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NOTE

from :	Council Secretariat
to :	Delegations
Subject :	Revised capital requirements rules (CRD IV) a) Proposal for a Regulation of the European Parliament and of the Council on prudential requirements for credit institutions and investment firms b) Proposal for a Directive of the European Parliament and of the Council on the access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms and amending Directive 2002/87/EC of the European Parliament and of the Council on the supplementary supervision of credit institutions, insurance undertakings and investment firms in a financial conglomerate = *Statement by Latvia, Lithuania, the Netherlands, Poland, Romania and Slovenia*

Delegations will find attached a statement by the abovementioned Member States.

"**Declaration by Latvia, Lithuania, the Netherlands, Poland, Romania and Slovenia**

Latvia, Lithuania, Netherlands, Poland, Romania and Slovenia welcome the political agreement on a general approach reached on CRD IV/CRR I, package with a view to enter into swift negotiations with the European Parliament. However, Latvia, Lithuania, Netherlands, Poland, Romania and Slovenia have strong doubts regarding the timeline set out in the proposal.

It is of the utmost importance and urgency to implement Basel III and to impose higher capital ratios as soon as possible, however Latvia, Lithuania, Netherlands, Poland, Romania and Slovenia believe that an entry into force on 1/1/2013 will not allow for sufficient time for national authorities to introduce the necessary changes to national laws, what may cause legal uncertainty for the institutions. Furthermore it will not allow industry to prepare sufficiently to the new rules as the final text would only be available a very short time before its entry into force. As effect, the very short dateline for entry into force may result in unnecessary turbulences in financial markets. Moreover Latvia, Lithuania, Netherlands, Poland, Romania and Slovenia would like to avoid the situation where quality of this important regulatory package will be sacrificed for speed of the legislative procedure.

Accordingly, Latvia, Lithuania, Netherlands, Poland, Romania and Slovenia would like to revisit the entry into force deadlines during the negotiations with the EP."