

Polish Bank Association position  
on the European Commission  
proposals on the reform of  
European supervisory  
architecture

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# General comments

- Experience after the crisis is the trigger for new supervisory architecture in EU
- Need for bigger harmonisation on European single market, the list of national options is long
- Current structure of supervision in Europe is too weak

# General comments – our perspective

- Specific situation of banking sector in CEE countries
- Different proposals concerning the structure of banking supervision in Europe were presented recently by different institutions, particularly regarding the division of task between home and host supervisor
- Last say for European supervisor is accepted, preferred voting according to the system „one state – one voice”
- General direction of changes in supervision architecture in EU seems to be politically decided
- Devil – as usually – is in details

# A lot depends on praxis of new supervision body

- The regulation is the framework for activity of new body
- It is important framework, but it remains only framework
- A lot depends on praxis of new supervision body, if EBA takes the opportunity to make a good job
- A big job has to be made quickly by EBA in order to adapt the existing banking regulations to new supervision architecture in Europe
- Attitude of European Banking Authority is important and the aid received from national supervisors can be crucial.
- The bigger activity of authority and supervisors from CEE countries in the EBA activity is necessary.

# Role of EBA in the architecture of banking supervision

- Role of European Commission
- Cooperation with European Central Bank and European Systemic Risk Board
- Cooperation with national supervisors and colleges of supervisors

# Comments on detailed questions

- Scope of technical standards and role of European Commission
- Emergency situation – definition, role of EBA and fiscal responsibility
- Settlement of disagreement between competent supervisors and voting system in Council
- Distinction between financial market participants and „key” financial market participants
- Exchange of information between supervisors, choice of source of information for EBA
- Confidentiality of EBA database
- Financing