

## Guidelines compliance table

EBA/GL/2020/05

(Update: 01 March 2021); Issue date:  
6 May 2020; Application date: 1  
January 2022

### Guidelines on credit risk mitigation for institutions applying the IRB approach with own estimates of LGDs

The following competent authorities\* comply or intend to comply with the EBA's Guidelines on credit risk mitigation for institutions applying the IRB approach with own estimates of LGDs:

		<b>Competent authority</b>	<b>Complies or intends to comply</b>	<b>Comments</b>
<b>Member State</b>				
BE	Belgium	National Bank of Belgium	<b>Intends to comply**</b>	By application date, i.e. 01.01.2022.
BG	Bulgaria	Bulgarian National Bank	<b>Intends to comply**</b>	By application date, i.e. 01.01.2022.
CZ	Czech Republic	Czech National Bank	<b>Intends to comply**</b>	By application date, i.e. 01.01.2022.
DK	Denmark	Danish Financial Supervisory Authority	<b>Comply</b>	By notification date, i.e. 01.03.2021.
DE	Germany	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)	<b>Intends to comply**</b>	By application date, i.e. 01.01.2022. The competent authority informs the EBA that it intends to comply with the Guidelines by 01 January 2022 in full, but correcting the editorial error in point (c) of paragraph 38 of the Guidelines. In agreement with the EBA staff participating in the drafting of the

		<b>Competent authority</b>	<b>Complies or intends to comply</b>	<b>Comments</b>
				Guidelines it has been established that point (c) of paragraph 38 of the Guidelines contains an editorial error that results in an inconsistency of the wording of point (c) with the wording of point (a) of that paragraph of the Guidelines. As already stated within the submission of comments on the German translation of the Guidelines the reference to “guaranteed part of the exposure” in the sentence of point (c) of paragraph 38 of the Guidelines should be replaced by “part of the exposure that is covered by this funded credit protection” to render the requirement of paragraph 38 (c) consistent with 38 (a). We intend to implement the Guidelines taking into account a correction of this editorial error and also intend to clarify this issue by submitting a Q&A on this matter.
EE	Estonia	Finantsinspektsioon	<b>Complies</b>	As of notification date, i.e. 28.10.2020.  Electronic link: <a href="https://www.fi.ee/et/juhendid/pan-gandus-ja-krediit/suunised-krediidiriski-maandamise-kohta-krediidasutustele-ja-investeerimisuhingutele-kes-rakendavad">https://www.fi.ee/et/juhendid/pan-gandus-ja-krediit/suunised-krediidiriski-maandamise-kohta-krediidasutustele-ja-investeerimisuhingutele-kes-rakendavad</a>
IE	Ireland	Central Bank of Ireland	<b>Intends to comply**</b>	By application date, i.e. 01.01.2022.  The date of implementation of these guidelines is the 1st of January 2022 to align with the implementation date of EBA guidelines under the IRB roadmap for changes relating to IRB PD and LGD model changes. The Central Bank of Ireland will integrate an assessment of the provisions of the Guidelines into its supervisory practices.
EL	Greece	Bank of Greece	<b>Intends to comply**</b>	By the date a relevant institution or instrument exists in the Greek jurisdiction.

		<b>Competent authority</b>	<b>Complies or intends to comply</b>	<b>Comments</b>
HR	Croatia	Hrvatska narodna banka (Croatian National Bank)	<b>Complies</b>	As of notification date, i.e. 21.10.2020. The Croatian National Bank sent a circular letter to all Croatian credit institutions, informing them that it expects them to apply the Guidelines.
ES	Spain	Banco de España	<b>Intends to comply**</b>	By application date, i.e. 01.01.2022.
FR	France	Banque de France	<b>Complies</b>	As of notification date, i.e. 21.10.2020. ACPR released an "avis" on its Official register: <a href="https://acpr.banque-france.fr/sites/default/files/media/2020/10/19/avis_eba_gl_2020_05.p">https://acpr.banque-france.fr/sites/default/files/media/2020/10/19/avis_eba_gl_2020_05.p</a>
IT	Italy	Bank of Italy	<b>Intends to comply**</b>	By application date, i.e. 01.01.2022.
CY	Cyprus	Central Bank of Cyprus	<b>Does not comply and does not intend to comply</b>	The Guidelines are not relevant to the credit institutions in Cyprus, as none apply the IRB approach.
LV	Latvia	Financial and Capital Market Commission	<b>Intends to comply**</b>	By the date a relevant institution exists in the jurisdiction. There are no banks under the FCMC direct supervision that apply IRB.
LT	Lithuania	Bank of Lithuania	<b>Comply</b>	By the notification date, i.e. 01.03.2021. The guidelines were implemented in the national handbook on asset separation tool
LU	Luxembourg	Commission de Surveillance du Secteur Financier (CSSF)	<b>Intends to comply**</b>	By application date, i.e. 01.01.2022.
HU	Hungary	Central Bank of Hungary	<b>Does not comply and does not intend to comply</b>	No response

		<b>Competent authority</b>	<b>Complies or intends to comply</b>	<b>Comments</b>
MT	Malta	Central Bank of Malta	<b>Intends to comply**</b>	By the date a relevant institution exists in the jurisdiction. The MFSA notes that as at the time of writing, there are no credit institutions licensed under the Banking Act (Chapter 371 of the Laws of Malta), and therefore supervised by the MFSA, which apply the IRB approach. The MFSA intends to comply with the EBA Guidelines should any such credit institution apply the IRB approach, and therefore fall within scope of the EBA Guidelines.
NL	Netherlands	De Nederlandsche Bank N.V. (DNB)	<b>Complies</b>	As of notification date, i.e. 12.10.2020.
AT	Austria	Austrian Financial Market Authority	<b>Intends to comply**</b>	By application date, i.e. 01.01.2022. Will comply as of the date of the Guidelines entering into force on 01.01.2022, with the Guidelines being applied in their entirety by FMA/OeNB.
PL	Poland	Komisja Nadzoru Finansowego	<b>Intends to comply**</b>	By 15.10.2020.
PT	Portugal	Banco de Portugal	<b>Does not comply and does not intend to comply</b>	No response
RO	Romania	National Bank of Romania	<b>Intends to comply**</b>	When necessary legislative or regulatory proceedings have been completed.
SI	Slovenia	Bank of Slovenia	<b>Intends to comply**</b>	By application date, i.e. 01.01.2022. Bank of Slovenia issued Regulation on the application of the Guidelines on credit risk mitigation for institutions applying the IRB approach with own estimates of LGDs (Official Gazette of the Republic of Slovenia, No. 152/2020 of 23 October 2020 - 2632. <a href="https://www.uradni-list.si/_pdf/2020/Ur/u2020152.pdf">https://www.uradni-list.si/_pdf/2020/Ur/u2020152.pdf</a> ), which enters into force on 1 January 2022.

		<b>Competent authority</b>	<b>Complies or intends to comply</b>	<b>Comments</b>
				<a href="https://www.bsi.si/financna-stabilnost/predpisi/seznam-predpisov/kreditno-tveganje/kreditno-tveganje-standardizirani-in-irb-pristop-za-izracun-kapitalske-zahteve">https://www.bsi.si/financna-stabilnost/predpisi/seznam-predpisov/kreditno-tveganje/kreditno-tveganje-standardizirani-in-irb-pristop-za-izracun-kapitalske-zahteve</a>
SK	Slovakia	Národná banka Slovenska	<b>Intends to comply**</b>	By application date, i.e. 01.01.2022.
FI	Finland	Finanssivalvonta (FIN-FSA)	<b>Does not comply and does not intend to comply</b>	No response
SE	Sweden	Finansinspektionen (Swedish Financial Supervisory Authority)	<b>Complies</b>	As of notification date, i.e. 02.10.2010.

#### EU Institutions – Agencies

European Central Bank	Single Supervisory Mechanism	<b>Intends to comply**</b>	By application date, i.e. 01.01.2022.
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#### EEA – EFTA State

IS	Iceland	Fjármálaeftirlitið (Financial Supervisory Authority, Iceland)	<b>Intends to comply**</b>	By a date a relevant institution exists in the Icelandic jurisdiction.
LI	Liechtenstein	Financial Market Authority Liechtenstein (FMA)	<b>Complies</b>	As of notification date, i.e. 25.01.2021.
NO	Norway	The Financial Supervisory Authority of Norway	<b>Intends to comply**</b>	By application date, i.e. 01.01.2022.

\*The EEA States other than the Member States of the European Union are required to notify their compliance with EBA guidelines and recommendations relating to a legislative act which has been incorporated into the EEA Agreement, and otherwise provide the information on a voluntary basis.

\*\* Please note that, in the interest of transparency, if a competent authority continues to intend to comply after the application date, it will be considered “non-compliant” unless (A) the Guidelines relate to a type of institution or instruments which do not currently exist in the jurisdiction concerned; or (B) legislative or regulatory proceedings have been initiated to bring any national measures necessary to comply with the Guidelines in force in the jurisdiction concerned.

## Notes

Article 16(3) of the EBA's Regulations requires national competent authorities to inform us whether they comply or intend to comply with each Guideline or recommendation we issue. If a competent authority does not comply or does not intend to comply it must inform us of the reasons. We decide on a case by case basis whether to publish reasons.

The EBA endeavour to ensure the accuracy of this document, however, the information is provided by the competent authorities and, as such, the EBA cannot accept responsibility for its contents or any reliance placed on it.

For further information on the current position of any competent authority, please contact that competent authority. Contact details can be obtained from the EBA's website [www.eba.europa.eu](http://www.eba.europa.eu).