



Mailing list Supervision/ Accounting/ Money Laundering

Brussels, 11 November 2014

Public consultation of the European Central Bank (ECB) on a draft regulation on reporting of supervisory financial information

Dear Madam or Sir,

On 23 October 2014 the European Central Bank (ECB) published a consultation on a draft regulation on reporting of supervisory financial information. The future supervision of significant credit institutions in the Eurozone and the participating member states by the ECB requires a thorough analysis of data of the concerned institutions. In addition, the ECB will supervise from 4 November 2014 onwards the activity of supervision of less significant credit institutions of national competent authorities. For this purpose national competent authorities shall communicate to ECB the data concerning the credit institutions which are supervised by them (article 6 (2) of the regulation on prudential requirements for credit institutions and investment firms/ CRR).

For supervisory reporting of financial information the Commission Implementing regulation (EU) No 680/2014 of 16 April 2014 laying down implementing technical standards with regard to supervisory reporting of institutions has been developed on the basis of the regulation CRR. It provides reference dates and remittance dates for supervisory reporting of own funds requirements, losses stemming from lending collateralised by immovable property, large exposures, leverage ratio, Liquidity Coverage requirements and Net Stable Funding requirements and especially financial information on a consolidated level (article 99 of the CRR).

The supervisory reporting of financial information is therefore to date only mandatory on a consolidated level for credit institutions which apply IFRS. The ECB plans to extend this obligation to all supervised credit institutions in the Eurozone. A supervisory reporting of financial information to the ECB or the competent national authorities shall become mandatory for all credit institutions which have applied up to now the national GAAP (Generally Accepted Accounting Principles) on a consolidated level and for the individual level.

The requirements however shall be reduced in due consideration of the principle of proportionality for less significant credit institutions. In this regard, the national competent authorities will be free to choose the format, the frequency and the remittance dates for data.

Furthermore, the volume of data shall be adapted accordingly. Whereas significant groups shall complete the entirety of the FINREP templates for the consolidated reporting, less significant credit institutions shall only provide a restricted amount of data. Title III of the proposal for a regulation provides for less significant groups and institutions a format of reporting, the frequency, the reference and remittance dates. For groups and less significant single institutions whose assets reach a maximum of 1 billion euros only data which is enlisted in annex III of the proposal for a regulation shall be reported. Moreover, a branch in a participating member state of a credit institution

established in a non-participating Member State is excluded completely from the reporting obligation if its total assets remain below 1 billion euros (article 12 (7) (b)).

According to article 11 and 14 the reference dates are pursuant to the frequency of reporting:

- Quarterly: 31 March, 30 June, 30 September, 31 December
- Semi-annual: 30 June, 31 December
- Annual: 31 December

The national competent authorities shall determine the remittance dates autonomously in due consideration of the reporting dates of the ECB.

While the first reference date for significant groups and credit institutions shall be 31 December 2015, it shall be 30 June 2017 for less significant groups/ institutions (article 17 of the draft regulation).

The future ECB regulation shall be directly applicable and binding in its entirety in the member states after its publication in the EU Official Journal.

Please find attached the draft regulation of the European Central Bank on reporting of supervisory financial information. We would be grateful if you would send your comments, replies and views on the draft to the EFBS office by **24 November 2014**.

If you have further questions, please contact us at any time.

Yours sincerely,



Andreas J. Zehnder
Managing Director
European Federation of Building Societies

Annexes

- Consultation paper of the European Central Bank (ECB) on a draft regulation on reporting of supervisory financial information