
**EACH Response to the consultation on the
Bank of England's fees regime for financial
market infrastructure supervision
2026/2027**

May 2026

1. Introduction

The European Association of CCP Clearing Houses (EACH) represents the interests of Central Counterparties (CCPs) in Europe since 1992. CCPs are financial market infrastructures that significantly contribute to safer, more efficient and transparent global financial markets. EACH currently has 19 members from 14 different European countries. EACH is registered in the European Union Transparency Register with number 36897011311-96.

EACH appreciates the opportunity to respond to the consultation on the Bank of England's ("the Bank") fees regime for financial market infrastructure supervision 2026/2027¹.

2. EACH feedback

EACH Members welcome the Bank's efforts to manage costs and note the small reduction in the general supervision component of the CCP fee for 2026/2027.

The Bank's supervisory fees however **remain high** from our point of view, following previous year-on-year increases. We are surprised that the Bank's emphasis on working efficiently and prioritising within supervisory work has only led to 3.2% reduction in supervisory fees. We also question whether the proposal is consistent with the UK's government growth priorities or its innovation objective, due to the proposal leading to funds being kept for fees which could otherwise have been used to improve risk management, operational resilience, or foster innovation.

Members also respectfully **do not support the inclusion of policy development costs** in the annual supervisory fee. The Bank's fee-levying powers are grounded in its statutory supervisory functions. The development of the UK CCP Rulebook — a policy initiative arising from the Bank's exercise of its new rulemaking powers under the Financial Services and Markets Act 2023 — is not, in our view, a supervisory cost that can legitimately be passed on to regulated firms. In addition:

- The principle of recovering policy costs through supervisory fees is **legally questionable and sets an undesirable precedent**;
- The extension of the recovery period, while reducing the annual impact, **prolongs a charge that should not exist** in the first place; and
- **ESMA does not levy equivalent charges** on CCPs for its rulemaking or regulatory policy activities.

Furthermore, EACH Members welcome the Bank's stated commitment to transparency in fee-setting. We particularly commend the Bank's efforts in bring the consultation forward to the first half of the preceding year. While this is line with the goal of better fee forecasting, we however note that the consultation period for this CP is relatively short (approximately four

¹ <https://www.bankofengland.co.uk/paper/2026/cp/the-boes-fees-regime-for-financial-market-infrastructure-supervision-2026-27>

weeks) and that the **fee forecasts are described as provisional pending confirmation of Bank pension cost impacts**. We would welcome:

- Confirmation that the final policy statement will be published with **sufficient time** before invoices are issued to allow firms to plan accordingly;
- Greater advance indication of **expected fee trajectories** over a two-to-three-year horizon, to support financial planning by supervised firms;
- Publication of a **detailed breakdown of the costs** included in the annual supervisory fee, equivalent in granularity to the information that ESMA provides in its fee determination notices.

EACH Members would therefore like to kindly request the Bank to:

- **Provide more transparency** on the read-across between working efficiently and prioritising within supervisory work and the proposed fees;
- **Remove policy development costs** from the fee regime;
- If the Bank proceeds with recovery of rulebook costs, the **recovery period should be extended** further to minimise the annual impact on supervised firms, consistent with the Bank's 'have regards' obligation to consider the desirability of sustainable economic growth;
- Provide **greater advance transparency over expected fee trajectories** as well as a more detailed breakdown of the costs included in the annual supervisory fee.

Regarding **proportionality** of fees across FMIs, we agree that the recovery of supervisory fees should be structured in a way that is balanced and proportionate across the FMI sector. Broadly, we support an approach that **links fee allocation to the relative systemic relevance** of firms or groups of firms — such as the proposed tiered categorisation framework — as well as to the **level of supervisory activity required**. Nevertheless, we continue to have concerns regarding the considerable differences in supervisory cost burdens applied across various FMI sectors.

As set out in our earlier submissions, although we recognise the important function of CCPs in mitigating and centralising financial risk, it is also important to acknowledge the critical role played by payment systems. These systems arguably have a wider direct impact on the broader economy and on consumers outside the financial sector, particularly in areas such as salary payments, ATM access, and everyday retail transactions. Considering the current statutory cap applied to payment systems, we therefore welcome HMT's proposed review of the regime to help ensure that the overall recoverable costs are allocated in a more balanced and equitable manner across all FMI participants.

We have also considered the section of the consultation addressing the **transitional arrangements for newly authorised FMIs**. Although we understand the rationale for measures intended to encourage innovation and support the development of new entrants, we believe it remains important that supervisory treatment is applied consistently across firms undertaking comparable regulated activities.

From our perspective, firms entering the market should bear the supervisory costs associated with their operations on the same basis as established providers. Existing FMIs should not be expected to absorb or offset those costs, particularly in circumstances where new entrants may compete directly with them within the same markets and services.

Finally, we note the statement in the consultation that the Bank expects CCP policy activity to reach a more settled state in the near term once the transition has completed. In this context, **we would anticipate a corresponding easing of supervisory fees in future years.**