

**EBA Consultation Paper on
Draft Implementing Technical Standards on
Supervisory Reporting Requirements for
Liquidity Coverage and Stable Funding
Consultation Launched 7th June '12 – End Date 27th August '12
- Groupe BPCE Response –**

As a general matter, we think that It should be made clearer about 1.what are the entities subject to reporting and 2. What are the entities to include in the reporting.

Question #1: Are the proposed dates for first remittance of data, i.e. end of January and end of March 2013 feasible?

The reporting templates are still being discussed. They are likely to be published in late November 2012 and draft templates are quite different from the existing Basel III QIS templates.

2 (LCR) and 4 (NSFR) months delay for implementing the new reporting is highly unrealistic. A one year delay, from the time the reporting standards are known, seems more reasonable to implement and industrialize a new reporting.

In the meanwhile, the on-going QIS reporting process could be maintained with :

- A slightly modified template to fit CRD4/CRR4
- A remittance delay of 30 business days or 45 calendar days
- Beginning on end of March 2013
- On a quarterly basis

The specific CRD4/CRR reporting process could be remitted first on end of December 2013 basis.

Question #2: Do respondents agree with this proposal for defining significant currency?

The 5% limit should apply after netting all change operations.

The significance of a currency should be defined on the consolidated basis and not redefined on any sub-consolidation level if any. If a sub-consolidation level is required, the significance defined at consolidated level should apply.

Question #3: Is the proposed remittance period of 15 days feasible?

A 15 days remittance delay does not seem feasible. It is a major issue that might be detrimental to the observation period.

Before 30 days, reportings will not be reconciled with GL and will be based on management data.

For LCR, a non-reconciled report, might be produced with a 25 days delay. **A 30 day delay is necessary for a reconciled report**, which will be of better use for the observation period.

For NSFR, we think that the lack of reconciliation is a very important bias for results (capital / own funds and “other assets”). This leads to :

1. Period ends without GL close seems inappropriate for NSFR reporting
2. Remittance delay could be different for LCR and NSFR, **30 business days for delay seems the minimum for NSFR** to ensure it keeps sense.

Question #4: Are there additional sub-categories of inflows and outflows that are consistent with the specification of the liquidity coverage requirement in the CRR and would inform policy options that should be reported?

First, we would like to suggest the reporting to be based on the last QIS report with additional sub-categories suitable to EBA’s needs.

For the proposed reporting, our remarks below :

- Outflows:
 - 1.1.5 Retail Term-Deposits exempted from the calculation of outflows should be separated into :
 - 1.1.5.1 Retail term deposits exempted from the calculation of outflows where the conditions of Art. 409.5 (a) have been met
 - 1.1.5.2 Retail term deposits exempted from the calculation of outflows where the conditions of Art. 409.5 (b) have been met

- 1.2.1 liabilities resulting from the institution's own operating expenses : They are excluded from calculation.
- 1.2.2 to 1.3.2 : Proposed sub-categories seem very detailed, we suggest an aggregation according to the applied run-off rates.
- Missing items :
 - Securities borrowing / lending without cash collateral are not specified in the instructions

Q.5-. For the purposes of providing guidance as to transferrable securities of high and extremely high credit and liquidity quality, what additional assets, if any, should the ITS collect?

For the purpose of the observation period, we suggest that the following assets be added to the template as they are already present on the last EBA reporting for QIS :

- Claims on non-financial corporates and public sector entities eligible as collateral at central banks
- Credit Line from a central bank
- CIUs
- Equity listed on major markets

Question #6: Do respondents agree that the template captures the requirement of the draft CRR on reporting of stable funding?

There is no section for encumbered amounts for assets (required stable funding).

Only unencumbered amounts would be reported and encumbered amounts being all considered as « other assets » weighted 100% as RSF. Is that right ?