

Re: CRD IV Alert - November 2015

Statistics and Information
Monetary and Banking
Statistics

This Annex lists the main changes and amendments to the upcoming quarterly reports:

1. Validation rules as of Q3 2015 and additional data checks
2. Other changes in the CRD IV reporting process
3. New and amended CRD IV reports
4. Specific issues with respect to the CRD IV reports

1. Validation rules as of Q3 2015 and additional data checks**1.1 Consistency checks added to DNB validation reports**

As of the Q3 2015 reporting period, DNB will perform consistency checks on reports received, as part of its validation process. These checks are established by the ECB, the EBA and DNB and will supplement the EBA's DPM 2.3 validation rules already in effect.

Following your submission of CRD IV reports, you will receive an email containing our validation report specifying whether EBA DPM validation rules or DNB consistency checks are triggered. The status of your report will be mentioned in the subject of this email, with a separate status for the EBA's DPM ("accepted" or "not accepted") and for the DNB consistency checks.

The set of consistency checks was published on e-Line DNB's news page on 3 November 2015. We amended our validation report with respect to this change on 2 November 2015. The other additional DNB checks (consistency and plausibility) for the June 2015 reporting period will remain in effect, and we will inform you of the outcomes of these checks separately.

1.2 EBA validation rules (DPM 2.3) and DNB assessment from Q3 2015 onwards

As you may be aware, on 9 September 2015, the EBA published an updated overview of its validation rules to be deactivated regarding the September 2015 reports in DPM 2.3. For more information, see:

<http://www.eba.europa.eu/-/eba-issues-revised-list-of-its-validation-rul-7>

DNB will continue to assess the EBA validation rules on a partial basis (i.e. only the validation rules contained within a single form set).

On 27 October 2015 we published a set of validation rules that DNB does not include in its assessment on our e-Line DNB news page. The ECB (and EBA) assess all EBA DPM validation rules, which means that banks must comply with all of these validation rules.

2. Other changes in the CRD IV reporting process**2.1 Submission of CRD IV reports in XBRL**

As mentioned in our previous CRD IV alert of 3 July 2015, all CRD IV reports must be submitted in XBRL from the second half of 2016 onwards. We organised an information meeting on the transition from submission of CRD IV reports in e-Line DNB to submission in XBRL on 27 October 2015. In the run-up to the transition, we

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will inform the banks of the transition schedule, implementation and testing on a regular basis. The information meeting presentations are available on e-Line DNB's information page. For more information, see:

<http://www.dnb.nl/en/statistics/eline-dnb/Credit-institutions/index.jsp>

If you have any questions about the transition to XBRL, please send an email to xbri@dnb.nl.

2.2 Data Point Model (DPM) updated to version 2.4

The EBA DPM 2.4 release contains the amendments to the Liquidity Coverage Ratio (LCR) and the Leverage Ratio (LR) resulting from the EC's Delegated Acts. You can find the amended LCR and LR reporting requirements in the amended "ITS on LCR reporting" and "ITS on LR reporting". See <https://www.eba.europa.eu/regulation-and-policy/supervisory-reporting>.

The EBA published DPM version 2.4 on 9 September 2015.

<http://www.eba.europa.eu/-/eba-publishes-new-dpm-and-xbri-taxonomy-for-remittance-of-supervisory-reporting>

The European Commission expects to formally approve the amended ITS within the next month. The new LCR and LR reporting requirements (and DPM 2.4) will officially enter into effect six months after publication in the Official Journal. Since the LCR obligation ensuing from the Delegated Act has been in effect from October 2015, we have decided to implement the new LCR reporting requirement before the end of this six-month period. For more information, see Section 3.1 below.

2.3 Funding plans report to be submitted in single euros

The Funding Plans report for significant banks must be submitted in single euros (rather than in thousands of euros) for the first time as at the end of December 2015. We will amend the applicable specifications and publish them on the e-Line DNB website by 1 December 2015 at the latest. Resubmissions for June 2015 should still be submitted in thousands of euros.

3. New and amended CRD IV reports

3.1 LCR reports

On 1 October 2015, the LCR Delegated Act (DA) entered into effect. As published on Open Book, banks should now also submit the new LCR reports through e-Line DNB, in addition to the existing monthly LCR reports. The existing monthly LCR reports will therefore continue to apply and the submission date also remains unchanged. Contrary to what is stated in the Government Gazette, this is the 15th calendar day of the month.

The first reference date for the new LCR report (based on the Delegated Act) is end-December 2015. Pending EC approval and implementation of the new ITS on reporting, this will be a quarterly report with a temporary submission period of 30 calendar days. Until the EC's approval, you should only report the total (for all currencies) at all applicable consolidation levels for the new LCR DA report. See also Open Book:

<http://www.toezicht.dnb.nl/en/2/51-234129.jsp>

The e-Line DNB specifications based on DPM 2.4 (pending the formal effective date, as mentioned under 2.2) will be published on the e-Line DNB website by 1 December 2015 at the latest. From 1 December 2015, DNB will offer the option of testing the new LCR report on request in a simulation environment.

Form 8028 will remain a monthly report for now and applies to the highest consolidation level in the Netherlands. Form 8029 has been cancelled for reports as of the 30 October 2015 reference period.

3.2 ITS on the Additional Liquidity Monitoring Metrics (AMM)

The "ITS on Additional Liquidity Monitoring Metrics", including the maturity ladder, is currently awaiting final approval by the European Commission, which is expected shortly. It is not clear whether the maturity ladder will also be approved at this stage. The implementation schedule depends on the European Commission's decision. Based on the EBA's opinion of 23 September 2015, implementation as at 1 January 2016 seems likely.

<http://www.eba.europa.eu/-/eba-recommends-to-the-eu-commission-retention-of-maturity-ladder-in-the-its-on-additional-liquidity-monitoring-metrics>

As soon as we have more information on the effective date and the maturity ladder, we will inform you about it through Open Book Supervision. We will also inform you of the frequency that will be set for this report (monthly or quarterly, depending on criteria).

For more information on the specifications and form sets, please refer to the CRD IV alert of 3 July 2015.

3.3 ITS on Supervisory Benchmarking Portfolios (SBP)

This benchmark report on consolidated and individual level is a new, regular report, to be submitted annually, starting as at end- 2015. The specifications for this report are based on DPM 2.3. The European Commission's approval of the ITS is expected within the next month. For more information, see:

<http://www.eba.europa.eu/-/eba-delivers-benchmarking-package>

We will publish the specifications on the e-Line DNB website by 1 December 2015 at the latest. From 1 December 2015, DNB will offer the option of testing the new benchmark report on request in a simulation environment.

3.4 FINREP extensions resulting from the ECB Regulation

In March 2015, the ECB issued its "Regulation on reporting of supervisory financial information". As mentioned in our January 2015 sector letter, this Regulation is the result of the ECB's consultation round in the period of October-December 2014. See the links below for more information:

https://www.bankingsupervision.europa.eu/ecb/legal/pdf/oj_jol_2015_086_r_0004_en_txt.pdf

and

https://www.bankingsupervision.europa.eu/legalframework/publiccons/pdf/finrep/finrep_feedback_statement.pdf

The FINREP scope extensions will be implemented successively. For significant institutions, they will become effective by mid-2016, and for less significant banks this will be by mid-2017. We are currently examining the extensions and their national implementation insofar as this is the responsibility of the national competent authorities. We will inform you as soon as we have more information.

4. Specific issues with respect to the CRD IV reports

4.1 Significant currencies in the LCR/NSFR/Additional Monitoring Metrics reports

As mentioned in our July 2015 CRD IV alert, reporting in significant currencies other than the euro will change. Reporting in the original currency will be required as soon as DPM 2.4 becomes effective. However, this depends on the publication date in the

Official Journal: the effective date is six months after publication. See also Section 2.2.

4.2 Geographical separation in FINREP and COREP

Some templates in COREP (C09) and FINREP (F20) which require breakdown into countries contain the option "not applicable/all geographical areas" in e-Line DNB. The EBA has confirmed that this option must not be used and that you must always specify individual countries. We will check this in all reports submitted to us.

4.3 Using counterparty LEI codes

A number of reports require you to enter a LEI code in order to identify counterparties. We urge you to use these codes as much as possible.