

Pascal Nicoloso European Central Bank DG-Market Operations Money Market Statistical Regulation: Fine-tuning the reporting of transactions with nonfinancial corporations

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Overview

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Open issues

- Given their relevance, the statistical data collection encompasses wholesale deposits taken from non-financial corporations
- Problems with identification of deals generally classified as "wholesale" NFCs using the Basel III definition:
 - Problems with identification of deals with "wholesale" NFCs within different internal systems
 - In particular banks that take in such deposits on decentralised basis might find it difficult to report such transactions in a timely manner

Definitions

- Regulation concerning statistics on the money markets (ECB/2014/48)
 - Transactions by the reporting agent [...] with non-financial corporations
 classified as 'wholesale' according to the Basel III LCR framework
- Basel III: Liquidity Coverage Ratio and liquidity risk monitoring tools
 - For the purposes of the LCR, "unsecured wholesale funding" is defined as those liabilities and general obligations that are raised from non-natural persons (i.e. legal entities, including sole proprietorships and partnerships)
 - It defines several categories:
 - a) wholesale as the opposite of retail
 - b) small business customers:

LCR also refers to paragraph 231 of Basel II defines them as managed like retail exposures, provided that aggregated exposures on one client are < €1 million on a consolidated basis, where applicable

Open issues



Proposal

1) Keep the current approach unchanged, or....

2) Adopt the LCR/Basel II definition of small businesses in the regulation and set up a threshold to eliminate them based on the following definition

- Basel II paragraph 231 defines

" […] small businesses and managed as retail exposures are eligible for retail treatment provided the total exposure of the banking group to a small business borrower (on a consolidated basis where applicable) is less than €1 million. Small business loans extended through or guaranteed by an individual are subject to the same exposure threshold"

 Amend the Reporting Instructions to reflect this exclusion that clarifies the text of the Regulation by staying in the same LCR framework.

Proposal



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- Members are therefore asked to provide their feedback on the proposal:
 - Does the focus on transactions with counterparties on a cumulative threshold above EUR 1 million of loans lead to lower IT set up costs compared to the initial version of the Reporting Instructions?

 Can you quantify, in broad terms, the impact of the exclusion of these trades (ie unsecured funding with NFCs for which the aggregated exposures are < EUR 1 million, in line with LCR requirements) for your institution on the burden of the data collection?

• Would you have any other suggestions - that are compatible with the Regulation?