BNP PARIBAS

20.03.2012

BNPP comments and responses to EBA consultation paper on draft ITS on supervisory reporting requirements for institutions (CP50)

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EXECUTIVE SUMMARY

Introduction

We welcome the opportunity to comment the Consultation Paper on draft ITS on Supervisory reporting requirements for institutions.

We support an initiative that aims at harmonizing reportings across Europe in order to ensure fair conditions of competition between credit institutions and investment firms and more efficiency for cross-border institutions. We also expect this initiative to ease data sharing between European supervisors and avoid reporting duplications for banks.

However, while EBA declares to seek reducing reporting burden, it should be noticed that the proposed ITS, whether FINREP or COREP, require a much larger scope of data, a much more detailed level of information and a much higher frequency of reporting. These requirements would inevitably result in both a significant implementation effort and a heavier reporting burden for banks.
Besides, it should be noted that EBA has or will publish several other ITS in the course of the year (large exposures, leverage ratio, liquidity reporting) that will generate additional workload, supported by the same teams.
In this respect, EBA doesn't meet its objectives and is not compliant with the European Commission recommendation to reduce administrative costs.

While the required data is extensive, banks sometimes don't understand its benefit for supervisory, statistical or stability purposes. Banks would consider relevant that the EBA justifies why some tables and frequencies are required with respect to the mandate conferred by Article 95 of the Proposal for a Regulation on prudential requirements for credit institutions.

1- Too short implementation timeline

The extending level of information, the shorter remittance date and the higher frequency required by the ITS imply significant IT developments and deep changes in reporting processes.

It is clearly not possible to meet these new requirements within 9 months.
Indeed, implementing new reportings requires conducting several successive phases in a project, that cannot be compressed within 9 months (requirements analysis, drafting expresses of needs, IT development, IT testing, parallel run). The EBA should also understand that institutions cannot launch any project by anticipation, on the basis of the requirements suggested in the Consultation Paper, as it would be too costly to undo what has been built in the IT systems, if the final requirements change.

However, we understand that the EBA needs for more information more frequently.

That is why we propose to report the full ITS on Q1 2014, except for some tables and data that we consider to be redundant with other reportings or not relevant and make

our best efforts to deliver a first reporting on Q1 2013, but on a smaller perimeter that is reachable in a short time period :

- Regarding COREP, we propose to report in 2013 only the COREP CA (Capital Adequacy) templates related to detailled own funds and aggregate capital requirements in their target format (compliant with CRD IV) but the other templates based on their current CRD III format. Then, in 2014, the full target ITS will be reported, except for tables that are considered irrelevant or non feasible in the required reporting format.

- Regarding FINREP, we propose to submit a limited scope of ITS templates in 2013 on a limited frequency and reach the target ITS requirements in 2014, except for some redundant or not relevant tables (refer to the detailed proposal in the appendix). And yet, the EBA should also take into account coming IFRS evolution, especially with regard to IFRS 9 that is expected to be in force as of beginning of 2015. It is most probable that ITS will need to be largely reshuffled in order to incorporate IFRS 9 changes. This will again generate significant costs for the industry and we urge the EBA to consider costs and benefits when asking for ITS earlier than 2015.

2- Remittance date

The target remittance date represents a significant acceleration in comparison with current calendar, that is close to d+50 / d+60. This acceleration raises concerns in many respects.

To achieve the high level of data quality, that is obviously necessary for supervision purposes, it is of extreme importance to give enough time for the reporting process to proceed safely. Reporting process involves sequential tasks of collection, processing and controls, at local level first, then at consolidated level. These processes cannot be compressed without endangering data quality, especially considering the high level of detail that ITS require.
Finance teams are fully dedicated in the production of financial statements, solvency ratio and pillar III disclosures on d+30, they cannot manage at the same time FINREP and COREP reportings. It is not conceivable to parallelize reporting streams and duplicate finance teams, as they handle and control the same basis of information.

COREP and FINREP contain sensitive information that is only confirmed by the Board meeting (e g distribution of dividends in COREP, consolidated benefits). We object the idea to report such data before the Board has decided and before the financial information has been made public, especially for listed companies.

Regarding audited figures, we understand that the EBA allows banks to submit a second version of ITS in order to integrate subsequent changes due to financial statements certification process.
We would like to point out that the submission of two versions actually doubles the workload for the reporting teams.
We strongly recommend the EBA postpones the annual remittance date, so as to submit one single and definitive set, once financial statements certification process is advanced enough to avoid any subsequent significant correction.

Considering all these reasons, we advocate that remittance date for COREP and FINREP should be no earlier than d+50 working days and d+45 for individual COREP.

3- Quarterly remittance

The EBA requires a higher reporting frequency, especially for FINREP reporting, which has been semi-annual so far.
The increase in frequency is obviously costly, as it multiplies the number of reportings. Banks understand the willingness of the European regulators to supervise institutions on a quarterly basis. However, we question the benefit for the supervisor to get some data on a quarterly basis (multiple P&L breakdowns, financial assets pledged as collateral, related parties,..)
In this respect, we encourage the EBA to divide ITS tables into three sets :

- The core set of tables to be submitted on a quarterly basis
- The medium set of tables to be submitted semi-annually
- The full set of tables to be submitted annually

Refer to the appendix for the detailed proposal.

Besides, we suggest reaching progressively the target frequency. Some tables will be reported on a semi-annual frequency in 2013 in order to have time to implement necessary IT and process changes and be ready in 2014 to submit on a quarterly basis.

4- Consistency and harmonization of reportings

While one of the EBA objectives is to push for more convergence between reportings in order to avoid duplication and reduce reporting burden, we consider that there is still room for rationalisation in the ITS.

■ *FINREP AND COREP DIVERGENCE ON EXPOSURE CLASSES*

While ITS aims at converging reportings, it is not acceptable to have an increasing gap between exposure classes under FINREP and COREP. This situation is even more penalizing as the Supervisor himself requires regular reconciliations between COREP and FINREP, mainly based on exposures classes.

Moreover exposure classes are even different under COREP IRBA and COREP Standard.

In some cases, the same counterparty is classified in different exposures classes in FINREP, COREP SA and COREP IRBA. (e.g : some public sector entities with no commercial purpose classified as General Government in FINREP, as Public Sector Entity in COREP SA and as Institution in COREP IRBA). Refer to Annex I page 45 : Exposure classes mapping between FINREP and COREP.

We would like to point out that such discrepancies are raising serious problems, while we don't see any benefit in it:

- Past years work to clean up gaps in terms of exposure classes between risks and accounting based on FINREP will be jeopardised
- Coherence in managing inflows/outflows CRM presentation between an obligor and a guarantor belonging to different methods,
- Impossibility for banks managements to get a global overview of their exposure by exposure classes.
- Costs both for institutions and supervisors to develop, maintain and control through heterogeneous classes

It is crucial that exposure classes are consistent between FINREP and COREP. Even if we understand that some reportings may require higher or different granularities within an exposure class, the regulator shall make sure that each main exposure class encompasses the same types of counterparties in each reporting.

The regulator should also understand that accounting systems are not structured to deliver data at the counterparty level on a consolidated basis. Banks have made significant efforts in the past years to provide breakdowns according to the former definition of exposure classes. If this definition were to be changed it will not only be a matter of slight adjustment in the very last reporting tool, but it will imply to restructure the data in each entity. This transformation is highly costly.

Besides, if exposure classes change with time, it will be difficult for both the institutions and the regulators to have an historical track and identify trends.

We urge the regulator to maintain previous definitions of exposure classes.

- ***COREP – FINREP redundancy***

For more coherence within the different reportings and in order to avoid reporting duplication, we suggest to cleary separate the type of information requested by COREP on one side and FINREP on the other side, and keep from mixing up data.

In particular FINREP requires some geographical and sectorial breakdowns (tables 10.1 and 10.2) that are already covered by COREP framework. These tables should be removed from FINREP reporting.

- ***Consistency between FINREP and IFRS Standards***

We appreciate that EBA tries to anticipate IFRS standards that are likely to be in force at the date when ITS is life (e.g. IFRS 9, IFRS13, IFRS12).
However, we would like the EBA to be very cautious with its requirement regarding these futures standards, for several reasons.

First as the standards are still under discussion, the final version may differ from the current draft and the proposed ITS may not be compliant any more with the final IFRS standards.

In some cases, ITS even go beyond IASB intentions, whereas we don't understand the benefit of getting the data required additionally ; for example, gross accumulated unrealised gains and losses on level 1, level 2 and level 3 instruments (table 13).

Second, it is likely that some IFRS standards will not be endorsed as of the first reporting reference date (31.03.2013). In such case, the EBA should consider removing the related templates from the ITS until the standard comes in force.

Besides, we notice that some data required by FINREP are not compliant with IFRS standards, whether current or future ;for example, when FINREP refers to accounting concepts that do not exist under IFRS (e.g. economic hedge regarding derivatives) or when FINREP requires one specific representation whereas IFRS proposes an alternative option on purpose.

5- Main difficulties regarding new required data

The ITS require a much deeper level of information. Part of the new data is not available in the information systems. For a part of it, the type of information requested is not conceivable in the existing tools. Providing this data would imply to rebuild IT tools, which is highly costly.

- ***COREP***

  - The usefulness of standalone data is questionable in our opinion, since home regulators can retrieve directly this reporting from host regulators, thanks to harmonization of reportings, in terms of content as well as common taxonomies

  - CR SEC Details :
    Regarding fully auto-subscribed programs, we don't see the interest in requiring characteristics of the securitization program in the COREP, as it is not used in capital adequacy measures.
    Regarding programs, in which banks play an investor's role, we question the relevance of a regular reporting on the program's structure at origination as this is static data that delivers few insights for supervision.
    We advocate maintaining an annual reporting frequency for CR SEC Details on current data perimeter

  - Long/short split of positions in Market risks template : this information is only available in front-office systems and would require very heavy developments to be carried to consolidated prudential level.

  - New Templates CR IP Losses
    COREP reportings have always covered risk exposures, considering the situation at the end of the period. Information systems have been developed to provide snapshots of positions, but not intra-period flows.
    As a consequence, it is not conceivable to report flows on credit or market risks such as required in this template.

  - Counterparty risk "number of counterparties": systems are not able to report the number of counterparties at a consolidated prudential level. Moreover, in our opinion, Concentration Risk is already monitored by Large Exposures reporting.

- ***FINREP***

FINREP requires to breakdown assets, liabilities and P&L according to counterparty characteristics (exposure class, country of residence). It should be noted that group accounting systems are not built at the counterparty level.

Whereas banks have made significant efforts during the past years to produce exposure classes on the assets, it is different when it comes to liabilities and income statement, for which no reporting standard has required such a presentation so far.
Obtaining this data will be highly costly, and yet redundant with other reportings or not relevant.

- Regarding the breakdown of liabilities by exposure classes, we understand the supervisors need to follow the sources of liquidity in the banks. However institutions are developing information systems to be able to report liquidity ratios and meet the regulatory deadline. A that time, this data will be provided in the liquidity reporting and we would advocate not to require a double reporting on the same data through FINREP.

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- Regarding breakdown of profit and loss items by exposure class, we don't understand the objective pursued by the Regulator when asking such data.
  Splitting the profits and losses by type of counterparties comes within performance analysis that is based on net margin and not gross.

Hence, we advocate removing any reference to exposures classes in the tables related to liabilities and profit and loss.
Similarly, we consider that the tables presenting assets, liabilities and interests by geography (tables 14.1, 14,2 and 14.3) are either redundant with other reportings (COREP, monetary statistics and future LCR, NSFR) or not relevant (for interests breakdown).

6- Individual reporting

The EBA has launched the idea to extend FINREP reportings to individual level. Although it is stated that this question is out of the scope of this Consultation Paper, we would like to stress out the additional workload that would be necessary to produce FINREP reporting on individual entities, whereas local regulatory reportings already exist.

We consider that the cost and benefits of requiring individual FINREP is not acceptable, especially as long as local supervisors require other reportings that also provide a deep level of information (like SURFI in France).
Besides, local reporting is based on local gaaps being different from IFRS in most European countries today, moving to IFRS would imply additional cost and would also prevent any reconciliation with local financial statements, that are still presented in local gaaps. That is especially the case in France according to French law.

As far as COREP reporting is concerned, Group Solvency will be required also at standalone level. As already stated above, we question both the relevance and the feasibility :
Relevance : As taxonomies have been harmonised to allow better exchanges between regulators, and as entities already report to their local regulators on a standalone basis, we suggest that Group Solvency should be limited to consolidated data, on an annual basis.

Home regulators could retrieve from host regulators standalone elements needed.
Feasibility : Not mentioning heavy workload and costs, D+30 WD as a remittance date for both standalone and consolidation items does not leave enough time for an adequate control of standalone data before integration. It is especially true for large groups consolidating numerous subsidiaries (proportionality aspect). An additional 5 working days delay for consolidation level vs standalone level would be a necessary minimum.

7- Costs

Banks would like to focus on the importance of costs implied by the ITS, not only costs to implement IT transformation and process changes, but also recurring running costs to produce the extended reporting.

Based upon macro level estimations, project costs should reach roughly 20 million euros, based on our proposal of revised FINREP and COREP ITS. If the full ITS scope were to be implemented, project costs could be doubled or tripled.
For information, the only analysis of the Consultation Paper 50 has already costed 100 thousand euros to the Group.

Regarding running costs, we expect an increase of about 3 million euros per year considering teams duplications, both at central level and in the entities.

20.03.2012

ANSWERS TO CONSULTATION PAPER QUESTIONS

- **Chapter 1 : Subject Matter, Scope and definition**

  - 1 : How would you assess the cost impact of using only CRR scope of consolidation for supervisory reporting of financial information :

    FINREP is already submitted based upon CRR scope. No cost impact.

  - 2 : Please specify cost implications if part 1 and 2 of annex III of this regulation would be required, in addition to the CRR scope of consolidation, with the accounting scope of consolidation ?

    Extending the reporting scope to accounting scope of consolidation would imply highly significant costs.
    Even if these additional entities are integrated in the accounting reporting scope, they are not asked to provide a level of detail compliant with FINREP requirements in their accounting reporting packages. Integrating them into FINREP scope would be highly costly, especially as regards with insurance companies that carry large number of financial informations.

    Integrating not supervised entities into FINREP scope would raise several concerns :
    - CRR applies to credit institutions and investment firms. ITS cannot extend the scope of reporting beyond CRR prerogatives.
    - Some of the entities that are out of CRR scope are monitored by other supervisors (eg Insurance Companies)
    - FINREP templates have been designed to represent pertinently banking activities and are not appropriate to integrate other specific industries, like insurance.

    Moreover if the FINREP scope were based on the accounting scope of consolidation scope, it would not be consistent with COREP any longer, which would cause difficulties for reconciliation purposes.

    We believe that it would bring very few added value to regulators that would not justify the costs implied.

- **Chapter 2 : Reporting Reference and remittance dates**

  - 3 : Financial information will also be used on a cross-border and on European level, requiring adjustments to enable comparability. How would you assess the impact if the last sentence of point 2 of article 3 referred to the calendar year instead of the accounting year ?

    No impact as accounting year is aligned with calendar year.

  - 4 : Does having the same remittance period for reporting on an individual and consolidated level allow for a more streamlined process ?

    Reporting process is organized sequentially in the Group, in a way that reflects the delegation of responsibility that is necessary to operate a banking activity.
    Regarding FINREP, which is mainly based on accounting data, information is produced and controlled at the level of the entity that is legally responsible for standalone accounting data. It is then reported to central teams for consolidation purposes and second level controls.

A simultaneous reporting is not consistent with the process. But in more general way, as stated in our executive summary, we consider that FINREP should not be mandatory for individual reporting, since we already report to local supervisors according to dedicated format, consistent with local gaaps.

Regarding COREP, standalone reportings are also produced locally. If the Group central team were to report them to the home supervisor, an extra time would be necessary to collect and control the data, in addition to producing the consolidated reporting. We consider that consolidated COREP should be submitted at least 5 working days after individual COREP.
But in more general way, we don't understand why the home supervisor would require standalone reportings, whereas they are already provided to host regulators. We would rather recommend the home and host supervisors exchange the data.

- 5 : How would you assess the impact if remittance dates were different on an individual level from those on a consolidated level ?

  Regarding COREP, Different remittance dates would not add any additional cost. On the contrary, they are necessary as individual data must be controlled before consolidated data can be sent. See answer to question 4.

  Regarding FINREP, we consider that it should not be applied on an individual level. Therefore, this question is not relevant for us

- 6 : When would be the earliest point in time to submit audited figures

  First we would like to clarify the question : only financial statements are to be audited. Neither COREP, nor FINREP are part of the scope of audit work.

  However, we understand that the supervisor wants to have COREP and FINREP built on financial data that are consistent with audited financial statements. To achieve this goal, we consider that D+50 (working days) is an appropriate date to have the audit process on consolidated financial statements completed and avoid significant subsequent corrections due to auditors controls.

- 7. Do you see any conflicts regarding remittance deadlines between pudential and other reporting ?

  Refer to the executive summary.
  Reporting process involves sequential tasks of collection, processing and controls, at local level first then at consolidated level. These processes cannot be compressed without endangering data quality, especially considering the high level of detail that ITS require.

  There is a major conflict with production of financial statements, especially for year-end and semi-annual closing.
  Indeed, the reporting calendar is first driven by the publication date to the market, especially for a listed company. This date is usually set around d+30 (working days). At this date, financial statements including the main notes are produced, as well as the solvency ratio ; but the preparation for the full pillar III, FINREP and COREP starts only then and require a significant time considering the required level of detail. . It is not conceivable to parallelize reporting streams and duplicate finance teams, as they handle and control the same basis of information.

  There is a major conflict regarding remittance deadlines on d+30 and as it is not conceivable to meet this deadline for FINREP and COREP, we propose to postpone the remittance date to d+50 (working days).

■ Chapter 3 : Format and frequency of reporting on own funds requirements

- 8. Do the proposed criteria lead to a reduced reporting burden?

  The first 10% threshold is too low to have any filtering impact on large international groups. Therefore it would be an increased reporting burden for us since this information is not requested under current COREP process.

- 9. What proportion of your total foreign exposures would be covered when applying the proposed thresholds? Please also specify the number of countries that would be covered with the proposed threshold as well as the total number of countries per exposure class.

  - Proposed thresholds cover 2/3 of our Total Foreign exposures.
  - Total number of countries, and total per exposure class (currently existing in our system) including domestic country

	Number of countries to be reported in CR IRB_Geographical Breakdown	
per IRB Exposure classes	**With** 2nd threshold at 0,5% of total IRBA exposures	**Without** 2nd threshold at 0,5% of total IRBA exposures
CORPORATE_SME	2	84
CORPORATE_Specialized Lendi	6	135
CORPORATE_Others	12	130
INSTITUTIONS	7	147
RETAIL_SME	2	51
RETAIL_Revolving	1	7
RETAIL_Mortgage	2	28
RETAIL_Others	2	31
Central Banks&Governments	7	115
TOTAL Number of countries	**16**	**177**

- 10. What would be the cost implications if the second threshold of Article 5 (1) (c) (ii) were deleted?

  Deleting the 2nd threshold would result in a quite costly, heavy and poorly useful IRB reporting for large groups since there could be over than 100 different countries on Corporate and Sovereign classes and some of them for insignificant exposures (< 500 K€). See Table in Question 9 illustrating the geographical breakdown without 2nd threshold.

- 11. Is the calculation of the threshold sufficiently clear?

  We note that template 3.3.b CR IRB GB “Geographical breakdown” does not share the same exposure classes than those required for CR IRB breakdown in subtemplates (3.3.a CR IRB Ref list). For example “Central Banks” and “General Governments” must be reported separately for CR IRB GB but aggregated for CR IRB sub-template : Must the 0.5% threshold be calculated by CR IRB exposures classes or by CR IRB GB ones ?

- 12. Do the provisions of Article 5 (2) lead to a reduced reporting burden for small domestic institutions?

Not applicable for our Group.

- 13. Is the calculation of the threshold sufficiently clear?

  Not applicable for our Group.

- 14. Competent Authorities are obliged to disclose data on the national banking sectors total assets as part of the supervisory disclosure. Do you find these publications sufficient to calculate the proposed threshold?

  Not applicable for our Group.

- 15. What would be the cost implications if information on own funds as put forward in Part 1 of Annex I (CA 1 to CA 5) were required with a monthly frequency for all institutions?

  Reporting CA1 to CA5 items require a whole closing process both for accounting and prudential streams, the latter being based on the first one. The variability of most own funds items does not require such a reporting frequency. Furthermore, the Profit&Loss consolidation on a monthly basis is a management process, not an accounting one. Therefore this is not manageable nor conceivable.

■ Chapter 3 : Format, and frequency of reporting on financial information

- o 16 : Are there specific situations where this approach (differentiating between institutions using IFRS and national accounting frameworks for supervisory reporting purposes) would not be applicable ?

  As we use IFRS gaaps to produce FINREP and COREP figures, this question is not applicable.

- o 17 : What is your assessment of impact, costs and benefits related to the extent of financial information as covered by article 8 and 9

  As already mentioned in the introduction, the ITS require a more detailed level of information, shorter remittance delays as well as a higher frequency of reporting. It will inevitably result in both a significant implementation effort and a heavier reporting burden.
  The impacts and costs are mentioned in the executive summary.

  Refer to the appendix that presents detailed and documented analyses of the impact, costs and benefits of each ITS table. Considering our perception of costs and benefits for the supervisor in respect with its mandate conferred by Article 95 and in order to avoid redundancy with other reportings, we propose some amendments in terms of content and reporting frequency.

- o 18 : In article 8(2) and 9(2) the proposed frequency is semi annually. Does this reduce reporting burden ? Please quantify the estimated cost of impact of reporting with semi annual frequency compared to quarterly ?

  This proposition concern only two tables : 10.2 and 10.3. Permitting a semi-annual frequency on two tables out of 60 will not significantly decrease the reporting burden. Besides, we consider that the content of these two tables is already reported, in a similar way, in the Corep and should not be required twice.

  However we believe that a semi-annual frequency would be relevant for several other tables. In this respect, we believe that consistency with IFRS should be kept. IFRS require interim publication on a limited scope of core data and further disclosures only

provided if there have been significant changes since the annual publication. We would like the EBA to keep the same principle and require only core tables on a quarterly basis.
Refer to the appendix, where we have proposed a target frequency for each table. The proposed frequency has been based on our analysis of importance with regards to the supervisor's mandate, on the volatility of data and on the availability of a data in our systems.

Besides, we demand to keep a semi-annual frequency for the majority of the tables during a transition period in 2013, when IT tools are not adapted yet and the production of news tables will be largely manual. We propose to adopt the target frequency in 2014.

- <u>19 : What is you general assessment of applying reporting standards regarding financial information on an individual level ?</u>

We consider that the cost and benefits of requiring individual FINREP is not acceptable, especially as long as local supervisors require other reportings that also provide a deep level of information (as SURFI in France).

It should also be noted that current local reporting is structured differently from FINREP and it would be very costly to maintain two structures and sets of data.

Besides, local reporting is based on local gaaps today, moving to IFRS would imply additional cost and would also prevent any reconciliation with local financial statements, that are still presented in local gaaps, according to French law.

<u>20 : How would you assess costs and benefits of applying the ITS requirements regarding financial information on an individual level ?
Please assess the impact for the two scenarios (i) application part 1 and part 2 of annex III on an individual level (ii) application of parts 1 to 4 of annex III on an individual level. Would there be obstacles for applying reporting on an individual level ?</u>

As reportings have different structures (different accounting gaaps, different breakdowns, different levels of details), no mutualisation is possible between current individual reporting and an individual FINREP. This constraint applies for the whole parts of annex III. Requiring an individual FINREP would be costly, even though it is limited to parts 1 and 2 of annex III.

- <u>21 : If the proposal was to be extended, what implementation time would be needed ?</u>

If the proposal was to be extended to individual FINREP, at least 2 years should be given after the publication of the definitive ITS, in order to address the necessary IT impacts and changes.

- **<u>Chapter 6 : IT Solutions</u>**

- <u>22 : What cost implications would arise if the use of the XBRL Taxonomies would be a mandatory requirement in Europe for the submission of ITS related data to competent authority ?</u>

FINREP is currently sent to the French Supervisor under XBRL format. IT could save reporting workload if XBRL was accepted (not necessarily required) by all European supervisors.

Besides, costs could arise from XBRL taxonomy evolutions. We understand that a consultation paper will circulate during the second quarter of 2012. In this respect, we would like to insist on the importance of getting XBRL taxonomy a long time enough before the implementation date, in order to have time to modify IT systems accordingly. We consider that XBRL taxonomy should be provided at the same time as final ITS, at least 18 months before the implementation date.

- **Chapter 7 : Final Provisions**

  - 23 : How would you assess the cost implications of the following two options ?
    (1) implement the ITS as of the first possible reference date (31/03/2013)
    (2) Delay the implementation of the ITS by 6 months (first reporting based on data as of 30/09/2013) and implement national interim solutions for reporting as of 31/03/2013.

Considering the extension of FINREP scope and the required level of detail, it is not possible to implement the ITS before early 2014 and even so, on a reduced scope, excluding some tables that are costly and either redundant with other reportings or not relevant. Indeed, some required data are so opposite to the way how IT reporting tools are structured now, that it is not conceivable to report them for 2014 either. Integrating such data would imply long term IT projects

Regarding FINREP : tables requiring breakdown according to counterparties characteristics cannot be provided by current accounting systems, as they are not structured by counterparty.

- Breakdown of credit exposures have been made possible for current FINREP reporting, thanks to a long convergence work between FINREP (accounting systems) and COREP (risk systems). Now, the ITS require different definitions of exposure classes and geographical axis between COREP and FINREP, Implementing these new breakdowns will not only imply costly changes for banks, but it will also prevent from any further reconciliation between FINREP and COREP.
  Therefore, we urge EBA to maintain current definitions of exposure classes and remove table with geographical breakdown from FINREP ITS as they are redundant with COREP or statistical reportings.
- Breakdown of liabilities will be produced for liquidity reports and we encourage the EBA to rather use liquidity reportings than asking twice similar data, issued from different reporting streams.
- Regarding P&L breakdown by counterparty, without even considering the high production costs, we don't understand its utility for the supervisor.

Regarding COREP : We can readily certify that we will not be able to implement all of the ITS as of 31/03/2013 since some of the new data needed will require heavy evolutions in our processes and information systems; moreover a number of modifications depend on normative regulatory aspects not decided yet and therefore their implementation is not consistent in terms of delays with information systems development constraints.

As stated in the executive summary, we propose a Basel III compliant CA1&CA2, possibly the whole CA part. During 2013, the current CRD3 compliant COREP templates (apart from CA ones) will be transmitted.

Please refer to the appendix where each table is qualified with regards to the capacity of providing it.

- 24. What would be the minimum implementation period to adjust IT and reporting systems to meet the new ITS reporting requirements ? Please elaborate on the challenges which could arise.

  Refer to the answer to question 23.

  As new ITS imply heavy IT changes, the implementation period should leave enough time to:
  - Analyse the final requirements
  - Draft the expresses of needs
  - Implement IT changes
  - Test IT changes
  - Execute a parallel run

  These phases cannot possibly hold in 9 months. The EBA should at least leave 18 months as implementation period.

- 25 : What would be the minimum implementation period required for institutions already subject to FINREP reporting to implement the financial reporting described in this CP ?

  There are so many structural changes in comparison with current FINREP reports, that the implementation period would not be quicker even if we used to report a previous version of FINREP.

- 26 : What would be the minimum implementation period required for institutions NOT subject fo FINREP reporting at the moment to implement the financial reporting described in this CP ?

  As we are already subject to FINREP, this question is not applicable

- 27 : Would the required implementation period be the same for reporting requirements on an individual basis and on a consolidated basis ?

  Requiring FINREP on an individual basis would require a longer implementation period, as local figures are built under local gaaps. It would first mean to produce standalone financial statements under IFRS gaaps, which means IT adjustments, implementation cost and heavy change management.
  It would also inevitably imply higher production costs to maintain standalone figures in two accounting gaaps.

Chapter 7 : Annex I and Annex II

- 28. Do restrictions (restricted cells are cells which do not have to be reported to supervisors – displayed in the COREP templates as grey/blocked cells) reduce the reporting burden?

  Not really as we need the level of details to deliver the figures at other aggregated crossings. Besides, sometimes the greyed cells are not applicable anyway (for example in CR SA Total, breakdown of Balance Sheet asset class by conversion factors is greyed; would it have not been, it would not have been reported as non applicable).

- 29. Compared to previous versions of the COREP templates are there additional reporting requirements which, cause disproportionate costs?

  Please refer to our Exec Sum.

- Global Solvency : The usefulness of standalone data is questionable in our opinion, since home regulators can retrieve directly this reporting from host regulators, thanks to harmonization of reportings, in terms of content as well as common taxonomies
- CR SEC Details : Regarding fully auto-subscribed programs, we don't see the interest in demanding characteristics of the securitization program in the COREP, as it is not used in capital adequacy measures. Regarding programs, in which banks play an investor role, we question the relevance of a regular reporting on the program's structure at origination as this is static data that delivers few insights for supervision.
  We advocate maintaining an annual reporting frequency for CR SEC Details on current data perimeter

- Long/short split of positions in Market risks template : this information is only available in front-office systems and would require very heavy developments to be carried to consolidated prudential level.

- New Templates CR IP Losses : COREP reportings have always covered risk exposures, considering the situation at the end of the period. Information systems have been developed to provide snapshots of positions, but not intra-period flows. As a consequence, it is not conceivable to report flows on credit or market risks such as required in this template.

- Counterparty risk "number of counterparties": systems are not able to report the number of counterparties at a consolidated prudential level. Moreover, in our opinion, Concentration Risk is already monitored by Large Exposures reporting.

o <u>30. Are the templates, related instructions and validation rules included in Annex I and Annex II sufficiently clear? Please provide concrete examples where the implementation instructions are not clear to you.</u>

  Please refer to our detailed comments by Templates.

o <u>31. CR IRB – What is your assessment of cost implications of the new lines for "large regulated financial entities and to unregulated financial entities"? What is the most cost efficient way of incorporating this kind of information in the reporting framework?</u>

  See point in Detailed comments. We would need a precise definition of a "financial" entity.
  Above average to high cost : 3-4 on a 1 to 5 scale : multi-criteria axis (regulated or not*total asset threshold*"financial" aspect) including currently not-collected data.

o <u>32. CR SA – What is your assessment of cost implications of the new lines to gather information about exposures without a rating or which have an inferred rating? What is the most cost efficient way of incorporating this kind of information in the reporting framework?</u>

  See point in Detailed comments on Credit Assessment by a nominated ECAI in CR SA Total and CR SA Detail : information required is not coherent : with/without Credit Assessment by a nominated ECAI.
  Medium cost : 2-3 on a 1 to 5 scale.

■ <u>Chapter 7 : Annex III, Annex IV and Annex V</u>

o <u>33 : Are the templates included in Annex III, IV and the related instructions included in Annex V sufficiently clear ? Please provide concrete examples where the implementation instructions are not clear for you ?</u>

We appreciate that EBA tries to anticipate IFRS standards that are likely to be in force at the date when ITS will be life (e.g. IFRS 9, IFRS13, IFRS12).
However, we would like the EBA to be very cautious with its requirement regarding these futures standards, for several reasons.

As the revised IAS 39 is expected for 2015 and will deeply modify the presentation of financial instruments, we would like the EBA to carefully consider costs and benefits of requiring FINREP ITS with such level of details before 2015 knowing that it will need to be deeply refunded in 2015. The requirements that are likely to be changed in short terms should therefore be as simple as possible.

For all the standards that are still under discussion, the final version may differ from the current draft and the proposed ITS may not be compliant any more with the final IFRS standards. In some cases, it seems that ITS go beyond IASB intentions ; for example, when requiring unrealised gains and losses on level 2 instruments in the trading book.

Second, it is likely that some IFRS standards will not be endorsed as of the first reporting reference date (31.03.2013). In such case, the EBA should consider removing the related templates from the ITS until the standard comes in force.

Besides, we notice that some data required by FINREP are not compliant with IFRS standards, whether current or future. For example :

- When FINREP refers to accounting concepts that do not exist under IFRS (e.g. economic hedge regarding derivatives,),
- When FINREP requires one specific representation whereas IFRS proposes an alternative option on purpose (e.g : tax effects on OCI). We strongly believe it should be left to the entity to decide which of the option it uses. This also clearly underpinned by CRR Art. 94 which states that the valuation of the assets and off balance sheet items shall be effected in accordance with the applicable accounting framework. We understand that CRR gives no power to EBA to decide on the use of options granted by the applicable accounting framework
- When FINREP requires breakdown of items even when IFRS requires just a simple amount without further split or no disclosures at all (e.g : breakdown of interest income and expenses (17.1), breakdown of fee, denetting gains and losses by disclosing them separately instead of providing a net information (17.2 for instance)
- In some cases it should be noted that ITS refer to non update IFRS (e.g current IAS 19 instead of amended IAS19 in table 27.1)Refer to the appendix where each table is commented and where unclear concepts are highlighted.

We would like to suggest the creation of a joint working group with EBA and the industry representatives to review the tables in detail from the perspective of IFRS as well as in the context of relevance of the requested data.

In addition, validation rules are not part of the tables. As a result it is often difficult to understand the structure of the tables. Check sums and aggregated lines are missing.

- <u>34 : Do the provisions of Article 8 (3) and 11 (3) lead to a reduced reporting burden ?</u>

Assessing proportionality on threshold doesn’t reduce production burden, since institutions still need to calculate the threshold to make sure that they haven’t exceeded it.

Assessing proportionality on the territoriality of a Group (whether pure local player or belonging to a cross-border group) is not relevant and is contrary to EBA objective to ensure fair competition conditions.

We would suggest that EBA would explore the proposal made by FEBELFIN to prepare a limited COREP package for institutions that only develop a limited range of activity (asset management firms, leasing companies or factoring activities). Indeed, it would much more efficient not to oblige them to analyse each page of the full ITS to figure out whether they are concerned or not.

- 35 : What are the cost implications of introducing a breakdown by economic sector by using NACE codes ?

  As already mentioned this type of data is not natively provided in the accounting systems. The economic sector issue shall be retrieved within the COREP framework according to us.

- 36 : What are the cost implications of introducing a breakdown by individual countries and counterparties ?

  Same answer as question 35.

- 37 : Would other classification be more suitable or cost efficient ?

  Exposures breakdown comes naturally within COREP scope.
  Accounting data are not structured by counterparty and it would be very costly to provide breakdown by exposure classes or residence of the counterparties on the accounting scope.
  In order to avoid redundancy, we would like that this type of information remains at within COREP reporting or other statistics reporting, as it is already the case.

  However a geographical breakdown by location of the booking entity is much easier to provide from accounting systems

- 38 : What would be the difference in cost if the geographical breakdown would be asked only by differentiating between domestic and foreign exposures compared to country by country breakdown ?

  This will avoid collecting the whole information into accounting systems and focus on a simpler rule by splitting only domestic/foreign exposures

- 39 : What are the cost implications of introducing breakdown of sovereigns holding by country, maturity and accounting portfolio ?
  Template 14 Annex III

  Introducing these breakdowns shall take into account ongoing projects regarding liquidity for instance.

- 40 : How would you assess the cost implications on providing a geographical breakdown of these items with the proposed breakdown to domestic, EMU countries, other EU and row ?

  Should the location of the activities refer to the country where the banking entity is incorporated, the breakdown required (domestic/non domestic) should not be costly.

On the other hand, the breakdown by residence of the counterparty would be highly costly as accounting systems do not provide data by counterparty.

We refer to the answer to question 23, where we recommend EBA rely on other reportings (COREP for assets, future liquidity ratios for liabilities, monetary statistics for individual level) rather than asking for another report by counterpary in the FINREP.

- <u>41 : Would application of a materiality threshold similar to Article 8 (3) and 11 (3) (reporting the breakdown only if foreign exposures exceed 10 % of the total exposures) reduce reporting burden ?</u>

  Introducing a materiality threshold will not necessarily reduce reporting burden given that firms will need to calculate the threshold to know whether they have to report or not.

- <u>42 : What would be the difference in cost implications if breakdown would be requested only with differentiation between domestic/foreign or alternatively country by country with similar theshold than in Article 8 (3) and 11 (3) compared to the proposal in the CP ?</u>

  First of all, we consider that requiring geographical breakdown is not relevant. Given that, reducing the spectrum of countries to three groups (domestic, EMU, ...) would be less costly.

- <u>43 : Are there specific aspects of national accounting framework that has not been covered or not adressed properly in the templates ?</u>

  We don't see any other specific aspects, that have not been raised in the different questions.

- <u>44 : Does the IAS 7 definition of cash equivalents follow the practice used when publishing financial statements ? How would this definition interact with the defintions of IAS 39 for assets in held for trading portfolio ?</u>

  Based upon IFRS 7 definition, cash equivalents stand for cash accounts only. Cash equivalents are disclosed as such when publishing the Statement of Cash Flow. Having different definitions of the cash equivalents between two different reportings do not seem to be efficient and will inevitably raise questions from the supervisor. Besides, it should be noted that this definition of cash equivalents is also very different from the LCR notion of High Quality Liquid Asset.

- <u>45 : How do you assess the impact of reporting interest income and interest expenses from financial instruments held for trading and carried at fair value through profit & loss always under interest income and interest expenses.</u>

  Interest income and expenses from financial instruments booked under HFTO and/or HFTI portfolios are currently disclosed in the interest margin within Financial Statements for our Group, when the financial instrument is not a derivative.

COMMENTS ON DETAILED TABLES

ITS ON SUPERVISORY REPORTING - Annex III.					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
	PART 1				
1	**Balance Sheet Statement (Statement of Financial Position)**				
1.1	Balance Sheet Statement: assets	- Cash and cash equivalent include debt securities, which is neither compliant with the definition in the cash flow statement nor with future LCR buffer. We propose to completely abandon the notion of cash equivalents in FINREP as it can be in opposition to distinction of financial assets into IAS 39 categories.	Quarterly	01/01/2013	
1.2	Balance Sheet Statement: liabilities	- No comment	Quarterly	01/01/2013	
1.3	Balance Sheet Statement: equity	- The item 330 „Reserves or accumulated losses of investments in subsidiaries, joint ventures and associates“ is not clear and reference to IAS 28.11 does not provide much help. Therefore if EBA wants to keep this item it should provide a clear explanation.	Quarterly	01/01/2013	
2	**Income Statement**	- No comment	Quarterly	01/01/2013	
	PART 2				
3	**Breakdown of financial assets by instrument and by asset class**				
3.1	Breakdown of financial assets by instrument and by asset class: demand deposits and cash equivalents	- Exposure class issue (refer to General Comments) : keep previous definition of exposure classes	Semi annual (2013) / Quarterly (2014)	01/01/2013 with previous definition of exposure classes	n/s (with previous definition of exposure classes) **+++ (if changes in the composition of exposures classes)**
3.2	Breakdown of financial assets by instrument and by asset	- The notion “at cost“ for equity instrument held for trading should be further explained.	Semi annual (2013) / Quarterly (2014)	01/01/2013 with proposed	n/s with amendments

ITS ON SUPERVISORY REPORTING - Annex III.					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
	class: financial assets held for trading	- For both debt securities and loans and advances, the ITS requires to disclose the amount of cumulative change in the FV attributable to changes in the credit risk, based on IFRS 7.9 (c). • IFRS 7.9 (c) deals with the HFTO portfolio only and not with HFTI • In addition IFRS 7.9 (c) is part of IFRS 7 reviewed with IFRS 9, and hence not yet endorsed. -Breakdown by exposure classes is not available for equity instruments **We propose to remove column 020 from tab 3.2** **We propose to submit this table on semi-annual basis for S2013 (excluding equity breakdown by exposure class) and quarterly at the beginning of 2014**.		amendments	**+++++** **(if credit spread were required)**
3.4	Breakdown of financial assets by instrument and by asset class: financial assets designated at fair value through profit or loss	-Based upon IFRS 7 (July 2009 currently endorsed), only loans and advances under HFTO portfolio should be disclosed taking into the credit spread. Providing this data is highly costly, as the credit spread is difficult to extract from the FV (should it be feasible at deal level i.e. at Front office, it will not be reported at the counterparty level) -The breakdwon by exposure class regarding equity is not feasible on a short time horizon. **We propose not to fulfill column 020** **We propose to postpone the equity breakdown by exposure classes to 2014**	Semi annual	01/01/2013 with 2 amendments 01/01/2014 with 1 amendment	**+++** **(equity exposure classes)** **+++++** **(if credit spread were required)**
3.5	Breakdown of financial assets by instrument and by asset class: available-for-sale financial assets	The item “of which at cost” regarding equity instruments is not clear and does not have any reference in the template : it should be clarified. **We propose to submit this table on a semi-annual basis, but excluding breakdown by exposure class for equity instrument in 2013.**	Semi annual	01/01/2013 with amendments 01/01/2014 full	**+++** **(equity exposure classes)**

ITS ON SUPERVISORY REPORTING - Annex III.					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
3.8	Breakdown of financial assets by instrument and by asset class: Loans and receivables and held-to-maturity investments	The column 050 should be renamed to be IFRS compliant : "collective allowances for collectively assessed financial assets" **We propose to submit this table on a semi-annual basis.**	Semi annual	01/01/2013	
4	**Past due, impaired and defaulted assets**				
4.1	Financial assets subject to impairment that are past due or impaired	- Pas due but not impaired assets shall be broken down according to the number of past due days. The item below 90 days is split into 3 buckets : <30 d / 30-60 d / 60 – 90 d (columns 010, 020 and 030). IFRS 7 does not ask any breakdown in such granularity. We question the relevance of such a level of detail taking into account the cost to provide such detail. - We question the relevance of getting a breakdown by product (lines 210 to 300) considering the cost to extract this data. Banks management do not use such breackdown to monitor their risks. - We question the relevance of column 150. We understand the interest to know the write-off recorded in the period (already provided in table 11) and the interest to know the global exposure risk by counterparty (but not the write-off by counterparty). Write-offs are part of the income statement and it would be very costly to get a breakdown by counterparty. - Column 100 should be renamed "collective allowances for collectively assessed financial assets". In addition we would like to point out that collective allowances for collectively assessed financial assets are not required for equity instruments, the cell should not be fulfilled **We propose to remove columns 010, 020 and 030.** **We propose to remove lines 210 to 300.** **We propose to remove column 150.** **We propose to submit this table on a semi-annual basis (without equity breakdown by exposure classes in 2013)**	Semi annual	01/01/2013 with 4 amendments 01/01/2014 with 3 amendments	n/s with amendments +++++ (if past due buckets were maintained in column 010,020,030) +++ (if breakdown by product were maintained- lines 210 to 300) +++++ (if accumulated write-offs were required by counterparty)

ITS ON SUPERVISORY REPORTING - Annex III.					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
4.2	Financial assets non-subject to impairment that are past due	- This concept doesn't refer to any accounting reality. An asset is either impaired or not (default doesn't exist). Past due on not impaired assets are reported in table 4.1. Banks insist that FINREP requirement are based upon IFRS standards and not prudential standards as CRR. **We propose to remove this table.**	None	None	
5	**Breakdown of financial liabilities by product and by counterparty**	- Liability breakdown by exposure classes is already provided for monetary statistics reporting and will be revised for liquidity reporting, according to CRD IV calendar. - The breakdown of issued debt securities by product is not required by IFRS and is not immediately available in the systems (lines 290 to 440) - The impact of own credit spread (column 060) is only required on HFTO portfolio by IFRS 7.9 (c) and should be limited to this scope in Finrep as well. **We propose not to disclose liability breakdown by counterparty in FINREP.** **We propose to limit the impact of credit spread to HFTO portfolios.** **We propose to submit this table semi-annually excluding breakdown of issued debts by product in 2013.**	Semi annual	01/01/2013 with 3 amendments 01/01/2014 with 2 amendments	**+**(with suggested amendments) **++** (with detailed breakdown by product on issued debts)
6	**Loan commitments, financial guarantees and other commitments**				
6.1	Off-balance sheet items subject to credit risk: loan commitments, financial guarantees and other commitments given		Semi annual	01/01/2013	
6.2	Loan commitments, financial guarantees and other commitments received		Semi annual	01/01/2013	
	PART 3				

ITS ON SUPERVISORY REPORTING - Annex III.					
	Tables	Comments	Proposal of frequency	Proposal of implementation date	Cost of implementation and reporting
7	**Derivatives: held for trading**	- The information regarding economic hedges is not part of IFRS framework and is not reported in any system; therefore, it should be excluded from the ITS requirement. - Derivatives must be broken down by type of risk, type of product and type of market : this will indeed burden the data collection as these data are not handled at accounting systems level. - The breakdown of the whole HFTI derivative portfolio by counterparty would lead to a significant burden also as the information is not implemented in the General Ledger either. **We propose to remove the lines relating to economic hedges (050, 100, 150, 200,220, 240)** **We propose remove the breakdown by exposure classes (lines 260 to 280)** **We propose to submit this table on a semi-annual basis in 2013 and quarterly in 2014.**	Semi annual (2013) / Quarterly (2014)	01/01/13 with 2 amendments	++ (by product and market type) +++++ (if exposure classes were required)
8	**Derivatives: hedge accounting**	- Same comments as above. **We propose remove the breakdown by exposure classes (lines 430 to 450)**	Semi-annual (2013) / Quarterly (2014)	01/01/13 with 1 amendment	
9	**Breakdown of loans and advances by product**	We question the relevance of this table. Similar data is already produced at individual level for statistics purposes/ **We propose to remove this table from the FINREP ITS requirement as we do not see the relevance of it.**	None	None	
10	**Credit risk**				
10.1	Geographical breakdown of financial exposures subject to credit risk by residence of the counterparty	**We propose to remove this table from the ITS requirement as the information could be retrieved in COREP**	None	None	**+++++ (if required, because of granularity and reconciliation work with Corep)**
10.2	Breakdown of loans and advances to non-financial corporations by NACE codes	**We propose to remove this table from the FINREP ITS requirement as the information could be retrieved in COREP.**	None	None	**+++++ (if required, because of granularity and reconciliation work with Corep)**

ITS ON SUPERVISORY REPORTING - Annex III.					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
10.3	Geographical breakdown of debt securities held from general governments by residence of the counterparty and by residual maturity	**We propose to remove this table from FINREP ITS requirement as the relevant information will be posted in Liquidity reporting, when enforced.** Besides, residual maturity for trading portfolio is not meaningful.	None	None	**++++ (if required, because of granularity)**
11	**Impairment**				
11.1	Impairment on financial and non-financial assets		Semi annual (2013) / Quarterly (2014)	01/01/2013	
11.2	Movements in allowances for credit losses and impairment of equity instruments	**- The notion of estimated probable loans losses should be clarified**	Semi annual (2013) / Quarterly (2014)	01/01/2013	
12	**Financial assets pledged as collateral: derecognition and financial liabilities associated with transferred financial assets**	-The information related to securitization is not always present within accounting system. -The "amount derecognized for capital purposes" (column 110) refers to CRD and should be reported in Corep, not Finrep. - the column 100 "principal amount outstanding of transferred financial assets entirely recognized" is not clear : should any sold asset be declared as derecognized ? - the content of "transferred financial assets recognized to the extent of the institution's continuing involvment" (columns 070 to 080) is not clear. **We propose to remove columns 100 and 110 and to submit this table on an annual basis.**	Annual	01/01/2013 with amendments	**++++**
13	**Fair value hierarchy: financial instruments at fair value**	- This template is based upon IFRS 13, which is not endorsed yet and could be amended. - IFRS 13 will require to disclose FV hierarchy by instrument class, which is assimilated to accounting portfolios and not type of instrument. - Disclosing unrealized gains and losses of level 2 instruments is not required by IFRS 13 (the reference to IFRS 13.81 does not deal with disclosures). - Nor IFRS 13 requires to disclose before taxes unrealized gains and losses for the three levels **We propose to remove the lines by type of instrument (20, 30, 40, 50, 70, 80, 90 ,110, 120, 130, 160, 170, 180, 190, 220,**	Annual (2013) / Semi annual (2014)	01/01/2013 with 3 amendments	**+++ (with amendments)** **+++++ (if proposed amendments were not accepted)**

ITS ON SUPERVISORY REPORTING - Annex III.

	Tables	Comments	Proposal of frequency	Proposal of implementation date	Cost of implementation and reporting
		230, 240) **We propose to remove columns 040, (unrealized gains & losses on level 2).** **We propose to remove the columns related to accumulated gains and losses (060, 070 and 080)** **We propose to submit the table on an annual basis for 2013 and semi-annual level at the beginning of 2014.**			
14	**Geographical breakdown**				
14.1	Geographical breakdown of assets by residence of the counterparty	Breakdown by geography of the counterparty is redundant with other reportings (BRI reportings and COREP) or not relevant (table 14.3). Benefits are limited considering the costs to implement counterparty breakdown in the accounting systems. **We propose to remove these 3 tables from the FINREP reporting.**	None	None	**+++ (if the table were required)**
14.2	Geographical breakdown of liabilities by residence of the counterparty		None	None	**+++++ (if the table were required : higher step for liability than asset)**
14.3	Geographical breakdown of selected income statement items by residence of the counterparty		None	None	**+++++ (if the table were required)**
14.4	Geographical breakdown of assets by location of the activities	Feasible if location of the activity is the location of the booking entity	Semi-annual	01/01/2013	
14.5	Geographical breakdown of liabilities by location of the activities		Semi-annual	01/01/2013	
14.6	Geographical breakdown of main income statement items by location of the activities		Semi-annual	01/01/2013	
15	**Off-balance sheet activities: Interests in unconsolidated structured entities**	- IFRS 12 is not endorsed yet. - Besides, some items are not required by IFRS12 : o IFRS 12 requires main balance sheet lines, whereas ITS requires B/S by type of instrument. o Losses incurred by the reporting entity are only disclosed, if the entity considers it as relevant (column 050) o Fair value of liquidity support drawn are not required by IFRS 12 (column 070)	Annual	01/01/2013 (if endorsed at this date)	**+++ (if annual reporting solely)**

ITS ON SUPERVISORY REPORTING - Annex III.					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
		This table should be required only when IFRS 12 is endorsed and should be compliant with IFRS 12 disclosure requirement. **We propose to remove from the table column 070** **We propose to submit this table on an annual basis so as to be aligned with IFRS requirements.**			
16	**Related parties: amounts payable to and amounts receivable**	**We propose to submit this table on annual basis so as to be aligned with IFRS requirements.**	Annual	01/01/2013	
17	**Breakdown of selected income statement items**				
17.1	Interest income and expenses by instrument, asset class and counterparty	- Refer to General comments. We question the benefits of getting breakdown of interests by exposure class, considering that such indicators are not available in the accounting systems. **We propose to remove this table from the FINREP.**	None	None	**+++++ if breakdown by exposure class were required.**
17.2	Realised gains and losses on financial assets and liabilities not measured at fair value through profit or loss by instrument	-We don't understand the relevance of this information, especially as realised losses are not compensated with utilisation of provision. - Denetting gains and losses is difficult to obtain. - Are equity instruments excluded on purpose? **We propose to remove columns 010 and 020 and report only the net gains & losses**	Semi annual	01/01/2013 (with amendment)	**+** **+++(if gains and losses are to be presented separately)**
17.3	Gains and losses on financial assets and liabilities held for trading by instrument	- IFRS do not require a breakdown by type of instrument. This information is not immediately available in the accounting systems - The content of "short positions" should be clarified (line 050) and is not necessarily easy to isolate. **We propose to remove line 050 and report on a semi-annual basis**	Semi annual	01/01/2013 (with amendment)	**++ (breakdown by type of instrument)**
17.4	Gains and losses on financial assets and liabilities held for trading by risk	Feasible if required only on a net basis	Semi annual	01/01/2013	
17.5	Gains and losses on financial	- Denetting gains and losses is difficult to obtain	Semi annual	01/01/2013 (with	**++++(if gains and**

ITS ON SUPERVISORY REPORTING - Annex III.					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
	assets and liabilities designated at fair value through profit or loss by instrument	- Picking up the amount of change in the fair value du to changes in the credit risk is hardly feasible as explained above (refer to table 3.5). Should it be it will not be by instrument. **We propose to remove column 040 (refer to tab 3.2) regarding credit spread disclosure as well as columns 010 and 020 on gross gains and losses.**		amendments)	**losses are to be presented separately)** **+++++ (if impact on credit risk were to be disclosed)**
17.6	Gains and losses from hedge accounting		Semi annual	01/01/2013	
18	**Fee and commission income and expenses by activity**	- The breakdown by type of customers is difficult to collect for of custody fees as well as for “Customer resources distributed but not managed”. **We propose to remove the lines 090, 100, 110 and 160, 170 and 180**	Semi annual	01/01/2013 with proposed amendments	++++ (if breakdown by type of customer were required)
	PART 4				
19	**Statement of comprehensive income**	-We question the relevance of this table comparing with data already submitted throughout table 1.3. - It is unclear what the lines 140, 180, 230, 270 and 310 “other reclassification” used for each reclassifiable OCI items means.	Semi annual	01/01/2013	
20	**Equity**				
20.1	Statement of changes in equity		Semi annual	01/01/2013	
20.2	Capital by counterparty	**We propose to remove this table from the FINREP requirement as the information is not relevant for listed companies.** Besides legal information on listed companies shareholders is disclosed in the annual reports.	None	None	

	PART 5 – local supervisors REQUIREMENTS (optional)				
21	**Collateral and guarantees received**				
21.1	Breakdown of loans and advances by collateral and	Most of the collateral are not recorded in the balance sheet, neither off balance sheet. These data are collected for risk	None	None	

ITS ON SUPERVISORY REPORTING - Annex III.					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
	guarantees	management, impairment calculations and COREP. They should not take place in a financial reporting. **We propose to remove this table from the FINREP.**			
21.2	Financial Assets designated at fair value through profit or loss: mitigation of credit risk with credit derivatives		Annual	01/01/2013	
21.3	Collateral held when the reporting institution is permitted to sell or repledge in the absence of default by the owner of collateral	-We question the relevance of splitting collateral sold and collateral repledged. We propose to disclose collateral sold or repledged into one column	Annual	01/01/2013	
21.4	Collateral obtained by taking possession during the period		Annual	01/01/2013	
21.5	Foreclosure [tangible assets] accumulated	The information of the table is not requested by IFRS 7.38.a). IFRS 7.38.a) only requests the nature and carrying amount of the collateral obtained by taking possession during the period which is the subject of the table 21.4. Therefore we propose to remove this table from the FINREP	None	None	
22	**Financial assets pledged as collateral**				
22.1	Financial assets pledged as collateral for liabilities and contigent liabilities	No comments	Annual		
22.2	Financial assets pledged as non-cash collateral for which the transferee has the right to sell or repledge in the absence of default by the reporting institution.	IFRS 7 does not require any breakdown by accounting portfolio. **We propose to remove this table from the FINREP.**	None	None	
23	**Fair value**				
23.1	Fair value hierarchy: financial instruments at amortised cost		Annual	01/01/2013	
23.2	Use of the Fair Value Option				
23.3	Hybrid financial instruments not designated at fair value through profit or loss				

ITS ON SUPERVISORY REPORTING - Annex III.					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
24	**Off-balance sheet activities: asset management, custody and other service functions**	The published financial information is not necessarily structured according to the format required by the table. Besides the information required in the last column is complex to collect, to make reliable and to report. Non-accounting information should not be required. - Accordingly we suggest deleting the table.	None	**None**	
25	**Tangible and intangible assets**				
25.1	Tangible and intangible assets: carrying amount		Annual	01/01/2013	
25.2	Tangible and intangible assets: assets subject to operating lease		Annual	01/01/2013	
26	**Provisions**		Annual	01/01/2013	
27	**Defined benefit plans and employee benefits**				
27.1	Components of defined benefit plan assets and liabilities	The unrecognised actuarial gains (losses) will no longer be part of the defined benefit obligation calculation as amended IAS19 requires them to be recognised in OCI. The table should be amended according to this IFRS amendment. The issue is the same regarding unrecognised past service cost (immediately recognised in th e P&L regardless the vesting period)	Annual	01/01/2013	
27.2	Movements in defined benefit plan obligations		Annual	01/01/2013	
27.3	Memo items [related to staff expenses]		Annual	01/01/2013	
28	**Components of own funds**	-			
28.1	Subordinated financial liabilities				
28.2.	Minority interests: accumulated other comprehensive income				
28.3	Information on unrealised gains and losses	- According to the standard IAS 1 (BC 65), the components of other comprehensive income can be displayed either net after tax effects, or before tax effects. - So that the treatment of the tax (net or gross) reflects the	**Annual**	**01/01/2013**	

ITS ON SUPERVISORY REPORTING - Annex III.					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
		option chosen by the establishment, we suggest splitting this table in two sub-tables, one for each of both options. These sub-tables will be fed according to the option chosen by the financial institution.			
29	**Breakdown of selected income statement items**				
29.1	Realised gains and losses on financial assets and liabilities not measured at fair value through profit or loss by accounting portfolio	Those tables seem to be much closed to the table 17. The items are split in a different way. As there is no added value to report them twice, they should be deleted.	None	None	
29.2	Gains and losses on financial assets and liabilities designated at fair value through profit or loss	See table 29.1	None	None	
29.3	Gains and losses on derecognition of non-financial assets other than held for sale	See table 29.1	None	None	
29.4	Other operating income and expenses	See table 29.1	None	None	
30	**Related parties**				
30.1	Expenses and incomes generated by transactions with related parties	Part of these data is published in the annual financial statement. Therefore, the table should not be reported other than on an annual basis.	Annual	01/01/2013	
30.2	Key management personnel compensation	Part of these data is published in the annual financial statement. Therefore, the table should not be reported other than on an annual basis. Moreover, the management key compensation is an annual data.	Annual	01/01/2013	
31	Scope of group	Data requested are burdensome to collect due to the number of consolidated entities. Therefore, the table should not be reported other than on an annual basis. The scope of the Groupe is alleady submitted througout the Registration documentation (accounting and prudential scope). **We propose to remove this table from the FINREP**	None	None	

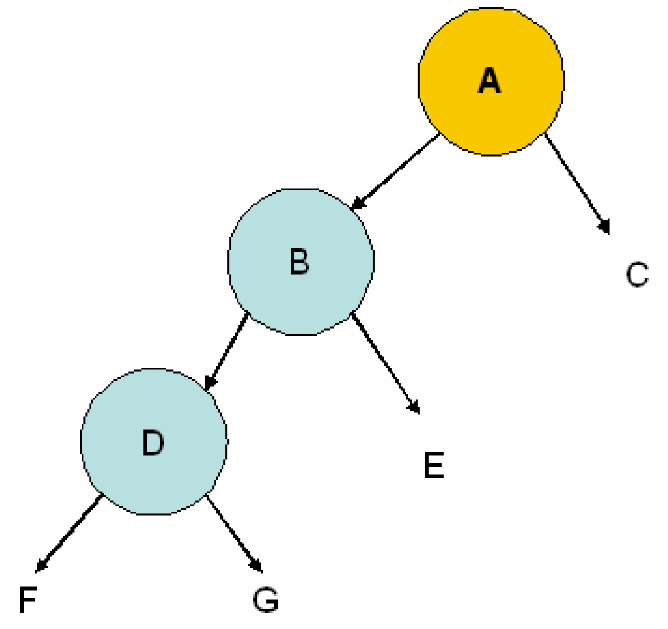
ITS ON SUPERVISORY REPORTING - Annex I					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
	PART 1				
1.2 CA1	Own funds	*Please refer to Exec Sum : We propose to report 1.2,1.3 (possibly 1.4, 1.5, 1.6) as soon as Q1 2013, under Basel III/CRD 4 methodology* 1.2 CA1 line 010 item 1 *:* TOTAL RISK EXPOSURE AMOUNT*. Is the wording correct, or should it be "TOTAL RISK WEIGHTED EXPOSURE AMOUNT" ?*	Quarterly	01/01/2013	
1.3 CA2	Own funds requirements	Line 1.8.3 Stricter prudential requirements based on national acts : Additional capital requirements requested by national supervisors. *As ITS intend to harmonize COREP templates, and implement the same requirements imposed by the CRR, this line does not seem necessary in this template.*	Quarterly	01/01/2013	++
1.4 CA3	Capital ratios	None	Quarterly	01/01/2013	
1.5 CA4	Memorandum items		Quarterly	01/01/2013	++
1.6 CA5	Transitional provisions	Table 4 Recognition in consolidated Common Equity Tier 1 capital of instruments and items that do not qualify as minority interests : We *would like some precision on the usefulness of this level of details.* Table 6 Unrealised losses and gains measured at fair value : *Splitting between unrealised gains&losses at consolidated level could require a new specific reporting, therefore difficult to set up for 2013, on some fixed income items.*	Quarterly	01/01/2013	++

ITS ON SUPERVISORY REPORTING - Annex I					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
	PART 2				
2 GS	GROUP SOLVENCY	SCOPE : *- The usefulness of standalone data is questionable in our opinion, since home regulators can retrieve directly this reporting from host regulators, thanks to harmonization of reportings, in terms of content as well as common taxonomies* *- Text is not clear about necessity to include in GS template foreign branches outside EU locally subject to prudential requirements* *- No threshold criterion is mentioned regulated entities on an individual basis, to be reported in the GS template : we strongly question the relevance of reporting regulated entitiesof a non significant size wrt the mother company* *- Expectations concerning standalone / sub-consolidated reportings in the local requirements / contribution to Group columns isextremly unclear . This question for more precision on Global Solvency scope was already asked to CEBS for 2010 COREP Revision Consultation in september 2010; CEBS answer to the industry in its Dec 2012 promised examples that are still missing.* *Please see our detailed question next page with our understanding of the required reporting* CAPITAL BUFFERS : *The Annex II-Part II Template Related Instructions refers to "Consolidated Own Funds" on field 320, "Of which Tier 1" field 330 (row); then Capital Buffers items from field 340 to 380. There seems to be an incoherence with the Annex I Global Solvency template, which displays Capital Buffer items form field 320 to field 340.*	Semi-annual	2014	+++

What should report the different entities in this consolidation scheme in each part of the Group Solvency Template ?

Our understanding of the required reporting, concerning the consolidation scheme represented, would be the following:

CONSOLIDATION SCHEME



	Stand Alone		Sub-consolidated	
COREP established by A	**INFORMATION RELATING THE SUBSIDIARIES AS INDIVIDUAL ENTITIES**	**INFORMATION RELATING THE CONTRIBUTION OF SUBSIDIARIES TO SOLVENCY OF THE GROUP**	**INFORMATION RELATING THE SUBSIDIARIES AS INDIVIDUAL ENTITIES**	**INFORMATION RELATING THE CONTRIBUTION OF SUBSIDIARIES TO SOLVENCY OF THE GROUP**
A	Yes	Yes, contribution to Group A	N/A	N/A
B	Yes	Yes, contribution to Group A	Yes, consolidation of B/D/E/F/G @ Group B level	No (the contribution to Group A of the sub Group B is the sum of stand alone contributions to Group A
C	Yes	Yes, contribution to Group A	N/A	N/A
D	Yes	Yes, contribution to Group A	Yes, consolidation of D/F/G @ Group D level	No (the contribution to Group A of the sub Group D is the sum of stand alone contributions to Group A
E	Yes	Yes, contribution to Group A	N/A	N/A
F	Yes	Yes, contribution to Group A	N/A	N/A
G	Yes	Yes, contribution to Group A	N/A	N/A

Could you validation our understanding ?

ITS ON SUPERVISORY REPORTING - Annex I

	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
	PART 3				
COMMENTS COMMON TO ALL CREDIT&COUNTERPARTY TEMPLATES		INFLOWS /OUTFLOWS : complete substitution of a credit line characteristics by its guarantor one will require important modifications of current reportings systems in France and additional data on guarantees.	Quarterly	2014	++++
		COUNTERPARTY RISK "NUMBER OF COUNTERPARTIES": *central systems are not able to report the number of counterparties at a consolidated prudential level, as they operate at an intermediate aggregate level compared to the contract level of the credit risk data bases. Moreover, in our opinion, Concentration Risk is already monitored by Large Exposures reporting; (same point on NUMBER OF OBLIGORS for Balance Sheet, Off Balance Sheet, Securities)*	*Systems are not able to report the number of counterparties at a consolidated prudential level*		
		COUNTERPARTY RISK "Securities Financing AND Derivatives & Long Settlement":of which: subject to CVA charge centrally OR cleared through a compliant CCP : *data not reported at consolidated level currently*	Quarterly	2014	+++
3.2 CR SA	CREDIT AND COUNTERPARTY CREDIT RISKS AND FREE DELIVERIES: STANDARDISED APPROACH TO CAPITAL REQUIREMENTS	STANDARD EXPO. CLASSES : *new fields and mapping to implement (French ACP allows currently use of IRBA asset classes for STANDARD), including decision tree to select the correct exposure class according to the order set by CRR.* CREDIT ASSESSMENT BY A NOMINATED ECAI coherence in CR SA Total and CR SA Details ; *in CR SA total, breakdowns are required such as "of wich : with credit assessment by a nominated ECAI"; in CR SA Details, it is asked (as in current COREP CR SA) : "of wich : without credit assessment by a nominated ECAI". Is it a typo or deliberate ?* VOLATILITY ADJUSTMENT TO THE EXPOSURE and VOLATILITY AND MATURITY ADJUSTMENTS : *columns 120 and 140. Under investigation.*	Quarterly	2014	Standard exposure classes : +++ RW from ECAI / Sovereign : +++

ITS ON SUPERVISORY REPORTING - Annex I

	Tables	Comments	Proposal of frequency	Proposal of implementation date	Cost of implementation and reporting
	PART 3				
3.2 CR SA	CREDIT AND COUNTERPARTY CREDIT RISKS AND FREE DELIVERIES: STANDARDISED APPROACH TO CAPITAL REQUIREMENTS	EXPOSURES OF WHICH: ARISING FROM DEFAULT FUND CONTRIBUTIONS (column 30) : *Regulatory text is not stabilized yet. It is therefore very difficult to put in place any reporting on that subject.* *It is required in template 3.2 CR SA to report Exposures arising from Default Fund Contributions on both Balance-Sheet (line 020) and Off-Balance Sheet (line 030). In CR SA Details, only Balance Sheet is needed, Off balance Sheet cell is greyed.* *1/ Is it an inconsistent or deliberate ? If inconsistent, what is the split required ?* *2/ If Default fund contributions exposures must be reported in Off-Balance Sheet, could you precise what is expected ? guarantee stipulated in dedicated contracts ? guarantees arising from rulebook specifications ?*	Quarterly	2014	+++++
3.2 CR SA Details	CREDIT AND COUNTERPARTY CREDIT RISKS AND FREE DELIVERIES: STANDARDISED APPROACH TO CAPITAL REQUIREMENTS Details		Quarterly	2014	++++

ITS ON SUPERVISORY REPORTING - Annex I					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
	PART 3				
3.3.a CR IRB	2	ORIGINAL PRE CONVERSION FACTOR column ;030 "Of wich :Large regulated financial entities and to unregulated financial entities" ref *;031. *As the definition of a financial entity is based on multiple criteria, identification in the systems will be complex and take time in systems evolution.* RETAIL SME and NON-SME exposure classes : *review of prudential algorithm needed* VALUE ADJUSTMENTS AND PROVISIONS of which: the Expected Loss amount is higher than the CVA at the netting set level (column 272) : *given the last evolution of CRR, where CVA are not to compensate for EL, we don't see the relevance of reporting this detail*	Quarterly	2014	++++
3.3.b CR IRB GB	Geographical breakdown of financial exposures subject to credit risk (IRB approach)	SCOPE :*These new breakdowns imply important system evolutions and will have an impact especially on data volumetry. We strongly advocate maintaining the 2nd threshold of 0,5% of total IRBA total for country to be reported by exposure class. See answer to question n°9 of the Consultation Paper.* QUESTION ON SCOPE *: we note that template 3.3.b CR IRB GB "Geographical breakdown" does not share the same exposure classes than those required for CR IRB breakdown in subtemplates (3.3.a CR IRB Ref list). For example "Central Banks" and "General Governments" must be reported separately for CR IRB GB but aggregated for CR IRB sub-template : Must the 0.5% threshold be calculated by CR IRB exposures classes or by CR IRB GB ones ?*	Quarterly	2014	+++
3.4 CR EQU IRB	CREDIT RISK: EQUITY - IRB APPROACHES TO CAPITAL REQUIREMENTS		Quarterly	2014	

ITS ON SUPERVISORY REPORTING - Annex I					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
	PART 3				
3.5 CR SETT	SETTLEMENT/DELIVERY RISK				
3.6 CR SEC SA	CREDIT RISK: SECURITISATIONS - STANDARDISED APPROACH TO OWN FUNDS REQUIREMENTS	- CQS AT INCEPTION (also required in CR SEC IRB) : *this information is not present in the systems, event in front office operations systems. One should remember indeed that a number of these banking book positions were reclassified as such in dec 2008 according to IAS 39.5. The trading book systems were not collecting the external ratings of the traded securitization positions as those positions were included in the VaR as any other market position. This information will be very costly to retrieve on the stock of securitization positions.* - METHODE IAA column 310 : *This method has been inserted in the CR SEC SA template. Could you confirm, as it seems incoherent ?*	Quarterly	2014	+++++ (CQS at inception)
3.6 CR SEC SA	CREDIT RISK: SECURITISATIONS - STANDARDISED APPROACH TO OWN FUNDS REQUIREMENTS	- CQS AT INCEPTION (also required in CR SEC IRB) : *this information is not present in the systems, event in front office operations systems.* *One should remember indeed that a number of these banking book positions were reclassified as such in dec 2008 according to IAS 39.5. The trading book systems were not collecting the external ratings of the traded securitization positions as those positions were included in the VaR as any other market position.* *This information will be very costly to retrieve on the stock of securitization positions.* - METHODE IAA column 310 : *This method has been inserted in the CR SEC SA template. Could you confirm, as it seems incoherent ?*	Quarterly	2014	+++++ (CQS at inception)

ITS ON SUPERVISORY REPORTING - Annex I					
	Tables	Comments	Proposal of frequency	Proposal of implementation date	Cost of implementation and reporting
	PART 3				
3.7 CR SEC IRB	CREDIT RISK: SECURITISATIONS - IRB APPROACH TO OWN FUNDS REQUIREMENTS	CQS AT INCEPTION : see CR SEC SA above	Quarterly	2014	+++++ (CQS at inception

ITS ON SUPERVISORY REPORTING - Annex I					
	Tables	Comments	Proposal of frequency	Proposal of implementation date	Cost of implementation and reporting
	PART 3				
3.8 SEC Details	DETAILED INFORMATION ON SECURITISATIONS	SCOPE : - *Regarding fully auto-subscribed programs, we don't see the point in asking characteristics of the securitization program in the COREP, as those programs are treated under credit risk in the regulatory framework. The inclusion of those programs in the CR SEC Details template, introduces an inconsistency with the other securitization templates (CR SEC SA & CR SEC IRB).* - *Regarding programs, in which we play an investor role, we question the relevance of a quarterly reporting on the program's structure at origination as this is static data that delivers few insights for supervision and can be found on Bloomberg or Reuters.* - MEMORANDUM ITEMS: OFF-BALANCE SHEET ITEMS AND DERIVATIVES : IRS/CRS *column 380 : difficult to implement* COMMENT on some NEW FIELDS : - ACCOUNTING TREATMENT column050 : *new data to be retrieved from accounting stream.* - SOLVENCY TREATMENT column 060: *No, or Banking/Trading/both books to implement* - UNDERLYING TYPE column 160 *: new management rule to implement (indicate the most important type)* - COUNTRY column 190: *new management rule to implement for securitization in different countries (threshold 20% to designate the most important country)*	*Maintain an **annual** reporting frequency for CR SEC Details.*	2014 with additional information on **current scope only**	IRS/CRS : +++++ Reporting programs structure : - Investor role : +++++ (6+ for potentially dynamic data such as total exposure securitized by programs, which requires updates) - Originator/sponsor : +++ - Auto-subscribed lines : ++++ Following detailed costs ratings on new fields refer only to Originator/sponsor role; otherwise, it always +++++ - Underlying type : ++ - Accounting treatment : ++ - Country : + - Solvency Treatment : + - Legal or Foreseeable Maturity : +

ITS ON SUPERVISORY REPORTING - Annex I					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
	PART 4				
4.1 OPR	**OPERATIONAL RISK**				
4.2 OPR Details	OPERATIONAL RISK: GROSS LOSSES BY BUSINESS LINES AND EVENT TYPES IN THE LAST YEAR	FIRST ACCOUNTING DATE : *The draft version states that actual incidents should be reported according to the first accounting date. We suggest the criteria should be the detection date. In most cases, this comes to the accounting date but it is more comprehensive as it would cover the following cases: losses that never materialize through accounting entries, such as uncollected revenues. With the proposed definition, these incidents would never be reported, creating a discrepancy with the common rules. events where it is understood a long time after they have been reported in ledgers, that they were actually an operational risk incident (typically some fraud cases). With the proposed definition, these incidents will never be reported.*	Annual	2014	+++
	PART 5				
5.1 MKR SA TDI	MARKET RISK: STANDARDISED APPROACH FOR POSITION RISKS IN TRADED DEBT INSTRUMENTS	None	Quarterly	2014	
5.2 MKR SA SEC	MARKET RISK: STANDARDISED APPROACH FOR SPECIFIC RISK IN SECURITISATIONS	- UNDERLYING type "COVERED BONDS" and "Other liabilities " Rows 200 & 201 *: has to be identified*	Quarterly	2014	++

ITS ON SUPERVISORY REPORTING - Annex I					
	Tables	**Comments**	**Proposal of frequency**	**Proposal of implementation date**	**Cost of implementation and reporting**
	PART 5				
5.3 MKR SA CTP	MARKET RISK: STANDARDISED APPROACH FOR SPECIFIC RISK IN THE CORRELATION TRADING PORTFOLIO	None	Quarterly	2014	
5.4 MKR SA EQU	MARKET RISK: STANDARDISED APPROACH FOR POSITION RISK IN EQUITIES	None	Quarterly	2014	
5.5 MKR SA FX	MARKET RISK: STANDARDISED APPROACHES FOR FOREIGN EXCHANGE RISK	None	Quarterly	2014	
5.6 MKR SA COM	MARKET RISK: STANDARDISED APPROACHES FOR COMMODITIES	None	Quarterly	2014	
5.7 MKR IM	MARKET RISK INTERNAL MODELS	'-LONG/SHORT SPLIT OF POSITIONS :The split between long and short positions is only relevant for the standard method for market risk. Indeed, in the internal model method, banks model all the positions as they are without any particular netting or offsetting rules and the modelled P&L or sensitivities (depending on whether banks use full revaluation approach or sensitivity approach) are then aggregated in the VaR. The split between long and short is therefore not needed (as opposed to the standard approach) and hence is not available in the systems - Detail by currency: idem see above	Quarterly	2014 without additional information on long/short positions	

ITS ON SUPERVISORY REPORTING - Annex VI					
	Tables	**Comments**		**Proposal of frequency**	**Proposal of implementation date**
	PART 1				
CR IP Losses	EXPOSURES AND LOSSES FROM LENDING COLLATERALISED BY IMMOVABLE PROPERTY	*This Template requires losses reporting by asset class. COREP reportings have always covered risk exposures, considering the situation at the end of the period (stock data). Information systems have been developed to provide snapshots of positions, but not intra-period flows. As a consequence, it is not conceivable to report flows on credit or market risks such as required in this template. Accounting systems could provide flows, but not on the required dimensions (residential vs commercial, adequately vs inadequately collateralized lending, Standard vs IRBA method)*	Non feasible in its current specification		

BNP PARIBAS

20.03.2012

ANNEX I : Exposure classes mapping between FINREP & COREP

NEW FINREP

General governments	**General governments**
	Central governments
	Social security funds
	Regional governments
	Local governments
	Public sector entities with no cial purpose
	International organisations
Central banks	**Central banks**
	Central banks
Credit institutions	**Credit institutions**
	Banks
	Multilateral banks
Other financial corporations	**Other financial corporations**
	Investment firms
	Investment funds
	Pension funds
	UCITS
	Clearing houses
Non financial corporations	**Non financial corporations - Corporate**
	Non financial corporations
	Public sector entities with cial purpose
	Non profitable organisations
Households Corporate	**Households - Corporate**
	Retail consumers - Corporate
Non financial corporations	**Non financial corporations - Retail**
	Non profitable organisations - Retail
Households Retail	**Households - Retail**
	Retail consumers

NEW COREP SA

Central Governments or Central Banks	**Central Governments**
	Central governments from European Union
	Central governments from third countries
	Central banks
	Central banks part of the European System Central Bank (ESCB)
	Central banks from third countries part of the World Bank Hub
Multilateral development banks	**Multilateral development banks**
	Multilateral Development Banks mentioned by the article 112
	Multilateral Development Banks not mentioned by the article 112
International organisations	**International organisations**
	International Organisations mentioned by the article 113
Regional governments or local authorities	**Régional governments**
	Regional governments (UE) treated as central governments
	Regional governments (TP's) treated as central governments
	Regional governments not treated as central governments
	Local Authorities
	Local authorities (UE) treated as central governments
	Local authorities (TP's) treated as central governments
	Local authorities not treated as central governments
Public sector entities	**Public sector entities**
	Public sector entities (UE) treated as central governments (with no cial purpose)
	Public sector entities (TP's) treated as central governments (with no cial purpose)
	Public sector entities (UE) treated as regional governments (with no cial purpose)
	Public sector entities (TP's) treated as regional governments (with no cial purpose)
	Public sector entities (UE) treated as local authorities (with no cial purpose)
	Public sector entities (TP's) treated as local authorities (with no cial purpose)
	Other public sector entities (with no cial purpose)
Institutions	**Institutions**
	Credit institutions
	Financial holding Companies
	Investment firms
	Authorised and supervised financial fnstitutions
Corporate	**Corporate**
	Non financial entities
	Unregulated financial entities
	Insurance undertaking
	Mixed-activity holding companies
	Public sector entities with a commercial purpose
	Specialised lending exposures
	Small or Medium Sized Market enterprises not managed in a HCR or O/S > 1Me
	Person or group of persons not managed in a HCR ***or O/S > 1Me***
Retail	**Retail**
	Person or group of persons managed in a HCR ***and O/S < 1 Me***
	Small or Medium Sized Market enterprises managed in a HCR and O/S < 1 Me

NEW COREP IRBA

Central Governments or Central Banks	**Central Governments**
	Central governments from European Union
	Central governments from third countries
	Regional governments (UE) treated as central governments
	Regional governments (TP's) treated as central governments
	Local authorities (UE) treated as central governments
	Local authorities (TP's) treated as central governments
	Public sector entities (UE) treated as central governments (with no cial purpose)
	Public sector entities (TP's) treated as central governments (with no cial purpose)
	International Organisations mentioned by the article 113
	Central banks
	Central banks part of the European System Central Bank (ESCB)
	Central banks from third countries part of the World Bank Hub
	Multilateral Development Banks mentioned by the article 112
Institutions	**Institutions**
	Regional governments not treated as central governments
	Local authorities not treated as central governments
	Public sector entities not treated as central governments (with no cial purpose)
	International Organisations not mentioned by the article 113
	Credit institutions
	Multilateral Development Banks not mentioned by the article 112
	Investment firms
	Financial holding companies
Corporate	**Corporate**
	Non financial entities
	Unregulated financial entities
	Insurance undertaking
	Mixed-activity holding companies
	Public sector entities with a commercial purpose
	Specialised lending exposures
	Small or Medium Sized Market enterprises not managed in a HCR or O/S > 1Me
	Person or group of persons not managed in a HCR
Retail	**Retail**
	Person or group of persons managed in a HCR
	Small or Medium Sized Market enterprises managed in a HCR and O/S < 1 Me