



**Single
Rulebook
Q&A**

Question ID	2014_1227
Status	Final Q&A
Legal act	Regulation (EU) No 575/2013 (CRR)
Topic	Supervisory reporting - Liquidity (LCR, NSFR, AMM)
Article	415
Paragraph	3
Subparagraph	-
COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations	Draft ITS on Supervisory Reporting of Institutions
Article/Paragraph	Annex XII, C61.00, r140; Annex XIII, Part I, Part II, Part III and Part V.1
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Disclose name of institution / entity	Yes
Name of institution / submitter	Bulgarian National Bank
Country of incorporation / residence	Bulgaria
Type of submitter	Credit institution
Subject matter	Liquidity templates and instructions
Question	We found some inconsistencies between the templates, the instructions and the CRR. Please confirm the following: 1. In template C61.00, rows 140-180 (which is 1.2.3.1 to 1.2.3.3.1) should refer to Article 427 CRR instead of Article 414. The rest of those references on sub-article basis seem correct. 2.

	<p>In Annex XIII, Part I the title for row 540 is different compared to the one in the template and does not correspond the text of Annex III, point 5 of the CRR. The text of Annex XIII should be amended accordingly. The same problem is present in Annex XIII, Part II, row 610 and Annex XIII, Part III, row 590. 3. In Annex XIII, Part I the title for rows 710-730 is different compared to the one in the template. We think that this is the correct title ("... not already reported in 1.10 to 1.11.3") and suggest to change the template accordingly. 4. In Annex XIII, Part I the title for rows 740-760 is different compared to the one in the template. We think this title should be amended because the the title used in the template seems to be the correct one. 5. In Annex XIII, Part I the title for row 820 is different compared to the on in the template. We think this is the correct title ("... reported in 4.6 - 4.10") and suggest to change the template accordingly. Similar issue is present in Annex XIII, Part II, row 890 where the correct title should be the one used in the template. Also such issue is found in Annex XIII, Part III, row 870 where the correct title is the one used in the instructions and the template should be amended accordingly. 6. In Annex XIII, Part II, the title for rows 1110-1120 and the individual titles for rows 1110 and 1120 are identical. We suggest to take the correct titles from the template. 7. In Annex XIII, Part III, the title for row 030 is different compared to the one in the template. We think this is the correct title and suggest to change the template accordingly. 8. In Annex XIII, Part V.1, the explanation for rows 140-200 is non consistent with the template. As the instructions seem correct, we suggest yoy amend the template legal reference accordingly.</p>
<p>Background on the question</p>	<p>We had to check the templates and applicable instructions.</p>
<p>EBA answer</p>	<ol style="list-style-type: none"> 1. The comment is correct: the template rows 140 to 180 (ID 1.2.3.1.to 1.2.3.3.1) in C 61.00 of Annex XII to Regulation (EU) No 680/2014 (ITS on Supervisory Reporting) should be adjusted to the correct reference in the instructions, Article 427 CRR instead of Article 414. 2. The comments are correct: the revision of the instructions should refer to the deviations mentioned above. 3. ID 4.4 of C 51.00 of Annex XIII to ITS on Supervisory Reporting should refer to ID 1.10. The template is correct, the instructions should be adjusted. In addition the wording under ID 4.4 as well as the wording under ID 1.10 should be adjusted in the instructions. 4. ID 4.5 of C 51.00 of Annex XIII to ITS on Supervisory Reporting should refer to ID 1.11. The template is correct. the instructions should be adjusted. 5. The comments are correct: <ul style="list-style-type: none"> • C 51.00-ID 4.11 of Annex XIII to ITS on Supervisory Reporting should refer to ID 4.6 - 4.10, the template has to be adjusted • C 52.00-ID 1.2.2.13.11 of Annex XII and XIII to ITS on Supervisory Reporting has to refer to 4.6 - 4.10 • C 53.00-ID 1.6.13.11 of Annex XII and XIII to ITS on Supervisory

	<p>Reporting has to refer to 4.6-4.10</p> <ul style="list-style-type: none"> • Alignment of positions in C 51.00, C 52.00, C 53.00 of Annex XII and XIII to ITS on Supervisory Reporting should be taken into account. <p>6. The comment is correct: Part II, rows 1110-1120, 1110, 1120 in C 52.00 Annex XIII to ITS on Supervisory Reporting should be adjusted to the template.</p> <p>7. The comment is correct: Reference in the template should read 422 (3) and (4) of Regulation (EU) No 575/2013 as amended by Regulation (EU) 2019/876 (CRR2). Moreover alignment of the wording of the template and instructions is needed.</p> <p>8. See above- the wrong reference is already addressed in point 1.</p>
Link	<p>https://www.eba.europa.eu/single-rule-book-qa/-/qna/view/publicId/2014_1227</p>

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