EBA mandates deriving from CRD6, informing members of EBA publications and holding online exchanges in preparation for incoming workstreams.

The working group also engaged with the EBA on the topic of **variable remuneration**, as the EBA is preparing a report on the application of waivers under Article 94 CRD. After an online exchange between the EBA and EACB member experts, we shared a letter to the EBA in April recounting our main concerns and takeaways. The EACB emphasised the importance of adjusting the remuneration threshold to reflect inflation, and underlined the negative effects of bank competitiveness in recruiting talent (e.g. human resources, IT teams), as companies in different sectors of the economy are not burdened by the same variable remuneration requirements. Additionally, we highlighted the challenges cooperative banks may face with remuneration via shares or instruments, which can lack relevance in a cooperative remuneration system.

Another significant area of focus has been the **ECB's draft guide on governance and risk culture**. The working group provided comprehensive feedback

to the ECB in response to its consultation on the draft guide, highlighting the cooperative difference and the potential harm that could arise out of additional requirements by the ECB on top of CRD obligations, the supervisory treatment of cooperative banks, under the draft guide as it currently stands. A high-level letter will be sent in this regard to the ECB and Commission, in view of holding bilateral exchanges.

Finally, CGWG members contributed to the **“Less is more”** report to simplify and improve European rulemaking in the financial services sector. This report,

proposed by an ad hoc expert group of professors, lawyers and bank experts from numerous Member States and organisations, has been completed thanks to a dedicated EACB Expert Group, which provided valuable feedback and examples. The report, which addresses in particular Level 2 and 3 normative inflation and shifts and proposes solutions for a better institutional balance, is finalised. With a foreword by J. de Larosière, it is supported by all the European banking associations (EBIC), the European Forum of Securities Association (EFSA) and the European Society for Banking and Financial law (ESBFL/AEDBF).

EACB position papers



21/10/2024 | [EACB comments on the ECB draft Guide on governance and risk culture](#)

11/09/2024 | [EACB comments on the first set of ESAs technical standards under the Digital Operational Resilience Act \(DORA\)](#)



COOPERATIVE ID FORUM

EACB policy messages

- 1 Cooperative banks are vital to Europe's banking diversity, operating a different, community-focused business model developed to address market failures. Their different governance and portfolio structure can offer broader systemic advantages, with the potential to reduce overall systemic risk. Policymakers must understand cooperative banks' unique governance, capital, and liquidity framework to support their contributions effectively.
- 2 Strongly committed to funding SMEs – 99% of all EU businesses, employing almost two thirds of the EU workforce – cooperative banks drive regional economic development and ensure fair access to credit for local businesses. Adequate SME financing will be critical for addressing future challenges like climate change and digitalisation. A diverse banking landscape that allows both big European champions and strong regional champions to develop is essential for sustaining this role.
- 3 As key actors in the social economy, cooperative banks provide multiple benefits to members, regions and society as a whole. The flexibility of the Corporate Sustainability Reporting Directive (CfRD) should be used to give more visibility to their unique social impact and the cooperative business model's specific benefits.

“ Statement from Hans Groeneveld,

Chairman of the EACB Working Group & Director International Cooperative Affairs at Rabobank and endowed Professor Financial Services Cooperatives at Tilburg School

The Cooperative ID Forum concluded another year of dedicated effort, actively monitoring and discussing developments related to cooperatives, including their identity, governance, and business models. Throughout the year, it provided cross-cutting support to EACB working groups and the secretariat, advocating for cooperative values and identity.

Campaigning for Market Diversity “Strengthening the recognition of the business model of cooperative banks”

In the context of the joint EACB-Mutuo project to create a convincing narrative in favour of cooperative banking, the forum worked to update and expand the supporting “proof points” for these statements of value, including on tax aspects and employment.

Studies on Cooperative Banking

During its July meeting, the forum discussed options for new studies on cooperative banking, such as member involvement processes, cooperative banks

as taxpayers or performance indicators/relevant key figures for cooperative banks.

Apropos Coop Banking: “Banking, Crises, and Cooperative Banks”, 17 July 2024

On the margins of the 2024 International Day of Cooperatives on 6 July, the EACB hosted a webinar on the crucial role of cooperative banks in addressing crises and fostering stability and growth. The event centred on the book “Of Banks and Crises” by Cristina Peicuti, ESCP Business School/economist at BPCE, and Jacques Beyssade, General Secretary of Groupe BPCE, which examines the impact of financial crises, tracing the evolution of banking and its reinvention through customer-focused cooperative banks.

Experts and industry leaders, including Edouardo Rulli, Policy Officer at the European Commission, Małgorzata Iwanicz-Drozdowska, Professor at the Warsaw School of Economics and CEO at KZBS, David Murano, Deputy CEO and CRO of Caja Ingenieros, and Jacques Beyssade, further delved into the book's themes, touching upon the impact of crises on regulation, the role of cooperative banks, and challenges like the green transition.

Reflecting the Cooperative Business Model in CSR Reporting

In its meeting in July 2024 in Paris, the forum took

note of an assessment of European Sustainability Reporting Standards (ESRS) indicators, which could become relevant for cooperative banks. While ESRS include a wide range of disclosure requirements, their scope remains very limited when it comes to capturing cooperative banks' unique value. The forum, together with the Sustainability Report Working Group and the secretariat, aim to identify and propose "new" potential indicators that better reflect the value added by cooperative banks, with discussions planned for the forum's spring 2025 meeting.

Collaboration with European cooperative bodies

In the context of its engagement in Cooperatives Europe, the regional body of the International Cooperative Alliance (ICA), the EACB participated in a joint event at the European Parliament on 5 November 2024. Organised by Cooperatives Europe and CECOP and supported by the EACB, Eurocoop, REScoop, and COPA-COGECA, the event theme, "Cooperative Vision for a Sustainable and Competitive Europe: Priorities for the 2024-2029 Term", presented a united cooperative stance to newly elected Members of the European Parliament. It underscored cooperatives' contributions to Europe's future and emphasised safeguarding their identity and benefits in upcoming legislation. In a panel with MEP Herbert Dorfmann and MEP Stefano Bonaccini, the EACB presented a number of its key priorities for the next term.

ACCOUNTING AND AUDIT

EACB policy messages

- 1 Preserving the accounting recognition of cooperative members' shares and certificates as equity, as established under IFRIC 2, is crucial for cooperative banks as this is the basis for their recognition as Tier 1 capital under the Basel Accords. Any uncertainty or changes in this classification could significantly impact the financial stability and regulatory compliance of cooperative banks.
- 2 The "IFRS-light" accounting regime for SMEs should not impose additional reporting or administrative burdens on smaller companies, diverting resources from their core operations. The framework should be strictly voluntary, refrain from requiring the submission of sensitive or confidential company data, and carefully consider specific national elements such as taxation obligations.
- 3 The new tax framework for financial services should prioritise modernisation and harmonisation of VAT rules for financial services, ensuring legal certainty and reducing administrative costs. Maintaining the current VAT exemption for financial services, establishing clear mandatory rules for VAT grouping in every Member State and enabling cost-sharing group arrangements should be the priorities.

“ Statement from Volker HEEGEMANN, Acting Chairman of the EACB working group & Head of the Legal Department, EACB

At the beginning of 2024, the AAWG focused on the International Accounting Standards Board's (IASB) exposure draft on Financial Instruments with Characteristics of Equity (FICE). We emphasised how maintaining the full recognition of cooperative members' shares and certificates as equity instruments under IFRS is fundamental for the cooperative banking sector, as it underpins their recognition as Tier 1 capital under the Basel Accords. Any changes that could affect the IFRIC 2 interpretation might have significant consequences for cooperative banks, affecting their financial stability and regulatory compliance.

While we were glad to see that the IASB clarified that the proposed amendments align with IFRIC 2 principles, the EACB advocated for explicitly referencing IFRIC 2 in a revised IAS 32 to ensure

consistency and clarity. The working group submitted a position paper to the IASB and also provided detailed input for the EFRAG's comment letter to the IASB. Given the critical importance of this issue, the working group will continue to emphasise the need to prevent any uncertainty regarding the classification of member shares as equity.

During the second quarter of 2024, the working group engaged with the European Commission's DG FISMA on its initiative to harmonise accounting frameworks for SMEs to facilitate investment, streamline communication, and improve access to finance. The initiative proposes additional voluntary reporting for SMEs and the collection of key performance indicators for submission to the European Single Access Point (ESAP). We underlined how the initiative should only use existing data to avoid administrative burdens and should not request sensitive or confidential information. Potential challenges such as language barriers and differences in presentation due to national elements like taxation were also highlighted.



SUSTAINABLE REPORTING AND AUDIT

EACB policy messages

- 1 The primary goal of the forthcoming banking sector-specific standard should be increasing comparability and providing harmonised information within the sector. For EACB it is key that the standard is tailored to cooperative sector specificities and made practical and relevant for cooperative banks' sustainability reporting efforts.
- 2 To promote widespread adoption among non-listed SMEs – a vital part of bank value chains – a simplified and pragmatic voluntary sustainability reporting standard for SMEs is key. An overly complex standard risks low uptake, which would hinder the quality of value chain data for banks. It is crucial that the comprehensive module remains optional and is not mandated alongside the basic module, minimising administrative burdens on SMEs.
- 3 Setting realistic expectations for the first ESRS reporting cycle is crucial, as the initial sustainability reports will create a new level playing field within the banking sector. Banks should be able to focus on building robust reporting frameworks without the immediate pressure of full compliance.

“ Statement from Volker HARTKE,

Chairman of the EACB Working Group & Head of Sustainability Services - Audit, Genossenschaftsverband - Verband der Regionen e.V.:

This year marked a significant milestone with the first-time application of sector-agnostic European Sustainability Reporting Standards (ESRS) under the Corporate Sustainability Reporting Directive (CSRD). As banks prepared their sustainability reports, the SRAWG provided a platform to exchange insights on practical implementation challenges. Roundtables were held to discuss the outcomes of double materiality assessments and value chain analyses, among others. EACB also responded to EFRAG's consultation on materiality assessment and value chain guidance.

To convey member concerns regarding the first sustainability reports, SRAWG met with the European Commission's DG FISMA. A key issue is the lack of bank-specific guidance within the ESRS framework, as sector-agnostic standards contain data points that are not well suited to banking. EACB emphasised the importance of managing expectations for the first reporting cycle and recommended issuing a statement clarifying that no enforcement actions will be imposed during this reporting period.

Developing the draft ESRS for listed SMEs and small non-complex institutions (SNCIs) was a major focus in 2024. We responded to EFRAG's consultation on the LSME ESRS, advocating for the standard to be practical and feasible for SNCIs. Since many SNCIs are non-listed and do not have to report on SFDR PAIs, we argued against making these requirements mandatory in the LSME standard. Through a series of technical meetings with EFRAG and the European Commission, we succeeded in clarifying that SNCIs with immaterial subsidiaries not preparing consolidated financial reports should not be required to prepare consolidated sustainability reports.

Throughout the year, we closely followed the development of the VSME ESRS, a voluntary standard for non-listed SMEs and micro undertakings, the importance of which is crucial for larger banks as these SMEs are part of bank value chains. If the VSME standard is too complex, SMEs may not adopt it widely. We advocate for keeping the VSME simple to reduce the administrative burden of SMEs and stress that the comprehensive module should not be mandated in addition to the basic module.

In the second half of 2024, we focused on EFRAG's work to develop sector-specific ESRS for banks. Anticipating the significant impact of this workstream, we initiated meetings with Members of EFRAG's Banking Advisory Panel to contribute directly to the

development of banking sector-specific ESRS and value chain guidance. This engagement allows us to influence the ESRS drafting process from its inception and tailor the sectoral standard to cooperative banks' needs.

Finally, a joint EACB-ESBG-EBF expert group was formed to support the EFRAG Sustainability Reporting Board member representing the banking industry.

Regular exchanges ensured the banking industry's views were consistently represented in discussions with EFRAG, and cooperative bank perspectives were communicated.

Closely following and contributing to the development of bank sectoral ESRS will be a main area of SRAWG work in 2025.

EACB position papers



- 15/07/2024** | [EACB comments on the CEAOB consultation on draft non-binding guidelines on limited assurance on sustainability reporting](#)
- 21/05/2024** | [EACB comments on the EFRAG public consultation on Exposure Draft ESRS for listed SMEs \(LSME ESRS\)](#)
- 31/01/2024** | [EACB comments on the EFRAG draft Materiality Assessment Implementation Guidance \(IG 1\) and Value Chain Implementation Guidance \(IG 2\)](#)



TAXATION

EACB policy messages

- 1 Preserving the accounting recognition of cooperative members' shares and certificates as equity, as established under IFRIC 2, is crucial for cooperative banks as this is the basis for their recognition as Tier 1 capital under the Basel Accords. Any uncertainty or changes in this classification could significantly impact the financial stability and regulatory compliance of cooperative banks.
- 2 The "IFRS-light" accounting regime for SMEs should not impose additional reporting or administrative burdens on smaller companies, diverting resources from their core operations. The framework should be strictly voluntary, refrain from requiring the submission of sensitive or confidential company data, and carefully consider specific national elements such as taxation obligations.
- 3 The new tax framework for financial services should prioritise modernisation and harmonisation of VAT rules for financial services, ensuring legal certainty and reducing administrative costs. Maintaining the current VAT exemption for financial services, establishing clear mandatory rules for VAT grouping in every Member State and enabling cost-sharing group arrangements should be the priorities.

“ Statement from Volker HEEGEMANN, Acting Chairman of the EACB Working Group & Head of the Legal Department, EACB

In early 2024, the TaxWG discussed and developed feedback on the Business in Europe: Framework for Income Taxation (BEFIT) proposal, advocating for straightforward and fair EU corporate tax rules, a reduction in the compliance burden caused by multiple accounting requirements like BEFIT, Pillar 2, and transfer pricing, and calling for necessary legislative clarifications. The working group welcomed the amendment in the EP report, proposing the delayed introduction of BEFIT, potentially in 2030, to give

companies more time for effective implementation. In the second half of 2024, the working group engaged with the consultancy firm contracted by the European Commission to conduct a study evaluating the current VAT system for financial and insurance services, as well as the broader regulatory and tax environment. The working group participated in a scoping interview to share preliminary insights on the study, focusing on the VAT regime for financial and insurance services, the use of VAT groups and cost-sharing arrangements, the scope and application of the option to tax in certain Member States, and banking sector taxes other than VAT. Engagement on this important topic will continue in 2025, including through the Commission's public consultation expected next year.

EACB position papers



24/01/2024

[EACB comments on the European Commission's proposal for a Directive on Business in Europe: Framework for income Taxation \(BEFIT\)](#)



GREEN AND SUSTAINABLE FINANCE

EACB policy messages

- ① Cooperative banks are key players when it comes to driving the real economy's transition toward more sustainable practices. In our relations with SMEs and retail clients, we need to rely on requirements that are proportionate and actionable on the ground.
- ② As the EU's sustainable finance framework is beginning to deliver results, work should continue to streamline its different components and ensure they are all decision-useful and consistent with one another. This will help make the requirements less complex and thus enhance their uptake by market players. Sustainability and banking regulations (e.g. capital requirements, consumer credit) should also be assessed so that they both support transition financing.
- ③ EU cooperative banks are already financing ESG transition in their respective communities. While regulation can help build comparable standards and data flows, it is important that banks retain control over their business and commercial practices.

“ Statement from Noémie Francheterre, Group Sustainability Division, Crédit Agricole SA

The SF working group has been actively engaged in a series of diverse initiatives aimed at advancing key objectives across regulatory, sustainability, and strategic workstreams. These efforts reflect a collaborative and knowledge-sharing approach to addressing complex challenges and contributing to critical industry developments.

The SFWG, in cooperation with the CGWG, actively contributed to the development of the Corporate Sustainability Due Diligence Directive, providing feedback to the co-legislators on the treatment of financial services until the official adoption of the Directive. Now work will focus on guidelines and consultations, particularly with respect to the potential inclusion of the downstream chain of financial services.

Throughout the year, we were involved in numerous discussions and consultations regarding the upcoming review of the Sustainable Finance Disclosure Regulation, exchanging with and providing written feedback to the Platform on Sustainable Finance and the Fit for Future platform on the potential establishment of a product categorisation system under SFDR, and liaising with different trade associations.

While advocacy work related to the Energy Performance of Buildings Directive was finalised in the spring, the SFWG picked up this file again in Q3 to contribute a response to the Commission's call for evidence on minimum performance standards (MPS), in view of the upcoming public consultation and delegated act on this topic.

In terms of climate resilience financing, our working group has supported the EACB representative to the Commission's dedicated Reflection Group by providing strategic input and resources. The SFWG aims to deepen this work in the coming months as the Reflection Group starts to build its report, due at the end of 2025.

A key deliverable during this period has been the finalisation of a comprehensive position paper on green loans and mortgages after several rounds of comments and exchanges with members and different departments in their respective organisations. This paper is a reaction to the EBA's Opinion and Report on green loans and mortgages that was published at the end of 2023. It reflects EACB members' commitment to promoting sustainable financing instruments and provides a series of considerations for the incoming Commission teams to take into account as they work to refine and streamline the sustainable finance framework.

We also addressed the Commission's proposal to delay

the implementation of the Deforestation Regulation. As no notable changes seem to be made to the future inclusion of financial services within the scope of the Regulation, the Secretariat aims to connect with the relevant Commission teams in the preparation of upcoming consultations and advocacy work.

The Secretariat monitored and kept members informed of different ongoing initiatives, such as ESA reports on

greenwashing, the Green Claims Directive, initiatives linked to energy efficiency financing, and global ESG frameworks.

Finally, we are monitoring the establishment of the new Commission and notably preparing for the upcoming Omnibus proposal, which will aim to streamline requirements across the sustainable finance framework (CS3D, CSRD, Taxonomy).

EACB position papers



27/11/2024 | [EACB response to the EBA opinion \(EBA/Op/2023/13\) and report \(EBA/REP/2023/38\) on green loans and mortgages](#)

05/11/2024 | [EACB Response to the EU Commission's Call for Evidence on a portfolio framework to increase lending for energy renovations](#)

AGRICULTURE EXPERT GROUP

EACB policy messages

- 1 Banks are increasingly required to take ESG risks into account in their risk management and strategies. There is a need for clear pathways and parameters or benchmarks for risk assessment that are coherent with prudential requirements.
- 2 For banks, access to reliable data is essential to measure farmer transitions and hence assess their risk profile. However, farmers are already subject to heavy reporting requirements under various frameworks. It is therefore essential that policy developments do not add another layer of reporting burden but rather streamline and rationalise the existing requirements. Banks should have access to the relevant data, which is not the case today.
- 3 Farmers must and will adopt new business models to secure a viable future for their enterprises, combining environmentally sustainable practices and innovative techniques generating new sources of income. These transformations will require large amounts of investment, which can be facilitated through blended financing instruments, guarantee mechanisms, de-risking instruments and public-private support.

“ Statement from Martin Reesink,

International Food & Energy Networks - Senior Relationship Manager and Advisor EU Affairs, Rabobank

Against the backdrop of recent farmer protests and growing discontent in the sector, the President of the European Commission decided to prioritise changes to the EU's agricultural policy. In this context, she launched a [Strategic Dialogue on the Future of Agriculture](#) in January 2024. This dialogue aimed to explore a common vision for the future of the EU agriculture and food sector. The participating organisations were tasked with providing recommendations to the European Commission in the form of a report, to feed directly into the policies of the upcoming Commission in its next mandate (2024-2029 cycle).

The EACB was invited to participate in this Dialogue alongside 26 other delegates from farming groups, NGOs and academia, as the only trade association from the finance sector: cooperative banks are major providers of finance to the agricultural sector, and enjoy privileged, historical ties to rural areas. In addition, the EACB and its members are generally increasingly active on the topics of climate, and environmental and social sustainability. As such, we were highlighted as key actors in the debate.

An EACB Expert Group was created to support this workstream throughout the year and formulate recommendations to the Commission. This resulted in an EACB position paper, as well as a dedicated chapter on financing in the Strategic Dialogue's finale report (published on 4 September). Our recommendations were taken up in the mission letter of the new Commissioner for agriculture and as such will be implemented by the new legislature.

Namely, these address the need for clear indicators and benchmarks; a coherent and simplified framework; access to reliable data for financiers; better cooperation between public and private actors, including guarantee systems, reflection on the EU prudential framework (including on the role of collateral requirements, infrastructure criteria, incentives and easing solvency requirements for banks).

The report also recommends the creation of a European board on agri-food, as a forum to continue the work of the Dialogue. Financial institutions are explicitly listed as key participants on this Board.

Following the Dialogue, the EACB is continuing exchanges with the different Commission teams (DG AGRI, DG FISMA, etc.). An initial meeting was held at the end of November, during which a delegation of member banks presented their approaches to Agri

finance, and concerns and suggestions regarding EU policies.

The EACB is also continuing engagement with other key stakeholders (e.g. EIB/EIF), as well as other associations such as Copa-Cogeca and Young farmers, to prepare our involvement in the upcoming discussions around dedicated benchmarks/pathways to measure the environmental transition of agricultural enterprises.



30/08/2024 | [EACB position on Financing the Future of EU agriculture](#)



DEVELOPMENTS AFFECTING THE PRODUCTS OFFERED BY COOPERATIVE BANKS

CONSUMER POLICY

EACB policy messages

- 1 The EACB wishes to underline that Member States should be flexible and proportionate in transposing the Consumer Credit Directive and the Distance Marketing of Financial Services Directive into their national frameworks by taking into account the specificities of their national consumer credit markets and frameworks. For example, concerning Article 18 CCD on creditworthiness assessments, Member States should be mindful that overly rigid frameworks could limit access to credit for the most vulnerable consumer groups.
- 2 Concerning Sustainable Finance files, such as the European Performance of Buildings and the EBA report on Green loans and mortgages, public financing such as subsidies and guarantees and incentives towards market actors are crucial for making energy-efficient renovations affordable for low-income households and unlocking green transition financing potential.
- 3 There is currently no need to review the Mortgage Credit Directive. Several Member States have only finalised their transposition of the 2014 Directive, and reviewing it now would impede legal stability.

“ Statement from Odile REGNIER,
Chairwoman of the EACB Consumer Policy Working
Group & Head of European Affairs, Confédération
Nationale du Crédit Mutuel:

Cooperative banks are dedicated to establishing a consistent and harmonised playing field in matters related to consumers. In 2024, the Consumer Policy Working Group monitored developments and reported to its members on a number of topics.

The transposition of the Consumer Credit Directive (CCD) and the Distance Marketing of Financial Services Directive (DMFSD) into the national laws of Member States represents a significant topic for cooperative banks, given the substantial regulatory burdens placed on them to adapt their practices to these new legislative acts. For this reason, the EACB kept its members updated on the national timelines for implementing the CCD and DMFSD into national frameworks.

The EACB monitored developments around a possible Code of Conduct on cancer survivors' access to

financial services and liaised with other European Credit Sector Associations to align approaches.

The EACB also participated in the EBA exercise on the Consumer Trends report and highlighted current trends in relation to payment fraud and over-indebtedness. Its comments focused on the recommendations of the Euro Retail Payments Group on Payment Fraud, the risks associated with the European Digital Identity Wallet, the importance of digital inclusion and consumer awareness to combat fraud. It also highlighted that the CCD requirements include sufficient creditworthiness assessments, which should not be further strengthened to maintain flexibility for creditors.

Additionally, it monitored several ongoing proceedings in front of the Court of Justice of the European Union (CJEU), such as case C-634/21 on credit scoring.

The EACB also took part in various events that touched upon Consumer Policy topics, such as the European Commission's presentation of its report on over-indebtedness, and a conference of the European Supervisory Authorities on Gender.

Along with the Sustainable Finance Working Group, the EACB has provided comments to the European Commission's call for advice on Mortgage Portfolio Standards (MPS), a mechanism to incentivise mortgage lenders to improve the energy performance of their portfolio of buildings, derived from the European Performance of Buildings (EPBD) provisions. In its comments, the EACB emphasised the importance of providing sufficient subsidies and guarantees to make energy-efficient renovations affordable for low-income households. It also highlighted the need for regulatory alignment between the legislation of Member States to ensure consistency with existing mortgage and

credit regulations and facilitate lending. The EACB called for clear sustainability standards to recognise energy renovation financing as sustainable, supported by pragmatic criteria. Additionally, it advocated for a harmonised policy approach across the EU.

Finally, the EACB started working with its members on a paper concerning Green loans and mortgages, to highlight several points of the 2023 EBA study on Green loans and mortgages, while bearing in mind a potential recast of the Mortgage Credit Directive by the European Commission.

EACB position papers



- 27/11/2024** | [EACB response to the EBA opinion \(EBA/Op/2023/13\) and report \(EBA/REP/2023/38\) on green loans and mortgages](#)
- 5/11/2024** | [EACB Response to the EU Commission's Call for Evidence on a portfolio framework to increase lending for energy renovations](#)
- 28/10/2024** | EACB response to the European Banking Authority Consumer Trends Report

PAYMENT SYSTEMS

EACB policy messages

- 1 Create a comprehensive and balanced framework for fraud prevention and liability for fraudulent transactions in the ongoing negotiations on Payment Services Regulation. The main goal should be fraud prevention at its source with the involvement of all actors in the chain, including electronic communication service providers.
- 2 Take into account and implement the recommendations of the ERPB Working Group on Fraud addressed to policymakers, regulators, supervisors, and market participants.
- 3 Keep the reporting requirements under the Instant Payments Regulation simple, avoid overlaps with other reporting requirements of banks, and extend the reporting timeline by 6 months to allow PSPs to implement the IPR requirements as a matter of priority.

“ **Statement from Bruno MEYER,**
Head of Payments, Digital, Security at Confédération
Nationale du Crédit Mutuel

EACB payments work in 2024 was spread over several legislative and non-legislative topics:

- **Revision of the Payment Services Directive 2**
In June 2023, the Commission proposed amending the existing Payment Services Directive (PSD2), replacing it with Payment Services Directive 3 (PSD3) and the Payment Services Regulation (PSR). While the European Parliament adopted its position before the European elections earlier this year, negotiations in the Council continue. A central topic in the draft PSR is fraud prevention, particularly fraud resulting from the manipulation of payees by fraudsters, known as social engineering fraud, and the related liability of various parties. The Commission proposes to shift liability to PSPs in cases where fraudsters impersonate bank employees (Article 59). We believe this approach risks undermining the current balance of liability between users and providers in cases of fraud. Instead, we urge the Parliament and the Council to develop a comprehensive framework in the PSR that prioritises fraud prevention at its source. This framework should involve all actors in the payment chain, including electronic communication service providers (ECSPs) such as telecom operators and online platforms, which must play an active role in preventing fraud and share liability. Much of social engineering fraud originates from areas under ECSP control – fraudulent phone

calls, SMS, emails and social media advertising – which could be effectively mitigated by these actors. Another important chapter is on open banking. We believe that maintaining the current practice of allowing third parties free access to the payment account data of bank customers overlooks a critical lesson learned from PSD2: open banking cannot thrive without a sustainable business model. In light of this, we reiterate the importance of establishing a fair distribution of value and risk among market participants. Last but not least, it is important to take into account the combined effects of relevant, recently adopted legislation and allow appropriate PSR/PSD3 implementation timelines for market actors.

- **Report of the ERPB Working Group on Fraud**
In 2024, a significant focus in fraud prevention was the work of a multi-stakeholder forum established under the Euro Retail Payments Board (ERPB), with chairmanship from the EACB and active involvement of EACB members. The initiative followed a 2023 call from European Credit Sector Associations (EACB, ESBG, and EBF) to create an ERPB working group on payment fraud. Formed in August 2023, the working group brought together a diverse range of stakeholders, including customer organisations, the ECSAs, e-money providers, Europol, the European Banking Authority, and the European Data Protection Board. Its mandate was to map possible actions for preventing, mitigating, and investigating fraud among various stakeholders, including reporting complaints to authorities. Co-chaired by an expert from Rabobank (an EACB member) and a consumer representative, and

supported by the EACB secretariat, the group released its final report in September 2024. The report outlined a series of recommendations to policymakers, regulators, supervisors, and market participants, focusing on combating emerging forms of fraud, particularly those leveraging social engineering techniques. The ongoing revision of PSD2 offers a timely opportunity to incorporate key recommendations, especially those promoting collaboration among all players in the payment chain – banks, payment service providers, telecom operators, online platforms, and social media companies. On 10 October, the EACB and other ERPB stakeholders co-organised a virtual event to present the working group’s findings to representatives from the European Council, Parliament, and other relevant stakeholders and also frequently present the report at events and conferences.

- **Instant payments in euro**

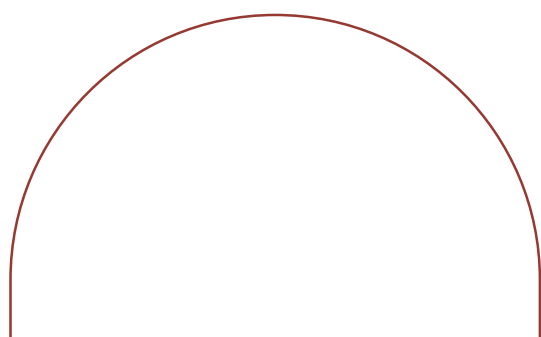
The Instant Payments Regulation (IPR) proposed by the European Commission in November 2022 was finalised and published in the Official Journal of the EU on 19 March 2024. The regulation mandates

payment service providers (PSPs) to offer instant euro credit transfers, regulates pricing, obligates PSPs to verify IBAN and payee name matches, and adapts sanction screening rules for instant payments. By 9 January 2025, all EU banks must be able to receive instant payments, and by 9 October 2025, Eurozone banks must also enable customers to send them. To support implementation, the European Commission held two online workshops in April and May 2024. The EACB and our members actively participated, raising key questions for clarification, and the final Q&As were published by the Commission in July. Under IPR Article 15, PSPs must report to competent authorities on charges for credit transfers, rejection rates (national and cross-border), and compliance with financial sanctions. The European Banking Authority (EBA) is drafting standardised reporting requirements that will allow the Commission to monitor IPR effects on customer fees for accounts and credit transfers. In its consultation response in October this year, the EACB urged the EBA to extend the reporting timeline, simplify requirements, and avoid overlapping reporting obligations for banks.

EACB position papers



28/10/2024	EACB response to the EBA consultation on draft Implementing Technical Standards on reporting obligations under the Instant Payments Regulation
09/2024	Report of the ERPB Working Group on fraud related to retail payments
05/07/2024	ECSA letter to the Council on fraud and liability provisions in the draft Payment Services Regulation
17/04/2024	ECSA letter to the European Parliament, the Council and the Commission on the definition of authorisation in the draft Payment Services Regulation



DIGITAL EURO

EACB policy messages

- 1 Set a maximum holding limit of EUR 500 in the Digital Euro Regulation to prevent a negative impact on (cooperative) bank deposits, their lending activities and financial stability.
- 2 Keep the digital euro's design simple, reduce the number of parties in the payment chain, reuse existing payment standards and infrastructure, and fairly distribute liabilities in order to reduce complexity, costs and the risk of fraud, and improve the resilience and latency of the transactions.
- 3 Ensure a well-designed and fair compensation model that reflects all costs for participants in the ecosystem.

“ Statement from Jens HOLECZEK,

Head of the Digital Payment Unit at the National Association of German Cooperative Banks, Bundesverband der Deutschen Volksbanken und Raiffeisenbanken

In 2024, the EACB continued its involvement in the digital euro project. As part of this effort, the EACB submitted proposals for amendments to the draft Digital Euro Regulation, drawing the attention of the European Parliament and the Council to key considerations. In parallel, the EACB maintained an active dialogue with the ECB through the Euro Retail Payments Board (ERPB) stakeholder engagements, bilateral high-level discussions, and technical consultations. Furthermore, the EACB representative contributed to the work of the Digital Euro Rulebook Development Group, ensuring that cooperative bank interests were represented.

The draft Digital Euro Regulation introduced by the European Commission in June 2023 provides the legal foundation for the potential issuance of the digital euro by the ECB. This framework outlines the use cases and regulatory requirements for the digital euro, while granting the ECB significant authority over critical aspects, such as holding limit calibration and the compensation model. Under the proposed framework, banks and intermediaries would be required to distribute the digital euro, and merchants would be obligated to accept it as a form of payment.

The EACB has consistently called on EU policymakers to carefully assess all aspects of the digital euro before moving forward. While acknowledging the importance

of exploring this initiative for Europe, the EACB has also raised questions about the tangible benefits of the digital euro for users, noting that its added value in the current payment landscape remains debatable. Moreover, we have emphasised the need to set a maximum holding limit of EUR 500 in the regulation to mitigate potential adverse impacts on cooperative bank deposits and their lending capacity to the real economy. Additionally, it is crucial to maintain a level playing field in the payments market, preserving the competitiveness of EU-based payment solutions and preventing market distortions. Equally important is the establishment of a fair and comprehensive compensation model to cover all costs, including fraud and liability, incurred by participants in the digital euro ecosystem. Finally, it is crucial to avoid unintended consequences associated with an “open intermediary” approach, which could contradict the ECB’s vision of achieving greater strategic autonomy. Progress on the draft regulation within the European Parliament and the Council has been limited in 2024, with negotiations expected to extend into 2025.

When it comes to the ECB’s work, the EACB actively contributed during the investigation phase (2021–2023) and has continued to contribute during the preparation phase launched on 18 October 2023. This phase, set to initially last two years, involves finalising the digital euro rulebook, selecting providers to develop the platform and infrastructure, conducting testing and experimentation to meet both Eurosystem requirements and user needs, and consulting stakeholders throughout the process.

Among the key areas of focus during the preparation phase is the calibration of holding limits. The EACB has put forward detailed proposals to ensure that the specificities of cooperative banks, which rely heavily on retail deposits to fund their lending activities, are adequately considered in the ECB methodology. Another significant area is the fit of the digital euro into the existing payment ecosystem. Here, the EACB advocates for a simple design, the reuse of existing standards and infrastructure, and the design of a sustainable and equitable compensation model for all

actors in the digital euro ecosystem. Through written consultations, multi-stakeholder exchange sessions, expert deep dives, and bilateral workshops with the ECB, the EACB has actively contributed to these workstreams.

The digital euro, if not designed properly, could have significant repercussions on the EU's cooperative banks, payment systems and the financial system as a whole. Therefore, the EACB will continue to advocate for the interests of cooperative banks moving forward.

EACB position papers



06/11/2024	EACB response to the ERPB consultation on the fit of the digital euro in the payment ecosystem
09/06/2024	EACB recommendations to policymakers on a compensation model for a digital euro
22/05/2024	<u>EACB response to the ERPB consultation on the methodology for the calibration of digital euro holding limits</u>
13/03/2024	<u>EACB position on the digital euro and competition issues</u>
02/2024	EACB proposals for amendments to the draft Digital Euro Regulation

ANTI-MONEY LAUNDERING

EACB policy messages

- 1 The EACB welcomes the adoption of the AML package in June 2024, promoting collaboration against ML/TF, but highlights that the numerous level 2 and 3 measures could impede effective implementation. The application date of the new framework remains unclear, particularly as the timelines differ between the AML Regulation and level 2 and 3 guidance. Obligated entities should be allowed flexibility in adjusting their internal practices, with distinctions made between existing clients and new clients.
- 2 It is crucial to closely monitor the development of level 2 measures on internal outsourcing and the concept of “group”. The EACB successfully included a reference to the cooperative banking model (Capital Requirements Regulation) in the level 1 text to allow cooperative banks to internally outsource the compliance officer’s tasks, which should be also reflected in level 2.
- 3 Further guidance with respect to which financial entities will be directly supervised by AMLA is essential to ensure legal certainty for those entities.

“ **Statement from Annemarie VERKERK,** Chairwoman of the EACB Anti-Money Laundering Working Group & Manager Global Compliance AML & Sanctions Expertise, Rabobank:

AML/CTF measures are critically important for cooperative banks, as they are responsible for upholding AML/CTF compliance standards and, in so doing, play a central role in combating ML/TF activities. The 2024 initiatives led by the EACB underscore the importance of this commitment.

In 2024 the EACB met regularly with EU co-legislators on the AML legislative package to advocate on key priorities, including providing data about the impact of proposed changes to Politically Exposed Persons, helping to narrow their scope in the final text. It also successfully advocated for the inclusion of a reference to the cooperative banking model in the level 1 text to allow cooperative banks to internally outsource the compliance officer’s tasks.

The EACB also engaged in discussions with the European Banking Authority to discuss level 2 content and the level 2 process. In October, the EACB took part in an EBA workshop aimed at initiating discussions with industry representatives on specific level 2 measures, with a focus on Customer Due Diligence (CDD) and direct supervision.

The EACB further participated in EBA consultations related to AML/CFT and sanctions frameworks. It answered the EBA consultation on the Guidelines on preventing the abuse of funds and certain crypto-assets transfers for money laundering under the Transfer of Funds Regulation (“Travel Rule” Guidelines). In its comments, it emphasised the importance of prioritising best practices over binding guidelines to provide flexibility for institutions in shaping their compliance structures, and urged the EBA to consider technical limitations and privacy laws regarding data sharing and customer identification.

In its response to the EBA consultation on guidelines for implementing Union and national restrictive measures, the EACB questioned the legal basis of the guidelines and called for the completion of level 2 work before addressing governance and risk management. It also noted that the guidelines appear to introduce an additional compliance regime not fully reflected in some Member State sanction frameworks, which typically only sanction intentional failures or negligence under criminal law.

It also actively took part in the fourth edition of the European Commission’s Supra-National Risk Assessment Process. Its comments focused on the need for the SNRA to better align with national and sectoral risk assessments carried out by Member States and the Financial Action Task Force (FATF), improve

user-friendliness, provide a more detailed description of predicate offences related to money laundering, and address the expanded scope of obliged entities as defined in the AML legislative package.

The EACB participated in the FATF consultation on Recommendation 16 regarding wire transfers, noting that it overlaps with existing EU and national laws, as well as CDD and KYC practices. It also warned that broad guidelines could increase bureaucracy, complexity, and costs for financial institutions without significantly improving crime prevention, and suggested a stronger focus on customer-level evaluations.

EACB position papers



- 02/05/2024** | [EACB response to the FATF consultation on Recommendation 16](#)
- 12/04/2024** | [EACB position paper on the fourth edition of the European Commission's Supra-National Risk Assessment](#)
- 21/03/2024** | [EACB response to the EBA consultation on the draft EBA Guidelines on internal policies, procedures and controls](#)
- 26/02/2024** | [EACB response to the EBA consultation on the EBA draft Guidelines on preventing the abuse of funds and certain crypto-asset transfers for money laundering](#)



FINANCIAL MARKETS

EACB policy messages

- 1 Cooperative banks believe that a diversified financial and banking system is essential to relaunching EU Capital markets under the SIU. Thanks to their strong client relationships, cooperative banks play a pivotal role in bridging gaps in European capital markets, especially fostering retail investor participation, and supporting the EU's green and digital transitions, as well as a fairer global economy.
- 2 Policymakers should prioritise bolstering the demand side of capital markets to meet SIU goals. This can be achieved by reducing the regulatory burden, cutting red tape, and optimising and adapting existing tools supporting retail investors, enabling easy access to capital markets, particularly for first-time and/or less affluent investors.
- 3 The Retail Investment Strategy, in its present form, does not contribute to these goals. On the contrary, it could increase complexity, hinder the investor journey, and disproportionately burden retail banks. Nevertheless, the RIS still offers an opportunity for legislators to simplify the retail investment regulatory framework and address the challenges in EU financial markets.

“ Statement from Giuseppe ZAGHINI,
Chairman of the EACB Working Group & Head of
Compliance Governance, Iccrea Banca:

This year, the EACB has worked extensively on the Retail Investment Strategy: while the Commission's legislative proposals were published in Q2 2023, discussions at the co-legislator level started actively in 2024. The RIS includes measures that intervene massively in retail investment market dynamics, while disregarding the coexistence of different banking models, in particular that of cooperative banking. As chief examples, the EACB perceives the “value-for-money” framework critically, as it could lead to price regulation and an excessive focus on costs at the expense of quality features that are important for retail investors, as well as the “Best Interest Test”, which is unnecessary for clients and may push banks to offer overly simplified products, predominantly US-based ETFs.

As part of its advocacy on the file, the EACB has actively engaged with key actors at both a Parliament and Council level, by providing detailed comments on key issues under discussion ahead of ECON Committee and Council Working Party meetings. In particular, the EACB FMWG has developed a position paper commenting on the Council's Proposals for value-for-

money and inducements (Q2/Q3), and a detailed paper on the RIS in the context of the upcoming Trilogue discussions (Q3/Q4), set to start in January 2025. Furthermore, in Q2 the EACB attended the Second high-level Roundtable on the Distribution of Retail Investment Products organised by the Commission and provided its views on the matter.

To set the agenda for the 2024-2029 mandate, discussions on how to revitalise the CMU project resumed this year. Significant recommendations on the subject came from the Eurogroup and the Letta, Noyer and Draghi Reports. The EACB has actively engaged in said discussions by providing inputs to the Draghi Report, as well as by releasing its own position paper on the future of the CMU under the Savings and Investments Union (Q3/Q4).

Additionally, the EACB has responded to:

- the ESMA Discussion Paper on MiFID II investor protection topics linked to digitalisation (Q1);
- the Commission's targeted consultation on the functioning of the EU securitisation framework (Q4-2024);
- the Platform on Sustainable Finance's consultation on SFDR categorisation;

and has organised:

- a meeting with ESMA on the 2025 work plan for Investor Protection and Sustainable Finance;

- a dedicated workshop on European Secured Notes with experts from member organisations. In this last respect, the EACB has submitted a note on ESN-related questions for “issuing banks” to the “EBA questionnaire to the industry for the CFA on the EU covered bond framework”.

We expect the above-mentioned topics to remain highly relevant in 2025, particularly because of the installation of the new commission, the resumption of work on key files for the cooperative banking industry at both L1 and L2, as well as an expected proposal reflecting CMU/SIU discussions.

EACB position papers



04/12/2024	<u>EACB Response to the Commission’s consultation on the EU securitisation framework</u>
20/11/2024	<u>Finance sector calls for co-legislators to reassess the Retail Investment Strategy in light of the European Commission’s competitiveness goals - EACB Position papers</u>
14/11/2024	<u>EACB inputs on the Future of the Capital Markets Union (CMU) under the Savings and Investments Union (SIU) - EACB Position papers</u>
14/11/2024	<u>EACB Comments to Proposals on the Retail Investment Strategy (RIS) in the context of Trilogue negotiations</u>
16/05/2024	EACB comments on the Belgian Presidency’s Draft General Approach’s suggestions on inducements and value-for-money
14/03/2024	<u>EACB Response to the ESMA Discussion Paper on MiFID II investor protection topics linked to digitalization - EACB position papers</u>
17/01/2024	Joint industry letter on the best execution test under RTS28
15/01/2024	Joint Trade Association’s Guiding principles for the design of an Active Account Requirement

DIGITALISATION AND THE USE OF DATA

EACB policy messages

- 1 Cooperative banks are essential to the European banking sector, providing broad access to financial services and promoting regional cohesion and financial inclusion. However, as digitalisation advances, they face growing competition from digital providers with lower costs and fewer regulatory burdens. To stimulate innovation in the EU, regulators should act as facilitators and ensure a level playing field that supports all market players.
- 2 EACB urges co-legislators to consider the Financial Data Access (FiDA) proposal within the context of Mario Draghi's report, which underscores the significance of European competitiveness and the potential implications of regulations on investments. The European data strategy aims to establish European leadership in the data sector; however, the current lack of operational clarity within FiDA, coupled with uncertainties regarding demand and the risk of favouring non-European entities, must be addressed before its adoption.
- 3 Europe has taken the lead globally by establishing a comprehensive AI framework. To avoid slowing down innovation, it is essential to have a clear and certain framework, with various standards and guidelines delivered on time. To integrate AI effectively into banking, future guidelines should align with existing risk management protocols, ensuring responsible use while mitigating risks.

“ Statement from Gilles SAINT-ROMAIN, Chairman of the EACB Working Group & Head of Digital Public Affairs, Groupe BPCE

Throughout 2024, the EACB led significant advocacy efforts in response to the Financial Data Access (FiDA) proposal. In January, the EACB finalised its amendments and actively engaged with MEPs from January to April, presenting EACB priorities and compromise input ahead of the April ECON Committee vote. As Council Working Party meetings resumed in March, the EACB re-engaged with Permanent Member State Representatives through both formal meetings and informal discussions in Brussels, Ghent and Budapest, providing targeted recommendations ahead of each Council Working Party meeting. With the pace of the discussions intensifying in September, and the Hungarian Presidency aiming for a General Approach, the EACB joined forces with the broader European financial services industry to address key concerns on competitiveness and data protection in three advocacy initiatives between September and November. In December, [a joint public statement](#) on the matter was also released.

In addition to its work on FiDA, the EACB undertook

work related to the Data Act, which establishes broad requirements for data sharing on IoT products and services, among other things. In early 2024, the EACB sought clarification from DG CONNECT regarding the Act's scope concerning PoS systems and ATMs. The Commission confirmed that while these devices are included, only operational data – not transaction details – are relevant, as transaction data is regulated by PSD.

Furthermore, in response to the DORA implementation process, the EACB engaged in consultations to shape implementation requirements. Between December and March, the EACB's relevant working groups [submitted](#) four key position papers in response to the second DORA consultation round of the ESAs. The EACB emphasised that DORA obligations should be proportionate and flexible to accommodate sector diversity. Meanwhile, the EACB monitored Parliament and Council review timelines. Regarding the feasibility study for the EU Hub for ICT incidents, the EACB provided input through its representative in the EBA Banking Stakeholder Group. Additionally, the EACB participated in the two ESA events focused on the dry-run exercise for DORA-compliant reporting on ICT contractual arrangements. The EACB has kept members informed of this simulation to support their

readiness for future mandatory reporting under DORA. Moreover, in December, the EACB, together with the ECSAs, reiterated their concerns regarding the DORA implementation timeline in a joint letter to both the ESAs and the Commission.

Moreover, in June the EACB also organised a dedicated [ICT Compliance Roundtable](#). This event gathered ICT compliance experts from several cooperative banks to discuss critical aspects of ICT compliance management and foster alignment on new regulatory frameworks. Key topics included the evolving role of ICT compliance in cooperative banks, the results of a benchmarking exercise on common ICT compliance practices, and insights on the current regulatory landscape. Participants also discussed specific challenges related to DORA.

In parallel, to address the AI Act, the EACB engaged in targeted advocacy and provided regulatory feedback. In early 2024, in collaboration with industry associations, the EACB prepared a [document](#) recommending MEPs exclude logistic regression and similar techniques

from the scope when not used in hybrid systems. After the Parliament's March vote on the AI Act, the EACB remained actively engaged, informing members of legislative progress and implementation timelines. With an eye on the Commission's work on the definition of an AI system, the EACB further submitted a joint note to the AI Office, DG FISMA, certain attachés, and select MEPs, emphasising the need for clarity to better support financial services. Additionally, the EACB organised meetings with members to discuss the AI Act and AI Pact's implications, regulatory obligations, and members' implementation priorities, with insights from DG CONNECT and DG FISMA. The EACB also joined a [Commission-led webinar](#) on risk management, gaining knowledge on compliance with high-risk AI systems and risk assessment practices. Complementing these activities, the EACB [responded](#) to DG FISMA's consultation on AI in financial services, ensuring member concerns and industry-specific needs remain at the forefront of regulatory dialogue, as well as to DG CONNECT's consultation on the guidelines for the [definition of an AI system](#) and prohibited practices.





18/12/2024	ECSAs letter on DORA implementation-RTS delays
11/12/2024	<u>EACB response to the DG CONNECT consultation regarding Commission guidelines on the application of the definition of an AI system and on prohibited practices</u>
09/12/2024	<u>Joint statement - Financial Data Sharing: Finding a sound approach for an effective Open Finance Framework</u>
04/11/2024	Joint political industry letter: Financial Data Sharing – The need for a sound approach for an effective Open Finance Framework in the EU/EEA
27/09/2024	Joint industry letter: Ensuring the FiDA Regulation is Fit-For-Purpose and Considers Market Impact
10/09/2024	<u>EACB contributions to the European Commission’s consultation on Artificial Intelligence in the Financial Services</u>
31/07/2024	Joint industry letter: Addressing FiDA’s impact: Essential considerations for a balanced Regulation
03/05/2024	Joint case study on the EU definition of artificial intelligence: logistic regression
01/03/2024	<u>EACB comments on the second wave of ESAs’ draft RTSs, ITSs, and Guidelines mandated by DORA</u>
20/02/2024	EACB’s top priorities and remarks on amendments to the ECON draft report on the FiDA proposal
16/01/2024	<u>Understanding Credit Scoring: Techniques and Distinction from Artificial Intelligence</u>
09/01/2024	EACB’s amendments to FiDA



DIGITAL IDENTITY WORKSTREAM

EACB policy messages

- 1 The EACB supports the European Digital Identity Wallet (EUDIW) and sees eIDAS 2.0 as pivotal for advancing digital identity in Europe. To ensure smooth adoption, we urge clarity on mandatory obligations for secure customer authentication (SCA) and confirmation that EUDIW use for payments remains voluntary. This flexibility will allow banks to meet consumer needs while minimising infrastructure costs and disruptions.
- 2 Mandating EUDIW for the full payment cycle would require costly infrastructure upgrades and disrupt established customer experiences. Voluntary use, aligned with standard terminal replacement cycles (5–7 years), would enable gradual adoption and market readiness.
- 3 The growing complexity of financial value chains raises questions about accountability, especially regarding EUDIW's role in SCA within payment flows. While PSD2 and the upcoming Payment Services Regulation (PSR) provide some guidance, further clarity is essential to define how these frameworks align with the EUDIW and its liability implications.

Co-Chair contribution to the 2024 EACB Annual Report

ECSAs Co-Chair: Jens HOLECZEK, Head of the Digital Payment Department at the National Association of German Cooperative Banks (BVR)

At the beginning of 2024, the legislative process for the eIDAS 2.0 regulation came to a close, with the final steps of the procedure including a plenary debate in February. During this debate, scepticism from some MEPs was evident in a vote of 335 in favour, 190 against, and 31 abstentions. This was followed by Council approval of the text on 26 March and signatures from the Presidents of the European Parliament and Council. The eIDAS 2.0 regulation was subsequently published in the Official Journal of the European Union in April and entered into force on 20 May. Member States will be required to provide European Digital Identity Wallets (EUDIWs) to citizens within 24 months following the adoption of Implementing Acts (IAs), which will be based on the EU Digital Identity Toolbox.

In early 2024, the ECSAs eID Task Force (TF) continued its efforts to address the lack of clarity regarding the scope of the mandatory obligation to accept the EUDIW for secure customer authentication (SCA) for online identification and for all or some kinds of payments. Concerns about this lack of clarity were shared with DG CONNECT and DG FISMA. The TF also called

for greater industry involvement in developing the Architecture Reference Framework (ARF), extending beyond participation in the Large-Scale Pilots (LSPs) to ensure that industry standards and specifications in this area are adequately reflected in the ARF.

In April, the ECSAs participated in a European Retail Payments Board (ERPB) technical session on digital identity and payments. The session was intended to explore whether the ERPB could play a potential role in this field by identifying the various payment use cases for digital ID. During this session, the ECSAs also raised questions to Commission officials regarding the scope of the mandatory obligation. Unfortunately, insufficient clarity was provided, prompting the ECSAs to follow up with a meeting with DG CONNECT. From this meeting, a few points became clear: SCA for identification and authentication is mandatory, but no additional details were confirmed beyond authentication and identification. The legislator chose not to limit the scope of use cases and SCA applications; therefore, vertical discussions will need to take place within each individual sector. The requirements for EUDIW and use cases (in-store or online) are framed in a very general way, and the Commission noted that it is challenging to go beyond this statement. Regarding the Implementing Acts and the ARF, the Commission clarified that they will not cover SCA, sectoral aspects, or specific use cases.

Following the publication of a new version of the ARF, the ECSAs shared their recommendations with the Commission in July, requesting that these be considered for inclusion in the ARF and in the drafting of Implementing Acts (IAs) stemming from the EUDIW Regulation. Around the same time, the Commission launched consultations on a first set of IAs between August and September. In response, the ECSAs provided further [input](#) to the IAs. A second set of IAs was also published for consultation between November and December, and the ECSAs provided their contributions to those as well.

Lastly, it is important to mention the Large-Scale Pilots (LSPs), where some consortia are focusing on the payments use case. A new call for grants was also launched in spring for a new set of LSPs. According to the information available, two new consortia focused on the payment use case are in the running to receive grants. The ECSAs have been monitoring discussions regarding the current LSPs and have invited them to share their insights with members.

Lists of position papers and documents



- 24/12/2024** | ECSAs' contributions to the second set of draft Implementing Regulations for the EUDIW
- 09/09/2024** | [European Credit Sector Associations \(ECSAs\) contributions to the draft implementing regulations on the European Digital Identity Wallets](#)
- 29/07/2024** | European Credit Sector Associations (ECSAs) Considerations for ARF Improvement



COMMUNICATION

In 2024, the EACB solidified its role as the leading voice for European cooperative banking. Through a dynamic and strategic communication approach, focusing on boosting the Association's visibility and deepening stakeholder engagement, the EACB strengthened its position within the European political landscape, effectively advancing the interests and concerns of its member cooperative banks.

Leveraging a combination of digital and traditional communication means, **the Association amplified its key positions on the legislative debate across multiple platforms**, driving awareness and inspiring action. From high-level events and informative newsletters, to media releases, website updates, and an engaged social media presence, the EACB successfully reached its audience with greater effectiveness and resonance.

The year was particularly significant, as it coincided with the European elections, **a critical moment for cooperative banking advocacy to disseminate its strategic key concerns** to incoming legislators for **the upcoming 5-year EU Mandate**. A pivotal campaign surrounding the EACB Manifesto "*Cooperative Banks' Contribution to the Future of Europe*" was launched on the eve of the European Elections, effectively highlighting the sector's priorities and recommendations. In this context, special newsletter editions tailored exclusively to members were also developed to debrief them on election processes and important political developments as they occurred.

As part of the expanded foothold of the Association's membership in the Asia-Pacific, **in June, the EACB hosted its first-ever Global Cooperative Banking Forum in Berlin**. This landmark event brought together high-level speakers and stakeholders from European and international institutions and banks to address global risks and trends impacting cooperative banks. The forum underscored the EACB's commitment to advocating for cooperative banking's relevance as a thought leader with a worldwide network.

Finally, 2024 was also a year of transformation for the EACB's communication strategy. Recognising the essential role communication plays in supporting advocacy, the EACB initiated a thorough review and refinement of its approach, resulting in a more focused and strategic framework to guide communication efforts in the years to come.

WEBSITE

The EACB website remained a central hub for information in 2024, showcasing the association's activities and advocacy achievements. With over **2,400 visitors** and a **33% growth in traffic** compared to the previous year, the website has become an indispensable resource for stakeholders. Key updates, including position papers, event announcements, media releases and sector news, were regularly featured, ensuring that visitors had access to timely and relevant content. These efforts have solidified the website's role as a trusted platform for the promotion of the values and legislative priorities of the cooperative banking community.

SOCIAL MEDIA

The EACB was particularly successful in its LinkedIn engagement, publishing a total of **82 posts** that resonated with a wide audience. These efforts paid off as we welcomed **815 new followers**, marking a significant **25% growth in our online community**. Our LinkedIn page has become a key platform for promoting thought leadership, sharing sector updates, and engaging with stakeholders on critical issues in the cooperative banking sector. The continued growth in both followers and engagement highlights the increasing value of our digital presence in fostering connections and enhancing our role as a leading voice in European financial services advocacy.

The EACB also remains present on X (formerly Twitter), albeit at a slower pace. The platform continues to serve as a communication channel, especially for sharing updates and highlights from our events and activities.

3,745 page visits

3,300 followers (+815 new)

82 posts

103,536 impressions

2,752 reactions

NEWSLETTER

In 2024, the EACB continued to foster dialogue and share key insights through its *EACB Newsletter*.

Each edition covered topics of critical importance to cooperative banks, providing valuable perspectives on legislative, financial and digital matters. The newsletter featured interviews based on the “three questions for...” format with influential speakers from across Europe, including high-level public officials, Members of the European Parliament, together with a “*second opinion*” essay from leading experts in EACB member organisations commenting from the cooperative banking perspective.

To stay informed and get key expert takes on the most pressing issues shaping the financial services regulatory agenda, sign up for [the EACB Newsletter](#).

EACB Newsletters 2024

<u>N°67 - Jan. 2024</u>	<ul style="list-style-type: none">•3 Questions for Mr Wolf Klinz, Chair, EFRAG Financial Reporting Board•Second Opinion from Ms Isabelle FERRAND, Chief Executive Officer of the Confédération Nationale du Crédit Mutuel (CNCM)
<u>N°68 - Feb. 2024</u>	<ul style="list-style-type: none">•3 Questions for Mr Othmar Karas, Member of the European Parliament•Second Opinion from Mr Mike Velthaak, Senior Advisor to the Board, Rabobank
<u>N°69 - Mar. 2024</u>	<ul style="list-style-type: none">•3 Questions for Mr Axel Voss, Member of the European Parliament•Second Opinion from Mr Gilles Saint-Romain, Head of Digital Public Affairs, Group BPCE
<u>N°70 - Apr. 2024</u>	<ul style="list-style-type: none">•3 Questions for Ms Alexandra Jour-Schroeder, Deputy Director-General, DG FISMA, European Commission•Second Opinion from Mr Alban Aucoin, Head of Public Affairs, Crédit Agricole group
<u>N°71 - May 2024</u>	<ul style="list-style-type: none">•3 Questions for Mr Michael Hager, Head of Cabinet, of Executive Vice-President Valdis Dombrovskis, European Commission•Reflections on the priorities for the next legislative cycle by Daniel Quinten, President of the EACB and Member of the Board of BVR
<u>N°72 - July 2024</u>	<ul style="list-style-type: none">•3 Questions for Mr Markus Ferber, Member of the European Parliament•Reflections by Priscille Szeradzki, President of the EACB and Deputy CEO, CNCM
<u>N°73 - Sept. 2024</u>	<ul style="list-style-type: none">•3 Questions for Mr Olof Gill, Spokesperson for Trade and Agriculture of the European Commission and Lennart Nilsson, President of Cogeca (Copa-Cogeca)•Reflections by Vincent Maagdenberg, Member of the Managing Board & Chief Risk Officer of Rabobank
<u>N°74 - Oct. 2024</u>	<ul style="list-style-type: none">•3 Questions for Dr Hans Groeneveld, Professor of Cooperative Financial Services at Tilburg University•Reflections by Dr Rainer Borns, Board Member at Volsbank Wien AG

MEDIA RELEASES

Over the course of the year, the EACB maintained its media presence, issuing consistent releases throughout the year to highlight key moments and developments within the Association's activities. These releases covered a wide range of topics, from cooperative banking sector milestones to discussions on emerging challenges and strategic priorities.

Press Releases 2024

25/01/2024	<u>EACB requests integration of finance in EU Dialogue on Future of Agriculture</u>
07/02/2024	<u>Cooperative banks close the financial year '22 with highest market share on record</u>
22/02/2024	<u>Key Lessons from the 2023 global turmoil by Vice-Governor of the National Bank of Belgium at the 4th EACB High-Level Roundtable dinner</u>
24/04/2024	<u>Cooperative Banks Forge Path Forward Amid Regulatory Landscape: Insights from 52nd EACB General Assembly</u>
25/04/2024	<u>The EACB Releases its 2023 Annual Report</u>
14/05/2024	<u>European Social Partners for the Banking Sector Sign New Joint Declaration on Employment Aspects of Artificial Intelligence</u>
12/06/2024	<u>EACB CEO Highlights Strategic Priorities for Cooperative Banks at CNCM General Assembly</u>
20/06/2024	<u>EACB Holds Inaugural Global Cooperative Banking Forum in Berlin</u>
21/06/2024	<u>EACB Elects New Leadership and Explores Use Cases of Central Banks Digital Currencies at 53rd EACB General Assembly</u>
01/07/2024	<u>Priscille Szeradzki Elected New President of the EACB</u>
19/07/2024	<u>EACB Webinar Explores "Banking, Crises and Cooperative Banks"</u>
04/09/2024	<u>EACB brings banking perspective in Commission's effort to boost ESG transition and resilience of agriculture</u>
17/09/2024	<u>European credit sector associations call for boosting fraud prevention efforts across the fraud chain</u>
17/09/2024	<u>EACB supports four cooperative banks in field test to assess sustainability reporting standard</u>
23/10/2024	<u>European Cooperative Banks Surge to New Heights in 2023: Record Market Share, Employment Growth, and Unmatched Local Presence</u>
07/11/2024	<u>Cooperative Vision for a Sustainable and Competitive Europe: Priorities for the 2024-2029 EU Term</u>

EVENTS

The EACB organised and participated in several key events in 2024, including the first-ever *Global Cooperative Banking Forum*, bringing together senior representatives from member organisations, policymakers, and other key stakeholders to promote the Association's initiatives and elevate discussions.

The EACB continued to leverage its established event formats, such as *Apropos Coop Banking*, to reinforce its brand identity. This included an *Apropos* webinar centred on the analysis of recent publications and research on the varying impacts of crises on society and the economy, as well as on the role of banks, especially cooperative banks, in financial stability.

Additionally, the EACB further strengthened alliances with the organisation of *Partner* and *Sponsor* events, for instance, sharing a cross-sector cooperative vision for the future of Europe to Members of the European Parliament.

Events 2024

13-14/06/2024	15th workshop on cooperative and responsible finance	Partner
18/06/2024	ICT Compliance Roundtable	EACB
20/06/2024	Global Cooperative Banking Forum in Berlin	EACB
17/07/2024	Apropos Coop Banking "Banking, Crises and Cooperative Banks"	EACB
10/10/2024	ERPB Working Group Event "Tackling Payment Fraud Holistically"	Partner
5/11/2024	Cooperative vision for a sustainable & competitive Europe - Priorities for the 2024-2029 term	Partner



ANNEXES



KEY STATISTICS

(AS OF 12/12/2024)

ECONOMIC INDICATORS						
European Countries and dataproviding institution	Total assets (EUROmio)	Total deposits from customers (EUROmio)	Total loans to customers (EUROmio)	Net profit after taxes (EUROmio)	Total equity (EUROmio)	Leverage Ratio (%)
Austria						
Österreichische Raiffeisenbanken	399 874	262 942	260 294	5 673	40 352	n.a.
Österreichischer Volksbanken	30 482	22 180	22 738	326	2 872	8,1
Bulgaria						
Central Co-operative Bank	4 187	3 750	1 545	56	386	9,2
Denmark						
Nykredit	225 719	15 327	194 545	1 461	13 561	5,1
Finland						
OP Financial Group	160 391	76 656	97 836	1 642	16 262	9,5
France						
Crédit Agricole	2 467 099	1 121 942	1 155 940	8 258	142 340	5,5
Crédit Mutuel	1 142 593	594 151	639 141	4 598	75 447	7,3
BPCE	1 544 100	711 658	839 457	2 804	71 200	5,0
Germany						
Co-operative Financial Network	1 597 180	1 033 200	1 023 602	10 805	143 238	8,0
Hungary						
Central Body of Integrated Financial Institutions***	4 176	3 261	3 360	60	819	13,6
Italy						
Federkasse (BCC)	257 694	188 877	139 013	2 701	23 600	9,2
Luxembourg						
Banque Raiffeisen	10 765	9 596	7 694	44	520	5,35
Netherlands						
Rabobank	613 796	391 380	434 007	4 377	49 641	7,1
Poland						
National Union of Co-operative Banks (KZBS)	62 650	43 169	21 412	1 110	4 519	9,6 6
Portugal						
Credito Agricola	25 302	20 004	12 059	297	2 438	9,6
Romania						
Creditcoop	344	255	245	1	31	20,61
Spain						
Unión Nacional de Cooperativas de Crédito	132 341	110 277	73 786	1 184	11 479	8,7
Banco de Crédito Cooperativo (BCC)	60 156	43 490	37 761	127	4 009	5,9
Switzerland						
Raiffeisen Schweiz	276 246	193 232	206 942	1 293	20 764	7,5
United Kingdom						
Building Societies Association	598 410	444 512	465 053	3 431	36 785	5,9
Total	9 613 506	5 289 860	5 636 430	50 248	660 262	
Non-European Countries						
Canada						
Desjardins Group	289 185	190 991	182 640	1 548	23 514	7,3
Japan						
The Norinchukin Bank / JA Bank Group 10	591 042	385 287	88 683	367	25 817	5,7
South-Korea						
Korean Federation of Community Credit Cooperatives	212 613	188 809	139 342	68	14 347	9,2
Total (Non-European)	1 092 840	765 087	410 665	1 983	63 678	

European Countries and dataproviding institution	PROFITABILITY INDICATORS			CAPITAL SOLIDITY INDICATORS
	ROA (%)	ROE after taxes (%)	Cost/Income Ratio (%)	Total capital ratio (%)
Austria				
Österreichische Raiffeisenbanken				
Österreichischer Volksbanken	1,42	14,3	46,9	18,2
Bulgaria				
Central Co-operative Bank	1,10	12,6	55,5	18,9
Denmark				
Nykredit	1,07	12,1	44,9	19,3
Finland				
OP Financial Group	0,70	11,4	32,2	23,0
France				
Crédit Agricole	0,98	10,6	46,1	21,2
Crédit Mutuel	n.a.	n.a.	58,8	21,1
BPCE	0,41	6,3	59,2	21,4
Germany				
Co-operative Financial Network	0,18	3,3 **	73,6	18,2
Hungary				
Central Body of Integrated Financial Institutions***	0,68	7,5	77,0	16,2
Italy				
Federkasse (BCC)	1,09	8,2	55,6	41,8
Luxembourg				
Banque Raiffeissen	1,05	11,6	56,1	24,4
Netherlands				
Rabobank	0,41	8,5	52,9	13,8
Poland				
National Union of Co-operative Banks (KZBS)	0,71	9,1	52,3	21,7
Portugal				
Credito Agricola	2.30 6	22.0 6	41.3 6	20,7 6
Romania				
Creditcoop	1,20	13,1	41,8	22,3
Spain				
Unión Nacional de Cooperativas de Crédito	0,22	0,9	98,5	28,0
Banco de Crédito Cooperativo (BCC)	0,89	10,3	42,7	n.a.
Switzerland				
Raiffeisen Schweiz	0,21	3,3	49,0	16,0
United Kingdom				
Building Societies Association	0,47	6,2	51,9	25,8
Total	0,58	10,5	55,2	27,2
Non-European Countries				
Canada				
Desjardins Group				
Japan				
The Norinchukin Bank / JA Bank Group 10	n.a.	6,8	76,3	21,9
South-Korea				
Korean Federation of Community Credit Cooperatives	0,06	1,1	96,0	21,0
Total (Non-European)	0,07	0,5	98,2	13,8

OTHER INDICATORS

European Countries and dataproviding institution	Nb Em- ployees Full-time equivalent	Nb Clients	Nb of legally independent local OR regional co-operative banks	Nb of branches (in home country)	Nb members	Nb of do- mestic ATMs
Austria						
Österreichische Raiffeisenbanken	33 000	2 800 000	291	1 337	1 700 000	n.a.
Österreichischer Volksbanken	3 108	966 082	9	232	484 000	n.a.
Bulgaria						
Central Co-operative Bank	1 559	1 941 829	n.a.	290	5 957	524
Denmark						
Nykredit	3 973	1 221 836	41	41	1 002 000	n.a.
Finland						
OP Financial Group	12 650	3 800 000	102	289	2 093 000	n.a.
France						
Crédit Agricole	154 000	54 000 000	39	6 750	11 800 000	n.a.
Crédit Mutuel	84 584	37 783 531	18	4 659	8 882 759	6 698
BPCE	100 000	35 000 000	29	n.a.	9 000 000	n.a.
Germany						
Co-operative Financial Network	171 689	> 30.000.000	697	7 207	17 827 897	14 696
Hungary						
Central Body of Integrated Financial Institutions***	648	126 907	3	14	4 312	19
Italy						
Federacasse (BCC)	29 147	6 500 000	222	4 089	1 440 433	6 500
Luxembourg						
Banque Raiffeisen	642	129 702	1	30	49 348	n.a.
Netherlands						
Rabobank	40 467	9 600 000	78	149	2 300 000	n.a.
Poland						
National Union of Co-operative Banks (KZBS)	26,950 6	n.a.	492	3 627	856 980	n.a.
Portugal						
Credito Agricola	4 136	1 593 059	68	618	409 272	1608
Romania						
Creditcoop	1 569	575 201	33	695	658 848	n.a.
Spain						
Unión Nacional de Cooperativas de Crédito	12 865	7 240 781	42	3 324	1 743 243	4 213
Banco de Crédito Cooperativo (BCC)	5 176	3 757 429	18	832	1 706 159	1 503
Switzerland						
Raiffeisen Schweiz	10 305	3 693 000	219	784	2 057 532	1 549
United Kingdom						
Building Societies Association	40,400 4	26,200,000 12	42	1264	26 200 000	1 455
Total	736 868	226 929 357	2 444	36 231	90 221 740	
Non-European Countries						
Canada						
Desjardins Group	56 165	7 700 000	209	661	7 700 000 7	1 559
Japan						
The Norinchukin Bank / JA Bank Group 10	189 824	n.a.	541	5987	10 275 232	10 292
South-Korea						
Korean Federation of Community Credit Cooperatives	15 726	23 554 281	1 288	3264	8 563 335	8 071
Total (Non-European)	459 758	31 254 281	2 038	9 912	36 702 844	

	MARKET SHARE			
European Countries and dataproviding institution	Domestic market share deposits (%)	Domestic market share loans (%)	Mortgage market share (%)	Market share SMEs (%) 1
Austria				
Österreichische Raiffeisenbanken	37,1	36,0	n.a.	n.a.
Österreichischer Volksbanken	4,1	4,0	n.a.	4,8
Bulgaria				
Central Co-operative Bank	5,0	3,3	4,8	n.a.
Denmark				
Nykredit	5,8	35,0	44,7	n.a.
Finland				
OP Financial Group	39,2	34,3	38,9	37,9
France				
Crédit Agricole	26,0	23,6	32,6	33,2
Crédit Mutuel	16,3	18,4	20,6	20,0
BPCE	21,0	22,0	n.a.	n.a.
Germany				
Co-operative Financial Network	22,1	23,4	32,2	36,3
Hungary				
Central Body of Integrated Financial Institutions***	0,4	0,3	0,5	0,2
Italy				
Federkasse (BCC)	10,0	8,0	11,8	n.a.
Luxembourg				
Banque Raiffeisen	19,0	13,0	13,0	n.a.
Netherlands				
Rabobank	34,7	n.a.	19.3 2	39.3 **
Poland				
National Union of Co-operative Banks (KZBS)	10.3 6	6.9 6	5.7 6	8.0 6
Portugal				
Credito Agricola	8,0	5,8	3,4	12,7
Romania				
Creditcoop	n.a.	n.a.	n.a.	n.a.
Spain				
Unión Nacional de Cooperativas de Crédito	7,5	6,5	n.a.	n.a.
Banco de Crédito Cooperativo (BCC)	2,7	3,0	n.a.	n.a.
Switzerland				
Raiffeisen Schweiz	15,6	n.a.	17,8	n.a.
United Kingdom				
Building Societies Association	19,0	n.a.	23,5	n.a.
Total				
Non-European Countries				
Canada				
Desjardins Group	38.0 8	26.0 8	38.0 8	23.0 8
Japan				
The Norinchukin Bank / JA Bank Group 10	9,6	n.a.	n.a.	n.a.
South-Korea				
Korean Federation of Community Credit Cooperatives	8,6	n.a.	n.a.	n.a.
Total (Non-European)				

* Table elaborated in collaboration with Tilburg University and based on Members input. The aggregated figures for 2020 onwards are not comparable to those before 2019.

The reason is that LCCU Group from Lithuania and Dezelna Banka Slovenije d.d. from Slovenia are no longer EACB members and the Korean Federation of Community Credit Cooperatives from South Korea joined the EACB in 2020.

** These indicators are calculated by Tilburg University which bears the full and sole responsibility. These figures are neither reported nor formally approved by the respective co-operative banks.

*** In April 2022, the largest cooperative bank, the Takarékbank, left the Organization of Integrated Credit Institutions.

¹ Cooperative banks do not apply a similar definition of the SME sector.

² Market share new mortgages

³ Market share corporate loans

⁴ Just FTEs, no parttime employees are included

⁵ Market shares in terms of deposits and loans of residents only

⁶ Data refers to co-operative banks without the two Polish affiliating banks

⁷ Desjardins Group has a total of 7.7 million members and clients. All clients of each local caisse are members. Desjardins subsidiaries have clients who are not necessarily members of a caisse.

⁸ Market shares in the province of Québec

⁹ Totals are based on reported data, i.e. data for some co-operative banks were not available.

¹⁰ Economic indicators, Profitability and Capital solidity indicators are The Norinchukin Bank figures. Other indicators and market share indicators are cooperative group (JA Bank) figures.

¹¹ The number of FTEs and members pertain to the JA Bank Group. In previous years, these figures only referred to The Norinchukin Bank

¹² Total number of clients equals total number of members, because every customer has to be a member.

MEMBER ORGANISATIONS

(AS OF 31/12/2024)

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Fédération Nationale du Crédit Agricole

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DZ BANK AG

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Federazione Italiana delle Banche di Credito Co-operativo - Casse Rurali ed Artigiane

Via Torino 153

I - 00184 ROMA

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www.creditocooperativo.it

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www.raiffeisen.lu

NETHERLANDS

Rabobank Nederland

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www.rabobank.nl

POLAND

Krajowy Związek Banków Spółdzielczych - KZBS

ul. T. Boya-Zelenskeigo 6 Apt. 22/23
PL - 00 - 621 WARSAW
Tel.: +48 22 875 30 30 - Fax: +48 22 875 30 40
www.kzbs.org

PORTUGAL

FENACAM - Federação Nacional das Caixas de Crédito Agrícola Mútuo, F.C.R.L.

R. Professor Henrique Barros, N° 4, 7°
P - 2685-338 PRIOR VELHO
Tel.: +351 (21) 313 69 00
fenacam.ca@creditoagricola.pt
www.fenacam.pt
www.creditoagricola.pt

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Banca Centrală Cooperatistă (CREDITCOOP)

Plevnei Way 200 - Sector 6
RO - BUCHAREST
Tel.: +40 21 317.74.05 - Fax: +40 21 317 74 86
www.creditcoop.ro

SPAIN

Unión Nacional de Cooperativas de Crédito (UNACC)

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E - 28014 MADRID
Tel.: +34 91 781 94 18
www.unacc.com

Banco de Crédito Cooperativo (BCC)

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E - 28046 MADRID
Tel.: +34 914 364 703
www.bcc.es

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Business Council of Co-operatives and Mutuals (BCCM)

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Sydney NSW, 2000, Australia
Tel.: +61 2 8279 6050
www.bccm.coop

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CERA - KBC Ancora

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B - 3000 LEUVEN
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www.desjardins.com

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Cyprus Asset Management Ltd

8, Gregory Afxentiou Street
CY - 1096 NICOSIA
Tel.: +357 22 74 30 00
www.kedipes.com.cy

DENMARK

Nykredit

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Tel.: +45 70 10 90 00
www.nykredit.dk

HUNGARY

Integrált Hitelintézetek Központi Szervezete

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www.szhisz.hu

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1-2-1 Otemachi, Chiyoda-ku

TOKYO 100-8155

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www.nochubank.or.jp

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Korean Federation of Community Credit Cooperatives (KFCC)

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114-gil, Gangnam-gu

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www.kfcc.co.kr

SWITZERLAND

Raiffeisen Schweiz

Raiffeisenplatz

CH - 9001 St. Gallen

Tel.: + 41 71 225 88 88 - Fax: +41 71 225 88 87

www.raiffeisen.ch

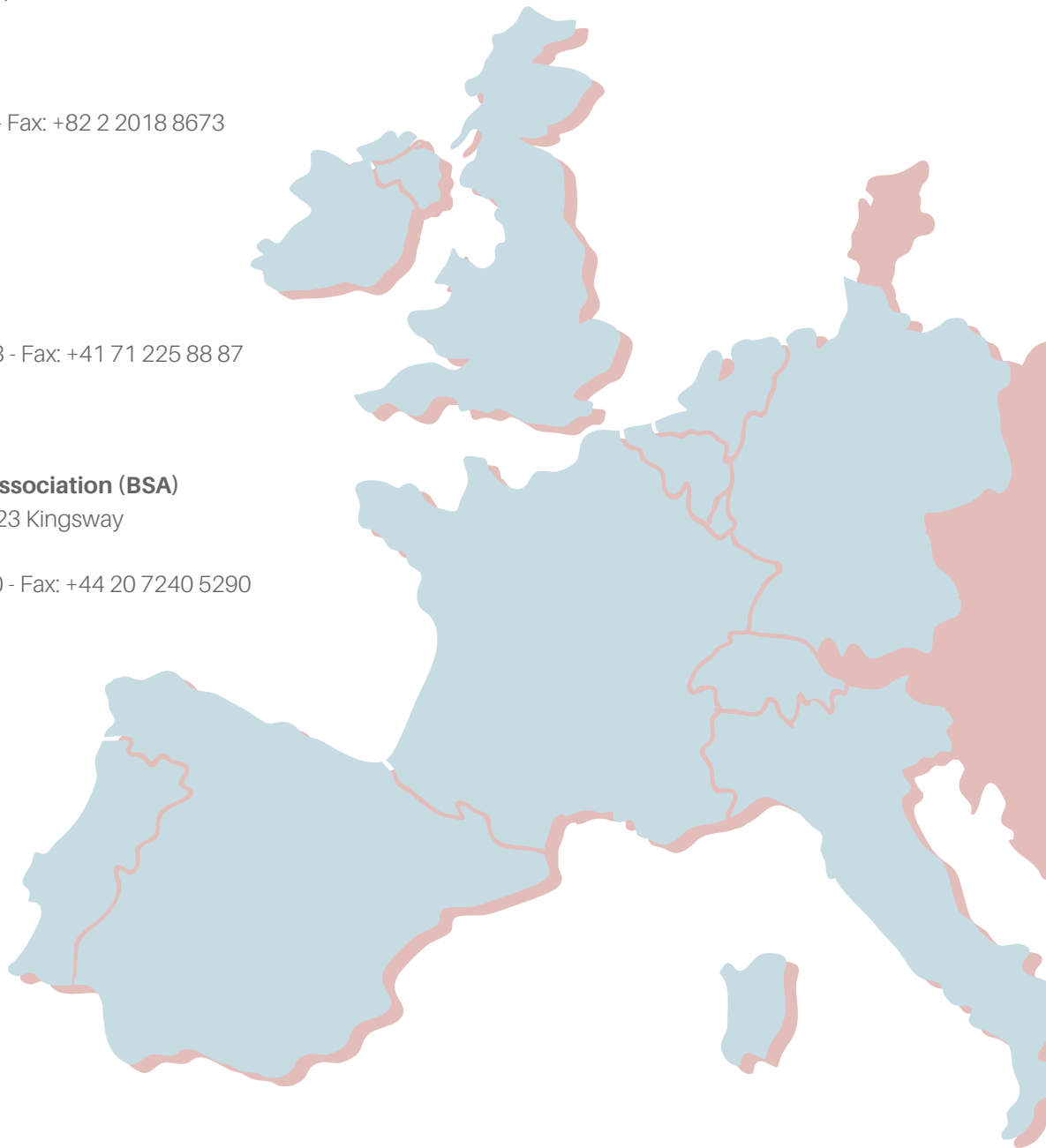
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Building Societies Association (BSA)

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(AS OF 31/12/2024)

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Crédit Mutuel (CNCM)

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Confédération Nationale du Crédit Mutuel (CNCM)

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M. KOLAK

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D. QUINTEN

Bundesverband der Deutschen Volksbanken und
Raiffeisenbanken – BVR

C. RIESE

DZ BANK AG

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A. TAJTHY

Integrált Hítelintézetek Központi Szervezete

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S. GATTI

Federazione Italiana delle Banche di Credito Cooperativo-Casse Rurali ed Artigiane

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