



Banc Ceannais na hÉireann  
Central Bank of Ireland

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Eurosystem

## National Template Return

## Notes on Compilation

Version 1.4

Email: [anacredit@centralbank.ie](mailto:anacredit@centralbank.ie)

Website: [www.centralbank.ie](http://www.centralbank.ie)

**Version Control Table**

<b>Version</b>	<b>date</b>	<b>Comment</b>
<b>V1.0</b>	22 December 2017	Original document
<b>V1.1</b>	3 December 2018	Updates to all sections
<b>V1.2</b>	10 April 2019	Updated Section 2 & 3 to clarify definitions based on common queries.
<b>V1.3</b>	07 May 2019	Updated Reference link for RWA definition to include most recent legislation rather than original legislation.
<b>V1.4</b>	20 October 2020	Updated Table of Contents and Section 1.8

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## Introduction

These notes on compilation are designed to assist reporting agents complete the Central Bank of Ireland (hereafter Central Bank) National Template Return (NCR1B) that will become effective from 30 June 2019.

Whilst the requirements and rules underpinning the document are fixed, the document can be updated and refined as required, including taking on board views of reporting agents.

Comments on the document are welcomed, and can be forwarded to [AnaCredit@centralbank.ie](mailto:AnaCredit@centralbank.ie).

The notes should be read along with the template and Notes on Compilation for the other AnaCredit returns.

## Section 1: General Guidance

These notes on compilation set out the statistical reporting requirements for the selected credit institutions resident in Ireland in relation to the National Template Return (NCR1B).

This new data initiative, known as Analytical Credit Datasets (AnaCredit), comprises the collection of granular credit data based on harmonised ECB statistical reporting requirements. The objective is to establish a common granular credit database shared between the Eurosystem members, comprising input data for all euro area member states. Granular credit data can be widely used to serve a number of different functions. The AnaCredit data will support the ECB and the Central Bank in performing their central banking and supervisory functions including monetary policy analysis and operations, risk management, financial stability surveillance, statistics, macroprudential policy and research.

A key part of building the AnaCredit System is the ability to reuse the data for domestic purposes. However, the ability of meeting the various domestic user requirements requires the collection of additional data over and beyond the requirements laid down in the AnaCredit Regulation. These requirements are targeted, to the greatest extent possible, at the relevant banks that can satisfy the user need.

### 1.1 Reporting population

The reporting population is a subset of the AnaCredit reporting population as laid down in Section 1.1 of the Central Bank of Ireland AnaCredit Notes on Compilation. The Central Bank of Ireland will notify the relevant institutions.

A list of all Irish credit institutions within the reporting population is available on the Central Bank's [AnaCredit webpage](#). For each credit institution, it is indicated whether a reporting obligation to the Central Bank under the AnaCredit Regulation applies.

Reporting agents shall report AnaCredit data on an individual basis. Reporting agents that are legal entities report in relation to all observed agents that are part of the legal entity. Reporting agents that are foreign branches located in Ireland report in relation to their own activity.

**Table 1: Reporting Frequency and Reporting Deadlines**

<i>Return</i>	<i>Dataset Template</i>	<i>Frequency</i>	<i>Deadline</i>
NCR1B	Instrument	Quarterly	T + 20
	Counterparty		
	Protection		

## 1.2 Reporting frequency

The National Template must be reported on a quarterly basis with reference to end of March, June, September and December in each year.

All fields and datasets in the National Template must be reported for each reference period.

## 1.3 Reporting deadline

The reporting deadline for the National Template is 20<sup>th</sup> working day after the last day of the reference period (T+20).

Working days exclude weekends and Irish public holidays. A schedule of reporting deadlines for will be published on the Central Bank website.

## 1.4 First reporting

Reporting agents are required to begin submitting the National Template with reference to positions at end-June 2019. The template should be reported to the Central Bank of Ireland no later than the reporting deadline for the end-June 2019 reference period in late-July 2019 (end-June 2019+20 working days).

## 1.5 Method of reporting

The returns must be submitted via the Central Bank's Online Reporting System (ONR). Reporting agents will log onto ONR (at <https://onlinereporting.cbfsai.ie>) and navigate to the Statistics business view. The new AnaCredit returns will be available under this business area.

Reporting agents must upload a separate National Template return on behalf of themselves and, where applicable, each of their observed agents.

The file format will be XML. Details on the XML file specifications are available on the [AnaCredit webpage](#) of the Central Bank's website..

The file and data will undergo a number of validations at file level which must be passed or it will result in a 'File rejection'. These validations include:

- File name is valid;
- File size (maximum of 160MB for zip files);
- File extension is valid (.XML);
- File and schema validations including data specifications;
- Consistency checks.

The naming convention for the files is as follows:

“CCCCCC\_XXXXXXXXXXXXXXXXXXXXX\_YYYYMMDD\_NCR1B.xml”

Where:

- CCCCCCC is the RA Code;
- XXXXXXXXXXXXXXXXXXXXXXXX is the Observed Agent ID. Maximum 20 alphanumeric characters;
- YYYYMMDD is the reference date of the return (e.g. 20180131); and
- NCR1B is the relevant file code

The results of these validations will be presented via the Central Bank’s online reporting platform. The results will also be available for download in Microsoft Excel or XML format.

Records will also undergo further plausibility and analytical checks within the Central Bank, and this may also result in further queries.

A full list of the validations are included in the relevant Template and Rules spreadsheet on the [AnaCredit webpage](#) of the Central Bank’s website.

It is expected that validation will change from time-to-time and any changes will be communicated to reporting agents.

## 1.6 Currency

All monetary amounts shall be reported in units of euro, with two digits after the decimal point. All foreign-currency data should be valued at the exchange rates published by the Central Bank on the reporting reference date and entered on the return as the euro equivalent of the amount outstanding on that day. If an exchange rate is not provided for a particular currency, institutions should use the same rate as that used in their own internal accounts.

## 1.7 Special reporting values

Some data attributes are not required or not applicable under certain circumstances. In such circumstances, specific values should be reported to indicate the reason for no value being reported. Under no circumstances should any attribute be left blank or empty.

The National Template comprises three types of values:

- a value as defined in the Template and Rules spreadsheet;
- “NA” (Non-applicable);
- “NP” (Not Reported).

**Please note that in the case of attributes that take the “Date” format, a date value must always be reported. The following dummy date values should be used to represent a given special value where applicable:**

- “8888-01-01” to represent ‘Non-applicable’;

Please note that reporting a data attribute as “NA” (Non-applicable) means that the data attribute has been carefully considered in a given situation and it has been confirmed that the data attribute does not apply.

The data specification details in the accompanying Template and Rules spreadsheets clarify which attributes permit reporting of these special values.

## 1.8 Counterparties, Instruments and Reporting Threshold

Reporting agents should report in the National Template all the instruments (and only the instruments) reported in the Central Bank of Ireland AnaCredit returns (ACR1B and ACR2B). Checks will be performed to ensure the instruments reported in the Central Bank of Ireland AnaCredit templates are comprehensively reported in the National Template.

As such, the threshold on the national template is also identical to the AnaCredit reporting.

The National Template covers only counterparties covered in the Central Bank of Ireland AnaCredit template. Specifically, for every instrument reported to AnaCredit in the instrument dataset, all counterparties that, from the perspective of the observed agent, take any of the following roles in relation to the instrument are reported in the National Template:

- the creditor to the instrument;
- the servicer to the instrument;
- the debtor to the instrument.

In addition, if the instrument is subject to a traditional securitisation transaction within the meaning of Regulation (EU) No 1071/2013 (ECB/2013/33), the transferor of the instrument to the securitisation structure is also reported in the National Template:

- the originator (the transferor) of the instrument;

As such, the National Template does not expand the scope of AnaCredit, it solely requires additional information on instruments already in scope for AnaCredit reporting.

Data on natural persons should not be reported in the National Template under any circumstances.

## 1.9 Identifiers

All identifiers should be consistent between the Counterparty Reference Return (ACPRD), the monthly credit return (ACR1B) and the quarterly credit return (ACR2B). Please see the AnaCredit Data Returns Notes on Compilations for full details.

## Section 2: Counterparty Reference Data Attributes

The AnaCredit Regulation requires that a number of attributes are reported for each counterparty. The exact attributes to be reported are dependent on the roles that apply to the counterparty, and the legal residency of the counterparty. This chapter outlines the attributes required for each counterparty and provides detail on these attributes. Please refer to the appendix for a full list of counterparty reference data.

### 2.1 External Rating

*Definition:* The credit rating received by an external rating agency.

The value “NA” (Non-applicable) may be reported if the counterparty does not have an external credit rating. The following domain values are applicable:

<b>Moody's</b>	<b>S&amp;P/Fitch</b>	<b>D&amp;B</b>
AAA	AAA	A(1-4)
AA1	AA plus	B(1-4)
AA2	AA	C(1-4)
AA3	AA minus	D(1-4)
A1	A plus	E(1-4)
A2	A	F(1-4)
A3	A minus	G(1-4)
BAA1	BBB plus	
BAA2	BBB	
BAA3	BBB minus	

### 2.1 External Rating Date

*Definition:* The last date the loan was externally rated.

The value “NA” (Non-applicable) may be reported if an external credit rating has not already been sourced for the counterparty. If an external credit rating is unavailable no rating is required.

### 2.1 External Rating Source

*Definition:* The source provider of the external rating.

The value “NA” (Non-applicable) may be reported if an external credit rating has not already been sourced for the counterparty. No new external rating is required to be sourced if it is unavailable.

## Section 3: Instrument Data Attributes

### 3.1 Accumulated Impairment

*Definition:* Accumulated changes in fair value due to credit risk and provisions.

Attribute is defined in accordance with FINREP regulation Annex V. Part 2. 46,183. from the EBA

More specifically: Accumulated impairment means the reduction in the carrying amount of the exposure either directly or through the use of an allowance account.

#### **CBI clarification in response to common queries:**

Previous reporting and AnaCredit reporting requirements were aligned in the National Template to reduce the burden of reporting requirements as much as possible; Accumulated Impairment and EBA Performing Status are defined the same.

### 3.2 Bank Division

Legacy Identifier from the PCAR submissions, if reporting agents wish to continue submitting from different divisions they can continue to do so, for those submitting a single return this can be reported NA.

### 3.3 Buy To Let Flag

*Definition:* The property was acquired for lease at origination.

Buy-to-let should refer only to properties purchased for investment purposes. It should not refer to holiday or second homes.

### 3.4 Credit Conversion Factor

*Definition:* the ratio of the currently undrawn amount of a commitment that could be drawn and that would therefore be outstanding at default to the currently undrawn amount of the commitment.

The extent of the commitment is determined by the advised limit, unless the unadvised limit is higher.

### 3.5 Current Principal Instalment

*Definition:* The last principal payment amount received.

### 3.6 Current Total Instalment

*Definition:* The last payment amount received; including principal, interest, and fees.

### 3.7 Current Total Suspense Interest

*Definition:* The amount of unpaid interest accrued.

### 3.8 Date of NPE Classification

According to either the bank's internal definition of non-performing or the EBA ITS on non-performing exposures, whichever is earliest.

### 3.9 Date of Provision Assessment

Most recent date provisions were assessed

### 3.10 Days Past Due

The number of days since payment was missed.

### 3.11 EAD Current (Exposure At Default)

The value in accordance with [Article 162 of CRR](#)

### 3.12 EBA Performing Status

If the loan is performing according to the EBA definition. Non-performance is defined as: Material exposures which are more than 90 days past due, or the debtor is assessed as unlikely to pay its credit obligations in full without realisation of collateral.

### 3.13 First Forbearance Date

Date on which the first forbearance on the loan was started.

### 3.14 Forbearance Status

Forbearance measures consist of concessions towards a debtor that is experiencing or anticipating difficulties in meeting its financial commitments. The following domain values are applicable:

1. Not Forborne
2. Performing forborne under probation
3. Performing forborne not under probation
4. Non-performing forborne

See [FINREP Annex V. Part 2. 163 – 183](#) for expanded definitions.

### 3.15 Forbearance Type Current

What type of forbearance treatment is currently active for the loan. One of 17 domain values may be selected: The reporting domain values are aligned with PCAR, there are fewer domains as only loans to commercial entities are considered.

1. Not yet assessed
2. Assessment in progress
3. Self cure
4. Insolvency
5. Bankruptcy
6. Forbearance – restructure with no debt forgiveness
7. Forbearance – restructure with no debt forgiveness including disposal of non-core assets.
8. Forbearance – restructure with no debt forgiveness including equity input
9. Forbearance – restructure with debt forgiveness (including granting of 0% margin)
10. Forbearance – restructure with debt forgiveness (including granting of 0% margin) and including disposal of non-core assets
11. Forbearance – restructure with debt forgiveness (including granting of 0% margin) and including equity input
12. Forbearance – other
13. Debt for equity swap
14. Debt for asset swap
15. Receiver
16. Other enforcement
17. NA

### 3.16 Last Forbearance Start Date

Last date the forbearance status was updated.

### 3.17 LGD Current (Loss Given Default)

Loss Given Default at most granular level. The loss given default expressed as a percentage between 0.0 and 1.0

### 3.18 Loan Credit Quality

The credit worthiness of the loan. The IFRS 9 “stage” value should now be reported.

### 3.19 Non Performing Last 12M Flag

In the 12 months preceding the date snapshot, has the facility ever been non-performing according to the EBA simplified NPE definition?

[Article 99\(4\) of Regulation \(EU\) No 575/2013](#)

### 3.20 NPL Resolution Status (Non-Performing Loan)

Classification of current resolution activity taking place to resolve the non-performing loan. The stage of resolution activity. The following domain values are applicable:

1. Self Cure – Offer
2. Self Cure – Accepted
3. Self Cure – Implemented
4. Receiver - Demand Letter Issued
5. Receiver - Appointed (with Power of Sale)
6. Receiver - Appointed (Rent Receiver Only)
7. Receiver - Instructed for Sale
8. Receiver - Sale Completed
9. Other Enforcement – Judgement
10. Other Enforcement – Examinership
11. Other Enforcement – Liquidator
12. Forbearance – Offer
13. Forbearance – Accepted
14. Forbearance – Implemented
15. Debt for equity swap – Offer
16. Debt for equity swap – Accepted
17. Debt for equity swap – Implemented
18. Debt for asset swap – Offer
19. Debt for asset swap – Accepted
20. Debt for asset swap – Implemented
21. Insolvency - Proceedings in progress
22. Insolvency - Approved by court
23. Bankruptcy - Proceedings in progress
24. Bankruptcy - Adjudicated bankrupt

### 3.21 Payment Type Current

The following domain values are applicable:

1. Interest only
2. Amortising

3. Endowment
4. Bullet
5. Credit card
6. Overdraft
7. Partial interest
8. Bridging
9. Moratorium
10. Zero payment
11. Closed
12. Pension
13. Other

**CBI clarification for common queries:**

**Closed** refers to paid off credit instruments that are still required to be reported in the period (they were paid down since the last reporting period).

**Zero Payment** is for those loans that did not receive payment when expected.

**Endowment** relates to life insurance payments.

**Bullet** refers to instruments where payment is made entirely at the end of the credit instrument's term.

**Pension** relates to distributions associated with pension funds

**Clarification of where values take priority-**

The domain values should specify what type of instrument the cashflow is related to eg Endowment/Bullet/Credit card/ Overdraft/Pension then where the instrument is not related to any of these values the value reported should specify what form the cashflow has taken- Interest only/Amortising/Partial interest/Bridging/Moratorium/Zero payment/Closed/Other

### 3.22 Portfolio Sale Flag

The portfolio has been marked for sale.

### 3.23 Provision Amount

The specific provision allocated to this loan. This is aligned with the FINREP definition of Accumulated impairment; accumulated changes in fair value due to credit risk and provisions.

### 3.24 Provision Type

Type of specific provision taken by the bank on this loan. The following domain values are applicable:

- Specific allowances collectively estimated
- Specific allowances individually estimated
- Collective allowances for IBNR

### 3.25 Provisioning Interest Rate

The effective interest rate when provisioning occurred. This is the discount rate used to calculate the provision amount. NA should be reported if no provisioning has occurred.

### 3.26 RWA Asset Classification

Classification of loan for RWA analysis. As per [Regulation \(EU\) No 575/2013, Article 147](#) 6 values are possible.

1. Sovereign- Central government entities, central banks.
2. Institutions- Exposures to Public Sector Entities which are not treated as exposures to central governments in accordance with Article 116(4);
3. Revolving- Debt exposures which do not have a principal repayment structure.
4. SME –Loans made to Small and Medium Enterprises.
5. Commercial Real Estate- Loans secured by commercial real estate.
6. Corporate- Any other credit obligation not assigned.

## Section 4: Protection Received Data Attributes

The Protection dataset on the National Template is an extension of the Protection-received dataset on the AnaCredit Credit Data Template (ACR1B). As such, the dataset follows the same level of granularity and coverage of protection as in the ACR1B. All protection items, and only the protection items, reported in the ACR1B Protection Received dataset should be reported in the National template.

All identifiers should be consistent with the ACR1B.

### 4.1 Commercial Property Sector

*Definition:* Type of Commercial Property Received.

This attribute should be reported for all protection items. The attribute is a more disaggregated view of the protection received items reported in the “Type of protection” attribute from the protection received dataset of the ACR1B. This includes and commercial residential real estate pledged as protection. Non-commercial residential real estate (i.e. residential real estate occupied by the collateral provider) should not be reported. In that case, the applicable value is non-applicable.

This comprises a list of 11 possible values, plus a non-applicable option.

1. Retail
2. Residential
3. Office
4. Industrial
5. Land
6. Development
7. Retail\_And\_Residential
8. Retail\_And\_Office
9. Other
10. Hospitality
11. Mixed

The value “NA” (Non-applicable) may be reported if the collateral is not Commercial Property.

### 4.2 CRE Type

Description of CRE as either

1. Investment (all units completed)
2. Development (no units completed)
3. NA (Not Applicable)
4. NP (Not Reportable)
5. OTHER.

### 4.3 Property Size

*Definition:* The size of the property is defined as the internal square metre area of the property securing the loan.

This attribute is only required for buildings. This is not required for collateral, where there is no building (i.e. land), or where the building is not yet complete (i.e. development properties).

This attribute is only required for new instruments originated on or after 1 June 2019.

NA is reportable where the attribute is not applicable.