

MiFID Implementation Progress Report

<http://www.spi-romania.eu/program-2007/mifid/>

**SPI Committee
November 13, 2007 Meeting**

Project Working Group Activities

PWG members: 7	PWG meetings: 2
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<p style="text-align: center;">Public Stakeholders</p> <ul style="list-style-type: none"> • National Bank of Romania. • National Securities Commission 	<p style="text-align: center;">Private Stakeholders</p> <ul style="list-style-type: none"> • Banking sector (3 banks) • Central Depository
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Preliminary Steps

May 29, 2007: Preliminary meeting of the bank representatives in PWG
 July 6, 2007: Workshop on MiFID transposition and implementation in Romania

Project steps

Aug. 30, 2007: SPI Secretariat sends to PWG members the document approved by SPI Committee and the draft questionnaire on MiFID implementation
Sept. 7, 2007: The approved questionnaire is sent to RBA
Sept. 18, 2007: Invitation letter was sent to NSC
Sept. 28, 2007: SPI centralized results of the questionnaire and sent the note to PWG members
Oct. 3, 2007: NSC appoints two representatives in the PWG
Oct. 15, 2007: PWG 1st meeting
Oct. 24, 2007: SPI Secretariat sends to RBA the letter with information on MiFID implementation and collaboration proposal with NSC

<p style="text-align: center;">Summary of Impact Assessment:</p> <p style="text-align: center;">RIA under elaboration</p>	<p>For more information, please contact:</p> <ol style="list-style-type: none"> 1. SPI Secretariat: Ms. Ramona Bratu and Ms. Oana Nedelescu, tel: +40 21 323 66 10; e-mail: ramona.bratu@convergence-see.eu oana.nedelescu@convergence-see.eu. 2. Project Management Group: Mr. Cristian Agalopol, manager, Citibank, tel: +40 21 203 55 50;
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Project Team

Project Management Group

Project Owner (PO): Sergiu Oprescu, President, Alphabank Romania

Project Manager (PM): Cristian Agalopol, Director, Citibank

Deputy Project Manager (DPM): Doru Bulata, Director, BCR

Project Working Group:

Mirela Serban, Manager, ABN Amro Bank Romania

Dana Vuvrea, Head of Reporting and Client Relationship, Bancpost

Luminita Buchidau, MiFID Project Manager, Bancpost

Cristina Irimia, expert, NSC

Dora Badea, expert, NSC

Summary of the SPI Secretariat Contribution

Workshop organization;

Questionnaire drafting;

Invitation letters for PWG members;

Organization of meetings and drafting the minutes;

Preparation of the informing message to banks.

Document prepared by SPI Secretariat
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SPI Project on MiFID Implementation

Project status report

I. Summary of actions undertaken so far

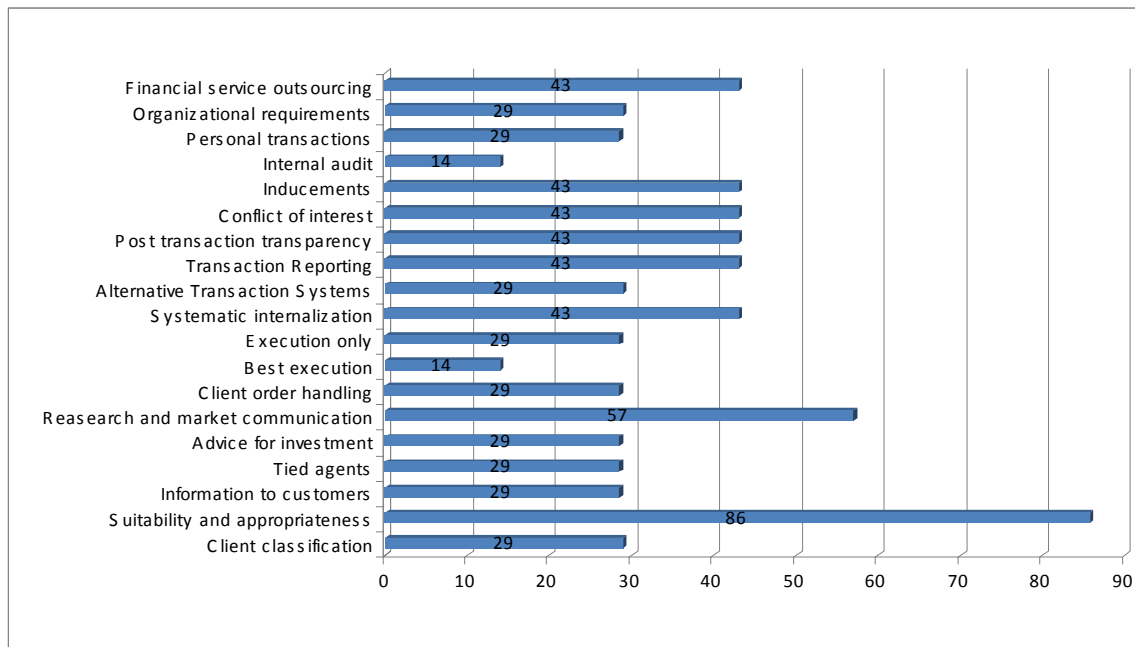
Bank survey on MiFID implementation

In order to assess the difficulties encountered by banks and the status of MiFID implementation, SPI Secretariat drafted a questionnaire that was approved by the PWG. SPI Secretariat run the bank survey with RBA support.

Results of the bank survey

The answers received from banks showed that the major part of the respondents is in an advanced implementation stage, none of them considers implementation as finalized, but estimated finalization by the end of October/beginning of November.

The difficulty scale presented below evidence that banks encountered problems especially in implementing MiFID provisions regarding suitability and appropriateness, research and market communication, systematic internalization, transaction reporting, etc.





PWG meeting

NSC answered RBA's invitation to join PWG by appointing two experts from the Regulation and from Authorization Divisions. Another bank nominated representatives in PWG, while one bank's representative withdrew from PWG works.

PWG had a meeting on October 15 to discuss on the ways to support banks in MiFID implementation. NSC representatives brought clarifications on some of the issues raised by banks and provided information on the relevant information sources and guidelines. PWG agreed on the following measures:

1. SPI Secretariat to prepare and send (after PMT approval) a **letter to all banks**, through RBA, acknowledging them on the above mentioned possible information sources and channels, as resulted from the meeting, and inviting banks to address specific questions either directly to NSC or centralized, through SPI Secretariat. The letter was sent to RBA on October 23.
2. NSC will answer the questions and will post on the website these answers (the necessary steps for the Commission's approval on posting the Q&A will be initiated).
3. the results of the discussions between NSC and NBR on authorization, supervision and money market operations will be posted on NSC website (subject to the Commission's approval) and the norms, measures and individuals documents will be published on NSC website and/or in the Official Gazette .

III. Next steps

Subject to SPI Committee approval, we envisage the following actions:

1. In order to facilitate a structured, coherent and continuous dialogue between banks and NSC, SPI Secretariat will centralize and consolidate the questions received from banks on MiFID implementation and will follow up with NSC representatives;
2. SPI Secretariat will follow up with NSC in the posting on website issue.