

# ***Monaleen Parish Credit Union***

## ***-----Limited-----***

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**Introduction to Tiered approach for Credit Unions  
Registry of Credit Unions  
PO Box 559  
Dame Street  
Dublin 2**

21<sup>st</sup> March 2014

Dear Sirs,

Following the recent board meeting to discuss CP 76 we would like to make a number of comments. The board were of the opinion that the overall thrust of the document is contrary of our understanding of the recommendations of the commission. We feel that the extent of the control outlined in CP76 is excessive in certain areas for a category 1 Credit Union. In particular we have reservations around the following sections:

Section 5: Lending.

The proposed Restricted Person Limits is not in keeping with the spirit of the legislation that says we must treat all our members equally. It should be removed.

Section 5: Investments

The reduction in time from 10 years currently to 5 is too much of a step. There should be a % of the overall portfolio included here for over 5 years.

Section 5: Reserves

Addition Reserves are something that should not be required for category 1 Credit Unions as the "Nature, Scale and Complexity are already confirmed as low.

Section6: Provisioning

The approach to provisioning should not be blanket on all accounts based on categories. It should take into account the progress on each case on a case by case basis.

Section 7 Timelines:

The changes are too close in to the large body of major changes already incurred by CU's in 2013/2014

On behalf of Monaleen Parish Credit Union Ltd.