

Stellungnahmen DK-Stellungnahme zum EBA- Diskussionspapier „Future of the IRB Approach“

6. Mai 2015

Das Diskussionspapier der EBA macht Vorschläge, wie die Vergleichbarkeit und Robustheit des auf internen Ratings basierenden Ansatz zur Ermittlung der Kapitalanforderungen unter Säule I (IRBA) gestärkt werden können (u. a. Regel-Review, Implementierungs-Review, erhöhte Transparenz). Hierzu hat die DK Stellung genommen.

Aus der Stellungnahme:

„We basically welcome the transparency created by the EBA by publishing the adjustment and harmonisation measures which it is planning regarding the IRBA. We would like to encourage the EBA to move ahead towards a more harmonized interpretation and application of the IRB approach reducing differences in RWA which are not explained by distinct risk profiles or management practices. When saying this, we recommend the EBA to be mindful in terms of burden for banks, implementation timelines, and to follow the principle of proportionality. Besides that, we propose the EBA to align with other regulatory, but also accounting, driven initiatives, like the guidance on accounting for expected credit losses. [...]“