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John Berrigan
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Submission of the Call for Advice for the purposes of a second benchmarking of national loan enforcements from a bank creditor perspective

Dear Mr Berrigan,

On 1 April 2025 the EBA received from the Commission Services a Call for Advice¹ on the Benchmarking of National Loan Enforcement Frameworks. The EBA was invited to replicate the work carried-out in the first benchmarking exercise² in 2020 by applying the same methodology, subject to the necessary adaptations and improvements, to more recent data, in order to update the existing insolvency benchmarks and by studying the characteristics of country-level loan enforcement procedures in terms of recovery rates and times to recovery.

It is my pleasure to submit to you today the final report on the Call for Advice. This report follows the interim report submitted on 16 July, which presented EU Benchmarks for the main variables, namely Recovery Rate, Time to Recovery, and Judicial Cost to Recovery, per asset class (Corporate and SME). The present report now also includes an econometric analysis of the characteristics of country-level loan enforcement procedures in terms of recovery rates and times to recovery.

The report is based on data collected from a sample of 260 banks from 27 Member States and for a subset of loans that are intended to be representative of the national loan enforcement and recovery processes across the EU Member States. Participating banks were the same as in the previous exercise, where possible. The banks in the eurozone were also selected based on the relevant debtors identified using AnaCredit. Despite the relatively high number of participating

¹ <https://www.eba.europa.eu/sites/default/files/2025-05/8d87e189-7d2d-4e06-85d0-bb9b084d6c47/Note%20to%20Mr%20Campa%20v2%20rev.pdf>

² EBA, 2020. Report on the Benchmarking of National Loan Enforcement Frameworks. EBA/Rep/2020/29. https://www.eba.europa.eu/sites/default/files/document_library/About%20Us/Missions%20and%20tasks/Call%20for%20Advice/2020/Report%20on%20the%20benchmarking%20of%20national%20loan%20enforcement%20frameworks/962022/Report%20on%20the%20benchmarking%20of%20national%20loan%20enforcement%20frameworks.pdf

banks, as well as the consistency of the results when comparing with the previous results in 2020, it should be stressed that some remaining data quality issues suggest that the results and possible policy considerations should be drawn with appropriate caution.

All in all, the final report provides a very rich and unique set of benchmarks, based on loan-by-loan data, showing averages and dispersion of the recovery outcomes across the 27 EU Member States. In addition, the report discusses characteristics in insolvency regimes across the EU that are associated with more efficient outcomes and identifies areas where the divergence in the effectiveness of the national insolvency regimes is widest, by analysing a number of variables that help to explain the observed differences in the benchmarks. The EBA will publish the report on its website shortly.

I look forward to continuing the fruitful cooperation with your services in the area of analysis of the national loan enforcement processes across the EU Member States.

Yours sincerely,

José Manuel Campa

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Encl: 2025 Final Report on the Call for Advice for the purposes of a benchmarking of national loan enforcements from a bank creditor perspective