



Commission de Surveillance
du Secteur Financier

Circular CSSF 20/748

Adoption of the Guidelines
of the European Banking
Authority on reporting and
disclosure of exposures
subject to measures
applied in response to the
COVID-19 crisis
(EBA/GL/2020/07)

Circular CSSF 20/748

Re: Adoption of the Guidelines of the European Banking Authority on reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis (EBA/GL/2020/07)

Luxembourg, 23 July 2020

To all credit institutions designated as Less Significant Institutions under the Single Supervisory Mechanism and to all branches of non EU credit institutions

Ladies and Gentlemen,

The purpose of this circular is to inform you on the publication of the Guidelines of the European Banking Authority (EBA) on **reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis** (EBA/GL/2020/07) (the **Guidelines**). The CSSF intends to integrate the Guidelines into its regulatory approach and administrative practice with a view to promote supervisory convergence in this field at European level. **All Less Significant Institutions¹ and branches of non EU credit institutions** that fall within the scope of application as set out in section 2 of this circular (**In-Scope Entities**) shall duly comply with it.

1. The Guidelines

The EBA has published the **EBA/GL/2020/07** dated **2 June 2020** to introduce reporting and disclosure requirements in the context of measures taken by credit institutions in response to the COVID-19 crisis, covering both payment moratoria on existing loans and public guarantees on new lending exposures (the **Measures**). The Guidelines introduce reporting templates, including in relation to forborne exposures, where such Measures are not captured in the existing supervisory reporting framework.

The Guidelines require competent authorities to specify the content and uniform formats when exercising the supervisory powers for reporting and disclosure of exposures subject to the Measures through a set of templates as described in the Annexes of the Guidelines. Institutions falling within the scope of application as set out in section 2 of this circular shall report the exposures as detailed in paragraphs 13 to 15 of the Guidelines and disclose information in accordance with paragraph 19 of the Guidelines to the CSSF.

These reporting and disclosure requirements are put forward strictly in the context of the COVID-19 crisis and are therefore expected to be limited in time.

¹ "Significant supervised entities" as defined in Article 2, point 16 of Regulation (EU) No 468/2014 of the European Central Bank (ECB) of 16 April 2014 (SSM Framework Regulation) shall refer to the relevant ECB rules.

The **EBA/GL/2020/07** and its Annexes are available on the EBA website at: <https://eba.europa.eu/regulation-and-policy/supervisory-reporting/Guidelines-covid-19-measures-reporting-and-disclosure>.

2. Scope of application

Reporting requirements and templates/tables

Less Significant Institutions and branches of non EU credit institutions (In-Scope Entities) **shall submit** on a quarterly basis:

1. Tables 90.01 and 91.01 if they apply the industry-wide moratorium in Luxembourg as coordinated by the ABBL for related exposures; and
2. Tables 90.03 and 91.05 if they have signed the Convention with the Luxembourg State Treasury to originate loans covered by the Luxembourg State Guarantee in the context of the COVID-19 pandemic pursuant to the Law of 8 April 2020 for related exposures.

In consideration of the evolution of the risk related to the Covid-19 crisis and the necessity to monitor such risk at the national and supranational level, the CSSF **may request** In-Scope Entities to submit additional reporting, in particular:

1. Tables 90.01, 91.01, 90.03 and 91.05 if they make use of legislative and non-legislative general moratoria compliant with EBA/GL/2020/02 in other EU jurisdictions or of public guarantee schemes in other jurisdictions.
2. Additional templates using the relevant tables in Annex 1 of the Guidelines in consideration of the evolution of the credit quality of the exposures.

The reporting templates shall be submitted on a quarterly basis, unless a higher reporting frequency is deemed appropriate in consideration of the evolution of the COVID-19 crisis.

For the purpose of assessing the need for additional reporting, In-scope Entities **shall notify** the CSSF by **3 August 2020** at the latest, or on a timely basis at any subsequent dates, **where they apply or intend to make use of such Measures in other (EU) jurisdictions** at the email address covid-moratorium@cssf.lu.

The level of application of the reporting requirements follows the level of application of the regular FINREP. However, in accordance with the principle of proportionality as set out in paragraph 20 of the Guidelines, In-Scope Entities may provide only one report at the (sub-)consolidated level where the regular FINREP is reported at the (sub-)consolidated and solo levels.

Disclosure requirements

The disclosure requirements in accordance with paragraph 19 of the Guidelines apply to In-scope Entities required to comply with some or all of the disclosure requirements in Part Eight of the CRR, as specified in Articles 6, 10 and 13 thereof. These In-Scope Entities shall disclose templates 1 to 3 of Annex 3 of the Guidelines on a semi-annual frequency.

3. Practical modalities

In-Scope Entities are required to comply with the reporting provisions on the reference dates, remittance dates, data exchange formats and representations, as well as associated information as detailed in paragraphs 16 to 18 and in the Annexes of the Guidelines. The first reporting reference date is 30 June 2020 with the first remittance date set for 11 August 2020.

In-Scope Entities are required to submit their reporting templates as at 30 June 2020 reference date using the Excel format and to complete the [COVID-19 reporting templates](#) in accordance with the reporting instructions published on the [EBA's website](#). From the end-September 2020 reference date onwards, only XBRL reporting tables will be accepted.

Excel files shall be submitted in accordance with the technical specifications for special enquiries given in CSSF Circular 08/344 following the proper naming convention: ESPREP-BNNNN-2020-06-CVD.xlsx.²

In-scope Entities subject to Part Eight of the CRR are required to publish the disclosure templates as of 30 June 2020 reference date onwards.

Questions with regard to the practical application of the present **reporting and disclosure requirements** by credit institutions should be submitted to the following e-mail address: covid-moratorium@cssf.lu.

² with "NNNN" being the signaletic number of the reporting entity.

4. Date of application

This circular shall apply **with immediate effect**.

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