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*Banking supervision
And Accounting issues Unit
The Director*

Paris, August 1st 2012

French Banking Federation comments on the European Banking Authority (EBA) Consultation Paper on Draft Implementing Technical Standards on Supervisory reporting requirements for liquidity coverage and stable funding (EBA / CP / 2012 / 05)

Dear Sir,

The French Banking Federation (FBF) is the professional body representing the interests of the banking industry in France. Its membership is composed of all credit institutions authorized as banks and doing business in France, i.e. over 450 commercial, cooperative and mutual banks operating in France. FBF member banks have 40,000 permanent branches in France. They employ 400,000 people, and service 60 million clients.

The French Banking Federation (FBF) welcomes the opportunity offered by the EBA to comment on the proposed draft implementing technical standards on supervisory reporting requirements for liquidity coverage and stable funding.

Regarding the proposed draft, the FBF draws the EBA attention to the following issues:

1. *Best-effort-based report in the meantime processes can be adapted to not even known texts:*

The delay in finalizing CRD4/CRR4 texts puts EBA, European Supervisors and banks under extreme pressure to abide by calendars that are expected to be set by those texts.

**Mr Adam FARKAS
Executive Director
EUROPEAN BANKING AUTHORITY
Tower 42 (level18)
25 Old Broad Street
London EC2N 1HQ**

This will shorten the actual observation period of CRD4/CRR4 since the quality of the reports will be lessened. This is all the more unfortunate as CRD4/CRR4 will have significant impacts on the European banking industry and on the whole economy.

As of July end 2012, the CRR is not known while the reporting requirements are expected to start early 2013, i.e. less than 6 months, and most probably less than 3 months, after the final texts are known.

As a general principle, there should be at least a 1 year period between a regulatory text on additional reporting and its implementation so as to enable banks, and supervisors, to adapt their processes. This period is consistent with what is being considered for FINREP/COREP.

In between the final text date and the reporting begin date, quarterly basis *best-effort*-based Quantitative Impact Study (QIS)-like reporting process should be applied, as it has been applied since Dec.'09, first date of BCBS paper publication.

The 1 year period is even more needed as it is envisaged that reports will have to go through COREP report framework which will need heavy IT developments.

2. EBA-liquidity reporting templates should be THE templates for European banks:

Considering the workload in completing the EBA-reporting requirements, **we urge that European banks are no longer subject to the BCBS-reporting requirements. This will enable EBA to have a CRR-specific template rather than having additional categories on BCBS templates.**

Moreover, we urge EBA to ensure that the different liquidity reporting templates are consistent in terms of liquidity breakdowns, and are consistent with the other reporting templates in terms of third parties' definitions (which is not the case currently between FINREP/COREP/LC-SF).

Dealing with these discrepancies between different reporting templates implies a considerable additional workload to produce and control the data, for a highly debatable value added.

Finally, **we recommend that a consultation is organized on the modified template once CRD4/CRR4 texts are available.**

3. The observation period should be organized to ensure its effectiveness:

The Basel III-Liquidity Coverage (LC) and Stable Funding (SF) metrics have been monitored five times by EBA since December '09 (Dec. '09, Dec. '10, June '11, Dec. '11, Mar. '12 and soon June '11).



So far, only two EBA reports have been made public on those collected data: on Dec. '09 data (€1.00tn LC shortfall) and on Dec. '10 data (€1.15tn LC shortfall). Those reports are valuable for their gross data disclosures. However, none of those reports have made sense of the data in terms of structure of balance sheet, potential shortage of liquid assets, necessary changes to the definition of liquid assets, necessary changes to runoff/rollover/drawdown assumptions and on the effects of the intended liquidity requirements on the banking industry and the whole economy.

There is no assurance that the upcoming observation period will be modified to reach that level of 'making sense of data'. On the contrary, **the envisaged monthly remittance frequency will overwhelm both banks and EBA with data that will be impossible to really analyze between two monthly reports. This overwhelming workload will be magnified by the reporting at institution level compared to a group-consolidated level so far, and by the multiplication by significant currencies.**

Most probably, the available bandwidths for both banks and supervisors, if any left, will be allocated to the production processes to the detriment of the analysis mode.

We urge EBA to switch from the 'brute force/big bang'-approach that is envisaged to a 'make sense/phase-in'-approach described below and in our response to Question #1.

The quantitative reports should be **complemented with:**

- **quarterly qualitative exchanges** between regulators and banks, based for example of regular bilateral hearings with each bank
- **hearings of non-banking industry stakeholders** to evaluate the impact on the real economy;
- **quarterly feedbacks from regulators**, with remittance within the next quarter of the quarter end reports, on the collected data not only limited to factual quantitative liquidity reports but on the effects on the banks' strategies and the impacts on the whole economy.

4. Numerous issues should be clarified before the observation period:

Important issues need to be determined or clarified by EBA **before** the first reporting date:

- The perimeters should be clarified:
 - As we understand the texts that are being discussed, all credit institutions and some investment firms will be subject to LCR requirements and reporting on an individual basis. Moreover, EU parent institutions are subject to LCR requirements and reporting on a consolidated basis, and subsidiaries that are owned by EU parent institution are *not* subject to reporting requirement. Could you confirm that this describes correctly the upcoming reporting scope?
 - What is the articulation of the waiver process described in Articles 7 and 19 and the observation period? Could waiver be applied to during the observation period so that the reporting requirement applies at a liquidity sub-group level?
 - Which entities should be included in reports?



- It is very important to know as soon as possible the reporting perimeter that will be required, as it has structural impacts on the reporting IT systems that have to be built to meet the numerous EBA requirements.
- The consultation paper mentions the requirements addressed to EBA to elaborate the definition of liquid assets, with the possibility given to 'competent authorities' to articulate guidance. **The governance on the EBA's and competent authorities' processes on those guidances on liquid assets should be clarified.** As an example, could a competent authority issue a guidance for liquidity reporting in its jurisdiction? In such a case, should this guidance be considered binding when building the liquidity reports for the rolled out version at Group or sub-Group consolidated levels?
- Which accounting standard should the liquidity reports be consistent with? We suggest using IFRS accounting framework. Note that this may have consequences on comparability between different jurisdictions that would use different accounting standards (notably US GAAP that are more netting-prone than IFRS, notably on repos). This subject is particularly important for the NSFR in which we understand that accounting amounts should be reported.
- Should the contribution of a non-EU entity consolidated (ex: US branch or US subsidiary) to a EU parent entity be based on CRD4/CRR4 application of Basel III or on its jurisdiction application of Basel III proposals? This applies notably to the limitations to the transferability of liquidity coverage excess that may be jurisdiction's interpretation-dependent.
- As the reporting requirements apply at sub Group consolidated level, the treatment of intragroup transactions (ie: runoff, rollover, drawdown assumptions) should be clarified specifically (while this issue has not been dealt with neither by the BCBS nor by CRD4/CRR4 levels).
- When the reporting requirement applies at consolidated level, we would welcome instructions on how to fill in the consolidated LC template when there is a limitation to transferring an entity's LC excess to other entities in the same group. By the way, it should be clear that, as the LC excess is dependent on the whole LC-assumption set. Consequently, the transferability effect will not be measurable until the final LC-assumption set.
- We would welcome detailed instructions for the definitions utilized in the template and share of Q&A sessions across jurisdictions (eg: definition of credit facilities, commitments received, non renewable loans, treatments of private banking trusts, special purpose asset-financing vehicles...)



- Can you confirm that LCR can be calculated with calendar month instead of 30 days cash flows? In our opinion, one calendar month makes sense because it is already the norm used for ALM and accounting purposes in most institutions. It is also the norm used for similar one-month ratios currently applied in some European jurisdictions (for example the French one). Moreover, it is consistent with market practices: EUR1M for example means the interest rate applied on one calendar month. Changing this norm could be costly for institutions without any value-added for the regulator.

You will find in the annex 1 attached to this letter our detailed comments to the consultation questions and in the annex 2 a modified template on the LCR. We thank you for the consideration of our remarks and remain at your disposal for any question or additional information you might have.

Yours sincerely,

Jean-Paul CAUDAL

A handwritten signature in black ink, appearing to be 'JP Caudal', with a long horizontal flourish extending to the right. The signature is written over the printed name 'Jean-Paul CAUDAL'.

Annex 1

FBF comments on the questions of the consultation

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

Considering our preliminary comments, we recommend that the liquidity reporting requirement is *phased in and complemented with qualitative exchanges*:

- 1 year from the date the CRD4/CRR4 is finalized (ie most probably over 2013):
 - Quarterly best effort QIS-like reports based on management data with CRD4/CRR4-specific reporting templates;
 - With first remittance date for end of March '13 as of date;
 - With remittance delay of 30 business days after period end for LC template and 45 business days after period end for SF template;
 - for bigger than €50bn entities;
- then (most probably from 2014 on):
 - LC: monthly reports with remittance delay of 30 calendar days;
 - SF: quarterly reports with remittance delay similar to COREP remittance delay;
 - for bigger than €10bn entities.

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

A one-size-fits-all 5% percentage threshold criterion is unlikely to capture what a significant currency for all kinds of institutions subject to liquidity requirements.

For instance, a currency may represent more than 5% of a small subsidiary' liabilities but be un-significant in terms of liquidity risk for both the subsidiary and its parent institution.

Based on the overarching proportionality principle, we suggest determining the significant criterion as:

- A currency for which liabilities for the entity, or group of entities that is considered representing more than
 - 5% of total balance sheet liabilities;
- and
 - €2bn

It should be made clear that there is no spill-over effect of requiring a currency reporting for an entity considered in isolation and groups of entities to which it is part of. As an example, a currency that would be significant for a subsidiary but not significant for the Group the subsidiary is part of, should not trigger a Group-wide LC report on that currency.



Moreover, we would welcome further details concerning the implementation of these principles, such as:

- Do the institutions have to produce a specific report on the currency that they usually use, separated from the all-currency report?
- Should the reportings be counter-valued or remain denominated in the foreign currency?

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

The remittance date that is envisaged, 15 days after period end, is our major concern.

First, we outline that the suggested remittance date does *not* relate on any CRD4/CRR4 requirement nor is consistent with General Ledger (GL) processes; neither for the observation period, nor for the binding period.

Second, it should be made clear that:

- a remittance period shorter than GL completion process (i.e. shorter than 30 day remittance period) or
- a remittance/ on period ends that don't meet the GL close (i.e.: non quarter ends);

will lead to liquidity reports that will be based on management data without ensuring that the liquidity report tie to the GL. This problem is particularly important for the NSFR in which items such as capital/own funds are to be reported on a consolidated basis, which is quite difficult to determine with sufficient accuracy if the consolidated accounting is not available.

Considering the above, our response is:


- **a 15 days remittance date:**
 - is **not feasible** in 2013;
 - is **not desirable** as it would require liquidity reports to be based on management data for month ends without any possibility to reconcile with the GL;
 - would be **detrimental to the observation period** since the data would not be reliable.
- in 2013: we suggest a 30 business day remittance date that would enable quarter end GL reconciliation process for LCR and NSFR;
- after 2013: we suggest a 30 business day remittance date for NSFR and a 30 calendar days remittance delay for LCR.

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



Please find below our remarks on the suggested template:

- **General comment:** it is not clear whether amounts to be reported in the template should be weighted or not. For example, concerning outflows, should the institutions input the outstanding amount of deposits in the template or the deposits after application of the run-off factors. It is worth making it clear in the instructions.

- **Outflows:**
 - Missing items:
 - As a ramification of the missing categories in the liquid assets (cf answer to Q#5), outflows from secured funding are missing for the categories:
 - transferable assets that are of extremely high liquidity and credit quality (Art.404(1)(b))
 - transferable assets that are of high liquidity and credit quality (Art.404(1)(d))
 - transferable securities other than those referred to in point (3) representing claims on or claims guaranteed by sovereigns or central banks issued in domestic currencies by the sovereign or central bank in the currency and country in which the liquidity risk is being taken or issued in foreign currencies, to the extent that holding of such debt matches the liquidity needs of the bank's operations in that third country (Annex III);
 - gold (Art.481 being discussed in the trilogue)
 - other than gold liquid commodities (Art.481 being discussed in the trilogue)
 - major index-linked equity instrument (Art.481 being discussed in the trilogue)
 - guaranteed bonds (Art.481 being discussed in the trilogue)
 - unsecured bank issuances and non-financial corporate bonds as asked in the current EBA reporting template
 - covered bonds or other securities backed by retail mortgages (Art.481 being discussed in the trilogue)
 - other asset backed instruments of the highest credit quality as established by EBA (article 404 being discussed in the trilogue)
 - central bank eligible securities and loans (Art.481 being discussed in the trilogue)
 - Outflows from deposits of established relationship
 - Outflows from Collateral Swaps
 - Securities borrowing / lending without cash collateral are not specified in the instructions
 - A 'Other Inflows' category should be added so as to identify cash inflows that would be missing in the template. 

- Other
 - Outflows from trade financing-related off balance should be isolated
 - Outflows: should the €1mm threshold apply to retail and/or SME deposit, which categories should the excess over €1mm be mapped to?
 - Operational costs have to be reported whereas they are excluded from the calculation: we propose not reporting this item
- **Inflows:**
 - Missing items:
 - As a ramification of the missing categories in the liquid assets (cf answer to Q#5), inflows from secured funding are missing for the categories:
 - transferable assets that are of extremely high liquidity and credit quality (Art.404(1)(b))
 - transferable assets that are of high liquidity and credit quality (Art.404(1)(d))
 - transferable securities other than those referred to in point (3) representing claims on or claims guaranteed by sovereigns or central banks issued in domestic currencies by the sovereign or central bank in the currency and country in which the liquidity risk is being taken or issued in foreign currencies, to the extent that holding of such debt matches the liquidity needs of the bank's operations in that third country (Annex III);
 - gold (Art.481 being discussed in the trilogue)
 - other than gold liquid commodities (Art.481 being discussed in the trilogue)
 - major index-linked equity instrument (Art.481 being discussed in the trilogue)
 - guaranteed bonds (Art.481 being discussed in the trilogue)
 - unsecured bank issuances and non-financial corporate bonds as asked in the current EBA reporting template
 - covered bonds or other securities backed by retail mortgages (Art.481 being discussed in the trilogue)
 - other asset backed instruments of the highest credit quality as established by EBA (article 404 being discussed in the trilogue)
 - central bank eligible securities and loans (Art.481 being discussed in the trilogue)
 - Inflows from trade financing transactions should be isolated
 - Inflows from affiliates should be isolated
 - Inflows from Collateral Swaps
 - Securities borrowing / lending without cash collateral are not specified in the instructions

- A 'Other Inflows' category should be added so as to identify cash inflows that would be missing in the template.
- Other
 - Securities borrowing / lending without cash collateral are not specified in the instructions What type of operations shall be reported in "other commitment received" other than credit facilities received: 413(2c)
 - What is the definition of "reduced amount" of inflows: 413 (2a)
 - The distinction asked between natural persons and small business customers is not required anywhere else in the liquidity or solvability framework and is not required by CRR. We suggest suppressing this distinction.
- **We would welcome a template file that shows totals and sub-totals in order to check consistency and completeness**
 - Ex: "insured non-transactional and non-operation" deposits are to be reported into 1.1.2
 - Stable funding: item 1.2.1.1 is a sub-limit of 1.2.1?
 - Intra-group items should be split as proposed in panel F of EBA QIS
 - Maturing reverse repos that cover short positions shall be reported as other maturing reverse repos but short positions shall be increased ?



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

1. At least EBA template for 2012

At the very least, the EBA template should comprise the supplemental data that is currently required by EBA in the current QIS's, notably for Gold and Equities, as illustrated in the table below:

	B	C	D	E
275	EBA - further information on banks' current holding of assets to assess the impact of transitioning to the new standard			
276		Market Value		
277		Owned outright	Borrowed in secured transactions	Avg CB haircuts applied
278	Other central bank eligible collateral, not being classified as Level 1 or Level 2 above, and not being reported as inflows:			
279	Covered bonds, not self-issued, rated A- up to A+, accepted as Category II instruments by the ECB or equivalent by national central bank			
280	Non-financial corporate bonds, rated A- up to A+			
281	Financial corporate bonds, rated A- or greater			
282	Own issuances, rated A- or greater			
283	Unsecured bank issuances, rated A- or greater			
284	RMBS rated AAA, with high quality prime mortgages as the underlying collateral			
285	Assets, not reported in section A, issued by a credit institution which has been set up and is sponsored by a Member State central or regional government and the asset is guaranteed by that government and used to fund promotional loans granted on a non-competitive, not for profit basis in order to promote its public policy objectives			
286	Other Central Bank eligible unencumbered assets not included in the previous categories			
287				
288	Other collateral:			
289	Gold			
290	Equities featured in major indices (incl. all non-EEA Central Bank eligible equities)			
291				
292	Shares or units in CIUs:			
293	of which the underlying asset is 'Level 1' as per the type reported in lines 6-15			
294	of which the underlying asset is 'Level 2' as per the type reported in lines 27-36			
295				
296	Information on assets reported in Panel A):			
297	Of the amount in lines 11-15			
298	Of the amount in lines 20-21			
299	Of the amount in lines 28-32			
300	Of the amount in line 35			
301	Of the amount in line 36			
302				

2. At least what it should cover the most probable outcome from Trilogue :

EBA states that “the most significant amendments to the CRR in respect of liquidity reporting proposed by the co-decision bodies are to include equities, gold, high quality RMBS or state guaranteed bank debt”.

Both the Parliament's and Council' compromise indicate that EBA reporting shall be broadened in order to **include equities, gold and Central Bank eligible assets**. The current reporting should take these items on board, with sub breakdown for the latter (RMBS, high quality loans, other securitization assets, others).

3. Detailed (cf attached modified template Annex 2):

The template does not cover the entire Art.404 and does not consider additional assets that should be considered in the observation period as defined in article 481. As is, this template would deprive EBA from actually using the observation period to determine the assets that should be considered liquid assets, even though it is one of the most important issues to be deal with during the observation period.

Consequently, the report on liquid assets is overly restrictive and should be modified.

As an illustration, there is no reporting line for neither for item Art.404(1)(b) “*transferable assets that are of extremely high liquidity and credit quality*”, nor for item Art.404(1)(d) “*transferable assets that are of high liquidity and credit quality*”.

It is unclear why there is only one column ‘Market Value’ for items 1.3 to 1.4.3 instead of the two columns “Market Value Extremely High Liquidity and Credit Quality” and “Market Value High Liquidity and Credit Quality”.

The missing items in the *Asset* template, and consequently in the *Inflows* and *Outflows* reports (in the secured funding and secured lending categories):

- transferable assets that are of extremely high liquidity and credit quality (Art.404(1)(b))
- transferable assets that are of high liquidity and credit quality (Art.404(1)(d))
- transferable securities other than those referred to in point (3) representing claims on or claims guaranteed by sovereigns or central banks issued in domestic currencies by the sovereign or central bank in the currency and country in which the liquidity risk is being taken or issued in foreign currencies, to the extent that holding of such debt matches the liquidity needs of the bank’s operations in that third country (Annex III);
- gold (Art.481)
- other than gold liquid commodities (Art.481)
- major index-linked equity instrument (Art.481)
- guaranteed bonds (Art.481)
- unsecured bank issuances and non-financial corporate bonds as asked in the current EBA reporting template
- covered bonds or other securities backed by retail mortgages (Art.481)
- other asset backed instruments of the highest credit quality as established by EBA (Article 404)
- central bank eligible securities and loans (Art.481)

Finally, as the jurisdictions for which there would not be enough liquid assets, which may very well apply to the euro-zone in the current environment, it is unclear of how central bank eligibility criterion in Art.404(3)(b) should be considered.

Other comment: as it is not clear in the CRR, it would be worth making it clear in the instructions if the 250M cap on CIUs should be applied both on an individual basis and consolidated basis or only on an individual basis.

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

Comments on suggested stable funding report:

- Operational deposits as defined in article 410(4) are missing from the template



- Is not there a problem with the reference to article 410 (3) in category 1.2.2. of the ASF (this reference should be 410 (4) according to our understanding of the template)
- Should “own fund” relate to Basel III 2022?
- Securities borrowing / lending without cash collateral should be specified in the instructions
- What does “non-renewable loans” mean (template item 1.7)?



ASSETS:					
Code	ID	Item	Legal references	Amount	
	1	LIQUID ASSETS	Article 404 of CRR		
	1.1	(-) cash	Article 404.1(a) of CRR		
	1.2	(-) deposits held with central banks			
	1.2.2	(-) deposits that can be withdrawn in times of stress	Article 404.1(a) of CRR		
	1,3	(-) transferable assets representing claims on or guaranteed by the central government of a Member state or a third country if the institution incurs a liquidity risk in that Member state or third country that it covers by holding those liquidity assets	Article 404 .1(c) of CRR		
	1.3.1	(-) representing claims on sovereigns			
	1.3.2	(-) guaranteed by sovereigns			
	1,4	(-) total shares or units in CIUs with underlying assets specified in Article 404	Article 406.2 of CRR		
	1.4.1	(-) underlying assets in point (a) of article 404.1	Article 406.2(a) of CRR		
	1.4.2	(-) underlying assets in point (b) and (c) of article 404.1	Article 406.2(b) of CRR		
	1.4.3	(-) underlying assets in point (d) of article 404.1			
				Market value extremely high liquidity and credit quality	Market value high liquidity and credit quality
		(-) transferable assets that are of extremely high liquidity and credit quality;	Article 404 .1(b) of CRR		
	1.5.1	(-) sub category 1			
	1.5.2	(-) sub category 2			
	1.5.3	(-) sub category ...			
		(-) transferable assets that are of high liquidity and credit quality.	Article 404 .1(d) of CRR		
	1.5.1	(-) sub category 1			
	1.5.2	(-) sub category 2			
	1.5.3	(-) sub category ...			
	1,5	(-) securities with a 0% risk weight			
	1.5.1	(-) representing claims on sovereigns			
	1.5.2	(-) guaranteed by sovereigns			
	1.5.3	(-) representing claims on or guaranteed by central banks			
	1.5.4	(-) representing claims on or guaranteed by public sector entities, regional governments and local authorities			
	1.5.5	(-) representing claims on or guaranteed by BIS, IMF, EC, or MDBs			
	1,6	(-) securities with a 20% risk weight			
	1.6.1	(-) representing claims on sovereigns			
	1.6.2	(-) guaranteed by sovereigns			
	1.6.3	(-) representing claims on or guaranteed by central banks			

1.6.4	(-) representing claims on or guaranteed by public sector entities, regional governments and local authorities			
1.6.5	(-) representing claims on or guaranteed by MDBs			
	(-) transferable securities other than those referred to in point (3) representing claims on or claims guaranteed by sovereigns or central banks issued in domestic currencies by the sovereign or central bank in the currency and country in which the liquidity risk is being taken or issued in foreign currencies, to the extent that holding of such debt matches the liquidity needs of the bank's operations in that third country;	Annex III		
1.7	(-) assets issued by a credit institution which has been set up and is sponsored by a Member State central or regional government and the asset is guaranteed by that government and used to fund promotional loans granted on a non-competitive, not for profit basis	Article 404.2(a)(iii) of CRR		
1.8	(-) non financial corporate bonds			
1.8.1	(-) rated AA- or better			
1.8.2	(-) rated A- to AA-			
1.9	(-) bonds eligible for the treatment set out in Article 124(3) or (4), which meet the criteria in Article 404.3(a)	Article 404.2(a)(i) of CRR		
1.9.1	(-) rated AA- or greater			
1.9.2	(-) rated A- to AA-			
	(-) gold	Article 481		

Outflows						
Code	ID	Item	Legal references	Amount	Amount	
	1	OUTFLOWS				
	1.1	(-) retail deposits				
	1.1.1	(-) covered by a Deposit Guarantee Scheme meeting the requirements of Article 409.1	Article 409.1 of CRR			
	1.1.1.1	(-) part of an established relationship making withdrawal highly unlikely	Article 409.1(a) of CRR			
	1.1.1.2	(-) held in transactional accounts, including accounts to which salaries are regularly credited	Article 409.1(b) of CRR			
	1.1.2	(-) deposits not meeting the requirements of Art. 409.1	Article 409.2 of CRR			
	1.1.3	(-) deposits subject to higher outflows than specified in Article 409.1 or 2	Article 409.3 of CRR			
	1.1.4	(-) deposits in third countries where a higher outflow is applied	Article 409.4 of CRR			
	1.1.5	(-) deposits exempted from the calculation of outflows where the conditions of Art. 409.5(a) and (b) have been met	Article 409.5 of CRR			
		(-) Retail term deposits exempted from the calculation of outflows where the conditions of Art. 409.5 (a) have been met				
		(-) Retail term deposits exempted from the calculation of outflows where the conditions of Art. 409.5 (b) have been met				
	1,2	(-) outflows on other liabilities				
	1.2.1	(-) liabilities resulting from the institution's own operating expenses	Article 410.1 of CRR			
	1.2.2	(-) liabilities resulting from secured lending and capital market driven transactions as defined in Article 188 if they are collateralised by assets that would qualify as liquid assets according to Article 404	Article 410.2 of CRR			
		(-) transferable assets that are of extremely high liquidity and credit quality;	Article 404 .1(b) of CRR			
		(-) sub category 1				
		(-) sub category 2				
		(-) sub category ...				
	1.2.2.1	(-) transferable assets representing claims on or guaranteed by the central government of a Member state or a third country if the institution incurs a liquidity risk in that Member state or third country that it covers by holding those liquidity assets				
	1.2.2.1.1	(-) representing claims on sovereigns				
	1.2.2.1.2	(-) guaranteed by sovereigns				
		(-) transferable assets that are of extremely high liquidity and credit quality; D21	Article 404 .1(d) of CRR			
		(-) sub category 1				
		(-) sub category 2				
		(-) sub category ...				
	1.2.2.2	(-) total shares or units in CIUs with underlying assets specified in Article 404				

1.2.4.2	(-) in the context of common task sharing within an institutional protection scheme meeting or as a legal or statutory minimum deposit by another entity being a member of the same institutional protection scheme	Article 410.4(b) of CRR	
	(-) in the context of an established relationship		
1.2.5	(-) liabilities not reported in 1.2.2, 1.2.4 and 1.2.5 resulting from deposits by clients that are not financial customers	Article 410.5 of CRR	
1.2.6	(-) net amount payable from the contracts listed in Annex II (net of collateral to be received that qualifies as liquid assets under Article 1.2.7	Article 410.6 of CRR	
1.2.7	(-) liabilities for which the competent authority has granted a lower outflow	Article 410.8 of CRR	
1.2.7.1	(-) where all the conditions of Article 410.8 (a), (b), (c) and (d) are met		
1.2.7.2	(-) where all the conditions of Article 410.8 (a), (b), and (c) are met for the purposes of applying the intra-group treatment of Article 18.1(b) in relation to institutions that are not subject to the waiver of Article 7		
1.2.8	(-) other liabilities	Article 410.7 of CRR	
1.3	(-) Additional Outflows		
1.3.1	(-) for collateral other than assets referred to in Article 404.1(a) to (c) which is posted by the institution for contracts listed in Annex II	Article 411.1 of CRR	
1.3.1.1	(-) for assets corresponding to Article 404.1(d)	Article 411.1 of CRR	
1.3.1.2	(-) for other assets	Article 411.1 of CRR	
1.3.2	(-) corresponding to additional collateral needs that would result from a material deterioration in the credit quality of the institution	Article 411.2 of CRR	
1.3.3	(-) corresponding to additional collateral needs that would result from the impact of an adverse market scenario	Article 411.3 of CRR	
1.3.4	(-) corresponding to the market value of securities or other assets sold short and to be delivered within the 30 days horizon unless the institution owns the securities to be delivered or has borrowed them at terms requiring their return only after the 30 day horizon and the securities do not form part of the institutions liquid assets	Article 411.4 of CRR	
1.4	(-) Outflows from credit and liquidity facilities		
1.4.1	(-) maximum amount that can be drawn of undrawn credit and liquidity facilities for retail clients	Article 412.2 of CRR	
1.4.2	(-) maximum amount that can be drawn of undrawn credit and liquidity facilities for clients other than retail and financial customers	Article 412.3 of CRR	
	(-) for trade finance		
	(-) other		
1.4.3	(-) maximum amount that can be drawn of other undrawn credit and liquidity facilities not reported in 1.4.1 or 1.4.2	Article 412.4 of CRR	
1.4.4	(-) maximum amount that can be drawn of undrawn credit and liquidity facilities granted for the purpose of funding promotional loans	Article 412.5 of CRR	

Inflows:							
Code	ID	Item	Legal references	Amount	Market value extremely high liquidity and credit quality	Amount	Market value high liquidity and credit quality
	1	INFLOWS	Article 413 of CRR				
	1.1	(-) capped inflows	Article 413.1 of CRR				
	1.1.1	(-) monies due from customers that are not financial customers	Article 413.2(a) of CRR				
	1.1.1.1	(-) monies due from natural persons	Article 413.2(a) of CRR				
	1.1.1.2	(-) monies due from small business customers	Article 413.2(a) of CRR				
	1.1.1.3	(-) monies due from non-financial corporate customers	Article 413.2(a) of CRR				
	1.1.1.4	(-) monies due from central banks	Article 413.2(a) of CRR				
		(-) monies due from trade financing transactions					
		(-) monies due from an affiliate (parent, subsidiary institution of the institution or another subsidiary of the same parent institutions)					
	1.1.1.5	(-) monies due from other entities	Article 413.2(a) of CRR				
	1.1.2	(-) monies due from financial customers					
	1.1.2.1	(-) that the institution owing those monies treats according to Article 410(4)	Article 413.2(c) of CRR				
	1.1.3	(-) monies due from positions in major index equity instruments					
		(-) monies due from secured lending and capital market driven transactions as defined in Article 188 if they are collateralised by assets that would qualify as liquid assets according to Article 404	Article 413.2(b) of CRR				
		(-) transferable assets that are of extremely high liquidity and credit quality;					
		(-) sub category 1	Article 404 .1(b) of CRR				
		(-) sub category 2					
		(-) sub category ...					
	1.1.3.1	(-) transferable assets representing claims on or guaranteed by the central government of a Member state or a third country if the institution incurs a liquidity risk in that Member state or third country that it covers by holding those liquidity assets					
	1.1.3.1.1	(-) representing claims on sovereigns					
	1.1.3.1.2	(-) guaranteed by sovereigns					
		(-) transferable assets that are of extremely high liquidity and credit quality;					
		(-) sub category 1	Article 404 .1(d) of CRR				
		(-) sub category 2					
		(-) sub category ...					
	1.1.3.2	(-) total shares or units in CIUs with underlying assets specified in Article 404					
	1.1.3.2.1	(-) underlying assets in point (a) of article 404.1					

				Amount	Market value
1.1.3.2.2	(-) underlying assets in point (b) and (c) of article 404.1				
1.1.3.2.3	(-) underlying assets in point (d) of article 404.1				
1.1.3.3	(-) securities with a 0% risk weight				
1.1.3.3.1	(-) representing claims on sovereigns				
1.1.3.3.2	(-) guaranteed by sovereigns				
1.1.3.3.3	(-) representing claims on or guaranteed by central banks				
1.1.3.3.4	(-) representing claims on or guaranteed by public sector entities, regional governments and local authorities				
1.1.3.3.5	(-) representing claims on or guaranteed by BIS, IMF, EC, or MDBs				
1.1.3.4	(-) securities with a 20% risk weight				
1.1.3.4.1	(-) representing claims on sovereigns				
1.1.3.4.2	(-) guaranteed by sovereigns				
1.1.3.4.3	(-) representing claims on or guaranteed by central banks				
1.1.3.4.4	(-) representing claims on or guaranteed by public sector entities, regional governments and local authorities				
1.1.3.4.5	(-) representing claims on or guaranteed by MDBs				
1.2.2.5	(-) transferable securities other than those referred to in point (3) representing claims on or claims guaranteed by sovereigns or central banks issued in domestic currencies by the sovereign or central bank in the currency and country in which the liquidity risk is being taken or issued in foreign currencies, to the extent that holding of such debt matches the liquidity needs of the bank's operations in that third country;				
1.1.3.5	(-) assets issued by a credit institution which has been set up and is sponsored by a Member State central or regional government and the asset is guaranteed by that government and used to fund promotional loans granted on a non-competitive, not for profit basis				
1.1.3.6	(-) non financial corporate bonds:				
1.1.3.6.1	(-) rated AA- or better				
1.1.3.6.2	(-) rated A- to AA-				
1.1.3.7	(-) bonds eligible for the treatment set out in Article 124(3) or (4), which meet the criteria in Article 404.3(a)				
1.1.3.7.1	(-) rated AA- or greater				
1.1.3.7.2	(-) rated A- to AA-				
	(-) gold				
	(-) other than gold liquid commodities				
	(-) major index-linked equity instrument				
	(-) guaranteed bonds				
	(-) covered bonds or other securities backed by retail mortgages				
	(-) central bank eligible securities and loans				
1.1.4	(-) monies due from secured lending and capital market driven transactions as defined in Article 188 if the assets would not qualify as liquid assets according to Article 404	Article 413.2(b) of CRR			
1.1.5	(-) any undrawn credit and liquidity facilities for which the CA has granted a higher inflow	Article 413.4 of CRR			

1.1.5.1	(-) where all the conditions of Article 413.4 (a), (b) and (c) are met		
1.1.5.2	(-) where all the conditions of Article 413.4 (a) and (b) are met for the purposes of applying the intra-group treatment of Article 18.1(b) in relation to institutions that are not subject to the waiver of Article 7		
1.1.6	(-) any other commitments received	Article 413.2(c) of CRR	
1.1.7	(-) net receivables expected from the contracts listed in Annex II (net of collateral to be received that qualifies as liquid assets under Article 404)	Article 413.3 of CRR	
1.1.8	(-) payments due on liquid assets not reflected in the market value of the asset	Article 413.5 of CRR	
1.1.9	(-) inflows exempt from the cap	Article 413.1 of CRR	