

Submission on CP88:

From Piercestown & District Credit Union Ltd:

27th February 2015.

We have serious objections to the following:

Savings: What is the rationale by the CBI to reduce the existing limits on savings. If this restriction is introduced the effect it could have on credit unions would be devastating.

Irrespective of whether a credit union has one member or multiple members with more than €100,000 in savings and they have to be told that the CBI does not allow them to have savings greater than the new limit, what can be done to force them to reduce their shareholding.

Also will the same limits apply to all financial institutions or are credit unions being discriminated against and why.

Connected Party Loans:

Just because a person is an officer in a credit union why should members of their family be subject to certain conditions when applying for a loan. As a member they should have equal treatment as all members and not be discriminated against as each loan is judged on its own merits.

The family member as specified in CP88 who is married, have their own families financial independence, living in their own premises, why should they be singled out.

The question is why anyone should volunteer to serve their local community by becoming involved in their credit union and then have family members discriminated against. Does the CBI want to sound the death knell of the volunteer.

The Risk Impact Analysis Document:

This document gives no clarity whatsoever on what impact these new regulations will have on credit unions. If you look at all comments above the effect of implementation suggested by your new regulations, in our opinion would have a colossal effect on credit unions, and yet there is no comment in the RIA on this, why?

The Board of Directors.

Piercestown & District Credit Union.

