

Stellungnahmen DK-Stellungnahme “Guidelines on the application of the definition of default under Article 178 of Regulation (EU) 575/2013”

22. Januar 2016

Die EBA legt eine umfassende Guidelines zu allen Aspekten der Ausfalldefinition im auf internen Ratings basierenden Ansatz (IRBA) und im Kreditrisikostandardansatz (KSA) vor.

Aus der Stellungnahme:

We welcome the consultation paper's underlying thoughts of harmonizing supervisory law, supervisory reporting and accounting in the context of the definition of default. However, the various fields of application have different underlying objectives. Thus, harmonization is not always possible. The proposed specification of the default definition will trigger considerable adjustment needs for all banks in Germany. This will apply in particular if historical data are no longer used or have to be adjusted. Therefore sufficiently long implementation periods should be allowed for institutions so that they can carry out the required process and method adjustments. Waiving the parallelism of two different default definitions could reduce the implementation costs. Institutions should not be penalized at least during the implementation period if they are not yet able to fully comply with individual parts of the guidelines. An incremental introduction and implementation of the guidelines in the jurisdictions may be expedient.