

Single Rulebook Q&A

Question ID	2013_406
Status	Final Q&A
Legal act	Regulation (EU) No 575/2013 (CRR)
Topic	Supervisory reporting - Liquidity (LCR, NSFR, AMM)
Article	415
Paragraph	1
Subparagraph	-
COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations	Regulation (EU) No 680/2014 - ITS on supervisory reporting of institutions (repealed)
Article/Paragraph	Various
Date of submission	18/10/2013
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Disclose name of institution / entity	Yes
Name of institution / submitter	Association for Financial Markets in Europe
Country of incorporation / residence	Europe
Type of submitter	Industry association
Subject matter	Inconsistent wording/references between reporting templates and ITS
Question	There are several inconsistencies between the reporting templates and ITS (examples given below) and it would be useful to understand whether the EBA intends to review and update the documents where needed.
Background on the question	Inconsistencies we have identified can be summarised as follows: Row 710-730 of template C51.00 (Liquid Assets) references 'non-residential MBS' whereas the ITS reference 'asset backed securities'. It is not clear therefore whether 4.4 is supposed to include commercial mortgage backed securities as well as other asset backed securities. Row 820 of C51.00 references 'funds based on the assets reported in 4.5-4.10' whereas the ITS mentions 'funds based on the assets reported in 4.6-4.10'. Row 780 of C51.00 refers to gold, whereas ITS refer to 4.7 gold not reported under 3.1.2 (it also references article 414(4)(a) whereas this should read 416(4)(a).
Final answer	

Q1: ID 4.4, row 710-730 of C51.00 refers to 'non-residential MBS' whereas the ITS reference 'asset backed securities'. It is not clear therefore whether 4.4 is supposed to include commercial mortgage backed securities as well as other asset backed securities.

The information in the instructions relating to the rows: 250-270, 280-300, 710-730 and 740-760 have not been updated accordingly to changes made in the template. The instructions should be amended to reflect the information in the template where non-residential mortgage back instruments (row 250-270 and 710-730) and residential mortgage backed securities (row 280-300 and 740-760) are reported in separate rows.

Q2: ID 4.11, row 820 of C51.00 states 'funds based on the assets reported in 4.5-4.10' whereas the instructions under ID 4.11 refers to 'funds based on the assets reported in 4.6-4.10'.

The reporting template should be changed to read: 4.6-4.10

Q3: ID 4.7, row 780 of C51.00 refers to "gold", whereas the instructions under ID 4.7 refer to "gold not reported under 3.12". ~~The legal reference should read CRR Art. 416(4)(a) and Art. 509(3)(c).~~

The different reporting lines reflect different fulfillment of the operational criteria for the same asset type. Gold has to be reported according to:

- ID 3.12 with reference to Annex III, point 12 of the CRR when it meets the conditions of Art 416 (1)(b) and (d) but not the operational requirements of Article 417(b) and (c); and according to
- ID 4.7 with reference to Articles 416(4)(a) and 509(3)(c) of the CRR, when it meets the operational requirements of Article 417(b) and (c) but not the conditions of Article 416(1)(b) and (d).

The template should be changed to read "gold not reported above under 3.1.2 1d (instead of gold), ~~and the legal references in the instructions should be changed to~~" Articles 416(4)(a) and 509(3)(c) of the CRR 1d (instead of Article 414(4)(a) 1d).

**As of 1/8/2014 the content of this answer was modified to reflect the publication of the final ITS on supervisory reporting of institutions in the Official Journal of the European Union. As a result, the references to the ITS were updated and the disclaimer deleted. For reasons of transparency, revisions are highlighted in track changes.*

Link

https://www.eba.europa.eu/single-rule-book-qa/-/qna/view/publicId/2013_406

