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European Banking Authority

EBA-CP-2013-8@eba.europa.eu

## **Consultation paper on the assessment of recovery plans**

The Swedish Banker's Association agrees broadly to the draft regulatory technical standards on the assessment of recovery plans. It is however essential that the recovery options can be executed within the existing governance structure of the institution/group. Further, we believe that the impact assessment is underestimated concerning the cost for the institutions.

**Q1 If your recovery plan has already been assessed by a competent authority, what are your general comments to this RTS on the basis of your experience? In particular, which elements do you suggest to add to the assessment criteria specified in this RTS?**

In accordance with the EBA's recommendation EBA/REC/2013/02 four of the Swedish banks are recommended to develop and present a group recovery plan to the Swedish Supervisory Authority (Finansinspektionen) by 31 December 2013. One bank of those Swedish banks was requested to submit their Group Recovery Plan to the Swedish FSA in June 2012, following G-SIFI classification in November 2011. The remaining three banks are in process of developing a group recovery plan. Since the Swedish banks are in the process of developing recovery plans the submitted answers should be read in the light of that.

The RTS is meaningful and covers the relevant aspects

**Q2 Do you think that the elements which shall be subject to assessment according to this Article are comprehensive? Do you think that some of the elements should be amended? Do you think that some additional elements should be added?**

The list covers the key elements.

**Q3 Do you think that the elements which shall be subject to assessment according to this Article are comprehensive? Do you think that some of the**



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The elements mentioned are the relevant ones for an evaluation of recoverability.

**Q4 Do you think that the elements which shall be subject to assessment according to this Article are comprehensive? Do you think that some of the elements should be amended? Do you think that some additional elements should be added?**

Requirement in Article 5 paragraph 1h is not meaningful and should be deleted. It is very unclear what the "verification of recovery options and the indicators" mean. The remaining parts can be supported.

**Q5 Could you describe what key elements the competent authority should assess when reviewing the matters stipulated in Article 5(3) letters a) to d)?**

The key elements would be to review the impact on the recovery indicators. Furthermore it should be ensured that the recovery options can be executed within the existing governance structure of the institution/group.

**Q6 Do you agree with our analysis of the impact of the proposals in this CP? If not, can you provide any evidence or data that would explain why you disagree or might further inform our analysis of the likely impacts of the proposals?**

No view on the authorities' costs. The costs for the institutions are substantial.

SWEDISH BANKERS' ASSOCIATION



Thomas Östros



Åsa Arffman