

✘ Single Rulebook Q&A

Question ID	2020_5159
Status	Final Q&A
Legal act	Regulation (EU) No 575/2013 as amended by Regulation (EU) 2019/876 (CRR2)
Topic	Supervisory reporting - FINREP (incl. FB&NPE)
Article	99
Paragraph	-
Subparagraph	-
COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations	Regulation (EU) No 680/2014 - ITS on supervisory reporting of institutions (as amended)
Article/Paragraph	Annex V Reporting on Financial information, Part 2, 113 and 115
Date of submission	04/03/2020
Published as Final Q&A	04/12/2020
Disclose name of institution / entity	No
Type of submitter	Competent authority
Subject matter	Reporting of the Undrawn limits of credit cards and overdrafts in F09.01.1 Off-balance sheet exposures: Loan commitments, financial guarantees and other commitments given.
Question	Where to report the Undrawn limits of credit cards and overdrafts? Should the Undrawn limits of credit cards and overdrafts be shown in F 09.01.1 row 10 (Loan commitments given) or in row 170 (Other commitments given)?
Background on the question	According to the instructions, Annex V, Part 2, 113 'Loan commitments' shall be firm commitments to provide credit under pre-specified terms and conditions, except those that are derivatives because they can be settled net in cash or by delivering or issuing another financial instrument. The following items of Annex I to CRR shall be classified as 'Loan commitments': (a) 'Forward deposits'; (b) 'Undrawn credit facilities' which comprise agreements to 'lend' or provide 'acceptance facilities' under pre-specified terms and conditions. In comparison Annex V, Part 2, 115g,h stated that 'Other commitments' shall include the following items of Annex I to CRR: (g) 'Note issuance facilities' (NIFs) and 'Revolving underwritings facilities' (RUFs). (h)'Undrawn credit facilities' which comprise agreements to 'lend' or provide 'acceptance facilities' where the terms and conditions are not pre-specified; Definitions given in Annex V

	do not indicate unambiguously where to put the Undrawn limits of credit cards and overdrafts correctly, when both options seem possible. We would appreciate the clarification within the Instructions.
EBA answer	<p>According to Annex V, Part 2.113 (b) of Implementing Regulation (EU) 680/2014 (ITS on Supervisory Reporting) loan commitments encompass inter alia undrawn credit facilities' which comprise agreements to 'lend' or provide 'acceptance facilities' under pre-specified terms and conditions. Pursuant to Annex V, Part 2.115 (h) of the ITS on Supervisory Reporting other commitments include amongst others undrawn credit facilities' which comprise agreements to 'lend' or provide 'acceptance facilities' where the terms and conditions are not pre-specified.</p> <p>Thus, based on the instructions in the ITS on Supervisory Reporting undrawn limits of credit cards and overdrafts shall be reported in row 010 (Loan commitments given) of template F 09.01 if the terms and conditions are prespecified.</p> <p>In contrast, where the terms and conditions are not pre-specified undrawn limits of credit cards and overdrafts shall be reported in row 170 (Other commitments given).</p>
Link	https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2020_5159

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