

Guidelines compliance table

EBA/GL/2016/10 Appendix 1

03 November 2016; Date of application – 1 January 2017 (updated 12.10.2017)

Guidelines on ICAAP and ILAAP information collected for SREP purposes

The following competent authorities* comply or intend to comply with the EBA's Guidelines on ICAAP and ILAAP information collected for SREP purposes:

	Competent authority	Complies or intends to comply	Comments
Member State			
BE	Belgium National Bank of Belgium	Intends to comply**	By 01.09.2017.
BG	Bulgaria Българска народна банка (Bulgarian National Bank)	Yes	As at 22.02.2017, notification date.
CZ	Czech Republic Czech National Bank	Intends to comply**	By 31.12.2017.
DK	Denmark Finanstilsynet	Intends to comply**	By 01.01.2018.
DE	Germany Bundesanstalt für Finanzdienstleistungsufsicht (BaFin)	Intends to comply**	By 31.12.2018. Please be informed that we intend to comply with the Guidelines by the reporting cycle 2018. We trust that we are already fully compliant with requiring all the necessary qualitative information on ICAAP and ILAAP. However, with respect to the quantitative

		Competent authority	Complies or intends to comply	Comments
				<p>information requested from institutions we still need to evaluate whether further quantitative information on the ILAAP needs to be requested. The assessment to require additional quantitative ILAAP information will be made against the backdrop of</p> <ul style="list-style-type: none"> the introduction of additional liquidity reporting in spring 2018 (notably the maturity ladder comprising the reporting of some behavioral assumptions by banks), the current harmonization of the SREP approach for less significant banks within the SSM and the ongoing considerations to ease the reporting burden for small banks. <p>Therefore, we decided not to introduce additional quantitative ILAAP reporting for the 1.600 institutions under our supervision in 2017. This, obviously, does not prevent us from requiring additional quantitative ILAAP information on a case by case basis if deemed necessary.</p>
EE	Estonia	Finantsinspektsioon	Yes	As at 22.03.2017, notification date.
IE	Ireland	The Central Bank of Ireland	Yes	As at 03.04.2017, notification date.
EL	Greece	Bank of Greece	Intends to comply**	By 30.06.2017
HR	Croatia	Hrvatska narodna banka (Croatian National Bank)	Intends to comply**	By 31.12.2017. Since 2009, CNB's Decision on the ICAAP is applied in the local regulatory framework (with several additional updates following the regulatory developments). It defines main elements of the internal capital adequacy assessment process that credit

		Competent authority	Complies or intends to comply	Comments
				institutions should follow. The required information on ICAAP defined in the template proposed by the Decision corresponds to the information defined by the Guidelines. Additionally, by means of circular letter addressed to all credit institutions in 2014, CNB expressed its expectation on the information on ILAAP that credit institutions should submit to the CNB. That information covers main ILAAP elements defined in the Guidelines with only several items that should be more closely defined. Due to the fact that current practice enables CNB in obtaining all necessary information on ICAAP/ILAAP process (and since it is largely compliant with Guidelines on ICAAP and ILAAP information), CNB intends to fully implement the Guidelines on ICAAP and ILAAP information by the end of 2017. In that way CNB will be able to follow the usual procedure of the local Decision update (the update has been initiated upon the official publication of the Croatian translation of the Guidelines) i.e the amendments on the Decision should pass the public hearing before they are officially published in the Official Gazette and applied in the SREP process, and in the same time ensure the updated ICAAP/ILAAP information submission by the credit institutions for the year 2017.
ES	Spain	Banco de España	Intends to comply**	By 31.12.2017.
FR	France	Autorité de Contrôle Prudentiel et de Résolution	Yes	As at 27.03.2017, notification date. The Report on Internal Control gives details of the institution's internal control activities during the past financial year and describes its systems for measuring, monitoring,

		Competent authority	Complies or intends to comply	Comments
				managing and disclosing the risks to which it is exposed. French Institutions send annually their Report to ACPR. This Report includes the information required by the GL on ICAAP and ILAAP information. The outline of the Report is available on the ACPR website – (http://acpr.banque-france.fr/fileadmin/user-upload/acp/communication/Communication-a-la-profession/20160807-canevasRCI-2016-EN.pdf - unable to access as address not clear on the pdf form – so try - http://acpr.banque-france.fr/)
IT	Italy	Banca d'Italia	Intends to comply**	By the second half of 2017.
CY	Cyprus	Central Bank of Cyprus	Yes	As at 17.07.2017, notification date.
LV	Latvia	Financial and Capital Market Commission	Yes	As at 11.04.2017, notification date.
LT	Lithuania	Bank of Lithuania	Intends to comply**	By 10.04.2017.
LU	Luxembourg	Commission de Surveillance du Secteur Financier (CSSF)	Intends to comply**	By 01.10.2017.
HU	Hungary	The Central Bank of Hungary	Yes	As at 10.04.2017, notification date.
MT	Malta	Malta Financial Services Authority	No response	No notification of compliance was received by the EBA within the two-month notification period.
NL	Netherlands	De Nederlandsche Bank	Yes	As at 05.04.2017,notification date.
AT	Austria	Austrian Financial Market Authority	Yes	As at 10.04.2017, notification date.
PL	Poland	Komisja Nadzoru	Intends to	Email dated 06.10.2017:

		Competent authority	Complies or intends to comply	Comments
		Finansowego	comply**	<p>We intend to implement the Guidelines partially. Bearing in mind that none of the Polish banks have been identified as a G-SII, we primarily intend to focus on those elements of the Guidelines which are the most tailored to the scale and specificities of the Polish banking sector.</p> <p>Taking a size and complexity of credit institutions in Poland, we came to the conclusions that it would be the most rational to address the provisions set out in paragraph 15 of the Guidelines to all Categories (I-IV) of the credit institutions from the Polish banking sector - through the application of principle of proportionality. We intend to focus on those elements of the Guidelines which are the most adequate from the domestically-oriented perspective and to address the vital requirements of the Guidelines to the Polish SREP methodology and supervisory practice.</p> <p>Nonetheless we would like to stress, that we have steadily been applying our SREP methodology in accordance with the provisions set out in the Guidelines. The 2017 questionnaire on capital and liquidity adequacy used by the KNF closely follows the Guidelines.</p>
PT	Portugal	Banco de Portugal	Intends to comply**	<p>By 31.12.2017.</p> <p>As of January 1st 2017 Banco de Portugal is largely compliant with the above Guidelines as information on ICAAP is being collected since 2007 and information on ILAAP is collected through periodic and ad-hoc reporting, altogether covering most of the referred information in the Guidelines. Considering the timing of publication of the Guidelines, Banco de Portugal is currently</p>

		Competent authority	Complies or intends to comply	Comments
				implementing all necessary changes in order to be fully compliant with the Guidelines for the 2018 SREP cycle.
RO	Romania	National Bank of Romania	Yes	As at 04.04.2017, notification date.
SI	Slovenia	Bank of Slovenia	Intends to comply**	<p>By such time as the necessary regulatory proceedings have been completed.</p> <p>Bank of Slovenia will wait with the compliance until the ECB provides a common SSM SREP methodology for LSI supervision including the listed items from the EBA guidelines on ICAAP and ILAAP information that are necessary to carry out the ICCAP / ILAAP assessment for LSIs, SSM LSI methodology should come into force as planned in year 2018. Regarding the guidelines Bank of Slovenia has circulated a letter to LSI explaining that institutions should report their ICAAP and ILAAP as in the previous year but are expected to take into consideration EBA guidelines when preparing their ICAAP and ILAAP reports on 31 December 2016.</p>
SK	Slovakia	Národná Banka Slovenska	Yes	As at 04.04.2017, notification date.
FI	Finland	Finanssivalvonta (FIN-FSA) (for Less Significant Institutions as defined in Council Regulation (EU) No 1024 / 2013 of 15 October 2013 conferring specific tasks on the European Central Bank concerning policies relating to the prudential	Intends to comply**	By 01.09.2017.

		Competent authority	Complies or intends to comply	Comments
		supervision of credit institutions)		
SE	Sweden	Finansinspektionen	Intends to comply**	By 31.12.2017.
UK	United Kingdom	PRA	Yes	As at 10.04.2017, notification date.
		Financial Conduct Authority (FCA)	Yes	As at 20.03.2017, notification date,

EU Institutions – Agencies

ECB	ECB	ECB	Yes	As at 17.02.2017, notification date.
-----	-----	-----	-----	--------------------------------------

EEA – EFTA State

IS	Iceland	Financial Supervisory Authority, Iceland	Intends to comply**	By the application date of the Guidelines.
LI	Liechtenstein	Financial Market Authority Liechtenstein (FMA)	Yes	As at 03.04.2017, notification date.
NO	Norway	Finanstilsynet	Yes	As at 08.06.2017, notification date.

European Territories under Article 355(3) TFEU

UK	United Kingdom	Financial Services Commission (Gibraltar)	Yes	As at 29.08.2017, notification date.
----	----------------	---	-----	--------------------------------------

*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.