

Template for comments

Public consultation on the Review of the ECB Regulation on supervisory fees

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General comments

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Please enter all your feedback in this list.

When entering your feedback, please make sure:

- that each comment only deals with a single issue;
- to indicate the relevant article/chapter/paragraph, where appropriate;
- to indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline:

ID	Article of the regulation	Page	Type of comment	Detailed comment	Concise statement why your comment should be taken on board
1	12	29	Clarification	<p>Banks need to have more visibility on the future budgets of the SSM. A clear and strict definition of the ECB budget on the long term (several years), in order to avoid budget drifting should be designed.</p> <p>Moreover, after a learning period, the EBC should be in a position to reduce its budget because of productivity gains and greater harmonization. After a stabilization period, the ECB cost should be planned on a three year period.</p> <p>Considering the transfer of significant supervisory tasks from NCAs to the ECB, it should be expected that supervisory fees due at national level be reduced as envisaged in articles (30 (5) of the SSM regulation. It would be appropriate to set a term (e.g. 3 years) when the total expenditure is to be evaluated also in relation to that of the NCAs in order to have some control over the size of the total budget.</p>	
2	12	29	Clarification	<p>In addition to the European Parliament, the Council, the Commission and the Eurogroup, banks should be informed of or have an oversight on the envisaged evolution of the structure and amount of the annual supervisory fees they pay to the ECB.</p>	
3	5	26	Clarification	<p>The ECB could also be expected to optimise its costs by limiting the recourse to external consultants in the context of its on-going tasks; this is especially the case for on-site missions for which the lack of ECB inspectors is currently compensated by the hiring of external consultants.</p>	
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