

Resolution Planning in Practice

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INTRODUCTION SRB Mission



- The SRB together with the National Resolution Authorities (NRAs) form the SRM
- The SRB is directly responsible for ± 140 banking groups:
 - > Significant banks
 - > Cross-border banking groups
- NRAs are directly responsible for all other banks. SRB could 'take over' direct responsibility
- The SRB closely cooperates with the NRAs



INTRODUCTION SRB Tasks & Responsibilities

Business as usual

Recovery stage

Resolution stage

Prepare for resolution

- Develop resolution plans and set MREL
- Assess resolvability and remove obstacles
- Manage the Single Resolution
 Fund



Triggers for resolution

- ECB and/or SRB determine if a bank is Failing or likely to fail
- ECB and/or SRB determine if alternative measures are possible
- SRB determines if resolution is in the public interest



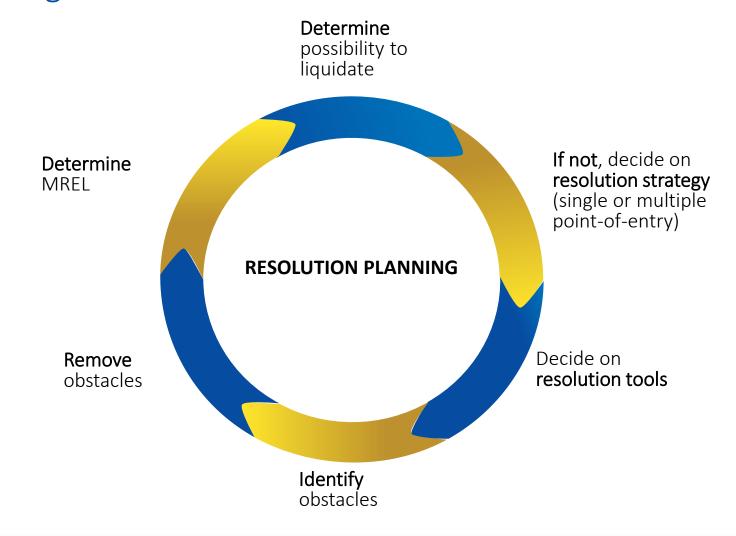
Enact resolution schemes

- Determine resolution actions to be adopted (based on resolution plan & market circumstances)
- Valuation to determine the extent of the write down or conversion
- Valuation to check the no-creditorworse-off principle





PREPARING RESOLUTION PLANS Ongoing Process





PREPARING RESOLUTION PLANS Multi-Annual Process

Transitional Plan	Phase 2 Plan	Phase 3 Plan
2015 (36) and 2016 (33 plans)	2016 (59 plans) and 2017	2017
Foundation for resolution plans, drafted by NRAs in 2015 and by the SRB, together with NRAs, in 2016.	Based on the Resolution Planning Manual. Informative MREL at consolidated level were communicated separately	More advanced plans, with binding MREL at consolidated level.
Chapters include:	Chapters include:	Chapters include:
•Strategic business analysis	•Updated TRP-chapters	•Updated Phase 2-chapters
Preferred resolution strategy	•Additional chapters: financial &	•Based on new SRB Templates and
•First identification of impediments to resolvability	operational continuity, information & communication •First resolvability assessment	Methodologies (i.e. critical functions, access to FMIs, operational continuity





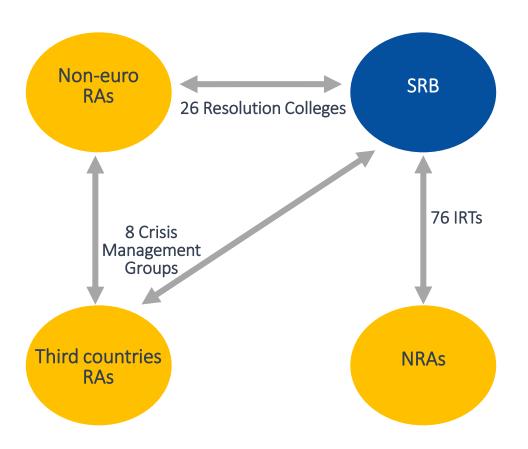
PREPARING RESOLUTION PLANS Horizontal Issues

- Addressing horizontal policies and operational issues
- Bringing together NRAs and observers within the SRM
- Coordinating work through sub-structures (taskforces, experts' networks)
- Deliverables feed into next iterations of resolution plans (Phase 3, Phase 4, etc.)





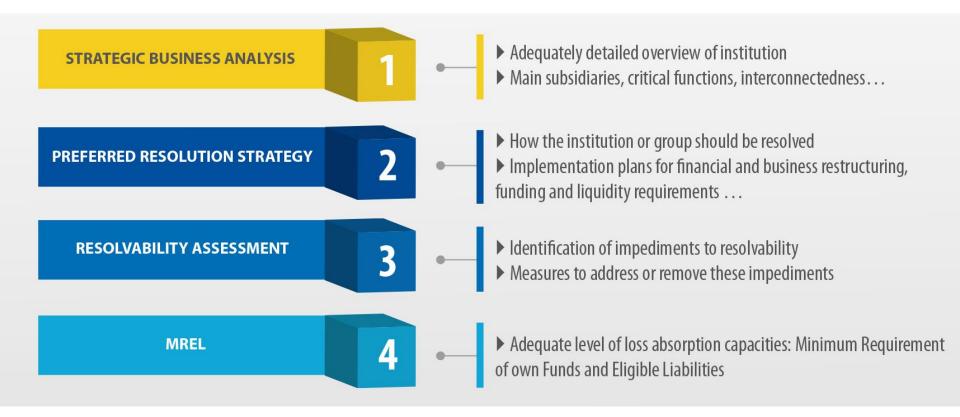
PREPARING RESOLUTION PLANS Interactive Process







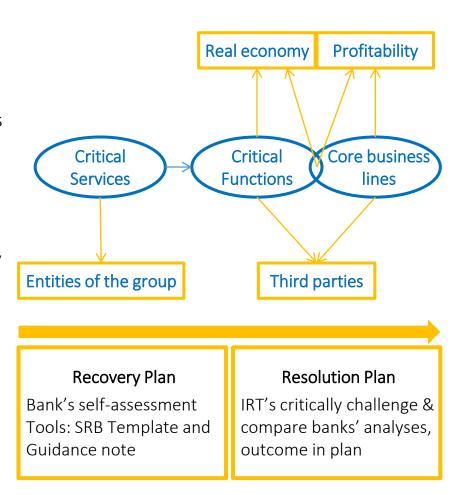
PREPARING RESOLUTION PLANS Key Elements





Focus on: Critical Functions

- Critical functions are:
 - > Provided to third parties AND
 - A sudden disruption would have a material negative impact on third parties, give rise to contagion or undermine general confidence of market participants
- Key role in resolution plans
 - > Input for separability analysis, preferred resolution strategy and tools, financial & operational continuity
 - > Input for quantum & location loss-absorbing capacity
- The SRB developed a common approach for identifying critical functions:
 - > Harmonized methodology for assessing criticality
 - > Harmonized indicators behind methodology
 - > No fixed thresholds for criticality
 - > Methodology & indicators summarized in template and guidance note





Focus on: Preferred Resolution Strategy & Tools

- Resolution authorities assess if the bank is eligible for resolution
 - > Are normal insolvency proceedings credible?
 - > Are normal insolvency proceedings feasible?
- If so, resolution authorities need to select the appropriate resolution strategy and tools
 - > Which strategy and tool(s) are suitable?
 - > Are these strategy and tool(s) necessary?
 - > Are these strategy and tool(s) proportionate?
 - Resolution always needs to be compared to insolvency
- Eligibility for resolution is time-dependent
 - > market circumstances, mergers, business restructuring, etc.
 - > Recent cases: different outcomes



Normal insolvency proceeding credible & feasible?

Assess if one or more of the objectives is at risk:

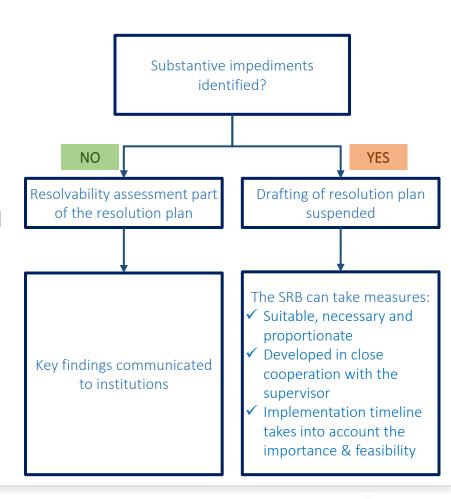
- 1. Ensure the continuity of critical functions
- 2. Avoid significant adverse effects on financial stability
- 3. Protect public funds
- 4. Protect covered depositors and investors
- 5. Protect clients funds and assets

Resolution Strategy	Resolution Tools
1.Single Point of Entry2.Multiple Point of Entry3.Hybrid Strategy	1.Sale of business2.Bridge bank3.Asset separation4.Bail-in



Focus on: Resolvability Assessment

- The preferred resolution strategy also depends on the outcome of the resolvability assessment
- The outcome of the resolvability assessment impacts the further resolution planning process
- Examples of the potential impediments identified last year:
 - > Insufficient loss absorbing capacity
 - Operational continuity, such as continuity of access to FMIs
 - > Inability to provide information in time
 - > Execution of bail-in
 - > Funding during/post resolution
 - > Group structure (i.e. lack of a Holding Company)
 - > Cross-border issues





Focus on: MREL

- The SRB is making good progress in refining its MREL policy and developing MREL targets for the banks under its remit.
 - > The SRB developed and requested the Liability Data Template:
 - Providing a view on liability structure and loss-absorbing mechanism
 - Assisting in setting the adequate MREL requirements at different levels (solo, consolidated)
 - Enabling to check compliance with the MREL decision in the future
 - Having a first set of detailed information to operationalise bail-in in real cases
 - > In 2016, the SRB organised numerous workshops with banks, including discussion of informative (non-binding) MREL targets.
 - > Publication: Approach taken in 2016 and next steps, 17 February 2017, available on SRB website
- In 2017, the SRB has started to develop binding targets for major banking groups, which resolution colleges will discuss in the fourth quarter.
 - > The SRB aims to develop MREL requirements for these groups in late 2017/early 2018.
 - > MREL requirements are set on the basis of the current legal framework.





THANK YOU