

Single Rulebook Q&A

Question ID	2014_1016
Status	Final Q&A
Legal act	Regulation (EU) No 575/2013 (CRR)
Topic	Supervisory reporting - FINREP (incl. FB&NPE)
Article	99
Paragraph	4
Subparagraph	-
COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations	Regulation (EU) No 680/2014 - ITS on supervisory reporting of institutions (repealed)
Article/Paragraph	157 (c)
Date of submission	26/03/2014
Published as Final Q&A	16/01/2015
Disclose name of institution / entity	No
Type of submitter	Consultancy firm
Subject matter	Tracking of Past-due amounts
Question	In our view, the criterion “there is not, following the forbearance measures any past-due amount” must be met at the date when the exit criteria is examined (regardless whether there have been any past-due amounts before that date but after the extension of the forbearance measure). Do you agree?
Background on the question	If the intention of the ITS would be, that any past-due amount has to be monitored over the entire cure period the result would be that any (small, short-lived) past-due amount would prevent the exposure from exiting the NPE-status for the entire remaining lifetime. This would also require a more complex process for tracking (minimal) overdue amounts.
Final answer	<p>The requirements of par. 157(c) of the draft ITS on Supervisory reporting shall be met at the date of the assessment of the exit criteria from the NPE status.</p> <p>Therefore, with regard to any past due amount incurred after the extension of the forbearance measure, the condition stated by par. 157 (c) is satisfied only if such past due amounts have been already entirely paid at the date of the assessment and</p>

	there are not any concerns regarding the full repayment of the exposure according to the post-forbearance conditions. To that end, the lender should evaluate if the presence of past-due amounts incurred after the extension of the forbearance measure but before the evaluation date could affect its assessment of the ability of the borrower to comply with the post-forbearance conditions.
Link	https://www.eba.europa.eu/single-rule-book-qa/-/qna/view/publicId/2014_1016

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