

Single Rulebook Q&A

Question ID	2021_6169
Status	Final Q&A
Legal act	Regulation (EU) No 575/2013 (CRR)
Topic	Supervisory reporting - Funding Plans
Article	430
Paragraph	-
Subparagraph	-
COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations	EBA/GL/2019/05 - Guidelines on harmonised definitions and templates for funding plans of credit institutions under Recommendation A4 of ESRB/2012/2 - repealing EBA/GL/2014/04
Article/Paragraph	n.a.
Date of submission	06/09/2021
Published as Final Q&A	17/02/2023
Disclose name of institution / entity	No
Type of submitter	Competent authority
Subject matter	Inconsistencies between FINREP (F 02.00) and Funding Plans (P 04.01)
Question	Will validation rule v08928_m be deactivated, temporarily? Where shall 'Cash contributions to resolution funds and deposit guarantee schemes' be included until row r0385 will be introduced in P 04.01?
Background on the question	As mentioned in Q&A 4943, the new row r0385 has been introduced to ensure consistent reporting of 'Cash contributions to resolution funds and deposit guarantee schemes' in reporting framework v2.9, but in template F 20.03 this line has only been introduced in reporting framework v3.0. Unfortunately, in Funding Plans, this row (r0385) is still not present, but the validation rules, ensuring the consistency between FINREP and Funding Plans, are in force. The lack of r0385 and the presence of validation rules make reporting difficult. Either the "equality" checks between FINREP and Funding Plans, or the "summation" check (v08928_m) will probably fail. A possibility for the institutions to report correctly, in line with the validation rules, is reporting in row 609 in Funding Plans, which has no equivalent in FINREP, thus no "equality" check is violated, and validation rule v08928_m ("summation" check) is satisfied. Consequently, the assumed consistency in the Funding Plans timeline is corrupted. The institutions are reporting according to the validation rules in column c010 'Actual current position' and

	<p>not according to their understanding of their business. In columns 020, 030, 040 (planned year positions), they are reporting similarly to FINREP before v2.9, i.e. without r0385. This leads to discrepancies in the reporting logic and structural breaks are introduced between columns 010 and 020, deliberately, but without foundation in the real world. Analyses building upon an assumed timeline consistency cannot be undertaken.</p>
Final answer	<p>Template P 04.01 of Annex I to EBA/GL/2019/05 contains selected information from template F 02.00 (statement of profit or loss) of Annexes III and IV to Regulation (EU) 2021/451. The row 0385 ('Cash contributions to resolution funds and deposit guarantee schemes') is currently not present in P 04.01.</p> <p>As row 609 of template P 04.01 (Other items (+/-) contributing to the profit or (-) loss before tax from continuing operations) includes any other amount (net) that contributes to the profit or (-) loss before tax from continuing operations that has not already been reported in rows 355 to 590 in P 04.01, the 'Cash contributions to resolution funds and deposit guarantee schemes' should be reported in this item as long as row 0385 from F 02.00 is not included as a separate row of template P 04.01. The validation rule v08928_m is applicable and will not be disabled.</p>
Link	<p>https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2021_6169</p>

European Banking Authority, 06/12/2023
www.eba.europa.eu