

Stellungnahmen Stellungnahme DK zum EBA-ITS- Entwurf zum Reporting der Leverage Ratio

27. Januar 2015

Mit dem ITS sollen die Meldevorschriften für die Meldung der Leverage Ratio an die Änderung durch den delegierten Rechtsakt zur Leverage Ratio angepasst werden.

We welcome large parts of the present EBA draft, which closely implements the European Commission's new requirements. We would like to address a number of overarching issues before answering the questions that are asked in the Consultation Paper.

Non-simultaneous entry into force of the delegated act and the reporting templates

The European Commission's delegated act amending the way the leverage ratio is calculated was published in the Official Journal on 17 January 2015 and entered into force on the day following its publication. By contrast, according to the Draft ITS the new reporting requirements are expected to be applicable at the later of December 2015 or six months from the date of publication of the final ITS in the Official Journal. There are currently no plans to change the reference dates for the reports and the remittance periods. We are assuming this means that the requirements will already be binding as from the beginning of this year. However, the required information cannot be reported meaningfully using the current reporting formats.

In light of this, it is important that EBA and the European Commission do adequately coordinate the entry into force of the requirements governing calculation on the one hand and the revised reporting requirements, together with the associated reporting templates, on the other. We believe that parallel reporting of the leverage ratio in accordance with both the "old" methodology and the delegated act would not be expedient, nor could correct presentation be ensured. In its FAQ, the European Commission itself makes it clear that the amendments contained in the delegated act will require amendments to the ITS.

We are therefore assuming that only a report using the old methodology in accordance with EU Regulation 575/2013 will have to be remitted, at least until December 2015, and that this will not be replaced by the leverage ratio as calculated under the delegated act before December 2015. [...]