



Mr Roberto Viola,
Director General, DG
CONNECT

Brussels, 26 March 2020

RE: Deadlines of public consultations

Dear Mr Viola,

First of all, please allow us to emphasise that the three European Credit Sector associations (ECSAs -EBF, EACB and ESBG) welcome all the extraordinary measures already initiated by the various European authorities following the rapid spread of COVID-19 (coronavirus) in the European Union. Prompt and dedicated reactions are very helpful, and they facilitate the necessary steps that banks need to take in order to face the emergency efficiently, to the best of their ability, without hampering their indispensable financing role to the economy. Just as for your authority, the coronavirus has been the number one priority for European banks these days.

Against this background and in light of the challenging and uncertain circumstances, we would like to draw your attention towards the deadlines of current and upcoming public consultations. For what specifically concerns DG Connect, we are referring to the two currently ongoing consultations which are particularly relevant for the banking and financial industry, namely the consultations on a European Strategy for data and on the European approach to artificial intelligence, both expiring on 31 May 2020.

Our member banks are currently focusing most of their resources on assuring a normal and smooth continuation of their activities, in order not to interrupt serving companies, in particular SMEs, and households. Similarly, banking associations at national and European levels are also trying to support their institutions in this endeavour. As a consequence, it takes longer to analyse consultation papers and provide detailed feedback. In our view, in fact, it could be even possible that some banks would not be able to provide feedback to a given consultation; not because of the lack of interest but due to the allocation of resources to face the emergency.

We have noted that ESMA has announced a four weeks extension for several of its consultations. The EBA on its side has announced a two months extension for its ongoing consultations. Both initiatives are strongly welcomed. We invite the Commission (DG Connect) to take initiative as well and converge in the direction proposed by the EBA. In any case, we would like to stress that possible further extensions must not be excluded a priori in order to account for any further evolutions in relation to the virus outbreak.

All of this would help make sure that the feedback collected from banks as well as from banking associations meets your expectations in terms of quality and quantity and a good and fruitful dialogue on the various files can be ensured. In these challenging times, a regular dialogue between authorities and the banking industry is of crucial importance, in our view.



We hope that you share our point of view and see yourself in the position to communicate particularly a two months extension for the consultation periods at your earliest convenience. We thank you very much in advance and we remain at your disposal.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Wim Mijs', written in a cursive style.

Wim Mijs
EBF Chief Executive

A handwritten signature in blue ink, appearing to read 'Chris De Noose', written in a cursive style.

Chris De Noose
ESBG Managing Director

A handwritten signature in black ink, appearing to read 'Hervé Guider', written in a cursive style.

Hervé Guider
EACB General Manager