

# PRESS RELEASE

## CCP12

### RESPONDS TO

# FSB DISCUSSION PAPER



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**CCP12**

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CCP12 - the Global Association of Central Counterparties responds to the discussion paper “Financial resources to support CCP resolution and treatment of CCP equity in resolution” published by the Financial Stability Board (FSB).

CCP12 greatly appreciates the continuous efforts of the FSB to further its work on financial resources to support CCP resolution and treatment of CCP equity in resolution to determine whether or not additional guidance is needed on these matters. In our response, we like to emphasize key points, which we feel the FSB should take into consideration:

- CCP12 stresses the importance of recognizing that CCPs have already incorporated default management and recovery measures into the rulebook, consistent with regulatory guidance set out by CPMI-IOSCO that share the primary objective of continuity of critical clearing services as stated in the FSB draft guidance.
- CCP12 supports establishing principle considerations to guide dialogue when establishing resolution frameworks based on particular jurisdictions.
- Further guidance on this subject should focus more on the actions of the resolution authority rather than CCP operations.
- Recovery measures established in the CCP rulebook ex-ante should be followed in their entirety to provide required risk and legal certainty to the market and its participants.
- CCP12 supports discussions around the situational complexity of resolution as it pertains to different CCP structures and ownership mechanisms and their financial resources.
- CCP12 does not support guidance that contemplates exposing the equity of a legal entity that may house the clearing service beyond what is stipulated ex-ante in the rulebook and relevant regulation and legislation.

CCP12 is highly interested to discuss the statements made in our response further and to elaborate on any of the comments. To read the full CCP12 response to the discussion paper click [here](#).

CCP12 is a global association of 35 members who operate more than 50 individual CCPs globally across Europe/Middle East/Africa (EMEA), the Americas, and the Asia-Pacific (APAC) regions. CCP12 aims to promote effective, practical and appropriate risk management and operational standards for CCPs to ensure the safety and efficiency of the financial markets it represents. CCP12 leads and assesses global regulatory and industry initiatives that concern CCPs to form consensus views, while also actively engaging with regulatory agencies and industry constituents through consultation responses, forum discussions and position papers.

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## CCP12 MEMBERS

