

# Guidelines compliance table

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EBA/GL/2019/05

Updated on 25.02.2021; Date of application – 31.12.2020

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## Guidelines on harmonised definitions and templates for funding plans of credit institutions under Recommendation A4 of ESRB/2012/2

The following competent authorities\* comply or intend to comply with the EBA's Guidelines on harmonised definitions and templates for funding plans of credit institutions under Recommendation A4 of ESRB/2012/2:

		<b>Competent authority</b>	<b>Complies or intends to comply</b>	<b>Comments</b>
Member State				
BE	Belgium	National Bank of Belgium	<b>Intends to comply**</b>	By date of application, i.e. 31.12.2020. The NBB circular that will integrate these EBA guidelines EBA/GL/2019/05 in the NBB's policy framework is still to be finalised and approved by the NBB's Board of Directors. In the meantime, reporting tools will be adapted.
BG	Bulgaria	Bulgarian National Bank	<b>Does not comply/ does not intend to comply</b>	Has not notified the EBA.
CZ	Czech Republic	Czech National Bank	<b>Intends to comply**</b>	When necessary legislative or regulatory proceedings have been completed. Due to the necessity of amending Czech National Bank's decrees No. 346/2013, with regard to data submission by the banks, and No. 426/2013, with regard to data submission by the savings and credit cooperatives, the Czech National Bank confirms the

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				<p>intention to comply with the Guidelines from the 28.06.2021 at the latest.</p> <p>The amendments of the decrees will cover, in particular, the update of the remittance date from 30th March to 15th March and the extension of the application scope on the savings and credit cooperatives on an individual basis.</p>
DK	Denmark	Danish Financial Supervisory Authority	<b>Complies</b>	As of the date of notification, i.e. 10.02.2020.
DE	Germany	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)	<b>Does not comply/ does not intend to comply</b>	<p>Setting up the list of institutions on a yearly basis comes along with a changing sample. Therefore, some LSIs that have not been affected in the past might have to take part in the following year in order to fulfil the criteria to cover 75% of the banking system's assets. Meanwhile, there is high uncertainty if the new institutions are going to be part in the sample in the following year again. In order to stay consistent and to keep the data and cost burden low we are collecting funding plan data for all German SIs as well as for a couple of German subsidiaries of European SIs. As this sample of German institutions is currently representing more than 65% of the German banking system's total consolidated assets we are still able to fulfil the criteria to obtain a genuinely comprehensive picture. The decision refers only to the reference date 31.12.2017. Bafin are confident to collect sufficient information to form a clear view on the funding of their national banking system and they are looking forward to sharing all relevant information afterwards.</p>
EE	Estonia	Finantsinspektsioon	<b>Complies</b>	<p>As of notification date, i.e. 09.06.2020.</p> <p>Electronic link:  <a href="https://www.fi.ee/et/juhendid/pan-gandus-ja-krediit/suunised-krediidasutuste-rahastamiskavade-">https://www.fi.ee/et/juhendid/pan-gandus-ja-krediit/suunised-krediidasutuste-rahastamiskavade-</a></p>

		Competent authority	Complies or intends to comply	Comments
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IE	Ireland	Central Bank of Ireland	<b>Intends to comply**</b>	<p>By date of application, i.e. 31.12.2020. The Central Bank of Ireland provided comments and input on the proposed changes to the funding plans returns during the discussions at SG REP, SCARA and Board of Supervisors Level.</p> <p>In relation to the changes to the FP template since the public consultation, the Central Bank of Ireland agreed with the change to the remittance date of the annual return to 15 March, so that banks have sufficient time to provide more precise 3-year forecasts.</p> <p>The Central Bank of Ireland also agreed with the proposed change to the FP reporting requirement to account for the new proportionality criteria set out in CRR 2 for “small and non-complex” banks. However, at present, none of the Irish banks meet the CRR 2 criteria to be designated as “small and non-complex”.</p> <p>Within the Central Bank of Ireland, the supervisory teams in Banking Supervision Division (BSD) and the Business Analysis team in Risk Analysis, Data Analysis and Reporting (RADAR) have noted that the liquidity ratio forecast templates reported in P01.03 is useful for SREP analysis and other business model forecasting analysis. Therefore, the Central Bank of Ireland agreed with the decision of the EBA to retain this template in the FP amendments, given that this forecast information is not available from any other source at present. The EBA have also clarified in the instructions that data defined in table P 01.03 should be reported where the credit institution is required to calculate liquidity ratios as per the Regulation 575/2013 and Commission</p>

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				Delegated Regulation (EU) 2015/61, at individual or consolidated level as appropriate.
EL	Greece	Bank of Greece	<b>Intends to comply**</b>	By date of application, i.e. 31.12.2020.
HR	Croatia	Hrvatska narodna banka (Croatian National Bank)	<b>Complies</b>	As of notification date, i.e. 25 February 2021. The obligation of credit institutions to deliver the reports referred to in Guidelines of the European Banking Authority (EBA/GL/2019/05) is subject of Decision on reporting of funding plans (OG 122/2020) that enter into force on 31 December 2020.
ES	Spain	Banco de España	<b>Intends to comply**</b>	By date of application, i.e. 31.12.2020.
FR	France	Banque de France	<b>Complies</b>	As of date of notification, i.e. 25 May 2020.
IT	Italy	Bank of Italy	<b>Does not comply/ does not intend to comply</b>	Has not notified the EBA.
CY	Cyprus	Central Bank of Cyprus	<b>Complies</b>	As of date of notification, i.e. 26 May 2020.
LV	Latvia	Financial and Capital Market Commission	<b>Complies</b>	Compliance with the EBA Guidelines EBA/GL/2019/05 is ensured by inserting the reference to the Guidelines in the FCMC Regulations No.113 "Regulations Governing the Reporting of Funding Plans for Credit Institutions" ( <a href="https://likumi.lv/ta/id/275248-parskatu-par-kreditiestazu-finansesanas-planiem-normativie-noteikumi">https://likumi.lv/ta/id/275248-parskatu-par-kreditiestazu-finansesanas-planiem-normativie-noteikumi</a> ).
LT	Lithuania	Bank of Lithuania	<b>Intends to comply**</b>	As of date of application, i.e. 31.12.2020.
LU	Luxembourg	Commission de Surveillance du Secteur Financier (CSSF)	<b>Intends to comply**</b>	By date of application, i.e. 31.12.2020.
HU	Hungary	Central Bank of Hungary	<b>Intends to comply**</b>	By date of application, i.e. 31.12.2020.
MT	Malta	Central Bank of Malta	<b>Complies</b>	As of date of notification, i.e. 04.01.2021.

		<b>Competent authority</b>	<b>Complies or intends to comply</b>	<b>Comments</b>
				<p>On 22 December 2020, the Malta Financial Services Authority published a revised version of Banking Rule BR/16 on Funding Plans for Credit Institutions Authorised under the Banking Act (Cap. 371) in order to implement the EBA Guidelines (EBA/GL/2019/05).</p> <p>The previous Annexes to BR/16 were repealed and replaced by Annex 1 and 2 to the Rule, providing credit institutions with the reporting instructions and the reporting templates respectively. This Rule is applicable from the date of application of the EBA Guidelines, that is, 31 December 2020.</p> <p>Link to BR/16: <a href="https://www.mfsa.mt/wp-content/uploads/2020/12/Circular-to-Credit-Institutions-on-Amendments-to-Banking-Rule-16.pdf">https://www.mfsa.mt/wp-content/uploads/2020/12/Circular-to-Credit-Institutions-on-Amendments-to-Banking-Rule-16.pdf</a></p> <p>Link to Annex 1 to BR/16: <a href="https://www.mfsa.mt/wp-content/uploads/2020/12/Annex-1-Reporting-Instructions.pdf">https://www.mfsa.mt/wp-content/uploads/2020/12/Annex-1-Reporting-Instructions.pdf</a></p> <p>Link to Annex 2 to BR/16: <a href="https://www.mfsa.mt/firms/regulated-firms/credit-institutions/regulation/supervisory-reporting/">https://www.mfsa.mt/firms/regulated-firms/credit-institutions/regulation/supervisory-reporting/</a></p>
NL	Netherlands	De Nederlandsche Bank N.V. (DNB)	<b>Complies</b>	As of date of notification, i.e. 25 May 2020.
AT	Austria	Austrian Financial Market Authority	<b>Intends to comply**</b>	<p>By date of application, i.e. 31.12.2020. Transposition by national reporting regulation (VERA-V, Regulation on Asset, Income and Risk Statement, Template G1)</p> <p>The legislative process is not yet finalised. Consultation ended on May 15. The next step to obtain the formal consent of the Ministry of Finance was now put on hold given the new COVID-19 reporting project. For reasons of expediency FMA plan to use the ongoing VERA-</p>

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				V amendment to transpose the upcoming COVID-19 reporting, i.e. an additional short consultation needs to be initiated. This will delay their initial plan by approximately one month. However, first reporting on 31.12.2020 funding plan data will be ensured so that full compliance by 31.12.2020 can be notified. Link to consultation version: VERA-V: <a href="https://www.fma.gv.at/download.php?d=4531">https://www.fma.gv.at/download.php?d=4531</a> (see § 10b therein) Template G1: <a href="https://www.fma.gv.at/download.php?d=452">https://www.fma.gv.at/download.php?d=452</a>
PL	Poland	Komisja Nadzoru Finansowego	<b>Intends to comply**</b>	By date of application, i.e. 31.12.2020.
PT	Portugal	Banco de Portugal	<b>Intends to comply**</b>	By date of application, i.e. 31.12.2020.
RO	Romania	National Bank of Romania	<b>Complies</b>	As of date of notification, i.e. 27.05.2020. National measures to be submitted for EBA's information as soon as possible.
SI	Slovenia	Bank of Slovenia	<b>Complies</b>	As of date of notification, i.e. 03.06.2020. Link to the measures published in the relevant jurisdiction (Uradni list RS, št. 78/2020, 29 May 2020 – 1158. Sklep o uporabi Smernic o usklajenih opredelitvah in predlogah za načrte financiranja kreditnih institucij na podlagi priporočila A4 ESRB/2012/2 - <a href="https://www.uradni-list.si/_pdf/2020/Ur/u2020078.pdf">https://www.uradni-list.si/_pdf/2020/Ur/u2020078.pdf</a> )
SK	Slovakia	Národná banka Slovenska	<b>Intends to comply**</b>	By 31.12.2021.
FI	Finland	Finanssivalvonta (FIN-FSA)	<b>Intends to comply**</b>	By 31.12.2020.
SE	Sweden	Finansinspektionen (Swedish Financial Supervisory Authority)	<b>Complies</b>	As of date of notification, i.e. 25.05.2020.

	<b>Competent authority</b>	<b>Complies or intends to comply</b>	<b>Comments</b>
	ECB	Single Supervisory Mechanism	<b>Intends to comply**</b> By 31.12.2020.

#### EEA – EFTA State

IS	Iceland	Fjármálaeftirlitið (Financial Supervisory Authority, Iceland)	<b>Intends to comply**</b>	By 03.06.2020.
LI	Liechtenstein	Financial Market Authority Liechtenstein (FMA)	<b>Intends to comply**</b>	By 31.12.2021. The updated EBA/GL/2019/05 will require changes to the legal framework for supervisory reporting. Credit institutions will not be able to implement the necessary reporting requirements by 30 December 2020. FMI LI expects that the necessary legal and practical steps for implementing the reporting requirements will have been taken by end of December 2021 allowing the FMA to collect the first submissions of funding plans by 15 March 2022 for the reference date 31 December 2021.
NO	Norway	The Financial Supervisory Authority of Norway	<b>Intends to comply**</b>	By date of application, i.e. 31.12.2020.

\*The EEA States other than the Member States of the European Union are not currently required to notify their compliance with the EBA's Guidelines. This table is based on information provided from those EEA States 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).