Notification template for Articles 133 and 134(5) of the Capital Requirements Directives (CRD) – Systemic risk buffer (SyRB)

Template for notifying the European Central Bank (ECB)and European Systemic Risk Board (ESRB) of the setting or resetting of one or more systemic risk buffer rates pursuant to Article 133(9) CRD and to request that the ESRB issue a recommendation to other Member States to reciprocate the measure under Article 134(5) 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) Regulation[1]);
- notifications@esrb.europa.eu when notifying the ESRB.

The ESRB will forward the notification to the European Commission, the European Banking Authority (EBA) and the competent and designated authorities of the Member States concerned without delay. This notification will be made public by the ESRB once the relevant authorities have adopted and published the notified macroprudential measure[2].

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 and scope of the notification	
1.1 Name of the notifying authority	Magyar Nemzeti Bank
1.2 Country of the notifying authority	Hungary
1.3 Type of measure (also for reviews of existing measures)	Which SyRB measure do you intend to implement? ☐ Activate a new SyRB ☐ Change the level of an existing SyRB ☐ Change the scope of an existing SyRB (incl. changes to a subset of institutions or exposures) ☒ **De-activate an existing SyRB** ☐ Reset an existing SyRB (review)

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authority, it may be agreed with the Head of the ESRB Secretariat that this notification, or a part thereof, should not be published for reasons of confidentiality or financial stability.

2. Description of the measure

2.1 Institutions covered by the intended SyRB

Please indicate whether the SyRB applies to:

☒ **All institutions authorised in the Member State**

☐ One or more subsets of credit institutions in the sector (please provide the names and identifiers (Legal Entity Identifier (LEI) code) of institutions covered)

Name of institution	LEI code	Consolidation level

☐ A subsidiary whose parent is established in another Member State. (Please provide the names and identifiers (LEI code) of subsidiaries)

Name of subsidiary	Name of the parent	LEI code of the subsidiary

If the SyRB applies to a subset of institutions, please describe the criteria for selection of the relevant institutions.

Since the reintroduction of the SyRB in 2024, the volume of problematic project loans has remained low across the banking sector. Therefore, the MNB has not found it necessary to prescribe the buffer for any individual institution.

For the details of the SyRB to be deactivated see the notification pertaining notification

2.2 Exposures covered by the SyRB

(Article 133(5) CRD)

Please indicate the exposures to which the SyRB applies:

☒ **(a) all exposures located in the Member State that is setting the buffer;**

☐ (b) the following sectoral exposures located in the Member State that is setting the buffer:

(i) ☐ all retail exposures to natural persons that are secured by residential property;
(ii) ☐ all exposures to legal persons that are secured by mortgages on commercial immovable property;
(iii) ☐ all exposures to legal persons excluding those specified in point (ii);
(iv) ☐ all exposures to natural persons excluding those specified in point (i);

☐ (c) subsets of any of the sectoral exposures identified in point (b). Please specify the subsets in Section 2.3;

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☒ **(d) all exposures located in other Member States;**

☒ **(e) exposures located in third countries.**

For the details of the SyRB to be deactivated see the notification pertaining notification

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<tr><td>2.3 Subsets of sectoral exposures</td><td>

Where the systemic risk buffer applies to subsets of any of the sectoral exposures identified (see point 2.2 (c)), please specify:

- The elements of the dimensions and subdimensions that were used to identify the subset(s) of sectoral exposures as laid down in the EBA Guidelines on the appropriate subsets of exposures in the application of SyRB:

<table>
<tr><th>Dimensions/subdimensions</th><th>Elements</th></tr>
<tr><td>1. Type of debtor or counterparty sector</td><td>]</td></tr>
<tr><td>1.a Economic activity</td><td>]</td></tr>
<tr><td>2. Type of exposure</td><td>]</td></tr>
<tr><td>2.a Risk profile</td><td>]</td></tr>
<tr><td>3. Type of collateral</td><td>]</td></tr>
<tr><td>3.a Geographical area</td><td></td></tr>
</table>

- Assessment conducted in accordance with Section 5 of the EBA Guidelines on the systemic relevance of the risks stemming from this subset, taking into account:
  (i) Size
  (ii) Riskiness
  (iii) Interconnectedness

- Why it would not have been appropriate to set the systemic risk buffer at the level of a sector (as in point 2.2(b)) to cover the risk targeted?
-

</td></tr>
<tr><td>2.4 Exposures located in other Member States and in third countries</td><td>

If the systemic risk buffer applies to exposures located in other Member States or third countries (see points 2.2(d) and (e)), please include the names of those countries

For the details of the SyRB to be deactivated see the notification pertaining notification.

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<tr><td>2.5 Buffer rate

(Article 133(9)(e) CRD)</td><td>

Specify the intended SyRB rate. If different buffer requirements apply to different exposures or subsets of exposures, please specify for each exposure indicated under 2.2.

Please indicate any changes to the list in 2.1 of institutions concerned and in the buffer rates given in point 2.5 as compared to the last notification, and provide an explanation, if applicable.

<table>
<tr><th rowspan="2">Exposures</th><th colspan="2">New SyRB rate</th><th colspan="2">Previous SyRB rate</th></tr>
<tr><th>All institutions (SyRB rate)</th><th>Set of institutions (range of SyRB rates)</th><th>All institutions (SyRB rate)</th><th>Set of institutions (range of SyRB rates)</th></tr>
<tr><td>(a) All exposures located in the Member State that is setting the buffer</td><td>%</td><td>% - %</td><td></td><td></td></tr>
</table>

</td></tr>
</table>

(b) *The following sectoral exposures located in the Member State that is setting the buffer:*				
(i) All retail exposures to natural persons that are secured by residential property	%	% - %		
(ii) All exposures to legal persons that are secured by mortgages on commercial immovable property	%	% - %		
(iii) All exposures to legal persons excluding those specified in point (ii)	%	% - %		
(iv) All exposures to natural persons excluding those specified in point (i)	%	% - %		
(c) All exposures located in other Member States	%	% - %		
(e) Exposures located in third countries	%	% - %		
(f) *Subsets of any of the sectoral exposures identified in point (b):*				
(i) Please specify the subset [Dimension/subdimensions]	%]	% - %		

If different buffer requirements apply to different subsets of institutions, please specify for each institution mentioned under 2.1.

Set of institutions				
Exposures	**Name of institution**	**LEI code**	**New SyRB rate**	**Previous SyRB rate**
			%	
			%	
			%	

3. Timing for the measure

3.1 Timing for the decision	What is the date of the official decision? For SSM countries when notifying the ECB: provide the date on which the decision referred to in Article 5 of the Single Supervisory Mechanism Regulation (SSMR) will be taken. **01/09/2025**
3.2 Timing for publication	What is the proposed date of publication of the notified measure? **01/12/2025**
3.3 Disclosure	Information about the strategy for communicating the notified measure to the market. Do you also intend to publish the justification for the SyRB? If not, why do you consider that publication could jeopardise the stability of the financial system? **The MNB's decision on the revision of the sSyRB framework was published in the pertaining press release on 1 September 2025.** **https://www.mnb.hu/en/pressroom/press-releases/press-releases-2025/central-bank-reviews-real-estate-lending-toolkit** **All the pertaining information will be disclosed on the systemic risk buffer subpage of the MNB.**

3.4 Timing for application	What is the intended date of application of the measure? **01/01/2026**
3.5 Phasing in	What is the intended timeline for phase-in of the measure (if applicable)? **Not relevant. This notification pertains to the deactivation of the actual SyRB. For the details of the SyRB to be deactivated see the pertaining notification.**
3.6 Review/deactivation of the measure	Until when will the measure presumably be in place? What are the conditions for its deactivation? On what indicators would the decision be based? Please specify whether you intend to review the measure before the maximum period of two years foreseen in Article 133(8)(b) CRD. **Not relevant. This notification pertains to the deactivation of the actual SyRB. For the details of the SyRB to be deactivated see the pertaining notification.**
4. Reasons for the notified SyRB	
4.1 Description of the macroprudential or systemic risk in your Member State **(Article 133(9)(a) of the CRD)**	Where applicable, please classify the risks targeted by the notified SyRB under the following categories: (i) risks stemming from the structural characteristics of the banking sector - Size and concentration of banks: - Ownership structure: - Other structural risks: (ii) risks stemming from the propagation and amplification of shocks within the financial system - Exposure concentration/asset commonality - Commonality in bank business models - Financial interconnections and contagion (iii) risks to the banking system stemming from either the real economy or specific sectors - Economic openness - Sectoral risks from the private non-financial sector, households and the public sector. (iv) Other risks Please specify: - Whether these risks are widespread across the whole financial sector? - Or whether they are concentrated only in one or more subsets of the sector? **This notification pertains to the deactivation of the currently applicable SyRB. The existing SyRB primarily targets CRE project loan exposures. However, due to the successful portfolio cleaning by institutions and the fact that CRE risks have not yet materialised, there was no need to set a positive SyRB for any bank. Consequently, in September 2025, the MNB**

	decided to deactivate the current SyRB and replace it with a more forward-looking and risk-sensitive sectoral SyRB (to be notified parallelly), aimed at addressing emerging risks in the CRE subsector (and also the RRE subsector).
4.2 Reasons why the dimension of the macroprudential or systemic risks threatens the stability of the financial system in your Member State **(Article 133(9)(b) CRD)**	Reasons why the macroprudential or systemic risks threaten financial stability and justifying the systemic risk buffer rate. **Not relevant. This notification pertains to the deactivation of the currently applicable SyRB. For the details of the SyRB to be deactivated see the pertaining notification.**
4.3 Indicators used for activation of the measure	Provide the indicators triggering activation of the measured. When notifying the ECB, please provide the data on which the decision is based, if possible (preferably in an Excel file). **Not relevant. This notification pertains to the deactivation of the currently applicable SyRB. For the details of the SyRB to be deactivated see the pertaining notification.**
4.4 Effectiveness and proportionality of the measure **(Article 133(9)(c) CRD)**	Explanation why the draft measures are deemed likely to be effective and proportionate to mitigate the risk. E.g. how will the effectiveness of the measure be assessed? Based on which indicators? What are the expected transmission mechanisms? **Not relevant. This notification pertains to the deactivation of the currently applicable SyRB. For the details of the SyRB to be deactivated see the pertaining notification. The current real estate related risks are better managed through a sectoral SyRB, which will be activated alongside with the deactivation of the current measure.**
4.5 Reason why the systemic risk buffer is not duplicating the functioning of the O-SII buffer provided for in Article 131 CRD **(Article 133(9)(f) CRD)**	Where the systemic risk buffer rate applies to all exposures, please justify why the authority considers that the systemic risk buffer is not duplicating the functioning of the O-SII buffer provided for in Article 131 CRD. **Not relevant. This notification pertains to the deactivation of the currently applicable SyRB. For the details of the SyRB to be deactivated see the pertaining notification.**
5. Sufficiency, consistency and non-overlap of the policy response	
5.1 Sufficiency of the policy response	For a macroprudential policy to be 'sufficient', the policy responses must be deemed to significantly mitigate, or reduce the build-up of, risks over an appropriate time horizon with a limited unintended impact on the general economy. Note that the ESRB will use this assessment of the macroprudential stance as relevant input in assessing the sufficiency of the macroprudential policy in the Member States.

	Please provide any additional information that the ESRB should consider in assessing the sufficiency of the policy response. **Not relevant. This notification pertains to the deactivation of the currently applicable SyRB. For the details of the SyRB to be deactivated see the pertaining notification. The current real estate related risks are better managed through a sectoral SyRB, which will be activated alongside with the deactivation of the current measure.**
5.2 Consistency of application of the policy response	For a macroprudential policy to be 'consistent', the policy instruments must be deemed to meet their respective objectives as outlined in ESRB/2013/1[3] and must be implemented in accordance with the common principles set out in the relevant legal texts. Note that the ESRB assessment of consistency will consider whether the same systemic risks are addressed in a similar way across and within the Member States over time. Please provide any additional information that the ESRB should consider in assessing the consistency of the policy response. **Not relevant. This notification pertains to the deactivation of the currently applicable SyRB. For the details of the SyRB to be deactivated see the pertaining notification. The current real estate related risks are better managed through a sectoral SyRB, which will be activated alongside with the deactivation of the current measure.**
5.3 Non-overlap of the policy response	For a policy instrument to be 'non-overlapping', it should aim to address a systemic risk that either differs to the risk addressed by other active tools in the same Member State, or to be complementary to another tool in that Member State which addresses the same systemic risk. - Are other policy instruments used to address the same systemic risk? - If yes, please explain the need for more than one instrument to address the same systemic risk and how the different instruments interact with each other. **Not relevant. This notification pertains to the deactivation of the currently applicable SyRB. For the details of the SyRB to be deactivated see the pertaining notification.**
6. Cross-border and cross-sector impact of the measure	

[3] Recommendation of the European Systemic Risk Board of 4 April 2013 on intermediate objectives and instruments of macro-prudential policy (ESRB/2013/1) (OJ C 170, 15.6.2013, p. 1).

6.1 Assessment of cross-border effects and the likely impact on the Internal Market **(Article 133(9)(d) of the CRD and Recommendation ESRB/2015/2[4])**	Assessment of the cross-border effects of implementation of the measure. a. Assessment of the spillover channels operating via risk adjustment and regulatory arbitrage. The relevant indicators provided in Chapter 11 of the ESRB Handbook on Operationalising Macroprudential Policy in the Banking Sector[5] and the Framework to assess cross-border spillover effects of macroprudential policies of the ECB Task Force on cross-border spillover effects of macroprudential measures can be used. b. Assessment of the: o cross-border effects of implementation of the measure in your own jurisdiction (inward spillovers); o cross-border effects on other Member States and on the Single Market of the measure (outward spillovers); o overall impact on the Single Market of implementation of the measure. **Not relevant. This notification pertains to the deactivation of the currently applicable SyRB. For the details of the SyRB to be deactivated see the pertaining notification.**
6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State	Referring to your Member State's specific characteristics, what is the scope for "leakages and regulatory arbitrage" in your own jurisdiction (i.e. circumvention of the measure/leakages to other parts of the financial sector)? Is there scope for "leakages and regulatory arbitrage" in other jurisdictions? **Not relevant. This notification pertains to the deactivation of the currently applicable SyRB. For the details of the SyRB to be deactivated see the pertaining notification.**
6.3 Request for reciprocation by other Member States **(Article 134(5) CRD and Recommendation ESRB/2015/2)**	Does the authority intend to ask the ESRB to issue a recommendation to other Member States to reciprocate the measure in accordance with Article 134(5) CRD? Choose an item. - If yes, please provide in Section 6.4. the justification for that reciprocity. - If no, what are the reasons for not requesting reciprocation? **Not relevant. This notification pertains to the deactivation of the currently applicable SyRB. For the details of the SyRB to be deactivated see the pertaining notification.**

[4] 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).
[5] Available on the ESRB's website at www.esrb.europa.eu.

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<tr><td>6.4 Justification for the request for reciprocation by other Member States

(Article 134(5) CRD and Recommendation ESRB/2015/2)</td><td>Not relevant. This notification pertains to the deactivation of the currently applicable SyRB. For the details of the SyRB to be deactivated see the pertaining notification.</td></tr>
<tr><td colspan="2">7. Combination of the SyRB with other buffers</td></tr>
<tr><td>7.1 Combination with G-SII and/or O-SII buffers

(Article 131(15) CRD)</td><td>Is the sum of the systemic risk buffer rate and the higher of the O-SII/G-SII buffer rates to which the same institution is subject above 5%?

Please provide a list of the institutions subject to a G-SII or an O-SII buffer, indicating the G-SII or O-SII buffer and the sum of the G-SII/O-SII and SyRB buffers (a combined buffer rate of over 5% requires authorisation by the Commission).

Not relevant. This notification pertains to the deactivation of the currently applicable SyRB. For the details of the SyRB to be deactivated see the pertaining notification.

<table>
<tr><th>Name of institution</th><th>G-SII/O-SII buffer rate</th><th>O-SII consolidation level</th><th>Sum of G-SII/O-SII and SyRB rates</th></tr>
<tr><td></td><td>%</td><td></td><td>%</td></tr>
<tr><td></td><td>%</td><td></td><td>%</td></tr>
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<tr><td>7.2 Combination with other systemic risk buffers

(Article 133(11) and (12) CRD)</td><td>Indicate all sets or subsets of exposures that would be subject to one or more systemic risk buffers with a combined systemic risk buffer rate in the ranges below:

- above 3% and up to 5%
- above 5%

Indicate whether any subsidiaries of a parent in another EU Member State would be subject to a combined systemic risk buffer rate above 3%.

Not relevant. This notification pertains to the deactivation of the currently applicable SyRB. For the details of the SyRB to be deactivated see the pertaining notification.</td></tr>
<tr><td colspan="2">8. Miscellaneous</td></tr>
<tr><td>8.1 Contact person(s)/mailbox at notifying authority</td><td>ÁDÁM BANAI, PHD MRICS
Executive Director and Chief Economist
EXECUTIVE DIRECTORATE MONETARY POLICY AND FINANCIAL STABILITY
1054 Bp., Szabadság tér 8-9.
Phone: +36 (1) 428 2600/1864</td></tr>
</table>

	Mobile: +36 (30) 789 9890 Email: banaia@mnb.hu **TAMÁS NAGY** Director DIRECTORATE FINANCIAL STABILITY AND MONETARY POLICY INSTRUMENTS H-1054 Budapest, Szabadság tér 8-9. Phone: +36 (1) 428 2600/2639 Mobil: +36 (20) 354 1282 E-mail: nagyt@mnb.hu
8.2 Any other relevant information	For further details check the SyRB subpage of the MNB: https://www.mnb.hu/en/financial-stability/macroprudential-policy/the-macroprudential-toolkit/systemic-risk-buffer-syrb
8.3 Date of the notification	Please provide the date on which this notification was uploaded/sent. 30/10/2025