



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR FINANCIAL STABILITY, FINANCIAL SERVICES AND CAPITAL MARKETS UNION

Banking, Insurance and Financial Crime
Banking regulation and supervision

Brussels

fisma.d.l(2022)5374494/MG

**Subject: Your letter on 16 June 2022 – Implementation of Basel III –
Amendment of Art. 2 paragraph 5 CRD**

Dear [REDACTED], dear [REDACTED],

Thank you very much for your letter of 16 June 2022 in which you suggest to add Investitionsbank Sachsen-Anhalt to the entities exempted from the application of the Capital Requirements Regulation (CRR) and the Capital Requirements Directive (CRD) by means of adding it to the list of exempted entities contained in Article 2(5) of the CRD.

As you are aware, the Commission proposed back in 2016 to set out criteria to define which entities could be included and removed from the list and to be empowered to update the list through a Delegated Act. However, this proposal was not retained in the final version of the text.

As you are also aware, the Commission's proposal for the new banking package has been published on 27 October 2021. Your suggestion would therefore be better addressed to the European Parliament and to the Council.

The Commission values the interaction with the Association of German Public Banks and looks forward to maintaining close cooperation with you in the future.

Yours faithfully,

[REDACTED]

(e-signed)

[REDACTED]
[REDACTED]

Association of German Public Banks
E-mail: [REDACTED]@vneb.de