

16 May, 2025

**SEB response to *Høring om neste generasjons oppgjørssystem i norske kroner og deltakelse i oppgjørssystemet T2 ref: 25/01299***

**Funksjonalitet**

- Hvilke spesifikke funksjoner i NBO anser dere som mest kritiske for deres daglige operasjoner?
  - Liquidity monitoring
  - Liquidity allocations for specific flows e.g. CLS, Enquiries (account, funds settlement enquiries, etc.)
  - Contingency backup
  - Overdraft facility, SCP (Scandinavian Cash Pool).
- Hvordan vurderer dere funksjonaliteten i T2 sammenlignet med NBO?
  - T2 GUI is much slower than NBO, NBO has better functionality and is more user friendly
  - In T2 one can create more user- roles
  - There is a dedicated Deposit account in T2 EUR where funds must be placed at the end of each day to obtain interest, all other MCA's/DCA's are not interest bearing apart from remuneration rate on "minimum"/"required" reserves (MRR). On the contrary, in T2 DKK the interest will be paid on the aggregate end of day balance (MCA+DCAs including TIPS) without the need to move funds to a dedicated deposit account (deposit account does not exist in T2 DKK)

SEB would strongly prefer the way that T2 DKK is set up.

- Hvordan tror dere overgangen til T2 vil påvirke deres organisasjons evne til å håndtere oppgjør og likviditetsstyring?

SEB is already familiar to the system and can adjust to T2, it depends on the implementation and functionality ordered from ECB.

- Hvordan vurderer dere behovet for opplæring og støtte ved en overgang til T2, spesielt med tanke på nye brukergrensesnitt og funksjonaliteter?

Webinars and training covering NOK specifics is highly recommended and appreciated. SEB believes that lessons learned from T2 DKK could benefit the whole NOK community. Octane application for managing tests and documentation used in T2 DKK was useful.

For SEB, limited training and support is needed with the transition.

- Har dere innspill til hvilken rolle Norges Bank bør ha i utformingen av løsninger for deltakere som ønsker konto i NBO, men som ikke ønsker å koble seg direkte til ESMIG?

There is a co-management role (in T2 service roles) to consider.

## Gjennomføringsprosjekt

- Hvordan vurderer dere kompleksiteten ved en overgang til T2?

Transition complexity is assessed as manageable, given the absence of bespoke solutions.

- Hvordan vurderer dere den overordnede tidslinjen for et gjennomføringsprosjekt?

Approximate 3-year implementation timeline after signing of agreement. Alignment with market participants of exact go-live date is recommended.

- Hva vurderer dere som de største kostnadsdriverne?

Primarily internal costs associated with infrastructure- and system development and testing to ensure compliance and requirements associated with the implementation.

- Hvilke faktorer anser dere som de største usikkerhetene eller risikoene?

SEB sees no major uncertainties or risk with T2 NOK implementation, if similar structure as T2 DKK implementation is followed.

SEB already uses T2 today so the incorporation of T2 NOK would be familiar.

- Hva vurderer dere som den mest effektive modellen for samarbeid med Norges Bank og andre relevante aktører i et gjennomføringsprosjekt?

Following the example of Danmark Nationalbank, Octane could be used for tests' scoping and status follow up.

Dedicated group in Teams for documentation and information sharing.

Communication, documentation and training in English.

## Muligheter og innovasjon

- Hvordan vurderer dere potensialet for innovasjon i deres tjenester ved bruk av T2?

Low, the development in the Target services is relatively slow for most developments, there needs to be consensus with all participants.

Change requests for development can be complex where consensus is often needed with other countries and currencies in order to be implemented.

- Hvordan tror dere en overgang til T2 vil påvirke deres organisasjons evne til å møte fremtidige krav til sikkerhet og beredskap?

In the future, if EUR, DKK, SEK and NOK use the Target Services, it will mean that, in case of an IT incident, all four currencies are affected at the same time. Such an incident will increase the risk for the clearing members in all four currencies. Each currency has its specific needs, requirements and expectations on the members also during incidents.

## Impact/Consequences:

Increased liquidity risk when EUR and all Scandinavian currencies are using the Target Services.

Using the same central bank system creates a new situation in case of system failure. In the future, all four currencies will go into contingency mode at the same time. To maintain sufficient resources (for

participants) for such occasions in all four currencies will be almost impossible. Also, there is a risk that all central banks choose their individual back-up solution for contingency situations. Should that be the case, it will be very difficult to keep the competence alive for those situations.

From a geopolitical point of view, where Europe needs to increase the defence capabilities including civil defence, it would be unfortunate, to gather all four currencies (so closely linked together through SCP and ECP) without having a common, fully automated back-up solution.

#### **Possible solutions**

Option 1. Ensure a fully automated back-up solution, hopefully for all four currencies.

Option 2. Continue using Perago.

- Hvordan vurderer dere effekter av en harmonisering av oppgjørssystemene i Norden og Europa ved bruk av T2?

See above.

- Legger en overgang til T2 til rette for effektiv deltakelse for nye typer aktører, dersom det blir aktuelt?

Yes, it probably will since T2 allows for more types of participation.