

Guidelines compliance table

EBA/GL/2020/07

(Update: 01 March 2022); Issue date:
2 June 2020; Application date: 3
August 2020

Guidelines on reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis

The following competent authorities* comply or intend to comply with the EBA's Guidelines on reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis:

		Competent authority	Complies or intends to comply	Comments
Member State				
BE	Belgium	National Bank of Belgium	Complies	<p>As of notification date, i.e. 30.07.2020.</p> <p>The National Bank of Belgium (NBB) recently issued circular NBB_2020_28. The circular was sent to the institutions concerned. The purpose of this circular is to implement the Guidelines of the European Banking Authority (EBA) of 2 June 2020 on reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis (EBA/GL/2020/07) in Belgium.</p> <p>The circular can be found on the NBB website via the following link: https://www.nbb.be/en/articles/circular-nbb202028-guidelines-european-banking-authority-eba-2-june-2020-reporting-and</p>

		Competent authority	Complies or intends to comply	Comments
BG	Bulgaria	Bulgarian National Bank	Complies	As of notification date, i.e. 14.07.2020.
CZ	Czech Republic	Czech National Bank	Does not comply and does not intend to comply	<p>The Czech National Bank confirms the intention to comply with parts of the guidelines covering the disclosure requirements for the exposures subject to the payment moratoria in accordance with the GL on moratoria (EBA/GL/2020/02) and the disclosure requirements for the new loans subject to the specific public guarantees set up to mitigate the effects of COVID-19 crisis as of the date of this notification.</p> <p>The Czech National Bank confirms the intention not to comply with parts of the guidelines covering i) reporting requirements to monitor the use of payment moratoria and the evolution of the credit quality of the exposures subject to such moratoria in accordance with the GL on moratoria; ii) reporting requirements for the new loans subject to specific public guarantees set up to mitigate the effects of the COVID-19 crisis; iii) reporting requirements on other forbearance measures applied in response to COVID-19 crisis.</p> <p>The reason for non-compliance is primarily the implementation of a completely new national data collection system since EBA reporting framework version 2.9. In this context relevant credit institutions have to make a maximum effort to deliver standard collection of EU-level data requirements (COREP and FINREP) and their capacity to implement new technical packages and fulfill temporary reporting requirements is currently limited.</p> <p>Due to the necessity of having sufficient information on the application of payment moratoria</p>

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				and the public guarantees for the supervisory purposes, the national supervisory reporting requirements were introduced in timely manner. Therefore the Czech National Bank will not miss important data for its supervisory activities. In the EU context, most of data is covered by parent credit institutions settled in EU.
DK	Denmark	Danish Financial Supervisory Authority Finanstilsynet	Does not comply and does not intend to comply	<p>The Danish Financial Supervisory Authority (DFSA) does not intend to comply with “EBA/GL/2020/07 – GL’s on reporting and disclosure of exposures subject to measures applied in response to Covid-19 crisis” as of the last reporting period of 2021.</p> <p>The reason is two-folded:</p> <p>i) EBA-compliant moratoria were never implemented in Denmark as a response to the COVID-19 crisis.</p> <p>ii) Public Guarantee Schemes (PGS) has never materialized in Denmark on a scale that can justify a continuation of this particular COVID-19 reporting framework.</p> <p>Notes: (i) EBA-compliant moratoria was never part of the relief package in response to the COVID-19 crisis, and thus this part of the reporting templates have been an unnecessary burden. Denmark’s relief package has been based on direct subsidies to firms hit by the COVID-19 crisis, rather than moratoria measures. (ii) PGS has been part of the larger relief package introduced by the Danish government. However, they never materialized and has remained a nuance of the credit institutions portfolio of exposures. For example of the population reporting the COVID-19 templates, exposures with COVID-19 guarantees attached to them amounted to less than 0,2</p>

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				% in 2021Q1. From the DFSA’s point of view this does not postulate a need for a singular reporting demands and would impose a unnecessary compliance burden on the institutions. If the unexpected of a material risk would occur in these exposures, both the other reporting templates in FINREP and the Danish Credit Register would cover macro or microprudential reporting needs.
DE	Germany	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)	Does not comply and does not intend to comply with parts of the guidelines / recommendations	<p>BaFin will partially comply with the EBA/GL/2020/07 by moving the first reference date for the required supervisory reporting from 30 June 2020 to 30 September 2020. This extended period to provide the first reporting information will be granted to the institutions to allow for an adequate period to implement the technical environment for an initial submission of the reporting templates directly in the XBRL format. The collection in this format is necessary in order to ensure that the reporting information for LSI can be forwarded to the EBA – as required from the reference date 31.12.2020 – since EBA only accepts data reported in the XBRL-format. Furthermore, this approach allows the processing and analysis of larger data volumes, which are expected to be submitted due to the large number of German LSIs obliged to report the required data.</p> <p>For the rest BaFin will fully comply with the GL and is planning to implement a quarterly reporting of templates 90.1, 90.2, 91.1, 91.2 and 91.5 for all of the German Less Significant Institutions as well as the German Development Banks. In case of the disclosure BaFin plans to waive it for all institutions.</p>
EE	Estonia	Finantsinspektsioon	Complies	As of notification date, i.e. 17.08.2020.

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				Electronic link: https://www.fi.ee/et/juhendid/pan-gandus-ja-krediit/euroopa-pangandusjarelevalve-asutuse-suuniste-ebagl202007-covid-19-kriisiga-seotud-meetmete
IE	Ireland	Central Bank of Ireland	Complies	<p>As of notification date, i.e. 08 March 2021.</p> <p>The new taxonomy 2.10 Phase 1 that includes the FINREP COVID 19 returns was deployed to CBI Online Reporting System in August 2020. The FINREP-COVID 19 returns have been collected in XBRL format on a monthly basis since September 2020, from our Significant Institutions as part of the ECB SSM COVID 19 reporting module and from a selection of our Less Significant Institutions that have loans on their balance sheet subject to payment moratoria. The data of Payment Moratoria has been further submitted to the ECB SUBA system as part of the sequential approach.</p> <p>In addition, banks have been advised of the new Q&As on the FINREP-COVID 19 reporting templates that have been periodically updated in the EBA Report on Implementation of Selected COVID-19 Policies.</p>
EL	Greece	Bank of Greece	Complies	As of notification date, i.e. 27.02.2020.
HR	Croatia	Hrvatska narodna banka (Croatian National Bank)	Complies	<p>As of notification date, i.e. 04.08.2020.</p> <p>The Croatian National Bank sent a circular letter to all Croatian credit institutions, informing them that it expects them to apply the Guidelines. The expectation is for all credit institutions to submit four COVID reports and for systemically important credit institutions to disclose COVID information semiannually.</p>
ES	Spain	Banco de España	Complies	As of notification date, i.e. 27.02.2020.

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FR	France	Banque de France	Complies	As of notification date, i.e. 03.08.2020.
IE	Ireland	Central Bank of Ireland	Complies	<p>As of notification date, i.e. 09.03.2021. The new taxonomy 2.10 Phase 1 that includes the FINREP COVID 19 returns was deployed to CBI Online Reporting System in August 2020. The FINREP-COVID 19 returns have been collected in XBRL format on a monthly basis since September 2020, from our Significant Institutions as part of the ECB SSM COVID 19 reporting module and from a selection of our Less Significant Institutions that have loans on their balance sheet subject to payment moratoria. The data of Payment Moratoria has been further submitted to the ECB SUBA system as part of the sequential approach.</p> <p>In addition, banks have been advised of the new Q&As on the FINREP-COVID 19 reporting templates that have been periodically updated in the EBA Report on Implementation of Selected COVID-19 Policies.</p>
IT	Italy	Bank of Italy	Complies	<p>As of notification date, i.e. 15.07.2020.</p> <p>https://www.bancaditalia.it/competi/vigilanza/normativa/archivio-norme/circolari/c115/Com_30giugno2020.pdf</p>
CY	Cyprus	Central Bank of Cyprus	Complies	As of notification date, i.e. 30.06.2020.
LV	Latvia	Financial and Capital Market Commission	Complies	<p>As of notification date, i.e. 31.07.2020.</p> <p>To ensure compliance with the EBA Guidelines on 21.07.2020 the FCMC Regulations No 102 on reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis was adopted (available in Latvian only following</p>

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				the link: https://likumi.lv/ta/id/316316-parskatu-un-informacijas-atklasanas-par-riska-darijumiem-kuriem-piemeroti-atbalstapasadumi-covid-19-krizes-ietekme-normative).
LT	Lithuania	Bank of Lithuania	Does not comply and does not intend to comply with parts of the guidelines / recommendations	Notification received on 24.02.2022. The Bank of Lithuania partially applies the Guidelines. The Guidelines apply only to systemically important institutions that should disclose the information on a consolidated basis as it is set out in Annex 3 to the Guidelines. LSI institutions do not have exposures related to measures applied in response to the COVID-19 crisis in place and therefore the application of the remaining Guidelines is not relevant. Partial application of the Guidelines was implemented by the decision of the Financial Market Supervision Committee No V 2022/(1.160.E-9004)-441-44, adopted on 22 February, 2022. https://www.lb.lt/uploads/documents/docs/34710_fdeb079ea1c507ae7988eed89aa1ee39.pdf
LU	Luxembourg	Commission de Surveillance du Secteur Financier (CSSF)	Complies	As of notification date, i.e. 31.07.2020. See https://www.cssf.lu/wp-content/uploads/cssf20_748eng.pdf
HU	Hungary	Central Bank of Hungary	Does not comply and does not intend to comply with parts of the guidelines / recommendations	Notification received on 28.02.2022. "A legislative moratorium is still in place in Hungary, however it can't be considered as EBA-eligible from June 2021. Both the amount of loans under current moratoria and PGS loans are not material. Furthermore, the effect of measures applied in response to the COVID-19 crisis

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				can be followed by us from other data sources, primarily from our detailed credit register data collection. Therefore - taking into account also the reporting burden of credit institutions – we do not see further justification for the extension of the COVID-19 reporting and disclosure requirements in our jurisdiction”.
MT	Malta	Central Bank of Malta	Complies	<p>As of notification date, i.e. 16.07.2020.</p> <p>“In accordance with its power laid down in Article 4(7) of the Banking Act (Chapter 371 of the Laws of Malta) to issue Banking Rules, the Malta Financial Services Authority issued a new Banking Rule BR/23 on 07 July 2020, on Reporting and Disclosure of Exposures subject to Measures applied in Response to the COVID-19 Crisis.</p> <p>Pursuant to such measures, credit institutions are obliged to report information, in accordance with the formats as specified in the Rule, on:</p> <ul style="list-style-type: none"> - exposures that are subject to payment moratoria in accordance with the Moratorium on Credit Facilities in Exceptional Circumstances Regulations, 2020 (L.N. 142 of 2020) and the Central Bank of Malta (CBM) Directive No. 18 on Moratoria on Credit Facilities in Exceptional Circumstances; - exposures that are subject to other forbearance measures introduced in response to the COVID-19 crisis; and - newly originated exposures subject to the Malta Development Bank COVID-19 Guarantee Scheme. - newly originated exposures subject to the Malta Development Bank COVID-19 Guarantee Scheme.

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				<p>The Malta Financial Services Authority has decided to take up the waiver in accordance with section 5 of the EBA Guidelines to require credit institutions to submit such reporting on a more frequent basis. Consequently, credit institutions are required to report such data on a monthly basis and in line with the following reference and remittance periods:</p> <p>a. reference reporting: on the last day of each month; and</p> <p>b. remittance reporting: 42 calendar days following each reporting reference date specified in paragraph (a) above.</p>
NL	Netherlands	De Nederlandsche Bank N.V. (DNB)	Complies	As of notification date, i.e. 31.07.2020.
AT	Austria	Austrian Financial Market Authority	Does not comply and does not intend to comply with parts of the Guidelines**	<p>The COVID-19-reporting requirements were transposed for LSI by amending the national reporting regulation (VERA-V, Regulation on Asset, Income and Risk Statement, new templates J1 and J2). The FMA has decided to waive the COVID-19-disclosure requirement for all less significant institutions that are not qualified as other systemically important institutions (notwithstanding voluntary disclosure). COVID-19-reporting was waived on a solo level for less significant institutions that form part of a banking group. The reporting frequency was kept at quarterly with 30.06.2020 as the first reporting date (also following EBA remittance dates, only extending the period for the first submission by one week). With regard to the reporting content, The FMA did waive templates F 92.01, F 93.01 and F 93.02 completely. The remaining templates were transposed for large LSI banking groups (balance sheet total > EUR 5 bn) in their entirety. To ensure a</p>

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				<p>proportionate application, the remaining templates were transposed for small LSI banking groups (balance sheet total < EUR 5 bn) and individual less significant banks not being part of a banking group by waiving certain “of which-columns” (see template J2 of VERA-V). As no waiver possibility is foreseen in the EBA/GL/2020/07 with regard to templates F 90.01, F 91.01 and F 91.05 for reporting on a consolidated basis, the FMA thus is partially compliant. In more detail, the FMA does not require small banking groups to report columns 0050-0060 in F 90.01, columns 0030-0050, 0070-0090, 0120-0140, 0160-0180 and 0200 in F 91.01 and columns 0030-0040, 0060-0070, 0100-0110 and 0130-0140 in F 91.05.</p> <p>Amendment of national reporting regulation (VERA-V, Regulation on Asset, Income and Risk Statement, new templates J1 and J2)</p> <p>https://www.ris.bka.gv.at/eli/bgbl/II/2020/328/20200721 (Templates are in the Annexes (Anhänge) J1 and J2).</p>
PL	Poland	Komisja Nadzoru Finansowego	<p>Does not comply and does not intend to comply with parts of the Guidelines**</p>	<p>In the current situation of the COVID 19 pandemic, the PFSA has taken a number of initiatives to limit additional reporting obligations which facilitate banks' operations. The PFSA's initiatives were collected in the so-called PIN package (Supervisory Stimulus Package).</p> <p>The proposal of new reports for banks mainly concerns those applying IFRS. Cooperative and association banks operating in Poland do not apply these regulations and are obliged to comply with Polish accounting standards. The package of domestic legal solutions differs significantly from the IFRS regulations.</p>

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				<p>The reporting on COVID prepared by the EBA is designed for large banks applying IFRS. The detailed solutions adopted for these banks at the European Union level do not apply to cooperative and association banks operating in Poland. Given the extent of the changes in reporting, it should be assessed that it brings financial expenditures for changes in IT systems.</p> <p>Moreover, it should be noted that in the current situation the banking sector in Poland will face the environment of historically low interest rates and consequently the banks' revenues will be significantly decreased. The PFSA's preliminary estimates that only in 2020 the profit of banks will fall by over 80% compared to the previous year. Therefore in the PFSA's opinion it does not seem necessary to burden the banks with additional reporting, which will involve additional costs. Additionally, cooperative banks were required to describe the effects of counteracting the COVID 19 pandemic and to provide some additional reporting information together with materials for 2019 SREP. The material to be provided by these banks fully addresses the current supervisory needs. If necessary, the PFSA has the possibility to ask banks for additional information.</p> <p>Therefore, at this stage, there is no need to impose an additional burden of new reporting on the banks, which, in addition, is not appropriate to the scale and complexity of the business and is not aligned with the existing accounting rules for cooperative banks. So the guidelines will not be applied to cooperative banks in Poland and their association banks. Referring to all other banks (commercial banks) the guidelines</p>

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				<p>will be applied, also regarding the proportionality rule as specified in the Par 19 of the guidelines.</p> <p>Additionally, the PFSA would like to deliver the September Data to the EBA in the Excel format as it encounters some technical adjustment difficulties on converting the templates into EBA XBRL.</p>
PT	Portugal	Banco de Portugal	Complies	<p>As of notification date, i.e. 10.03.2021</p> <p>Instruction 19/2020.</p> <p>https://www.bportugal.pt/instrucao/192020-0</p>
RO	Romania	National Bank of Romania	Complies	<p>As of notification date, i.e. 09.03.2021.</p> <p>Guideline has been transposed through NBR Instructions from 03.08.2020.</p> <p>http://www.bnr.ro/Institutii-de-credit--1965.aspx</p>
SI	Slovenia	Bank of Slovenia	Does not comply and does not intend to comply with parts of the Guidelines**	<p>Notification from 19.02.2022.</p> <p>As of 1 January 2022 Banka Slovenije no longer complies with EBA/GL/2020/07. Consequently, banks, supervised by Banka Slovenije are no longer obliged to comply with the reporting and disclosure obligations under the guidelines from this date onwards, for the following reasons:</p> <ul style="list-style-type: none"> - Covid-19-related public guarantee scheme and legislative payment moratorium scheme in Slovenia ceased to exist; - the exposures under public guarantee scheme are immaterial in the Slovene banking system, the approved moratoriums on debt repayments expired by the end of 2021; - Banka Slovenije will monitor the credit quality of exposures that have benefited from COVID-19 mitigation measures on the basis of information received from banks' reports being delivered based on

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				<p>the Guidelines for the Implementation of the Regulation on Reporting by Monetary Financial Institutions (the Official Gazette of the Republic of Slovenia, No 195/2021). They relate to information for statistical as well as supervisory purposes;</p> <p>- the importance of the disclosed information to investors and the general public is in case of the Slovene banks disproportionate to the efforts needed for its preparation.</p> <p>The revised Regulation on the application of the Guidelines on reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis was published in the Official Gazette of the Republic of Slovenia, No. 20/2022 of 18 January 2022 (page 1027).</p> <p>URL: https://www.uradni-list.si/_pdf/2022/Ur/u2022020.pdf</p>
SK	Slovakia	Národná banka Slovenska	Complies	As of notification date, i.e. 19.11.2020.
FI	Finland	Finanssivalvonta (FIN-FSA)	Complies	<p>As of notification date, i.e. 08.10.2020.</p> <p>EBA/GL/2020/07 are included in the Regulations and Guidelines issued by the FIN-FSA. See supervision release 61/2020 (in Finnish and Swedish only): https://www.finanssivalvonta.fi/tie-dotteet-ja-julkaisut/valvottavatiedotteet/2020/eban-ohjeet-vastuiden-joihin-sovelletaan-covid-19-kriisin-vastatoimia-raportoinnista-ja-julkistamisesta-liitetty-finanssivalvonnan-maarays-ja-ohjekokoelmaan-sivu/</p>

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SE	Sweden	Finansinspektionen (Swedish Financial Supervisory Authority)	Does not comply and does not intend to comply with parts of the Guidelines**	The measures introduced in Sweden in response to the COVID-19 crisis that meet conditions under the guidelines on moratoria have in one case been fully withdrawn, and in the other remaining case there is only a very limited remaining volume. Also, the information gathered through the specific reporting according to the GL does not add any significant additional supervisory information apart from what Finansinspektionen already gets from other supervisory reporting and supervisory activities. Against this background, we have assessed that this extra reporting burden for the institutions is no longer warranted in Sweden.

EU Institutions – Agencies

Single Supervisory Mechanism		Complies	As of notification date, i.e. 04.08.2020. 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 supervision of credit institutions.
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EEA – EFTA State

IS	Iceland	Fjármálaeftirlitið (Financial Supervisory Authority, Iceland)	Complies	As of notification date, i.e. 29.06.2020. See: https://www.fme.is/log-og-tilmaeli/ees-vidmidunarreglur/eba/ .
LI	Liechtenstein	Financial Market Authority Liechtenstein (FMA)	Complies	By date of this notification, i.e. 09.03.2021.

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NO	Norway	The Financial Supervisory Authority of Norway	Does not comply and does not intend to comply**	There are no moratoria in Norway that the FSA considers to be covered by the EBA Guidelines on moratoria. Furthermore, the FSA has already introduced monthly reporting that covers some of the requirements not subject to the said Guidelines on moratoria.

*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.