



Single Rulebook Q&A

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Status	Final Q&A
Legal act	Regulation (EU) No 575/2013 (CRR)
Topic	Supervisory reporting - Liquidity (LCR, NSFR, AMM)
Article	Article 415
Paragraph	3
Subparagraph	b
COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations	Not applicable
Article/Paragraph	Not applicable
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Disclose name of institution / entity	Yes
Name of institution / submitter	Wolters Kluwer
Country of incorporation / residence	Ireland
Type of submitter	Other
Subject matter	Treatment of non-withdrawable central bank reserves on C 66.
Question	How should the non withdrawable part of the reserves placed with the Central bank be reported on the inflow section of the C66?
Background on the	The EBA Q&A 2018_4318 covers the withdrawable part but what about the

question	non-withdrawable minimum reserve?
EBA answer	<p>In accordance with Annex XXIII, Instructions to Regulation (EU) No 680/2104 (ITS on Supervisory Reporting), part I, paragraph 6, “The section of the maturity ladder template entitled ‘Outflows and inflows’ shall cover future contractual cash flows from all on- and off- balance sheet items. Only outflows and inflows pursuant to contracts valid at the reporting date shall be reported”. Paragraph 7 states that “The section of the maturity ladder template entitled ‘Counterbalancing capacity’ shall represent the stock of unencumbered assets or other funding sources which are legally and practically available to the institution at the reporting date to cover potential contractual gaps (...)”. Therefore, the outflows and inflows related to the non withdrawable part of the reserves placed in a Central Bank, should be reported under the section “Outflows and inflows”. The difference between the non withdrawable and the withdrawable part relies on the possibility of being available for the institution to convert them into cash at any time, as specified on the instructions of section “Counterbalancing capacity”. The reporting of the withdrawable part is clarified in Q&A 2018/4318. On the other hand, the non withdrawable part should be reported, under the corresponding maturity bucket, as a cash outflow in item 1.6 “Other outflows” and as cash inflow, in item 2.2.5 “Monies due not reported in item 2.1 resulting from loans and advances granted to Central Banks” as clarified in Q&A 2018/4318. In case of sight and non-maturing deposits, it shall be reported as overnight in column 020, as specified on paragraph 12.c). of the general instructions.</p>
Link	https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2020_5286

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