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Policy Snapshot – Member Personal Current Accounts (MPCAS)

John Meagher

Member Personal Current Account Services (MPCAS)

- Represents broadening of credit union service offering – current framework encompasses “core services”, “exempt services” and “additional services”.
- MPCAS is an “additional service” defined in 2016.
- As at September 2022, 77 credit unions approved, with a number in the pipeline.
- RCU initially communicated that applicant credit unions should have asset size at least €75m and membership of 15,000 or more.
- A number of credit unions below the above threshold have applied for and been approved for MPCAS.
- Regardless of size, imperative to undertake thorough and robust risk assessment prior to submitting an application for approval for MPCAS.
- More information available at the “[Applying for Approvals for Credit Unions](#)” section of “Credit Unions” area of the Central Bank’s website. Other relevant resources also available e.g. MPCAS Application Process guidelines and Business Model Strategy guidance.



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Policy Snapshot – Lending Overview

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Credit Union Lending Overview

- Credit union lending remains predominantly personal.
- Loans outstanding growth back to pre-Covid levels – YOY to June 2022 c.6.7% - significant variations across sector.
- Trend towards:
 - Longer maturity, in particular 5-10 years;
 - Larger value loans, in particular > 5 year categories (including house loans);
 - Fewer number of loans overall, despite increasing membership.
- Decline in reported arrears in the average arrears >9 weeks bucket.
- Uncertain financial conditions (cost of living, interest rate increases) has potential to impact loan demand and credit quality.



Business Lending

- Business loans overall form small proportion of credit union sector lending (c. 2.4% at September 2021).
- In past five years, net number of business loans outstanding in sector increased by c.2k. Over same period, over 14k new business loans advanced.
- Business loans typically shorter term and / or repaid early e.g. stocking / working capital.
- Value growth in gross loans outstanding (GLO) for business loans in five years to June 2022 = c.€70m.
- Average new business loan amount has increased significantly, from c.€13k in 2017, to c.€25k in 2022.
- Business lending predominantly undertaken by “community” (and non-Dublin based) credit unions– 40 credit unions account for c. ¾ of all business lending. Agriculture-related lending appears to dominate.



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House Lending

- As at June 2022, c.€300m of house loans which equates to c.6% of total credit union loans, up from 4% of total (€151m) in June 2017.
- Average new house loan advanced is €105k, compared to €65k in 2017/18.
- 30 credit unions (c.14% of number in sector) account for >80% of all house loans outstanding.
- >100 credit unions (c.50% of number in sector) have no house loans, reflecting specialist nature of house lending activity and the necessary framework and skills required.



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House and Business Lending - Concentration Limits

- Introduced January 2020 – replaced previous longer term lending limits based on outstanding loan book.
 - **Base combined limit of 7.5%** for combined house and business lending, with larger (by asset size) entitled to avail of **10% combined limit** (by notification) or **15% combined limit** (by application).
- Business lending capacity – at June 2022, business lending stands at c.0.7% of Total Assets.
- House lending capacity – at June 2022, house lending stands at c.1.5% of Total Assets:
 - Over 90% of credit unions have *significant* headroom before coming close to base limit;
 - Capacity continually generated through asset growth and loan amortisation.
- Seven credit unions have applied for and been approved for the increased 15% combined limit.
- There are five active notifications to the Central Bank to avail of the 10% combined limit - one with assets between €50m and €100m, while the remainder have assets >€100m.
- As part of CP125, RCU committed to carrying out a review of credit union sector lending three years post-commencement of the 2020 amendments to the lending framework, in order to assess and analyse the actual impact that these changes have had on lending in the sector.

