## The ESRB template on the O-SII and G-SII buffer<sup>1</sup>

Notifying national authority (If several designated authorities, please mention all of them)			
1.1 Name of the notifying authority	Autorité de Contrôle Prudentiel et de Résolution (ACPR)		
2. Buffer levels and the institution to which they apply			
2.1 Categorisation of measures	Which measure do you intend to implement? - O-SII		
2.2 Concerned institution or group of institutions	On which institution is the measure applied?  a. LA BANQUE POSTALE (LBP)  b. N/A:  c. N/A –  No O-SII notification on a sub-consolidated basis from ACPR. A designation of a foreign subsidiary as O-SII is unlikely because there is no significant banking presence abroad.		
2.3 Level of the buffer applied	The level of the buffer applied to LA BANQUE POSTALE group amounts to 0.25%.  This buffer is subject to a 4 year phase-in from 2016 (incl.) to 2019 (incl.). The buffer will be incremented each year by 0.0625%.		
2.4 Firm level at which the buffer is applied	Consolidated level.		
2.5 Information on other buffers already in application	None.		
2.6 Annual review of the G-SII or O-SII (Articles 131.6 and 131.12)	Change of level of O-SII buffer: Not applicable as it is the first designation.		
3. Rational for activation of the G-SII and O-SII buffer			
3.1 Description of the G-SII (Article 131.2)	NA		
3.2 Description of the O-SII (Article 131.3)	See below		
3.3 Indicators used for designation of the G-SII (Article 131.2 and 131.9)	NA		

 $<sup>^{\</sup>rm I}$  To be filled in and submitted for each O-SII/G-SII.

The identification of credit institutions as O-SIIs was carried out according to the two steps referred in the aforementioned EBA Guideline. The first step consists in automatic designation of credit institutions whose score exceeds the 3.5% threshold that requires a credit institution to be categorized as O-SII. It isn't the case for LA BANQUE POSTALE Group (LBP) whose score is even below the possible threshold modification mentioned in EBA/GL/2014/10 (275 basis points).

Credit institution	Scores (basis points)
LBP	201

Indicator	Weight
Size	25%
Value of Domestic payment transactions	8.33%
Private sector deposits from depositors in the EU	8.33%
Private sector loans to recipients in the EU	8.33%
Value of OTC derivatives (notional)	8.33%
Cross jurisdictional liabilities	8.33%
Cross jurisdictional claims	8.33%
Intra-financial system liabilities	8.33%
Intra-financial system assets	8.33%
Debt securities outstanding	8.33%

## 3.4 Indicators used for designation of the O-SII (Article 131.3)

Supervisory judgement has been used to designate LBP as O-SII.

For this second step of the designation procedure of the Guidelines (supervisory judgment), ACPR has selected two additional optional indicators from Annex 2:

- share of private domestic deposits, excluding regulated saving accounts centralised at Caisse des Depots et Consignations (CDC<sup>2</sup>);
- share of private domestic loans.

For both indicators, ACPR has decided to use a threshold of 3.5% (350 basis points over 10 000). LBP market share for deposit is higher than this level.

The rationale for excluding regulated saving accounts centralised at CDC is the following: in spite of the recording of these centralised deposits in the balance sheets of French credit institutions, in practice, the corresponding amounts are not freely available to the banks.

## 3.5 In case of O-SII: Suitability, effectiveness and proportionality of measure (Article 131.7)

ACPR has aimed at ensuring an overall consistency between G-SII and O-SII buffers applied to the four French G-SIIs and continuity for the designated O-SIIs which are not G-SIIs. To ensure level playing field and to reflect the hierarchy between O-SIIs in terms of systemic importance, ACPR has decided to calibrate O-SII buffer in relative proportionality with O-SII scores.

The French banking system is rather concentrated on a consolidated basis. Four French banking groups have a G-SII status (BNP PARIBAS, SOCIÉTÉ GÉNÉRALE, GROUPE CRÉDIT AGRICOLE and GROUPE BPCE). With the designation of two additional systemic banking groups in France (GROUPE CRÉDIT MUTUEL and LA BANQUE POSTALE, on top of the four G-SIIs), the market share of the 6 designated O-SIIs covers around 83% of the total assets of the French banking system (at the highest level of consolidation).

<sup>&</sup>lt;sup>2</sup> In France, a significant part of regulated saving accounts deposits collected by credit institutions is replaced at Caisse des Depots et Consignations (CDC), a French state owned financial institution. The market share of private domestic deposits for each bank has thus been determined after deduction of the deposits they replace at CDC.

3.6 In Case of O-SII, Assessment of likely impact on the internal market (Article 131.6)	So far, the main factor behind credit dynamics in France is the low level of demand for credit from non-financial agents.	
4. Combinations and timing of the G-SII or O-SII notified		
4.1 combinations between G- SII and OSII buffers (Article 131.14)	NA: no G-SII buffer.	
4.2 Combinations with SRB buffers (Article 131.14 + Article 133.5)	The "Haut Conseil de Stabilité Financière" (HCSF) is the designated authority in charge of the SRB buffer	
4.3 Combined buffer requirement (Article 131.16 and Article 131.17)	NA	
4.4 Timing of the measure	1 <sup>st</sup> January 2016;	
4.5 Review of the measure	One year.	
5. Miscellaneous		
5.1 Disclosure	ACPR website	
5.2 Contact person(s) at notifying authority	Research Directorate, Statistical Studies Division  (Etudstat@acpr.banque-france.fr)	
5.3 Any other relevant information		