



Notification template for Article 131 of the Capital Requirements Directive (CRD) – Other Systemically Important Institutions (O-SIIs)

Template for notifying the European Central Bank (ECB) and the European Systemic Risk Board (ESRB) of the setting or resetting of an O-SII buffer under Article 131(7) CRD and of the identity of O-SIIs under Article 131(12) CRD

Please send/upload this template to:

- macropru.notifications@ecb.europa.eu when notifying the ECB (under Article 5 of the Single Supervisory Mechanism (SSM) Regulation¹);
- DARWIN/ASTRA when notifying the ESRB.

The ESRB will forward this notification to the European Commission, to the European Banking Authority (EBA) and to the competent and designated authorities of the Member States concerned without delay and will publicly disclose the names of the O-SIIs on its website. This notification will be made public by the ESRB once the relevant authorities have adopted and published the notified macroprudential measure².

E-mailing/uploading this template to the above addresses constitutes official notification; no further official letter is required. To facilitate the work of the notified authorities, please send the notification template in a format that allows the information to be read electronically.

1. Notifying national authority						
1.1 Name of the notifying authority	National Bank of Belgium (NBB)					
1.2 Country of the notifying authority	Belgium					
2. Description of the measure						
	Name of institution	LEI	Consolidation level			
	1. KBC Group	213800X3Q9LSAKRUWY91	Consolidated			
	KBC Bank NV	6B2PBRV1FCJDMR45RZ53	Sub-consolidated + Individual			
2.1a Institution or group of	2. BNP Paribas Fortis SA/NV	KGCEPHLVVKVRZYO1T647	Consolidated + Individual			
institutions concerned	3. Euroclear Holding	549300IQZVZ949N37S44	Euroclear Bank consolidated to the level of Euroclear Holding			
	Euroclear SA	549300CBNW05DILT6870	Sub-consolidated			
	Euroclear Bank SA/NV	549300OZ46BRLZ8Y6F65	Sub-consolidated + Individual			
	4. ING Belgium NV	JLS56RAMYQZECFUF2G44	Consolidated + Individual			
	5. Belfius Bank SA/NV	A5GWLFH3KM7YV2SFQL84	Consolidated + Individual			
	6. The Bank of New York Mellon	MMYX0N4ZEZ13Z4XCG897	Consolidated + Individual			

¹ Council Regulation (EU) No 1024/2013 of 15 October 2013 conferring specific tasks on the European Central Bank concerning policies relating to the prudential supervision of credit institutions (OJ L 287, 29.10.2013, p. 63).

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² On request by the notifying authority, it may be agreed with the Head of the ESRB Secretariat that this notification, or a part thereof, should not be published for reasons of confidentiality or financial stability.

	7. Investeringsmaatschappij Argenta	549	3008QOCP58OLEN998	to th	enta Spaarbank consolidated ne level of Investerings-	
	Argenta Bank- en Verzekeringsgroep NV/SA	549			naatschappij Argenta ub-consolidated	
	Argenta Spaarbank SA/NV	A6NZLYKYN1UV7VVGFX65 Si		Sub	sub-consolidated + Individual	
	8. Crelan SA				onsolidated+ Individual	
	AXA Bank Belgium SA				ub-consolidated	
2.1b Changes to the list of institutions concerned	N/A					
	Name of institution New O-SII buffer Previous O-SII buffer					
	1. KBC Group		1.50%	Ticviou	1.50%	
	1. KBC Group KBC Bank NV		1.50%		1.50%	
	2. BNP Paribas Fortis SA/NV		1.50%		1.50%	
	3. Euroclear Holding		1.50%		0.75%	
	Euroclear SA		1.50%		0.75%	
2.2 Level of the buffer	Euroclear Bank SA/NV		1.50%		0.75%	
applied	4. ING Belgium NV		1.50%		1.50%	
арриса	5. Belfius Bank SA/NV		1.50%		1.50%	
	6. The Bank of New York Mellon		0.75%		0.75%	
	7. Investeringsmaatschappij		0.75%		0.75%	
	Argenta Bank- en Verzekeri		0.75%		0.75%	
	NV/SA		0.75%		0.75%	
	Argenta Spaarbank SA/NV					
	8. Crelan SA		0.75%		0.75%	
	AXA Bank Belgium SA		0.75%		0.75%	
	Name of identified O-S	SII UIt	Ultimate EU parent institution		LEI of ultimate parent institution	
	2. BNP Paribas Fortis SA	BNF	BNP Paribas SA		R0MUWSFPU8MPRO8K5P83	
2.3 Name of the ultimate EU	3. ING Belgium NV	ING	ING Groep N.V.		549300NYKK9MWM7GGW15	
parent institution			·			
		1				
	Name of parent O-SI identified		Name of O-SII subsidiary		LEI of O-SII subsidiary	
	1. KBC Group NV		koslovenská obchodná ba	.	52990096Q5LMCH1WU462	
			Československá obchodná banka, CZ		Q5BP2UEQ48R75BOTCB92	
			United Bulgarian Bank AD		5299000PCY1EP8QJFV48	
2.4 Names of subsidiaries		KBC Bank Bulgaria EAD		5299009KAL4KO7584196		

3. Timing for the measur	re						
3.1 Timing for the decision	27/06/2023.						
3.2 Timing for publication	The list of O-SIIs and their associated capital buffer rates will be published on 01/12/2023.						
3.3 Disclosure	The list of O-SIIs with O-SII scores and associated O-SII buffer rates will be published on the NBB website.						
3.4 Timing for application	The new O-SII buffer rates will come into force on 01/01/2024.						
	N/A						
3.5 Phasing in	Name of institution		Date1	Date2	Date3		Date5
			%	%	%	%	%
3.6 Review of the measure	The list of O-SIIs and their associated capital buffer rates will be reviewed annually						
4. Reason for O-SII ident	tification and activation	of the	O-SII buff	er			
	The O-SII scores base	d on da	ta referrin	g to end-2	022 are	shown below	<i>'</i> .
	Name of institution	Size		stitut- oility	Com- plexity	Intercon- nectedness	Overall Score
	1. KBC Group	2519	2	191	3242	2088	2510
4.1 Scores of institutions or	2. BNP Paribas Fortis SA/NV	2567	2	101	2398	2098	2291
group of institutions	3. Euroclear Holding	988	2	258	1234	1143	1406
concerned, as per EBA guidelines on the	4. ING Belgium NV	1283	1	381	1331	1402	1349
assessment of O-SIIs	5. Belfius Bank SA/NV	1268	9	982	670	1558	1120
(Article 131.3 CRD)	6. The Bank of New York Mellon	312		1	617	810	435
	7. Investerings- maatschappij Argenta	415	4	125	273	395	377
	8. Crelan SA	417	4	170	100	283	317
4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)	Please provide informa. whether you followard on the assessmenta b. which threshold. The NBB uses at the score, 7 institution in 4.1 and in the eapplying supervise optional indicators 350 basis points (s. whether relevant	dentification of O-S score II nresholds are a scel file ory judg with a see exce	te EBA guation followalls. The state of the	set to idea 350 basis by designa crelan S alternativ scope (see	antify O-S points. Ented as O A is iden e O-SII see 4.3) is a	Sills; Based on this D-Sills (see the other than th	s threshold eir scores D-SII by on reshold of
	0.02% have been excluded from the identification process;All Belgian banks reporting in FINREP have been included in the identification process.						

	 d. the names and scores of all relevant entities not excluded from the identification process (could be sent in a separate Excel file, see 4.1); The names and scores of all relevant entities not excluded from the identification process are reported in a separate excel file e. whether non-bank institutions have been included in the calculations. No non-bank institutions have been included in the calculations.
4.3 Supervisory judgement	Crelan SA has been identified as an O-SII by applying supervisory judgement based on four optional indicators in which the global/EU scope is replaced by a national scope: deposits from Belgian households, loans to the Belgian private sector, deposits of Belgian credit institutions and loans to Belgian credit institutions. Please refer to the excel file for the detailed scores. Optional indicators with domestic scope are more appropriate for determining domestic systemic importance. The alternative O-SII score based on these optional indicators is above the threshold score of 350 basis points.
4.4 Calibrating the O-SII buffer	The EBA scores allow for assigning the identified O-SIIs to two buckets, one with a buffer rate of 1.50% and another one with a buffer rate of 0.75%. Several criteria were accounted for in the O-SII buffer rate calibration, among others: - the institution's systemic importance as measured by its size and O-SII score. - historical losses in the Belgian banking sector. - stress test results. - level playing field and single market considerations (with respect to O-SII buffer rates and total capital requirements for O-SIIs in other EU jurisdictions).
4.5 Effectiveness and proportionality of measure	O-SIIs are institutions whose failure would have an important negative impact on the domestic financial system and/or the real economy. The rationale for imposing capital buffers on O-SIIs is at least twofold. First, capital buffers reduce the probability of failure of O-SIIs, which may be desirable given the high economic and social cost of their failure. Second, capital buffers require O-SIIs to internalize externalities they impose on the financial system and the real economy, and the buffers may provide incentives for O-SIIs to reduce their systemic importance. The Belgian banking sector is large (around 235% of GDP) and highly concentrated, with the 4 largest banks representing 76% of total assets and the 8 identified O-SIIs almost 98%. The identified O-SIIs are institutions of domestic systemic importance, given that their total assets range from 7% to 60% of Belgian GDP and they are also important in terms of - credit provisioning and deposit taking for the Belgian economy - global custodian services (The Bank of New York Mellon) and activities as an International Central Securities Depository (Euroclear Holding). The O-SII buffers applicable to Belgian institutions were calibrated accounting for the institutions' systemic importance. Banks with a higher O-SII score need to hold a higher O-SII buffer. To this end, Belgian O-SIIs were allocated to two buckets, to which a unique O-SII buffer rate applies. Furthermore, the calibration of the O-SII buffers levels explicitly accounted for level playing field and internal market considerations.

	Given the above considerations, the imposed level of the O-SII buffer is expected to be both effective and proportionate.					
5. Sufficiency, consistency and non-overlap of the policy response						
5.1 Sufficiency of the policy response	For 7 of our O-SIIs, the O-SII buffer rate remains unchanged as it is still assessed to be sufficient. By considering two buckets with a different O-SII buffer rates, the four largest institutions need to hold a larger buffer. In 2024, the higher buffer rate will also be imposed on Euroclear as this institution has seen its balance sheet increase strongly with their cross-border liabilities being inflated because of the international sanctions against Russian entities. In general, no unintended impact on the general economy is expected as institutions have sufficient capital to comply with these (mostly unchanged) O-SII buffers.					
	The NBB considers the O-SII buffer rates to be consistent in that they meet their objectives: (i) strengthening the resilience of these O-SIIs and (ii) internalise the externalities imposed on the financial system and the real economy.					
5.2 Consistency of application of the policy response	The O-SII methodology has also been applied consistently over time, resulting in very stable O-SII buffer rates. The main exception is the very specific case of Euroclear whose O-SII buffer rate will increase from 0.75% to 1.5%, as this institution has seen its balance sheet increase strongly with their cross-border liabilities being inflated because of the international sanctions against Russian entities.					
5.3 Non-overlap of the policy response	NBB sees no overlap between its O-SII buffers and other macroprudential policy instruments, as they do not address the same systemic risk.					
6. Cross-border and cros	ss-sector impact of the measure					
6.1 Assessment of cross- border effects and the likely impact on the Internal Market (Recommendation ESRB/2015/2 ³)	The higher capital requirements following the implementation of the O-SII buffer structurally increase the resilience of Belgian systemically important institutions. This positively affects the stability of the financial system and the real economy in Belgium, and with that, the internal market. As the O-SII buffer is applied to the Belgian O-SIIs at the consolidated level, there may be an impact on individuals or companies outside Belgium through exposures of subsidiaries and branches of Belgian banks in other jurisdictions. However, no major cross-border impact has been observed. There are several potential reasons for this limited impact: - First, for most banks, FINREP data show that exposures in Member States other than Belgium (both in terms of total assets and loans and advances to					

³ Recommendation of the European Systemic Risk Board of 15 December 2015 on the assessment of cross-border effects of and voluntary reciprocity for macroprudential policy measures (ESRB/2015/3) (OJ C 97, 12.3.2016, p. 9).

	non-financial corporations and households) generally amount to only a small fraction of these Member States' GDP.			
	 Second, to the extent that EU parent companies and/or important subsidiaries in other Member States are subject to G-SIB or local O-SII buffer requirements, the Belgian O-SII buffer does not increase capital requirements for these exposures in these Member States. 			
	No major leakages have been ob	served.		
6.2 Assessment of leakages	- First, the O-SII buffer is applied to the Belgian systemically relevant institutions at the consolidated level, which avoids (geographical) shifts of activities within a banking group. Universal banks may shift activities from the bank to the insurance part of the group, but no such effects have been observed.			
and regulatory arbitrage within the notifying Member State	Second, Belgian O-SIIs may restrict activities to reduce their systemic importance, which may entail a shift of activities to other bank or non-bank entities. There is no evidence that such effects have occurred, which may be explained by the fact that the reduction in activities needed for the large Belgian O-SIIs to bring their O-SII scores down to a level that would put them in a lower bucket with a lower buffer is very large. Furthermore, possible shifts of activities also have beneficial effects if they are the result of SIIs internalizing externalities they impose on the financial system and reducing their systemic importance.			
	The NBB closely monitors any of	these potential leakages.		
7. Combinations and inte	ractions with other measures			
	N/A			
7.1 Combinations between G- SII and O-SII buffers	Name of institution	O-SII buffer	G-SII buffer	
(Article 131.14)		%	%	
,		%	%	
	Are any of the institutions iden buffer? If yes, please provide the		a systemic risk	
7.2 Combinations with systemic risk buffers (SyRBs) (Article 131.15 CRD)	 a. What is/are the systemic risk buffer rates(s)? Of the 8 institutions identified as O-SII, 6 are also subject to a sectoral systemic risk buffer of 9%, applicable to their IRB retail exposures secured by residential immovable property for which the collateral (immovable property) is located in Belgium (both non-defaulted and defaulted exposures). b. At what level is/are the systemic risk buffer rate(s) applied (i.e. consolidation level and/or individual)? The sectoral systemic risk buffer is applied at consolidated and individual level (see table) c. Is the sum of the systemic risk buffer rate(s) and the O-SII buffer rate (or the higher of the G-SII and O-SII buffer rates, if a group is subject to a G-SII buffer and to an O-SII buffer at consolidated level) to which the same institution is subject over 5%? When simply adding up the two percentages, the sum of the sectoral systemic risk buffer and the O-SII buffer is larger than 5%. 			

	Name of institution	SyRB rate	SyRB application level	Sum of G-SII/O- SII and SyRB rates
	1. KBC Bank NV	9%	Consolidated	10.5%
	2. BNP Paribas Fortis SA/NV	9%	Sub-consolidated	10.5%
	4. ING Belgium NV	9%	Sub-consolidated	10.5%
	5. Belfius Bank SA/NV	9%	Consolidated	10.5%
	7. Argenta Spaarbank SA/NV	9%	Consolidated	9.75%
	8. Crelan	9%	Consolidated	9.75%
	AXA Bank Belgium	9%	Consolidated	9.75%
7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)	-	es not prevent the implementation estic buffer setting methodology. Name of the EU parent of the O-SII subsidiary		Of a higher O-SII Buffer applicable to O-SII EU parent
CRD)	2. BNP Paribas Fortis SA/NV	BNP Paribas SA		1.50%
	4. ING Belgium NV	ING Groep N.V.		2.50%
			%	
8. Miscellaneous 8.1 Contact person(s)/mailbox at notifying authority	Annick Bruggeman – annick Alexandre Francart – alexan Alexandre Reginster – alexa Thomas Schepens – thomas	dre.francart@nbb ndre.reginster@n	<u>.be</u> - +32 2 221 5 <u>bb.be</u> - +32 2 22	2 09 1 35 03
8.2 Any other relevant information				
8.3 Date of the notification	18/07/2023			