

**Stellungnahmen
Stellungnahme DK zum EBA
Consultation Paper "Draft
Implementing Technical
Standards amending
Commission Implementing
Regulation (EU) No 680/2014
(ITS on supervisory reporting)
with regard to the Liquidity
Coverage Ratio (LCR) following
the EC's Delegated**

Die Deutsche Kreditwirtschaft hat Stellung genommen zur Konsultation der EBA zum überarbeiteten Meldestandard für Liquidität (LCR, NSFR),

Aus der Stellungnahme:

In general, we welcome the proposals made in the Consultation Paper. With the proposed changes, EBA creates the necessary transparency of the final LCR reports. With the help of the enclosed Excel tool, it is disclosed how certain items from the reporting sheets are incorporated into the calculation of the LCR.

The publication of the decision trees for classifying deposits into appropriate reporting items likewise serves the uniform reporting of specific transaction types. This creates a uniform general framework. However, it should still be possible to take into account national peculiarities.

From a supervision law point of view, the creation of the so-called "memorandum" items is comprehensible to obtain a full view of the bank's liquidity situation. From the banks' point of view, however, the re-reporting and control of these items means additional expenditure.

The new reporting requirements are to apply to CRR banks only. Investment firms are to continue to use the already known report templates. We believe it would make more sense to also enable investment firms to use the new report templates.

Otherwise, investment firms belonging to a group would have to use the known templates for regulatory purposes and the new templates for internal deliveries to the group report. We believe this double expenditure is not intended. [...]