



FBF response to EBA consultation on permissions for data waivers.

The French Banking Federation (FBF) represents the interests of the banking industry in France. Its membership is composed of all credit institutions authorized as banks and doing business in France, i.e. more than 390 commercial, cooperative and mutual banks. FBF member banks have more than 38,000 permanent branches in France. They employ 370,000 people in France and around the world, and service 48 million customers.

Comment on the definition of institution

The French Banking Federation welcomes the opportunity to comment the draft RTS specifying conditions according to which competent authorities may permit institutions to use relevant data covering shorter time period (data waiver permission) with the reference EBA/CP/2014/02. We appreciate this disposal which encourages the migration of some institutions to the IRB approach. But, it should be stressed that the draft RTS is not clear enough regarding the entity concerned by the data waiver permission. In the article 5 the use of the term "institution" is confusing and difficult to interpret. According to the FBF, it should be replaced by "parent company".