

## Brexit – a supervisory outlook how to mitigate risks

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## Brexit – potential cliff effects



(non-exhaustive enumeration)

- Financial Market Infrastructure
   (Securities settlement systems; Central counterparties (CCP))
- Contract continuity
   derivative contracts ... insurance contracts
- Equivalence

...financial regulation ... data protection ...risk weighting ...cover funds for mortgage Pfandbriefe ...

Market access
insurer, mutual funds, payment services, banks

## 3 key questions...



How can we avoid arbitrage?

• How can banks/competent authority achieve finalization of approval processes in time?

• What are the operating models / governance arrangements we want to be in place in which time?

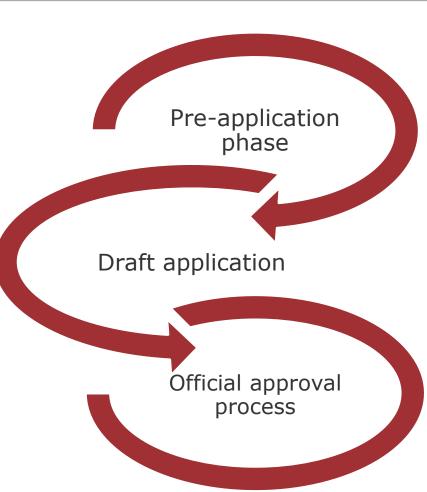
### Authorisation is an SSM common procedure



Quasi-licensing if change of business model / scope

BaFin: dedicated teams

cooperation with Deutsche Bundesbank and ECB case handler



ECB involvement depending on SI/LSI status

## Operating model



Frequent issues of discussion

#### No letterbox

- Adequate management & control functions
- staffing

#### Booking model

- Remote booking
- Intragroup back-to-back hedging
- Split hedging

#### **Dual hatting**

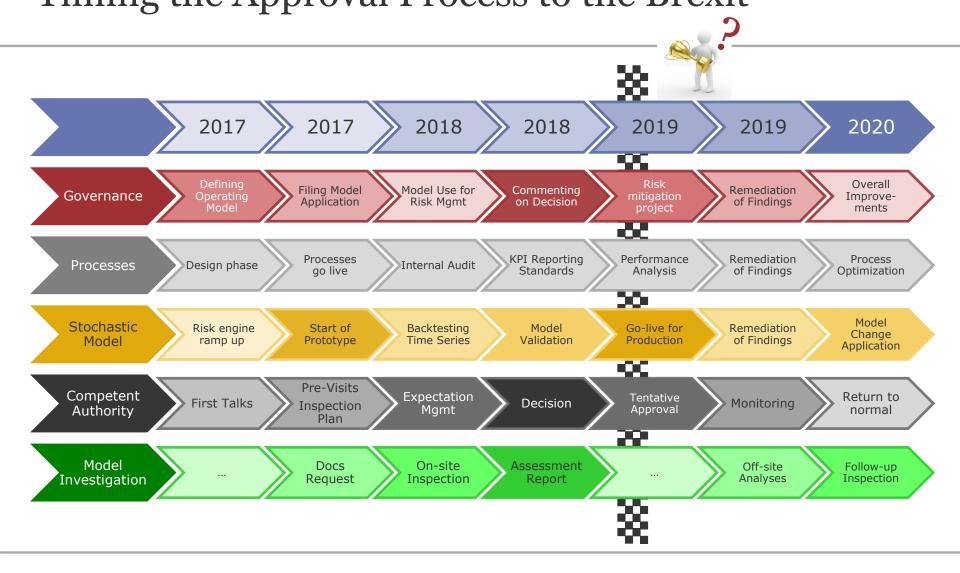
- Cross border
- Domestic

#### 3rd country branch in UK

- Passporting back to EU 27?
- Providing service functions

## Internal Models: Timing the Approval Process to the Brexit







# The greatest challenge to any thinker is stating the problem in a way that will allow a solution.

(Bertrand Russell 1872-1970)