Record 1

From: [redacted]
Sent: 18 September 2023 09:46
To: [redacted]
Subject: EMBARGO_Quarterly Bulletin No3 2023
Attachments: EMBARGO_Quarterly Bulletin No3 2023.pdf

Central Bank of Ireland - UNRESTRICTED

[redacted],

Hope you are both keeping well. Attached for info is the QB, which will be published just after midnight tonight. There will be a media briefing under embargo later this afternoon, so there might be some questions arising after that.

Kind regards
[redacted]

If I send you an email outside of standard working hours, please do not feel you need to reply outside your own working hours.

[redacted]
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M (+353) [redacted]
E [redacted]

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Integrity & Care, Courage & Humility, Teamwork & Excellence

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From: [redacted]
Sent: 21 September 2023 13:24
To: [redacted]
Subject: [External]Fwd: Additional mortgage data

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As discussed

From: "[redacted]
Date: Thu 21 Sep 2023, 11:26
To: "[redacted]
CC: [redacted]
Subject: Additional mortgage data

[redacted]

From: [redacted]
Sent: 21 September 2023 15:10
To: [redacted])
Subject: RE: [External]Additional mortgage data
Attachments: Table One.docx

Central Bank of Ireland - CONFIDENTIAL

Hi [redacted]

Please see table one, this table was requested and prepared for a letter at the [redacted] – I will forward the link to the letter when available on the website.

On Point (ii) and Point (iii), thank you for requesting this, this is something that we can explore on our side when End-September 2023 data is available as you can imagine this is not something we have to hand within Statistics at our fingertips.

The Central Bank's, Central Credit Register (CCR) is located within the Financial Stability Directorate and therefore Statistics Division is only one of a number of users of the anonymised CCR data, we don't have a full time resource on the CCR within Statistics we very much try and continue to incorporate it into our other operational and mandated ECB and national data collections.

These are very much experimental Statistics and not official Central Bank Statistics. This is purely for information and **not for publication externally** at this time.

Kind Regards,
[redacted]

From: [redacted]
Sent: Thursday 21 September 2023 11:27
To: [redacted]
Cc: [redacted]
Subject: [External]Additional mortgage data

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Hi [redacted]

Based on the end June mortgage (arrears) data as published last week by the Bank, I would be grateful if the following data could be provided:-

(i) an end June update of the end March distribution of mortgage accounts based on the interest rate (which was initially provided in the Governor's letter dated 6 June to the Minister);
(ii) an end June distribution of mortgage balance amounts based on interest rates;

(iii) of the 712,347 PDH mortgage accounts at end June, a profile of the PDH mortgage balances of these accounts which sets out the number of mortgages in each €50,000 band if possible (or at least each €100,000).

I would be appreciated if this information could be provided as soon as possible as it will assist in the consideration of upcoming matters.

Many thanks.

Kind regards.

[redacted]

Table 1: Estimates of the distribution of Interest Rates of Outstanding PDH Mortgages: June 2022 versus June 2023 ***(cumulative percentage of mortgages at each interest rate interval)****

End-June 2022				End-June 2023			
Interest Rate Intervals (%)	Banks	Lending RCFs	Non-lending firms	Interest Rate Intervals (%)	Banks	Lending RCFs	Non-lending firms
<= 0.5	2%	0%	14%	<= 0.5	2%	0%	11%
<= 1.0	15%	0%	35%	<= 1.0	2%	0%	12%
<= 1.5	30%	3%	55%	<= 1.5	2%	0%	12%
<= 2.0	32%	17%	57%	<= 2.0	2%	16%	13%
<= 2.5	44%	45%	60%	<= 2.5	16%	45%	14%
<= 3.0	68%	69%	65%	<= 3.0	36%	70%	16%
<= 3.5	83%	98%	69%	<= 3.5	56%	87%	18%
<= 4.0	93%	99%	78%	<= 4.0	67%	91%	21%
<= 4.5	99%	99%	94%	<= 4.5	71%	92%	39%
<= 5.0	100%	100%	96%	<= 5.0	86%	93%	70%
<= 5.5	100%	100%	98%	<= 5.5	98%	95%	76%
<= 6.0	100%	100%	99%	<= 6.0	99%	97%	80%
<= 6.5	100%	100%	99%	<= 6.5	100%	99%	89%
<= 7.0	100%	100%	100%	<= 7.0	100%	100%	93%
<= 7.5	100%	100%	100%	<= 7.5	100%	100%	98%
<= 8.0	100%	100%	100%	<= 8.0	100%	100%	99%
<= 8.5	100%	100%	100%	<= 8.5	100%	100%	100%
<=9.0	100%	100%	100%	<=9.0	100%	100%	100%

**Estimates based on CCR data. These are not official Central Bank Statistics.*

***A small number of mortgages are held at interest rates above 8% at end June 2023 - approximately 1,300 with 63 percent of these held by Non-Lending Firms*

Record 4

From: [redacted]
Sent: 21 September 2023 16:04
To: [redacted]
Subject: [External]FW: [External]Additional mortgage data

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Hi folks,

As discussed,

Thanks,
[redacted]

From: [redacted]
Sent: Thursday 21 September 2023 15:57
To: [redacted]
Cc: [redacted]
Subject: RE: [External]Additional mortgage data

[redacted]

[redacted]

[redacted]

"***
****
**************"

From: [redacted]
Sent: 21 September 2023 16:25
To: [redacted]
Cc: [redacted]
Subject: RE: [External]RE: [External]Additional mortgage data

Central Bank of Ireland - CONFIDENTIAL

Hi [redacted]

https://www.centralbank.ie/docs/default-source/statistics/data-and-analysis/credit-and-banking-statistics/retail-interest-rates/2023m06_ie_retail_interest_rate_statistics.pdf?sfvrsn=e859f1d_3

June-2023 - Non-Lending non-banks" account for €11.7 billion of outstanding PDH mortgage lending and 78,108 accounts, while "lending non-banks" account for €7.4 billion and 34,535 accounts.

While June 2022 data is not publically available 111,850 Mortgage accounts were held by Non-Banks in the Mortgage arrears data and this would be broadly the same breakdown as the June 2023 split above.

On points (ii) and (iii) we would have a preference for an update based on End-September 2023 data when that becomes available rather than prepare based on End-June data at this point.

Kind Regards,
[redacted]

From: J[redacted]
Sent: Thursday 21 September 2023 15:57
To: [redacted]
Cc: L[redacted]
Subject: [External]RE: [External]Additional mortgage data

CAUTION: This email originates outside the Bank. Verify sender details and ensure content is safe prior to clicking on links or opening attachments. Use the Phish Alert Button to report any suspicious email.

Hi [redacted],

Many thanks for the updated data on the distribution of mortgage accounts based on interest rates – it is most helpful. Just one final ask on that table, can you indicate how many of the 112,630 'non-bank' mortgage accounts as at end June 2023 are held by non-lending firms (and also the number held at end June 22).

I note your response to the requests set out at (ii) and (iii). It is disappointing that it does not appear to be possible to get any data on those aspects at this point. However, given the reason for the request, it would be helpful to at least have any data that could be provided on the distribution of mortgages based on outstanding balance amounts at this time. If that request is more appropriate for FSD in the Bank, I would be grateful if you could provide me with a name and contact details of an appropriate person in that division and the Department can follow up directly.

Regards

[redacted]

From: [redacted]
Sent: Thursday 21 September 2023 15:10
To: [redacted]
Subject: RE: [External]Additional mortgage data

[redacted]

[redacted]

"***
****
**************"

This e-mail is from the Central Bank of Ireland. The e-mail and any attachments transmitted with it are confidential and privileged and intended solely for the use of the individual or organisation to whom they are addressed. Any unauthorised dissemination, distribution or copying, direct or indirect, of this e-mail and any attachments is strictly prohibited. If you have received this e-mail in error, please notify the sender and delete the material from your system.

"***
****
**************"

Tagann an ríomhphost seo ó Bhanc Ceannais na hÉireann. Tá an ríomhphost, agus aon iatán a ghabhann leis, faoi rún agus f[redacted]i phribhléid agus ceaptha d'aontoisc le haghaidh úsáide an té nó na heagraíochta chun a ndíreofar iad. Tá dianchosc ar chraobhscaoileadh, ar dháileadh nó ar chóipeáil neamhúdaraithe ar bith, díreach nó indíreach, an ríomhphoist seo nó aon iatán a ghabhann leis. Má tá an ríomhphost seo faighte agat trí dhearmad, cuir an seoltóir ar an eolas agus scrios an t-ábhar ó do chóras le do thoil.

"***
****
**************"

From: [redacted]
Sent: 25 September 2023 14:10
To: [redacted]
Cc: [redacted]
Subject: Memo- mortgage interest relief
Attachments: DOF MIR Memo - CBI_Final.docx

Central Bank of Ireland - RESTRICTED

Hi [redacted]

Following our call last Friday, please find attached a short memo with the data you requested and the Central Bank's views on DoF's proposal.

Please note the data are confidential estimates based on experimental data rather than official Central Bank statistics.

Give us a shout if you have any further queries.

Mise le meas
[redacted]

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Memo - Mortgage Interest Rate Relief in Budget 2024

Since the onset of the pandemic, the cost of living has significantly increased for Irish households. Monetary policy has responded, with the ECB Governing Council increasing policy rates by 4.5 per cent since last summer. Monetary policy impacts the economy through a number of channels, including by directly increasing the cost of borrowing for households. The additional cost of servicing mortgage debt accounts for 1.4 percentage points (or 7 per cent) of the 18 per cent increase in the cost of living in Ireland since February 2020 (Figure 1). While these aggregate statistics point to a relatively limited contribution to the overall cost of living, the burden of higher interest rates does not fall evenly, undoubtedly creating financial difficulties for some households.

Figure 1: Contribution of mortgage interest to Irish Consumer Price Index since Feb 2020 (Source: CSO)

The role of mortgage debt on household's balance sheets has evolved significantly over the last decade. Firstly, there are fewer mortgaged households, with the Census showing approximately 29 per cent of the 1.8 million households as owner-occupiers with a mortgage. Secondly, the resilience of households has improved. The debt-to-disposable income ratio of the Irish household sector fell from 200 per cent in 2011 to 90 per cent in 2022, in contrast to steady or rising indebtedness among many European peers. This points to an economy and financial system with the ability to absorb the normalisation of policy rates after the extended period of low and negative interest rates. Given the strength of the economy in aggregate, the importance of domestic policy avoiding working at cross purposes to monetary policy should be emphasised. Policy responses should focus on assisting households most at risk from cost of living pressures. The policy response should, in this regard, be timely, targeted, and sustainably funded.

An important contextual factor is the existence of targeted, timely support for borrowers through the framework of the Code of Conduct on Mortgage Arrears (CCMA) and the Mortgage Arrears Restructuring Process (MARP). Under these frameworks, established during the aftermath of the Global Financial Crisis, lenders are obliged to assess borrowers' capacity to meet their mortgage obligations using timely information, and to propose mortgage restructuring options that are sustainable and appropriate based on financial circumstances. It is a priority of the Central Bank that this system functions effectively and in the interests of households during this period of monetary tightening.

A broad Mortgage Interest Relief (MIR) scheme has a number of characteristics that, taken together, do not suggest that it is the best course of action for providing these cost of living supports. It is a direct counterweight to the monetary policy transmission – directly and through the expectations channel. This increases the likelihood of overheating risks thereby rendering inflation more persistent at higher levels than would otherwise be the case.

While the detailed design of the scheme is essential to understanding its ultimate economic impact, there is a large body of international policy assessments from the OECD and others showing MIR provides a subsidy to homeowners, who are more likely to have higher incomes than renters or those in social housing, at significant fiscal cost. Therefore, it can be characterised as regressive. These studies also point out that mortgage interest relief raises home prices without increasing homeownership rates, thus raising household debt levels and negatively impacting macroeconomic and financial stability.

[redacted]

A more effective fiscal response to pressures facing mortgage holders would involve implementation through the social welfare system, where means-testing and targeting are likely more feasible and thus lessening the broader macroeconomic impact of providing support to vulnerable households.

While the Central Bank's policy advice is clear, we believe in supporting data driven policy outcomes and staff have used multiple data sources, including the Central Credit Register, to provide the insight below on the distribution of mortgage lending to aid the design and costing of a MIR scheme.

Data Appendix

Interest bills in Ireland - Aggregate

Based on June 2023 data, the total annual interest bill in the Irish €100bn PDH mortgage market is €3.75bn. This has risen from €2.32 based on aggregate data for June 2022, implying the household sector has experienced an increase in its mortgage interest bill of €1.43bn in the first year of this interest rate cycle.

Mortgage Exposures across the income distribution

In Ireland, mortgage holders are much more likely to be higher income households. The distribution of mortgage volumes across the income distribution will have implications for the way in which implemented relief will reach households. For example, a widespread MIR package would disproportionately reach higher-income households, who have the highest mortgage interest bills.

Table 1 provides estimates based on 2020 HFCS data of the size of the mortgage market accounted for by each household income decile. The bottom half of households account for only 18% of the mortgage market by this estimate.

Income Decile	Share of all mortgage balances	Implied €M Balance
1	2%	1,616.97
2	2%	1,947.77
3	3%	2,959.30
4	4%	3,575.14
5	8%	8,216.78
6	10%	9,998.34
7	16%	15,730.53
8	20%	20,383.55
9	19%	19,193.63
10	17%	16,672.37

Mortgage exposures across the interest rate distribution

Table 2 provides the amount of mortgage exposure, at June 2023, in 1% interest rate bands. [redacted]

Table 2: Total mortgage balances in interest rate bands, June 2023 Central Credit Register

Interest rate	EUR bn
Zero	1,861

(0, 1]	123
(1, 2]	2,315
(2, 3]	47,634
(3, 4]	16,695
(4, 5]	22,173
(5, 6]	5,080
(6, 7]	2,025
(7, 8]	739
Over 8	130

The size of mortgages in Ireland

The size of mortgages may be an important consideration when designing a scheme. Table 3 provides the breakdown of the March 2023 Central Credit Register view of the mortgage market into bands of €50k. The largest cohorts of the Irish mortgage market are located in the region between €100k and €300k of outstanding mortgage amounts.

Table 3: total mortgage balances per €50k band of mortgage balance

Balance Band	(€M)
(0 - 50k]	4,027.4
(50k - 100k]	10,598.7
(100k - 150k]	17,034.3
(150k - 200k]	17,987.3
(200k - 250k]	14,967.2
(250k - 300k]	10,985.0
(300k - 350k]	7,352.7
(350k - 400k]	4,735.4
(400k - 450k]	3,095.4
(450k - 500k]	2,090.3
(500k -550k]	1,450.4
(550k -600k]	1,038.1
(600k -650k]	785.6
(650k - 700k]	636.6
(700k -750k]	439.7
(750k -800k]	375.2
(800k - 850k]	307.4
(850k -900k]	256.7
(900k - 950k]	188.5
Over 950 k]	1,942.4

Recent interest rate changes

Table 4 reports the size of cohorts based on their change in mortgage interest rate from June 2022 to May 2023, based on CCR data as above. The sample size is smaller than in above tables owing to the need to observe mortgages present at both time periods in order for inclusion in the analysis.

€6.4bn of mortgages have actually had a fall in interest rate over that timeframe, owing to switching. A large cohort of €42.8bn have experienced no change, owing to fixed rate lending. The largest group based on exposure to the interest rate increases are the €23bn that experienced increases of between 3 and 4 per cent as reported in the Central Credit Register. It is likely that the vast majority of these have, by September, entered the "4 to 5%" category, due to the dominance of Tracker mortgages in this cohort. The interest bill at May among this most-affected group was €1.1bn.

Table 4: PDH mortgages grouped by the change in interest rate from June 2022 to May 2023

% change in rate	Accounts	Balance, EUR bn, May 2023
Below 0	45,410	6.4
0	302,102	42.8
0 to 1	75,549	9.8
1 to 2	24,050	2.8
2 to 3	20,362	2.5
3 to 4	198,229	23.0
4 and up	118	0.0
Total	**665,893**	**87.3**

From: [redacted]
Sent: 03 October 2023 19:39
To: [redacted]
Cc: [redacted]
Subject: RE: [External]RE: Memo- mortgage interest relief
Attachments: MIR Follow On Data and Estimates.docx

Central Bank of Ireland - CONFIDENTIAL

Hi [redacted]

Please see attached the data you requested, our updated opinion and estimates we used to inform that view.

Mise le meas
[redacted]

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youtube.com/user/centralbankireland

From: [redacted]
Sent: Monday 2 October 2023 12:47
To: [redacted]
Cc: [redacted]
Subject: [External]RE: Memo- mortgage interest relief

Confidential – budget secret

Dear all,

Thanks again for all your efforts on this.

[redacted]

Finally, if you have further insights on the best approach to costing the measure, happy to engage further and include our tax colleagues.

Kind Regards,
[redacted]

From: [redacted]
Sent: Monday 25 September 2023 15:40
To: '[redacted]
Cc: [redacted]
Subject: RE: Memo- mortgage interest relief

Dear all,

Many thanks for this Memo, the data and the speed with which you turned it around!

We'll keep in touch.

Kind Regards,
[redacted]

From: [redacted]
[redacted]
To: [redacted]
Cc: [redacted]
Subject: Memo- mortgage interest relief

[redacted]

[redacted]

Follow-on memo on Mortgage Interest Relief. Central Bank of Ireland, October 3 2023.

On September 25, the Central Bank sent a memo to DFIN , outlining views on Mortgage Interest Relief (MIR) schemes in a general sense, as well as data returns responding to specific queries raised by DFIN to aid potential costing of such schemes. This memo provides follow-on responses to additional queries, as well as broader consideration on the scheme proposed.

Background

As outlined in the previous memo of September 25, the Central Bank has a range of concerns about the use of the tax system to fund mortgage interest relief. These concerns relate to the lack of an ability to target the scheme towards those intended – those most in need of repayment support, as well as the inherent regressivity of using taxpayer funds to support mortgage holders in a non-targeted fashion, given that they are on aggregate predominantly from the higher ends of the household income distribution. Further, support for mortgage holders through tax relief, in instances where borrowers' repayment capacity is not in fact under stress, represents a deadweight loss to the taxpayer, as well as risking pro-cyclical contribution to aggregate demand at a time of high inflation.

The Central Bank continues to believe that timely, targeted and temporary support through the social welfare system would be a more appropriate means through which to provide support to those most affected by the interest rate increases, and reiterates that payment relief, through the banking system and other lenders, continues to be available to affected borrowers in a targeted fashion through the provision of loan restructuring under the CCMA and MARP frameworks. The Central Bank has also produced a number of research notes recently showing that the mortgaged household sector is, broadly speaking, resilient to the type of interest rate and inflation increases being experienced currently, and is therefore not in need of blanket need in the form of mortgage interest relief.

[redacted]

2. Like any such intervention, the proposed MIR **scheme will impose fiscal costs**. The Central Bank has done an experimental costing exercise using granular data to inform our advice of the potential impact of the scheme in the wider system. Under this calculation, the scheme as outlined above would cost, [redacted]
3. Changing the calibration of the scheme can pose considerable **upward risks to the fiscal outlay**. For example, [redacted]
4. [redacted]
5. [redacted]
    a. While the Central Bank has not done a formal assessment, it follows naturally that [redacted]
6. While the estimated cost of the scheme in this note has a total one-off size that is not particularly large relative to the total size of the national budget, it nonetheless represents a fiscal policy action at cross-purposes to monetary policy. Any additional roll-out of the scheme across future years or to a wider group of borrowers would **create additional barriers to the pass-through of monetary policy** which is needed to tackle inflation.
7. Relief may **increase the incentive for lenders to increase interest rates**, in the knowledge that government relief will soften the effect of higher interest rates on borrower repayment capacity. Under such a scenario, the relief would act to support lender profitability without necessarily helping borrowers as intended.

In the Annex, this memo provides a tentative estimate of the cost of the scheme outlined by DFIN officials. The Central Bank has carried out this an experimental basis using Central Credit Register data, with the aim of informing its own assessment of the potential market-wide and macro-financial impacts of the scheme. [redacted]

[redacted]

[redacted]

The main beneficiary group (i.e. rates that rise by over 2 per cent) has certain characteristics:

1. Almost all are on Tracker rates.
2. They owe less than other borrowers, on average.
3. Their average interest costs were significantly less than for other borrowers in 2022 and for many years previously. However, they now pay relatively large interest costs.
4. Almost no borrowers in the main beneficiary group are below 40 years of age. They are disproportionately likely to be 50 years of age or over.

Overall, these characteristics do not point to the targeting of greatest need for support. The benefits can be firmly predicted to accrue to Tracker rate borrowers, regardless of household circumstances. In particular, they have benefitted from lower average interest bills than other borrowers for a decade or more, with a total impact over time significantly exceeding recent changes in interest rate costs.

[redacted]

Household survey data on tracker customers

Using HFCS data from 2020, we highlight that tracker mortgage customers, as well as being older than less-affected borrowers, are also less likely to come from the lower-income cohorts of the mortgage market, particularly when compared to other variable rate customers (Chart 1).

Chart 1: Share of HHs holding different types of mortgages in 2020, by gross income quintile
(conditional on having an HMR mortgage)

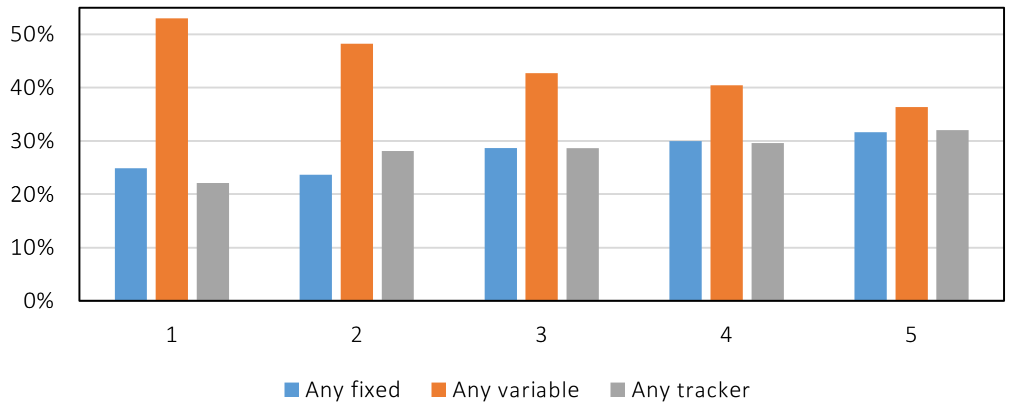
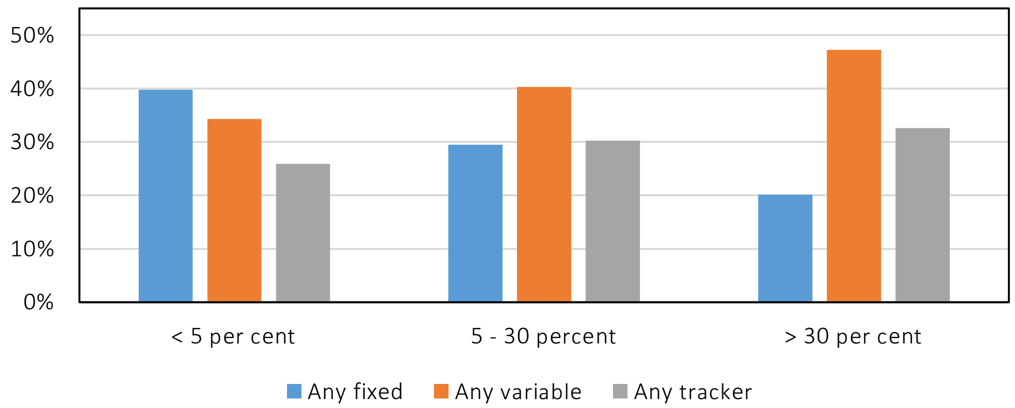


Chart 2 then shows that, as of 2020, the borrowers experiencing particularly high debt service burdens relative to income were substantially more likely to be variable customers than tracker customers. With these two pieces of evidence from the HFCS, we can again conclude that a scheme that is, in aggregate, going to accrue almost exclusively to tracker mortgage customers is not a scheme that is targeted at the most vulnerable mortgage customers.

Chart 2: Share of HHs holding different types of mortgages in 2020, by debt service to income ratio
(conditional on having an HMR mortgage)



Annex 2: the number of mortgage accounts in each bin of €50k balance.

Table 2.1 uses June 2023 Central Credit Register data, highlighting that 172k mortgage accounts have balances below €50k, while another c.270k have balances between €50k and €150k. It is important to note that all "account" numbers below relate to individual mortgage loan accounts. In many cases, a primary dwelling loan, followed by a top-up or equity release during the lifetime of the mortgage, will comprise two separate mortgage accounts, despite being owed and managed by the same borrower to the same lender. As a rule of thumb, there are 1.2 accounts per mortgage borrower/household in the CCR data.

Table 2.1: The €bn in each €50k band of outstanding balance, as well as the number of accounts, as at June 2023:

Balance up to	Accounts	Balance, EUR M	Interest cost in June, EUR M	Annualised interest cost, EUR M
0k to 50k	171,904	3,952	13	154
50k to 100k	138,010	10,395	33	391
100k to 150k	134,571	16,735	51	608
150k to 200k	101,686	17,653	51	617
200k to 250k	66,017	14,727	41	490
250k to 300k	39,749	10,850	28	340
300k to 350k	22,596	7,291	19	223
350k to 400k	12,673	4,725	12	145
400k to 450k	7,321	3,099	8	96
450k to 500k	4,336	2,052	5	65
500k to 550k	2,754	1,440	4	47
550k to 600k	1,808	1,037	3	34
600k to 650k	1,243	775	2	26
650k to 700k	945	636	2	22
700k to 750k	608	440	1	15
750k to 800k	475	367	1	13
800k to 850k	355	292	1	11
850k to 900k	294	256	1	9
900k to 950k	200	185	1	7
950k to 1 million	187	182	1	6
Above 1 million	1,123	1,684	6	67
Total	**708,855**	**98,775**	**282**	**3,386**

[redacted]

[redacted]

From: [redacted]
Sent: 04 October 2023 15:20
To: [redacted]
Cc:
Subject: RE: [External]RE: [External]RE: Memo- mortgage interest relief
Attachments: MIR Additional Responses Wednesday 10-04.docx

Central Bank of Ireland - CONFIDENTIAL

[redacted] all

Please see attached responses to your questions.

Best
[redacted]

From: [redacted]
Sent: Wednesday 4 October 2023 13:36
To: [redacted]
Cc: [redacted]
Subject: [External]RE: [External]RE: Memo- mortgage interest relief

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Hi all,

Many thanks for the detail provided which is very helpful. The advice is very clear.

Tax side has asked whether it would be possible to cost some additional targeting of the measure in case the conversation develops in this direction.

[redacted]

Thanks,

[redacted]

From: [redacted]
Sent: Tuesday 3 October 2023 20:09
To: [redacted]
Cc: [redacted]
Subject: Re: [External]RE: Memo- mortgage interest relief

[redacted]

[redacted]

[redacted]

"***"

"***"

"***"

Additional responses on Mortgage Interest Relief. Central Bank of Ireland, 4 October 2023

The following document contains responses to queries received by the Central Bank on Wednesday, 4 October 2023, following the Central Bank memo of 3 October 2023.

[redacted]

In the following table, we provide the requested figures as at 30 June 2022 (i.e. prior to increases in ECB interest rates). The approach to estimate an "annualised" figure remains the same as in the memo of 3 October, i.e. 12 times the monthly interest cost for June.

Table: The €bn in each €50k band of outstanding balance, as well as the number of accounts, as at June 2022:

Balance up to	Accounts	Balance, EUR M	Interest cost in June 2022, EUR M	Annualised interest cost, EUR M
0k to 50k	183,177	4,206	9	103
50k to 100k	144,326	10,856	21	253
100k to 150k	140,991	17,536	34	411
150k to 200k	106,141	18,423	36	435
200k to 250k	68,133	15,192	31	367
250k to 300k	39,609	10,807	22	266
300k to 350k	21,716	7,007	14	173
350k to 400k	11,833	4,414	9	109
400k to 450k	6,764	2,862	6	70
450k to 500k	4,253	2,013	4	49
500k to 550k	2,575	1,347	3	32
550k to 600k	1,744	1,001	2	23
600k to 650k	1,176	733	1	17
650k to 700k	888	598	1	14
700k to 750k	578	419	1	9
750k to 800k	451	349	1	8
800k to 850k	342	282	0	6
850k to 900k	287	251	0	5
900k to 950k	198	183	0	4
950k to 1 million	195	190	0	4
Above 1 million	1,186	1,807	3	31
Total	**736,563**	**100,477**	**199**	**2,389**