Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes		Deadline 20 February 2012
Name of Company:	European Systemic Risk Board (ESRB)	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public

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The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the accompanying spreadsheets and LOGs.

Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes		Deadline 20 February 2012
Reference	**Comment**	
General Comment	The European Systemic Risk Board welcomes the opportunity to provide its comments on the Consultation Paper EIOPA-CP-11/011[1]. Article 3 of the ESRB Regulation 1092/2010 (Regulation (EU) No 1092/2010 of the European Parliament and of the Council of 24 November 2010 on European Union macro-prudential oversight of the financial system and establishing a European Systemic Risk Board) refers to the determination and collection of the information necessary to conduct macroprudential oversight in the European Union as one of the tasks to be carried out by the ESRB. In the recital (6) of the same regulation it is stated that the European Central Bank should provide statistical support to the ESRB. Article 15 specifies that European Supervisory Authorities (ESAs) shall provide the ESRB with the information it needs for the performing of its tasks. Future Solvency II reporting requirements would cover most of the ESRB data requirements on the insurance sector and therefore the ESRB has a high interest in replying to the present consultation, pointing out at some issues of macroprudential relevance. It should be noted that the ESRB will also be a user of data covered under the first EIOPA consultation with regard to Supervisory Reporting and Public Disclosure (EIOPA-CP-09/011) issued on 8 November 2011. The latter contains microprudential requirements for solo entities and groups, and aggregated statistical information from these data will also be important input into the analysis of the ESRB. Some of the comments presented in the following paragraphs therefore also concern the requirements in EIOPA consultation EIOPA-CP-09/011. Insurers corporations are important investors in the European financial markets and therefore enhanced statistics on them are essential for the monitoring of systemic fragilities in the EU. At the same time, the ESRB acknowledges the importance of limiting the reporting burden on the insurance industry, in particular by combining the	

[1] Furthermore, given the ECB task of providing statistical support to the ESRB (as per Council Regulation 1096/2010, see http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:331:0162:0164:EN:PDF), the present response is, in its main parts, consistent with the response submitted by the ECB.

ESRB requirements with the supervisory requirements under Solvency II, to the extent possible, and by considering lighter requirements for smaller insurers.

From a macroprudential perspective, the following issues should be highlighted:

(a) First, the fact that insurers are important institutional investors in European financial markets implies that changes in their **holdings of financial assets** or investment strategies may have a significant impact on the markets, which, in some circumstances, may also have systemic consequences:

- The ESRB considers it essential to have **detailed information about the investment** assets of insurers, on an **security-by-security basis** (in particular in the framework of the ESCB's work towards a Securities Holdings Statistics) in order to be able to monitor their evolution and to assess systemic risks. The ESRB would welcome this granular reporting of the portfolios of insurers as, once the appropriate aggregations (by counterpart sector or by country of issuer, among others) are carried out, it will enable to monitor and interpret changes in this portfolio, the interlinkages between financial institutions and the assessment of risks. This granular reporting would also reduce the need to launch ad-hoc requests, with the subsequent reduction in the reporting burden of entities. **Detailed balance sheet** information is also needed for understanding developments in the risk-taking behaviour of the insurance sector.
- Information on derivatives contracts is considered essential as these can significantly alter the exposure profile of institutions.
- A look-through principle should be applied to assets holdings, where necessary, to ensure a proper view of counterparties and risks.
- In order to complement the picture on risks on the asset side of the balance sheets, items such as structured **credit, collateralised (asset-backed) securities and investments in property other than own use** are of relevance.
- In addition, a segregation of financial assets for **unit-linked contracts** from the investment portfolio is fundamental.
- Detailed information on **remaining maturities** on both the asset and liability sides would enable maturity mismatch analysis, which is important given its

significance for risk management in insurance business. Information on long maturities is particularly important, as insurance (in particular life insurance) liabilities are typically of very long-term nature.

- Information on **sectors of counterparts** is necessary not only for following the risk-taking behaviour of insurers but also to be able to analyse linkages with other sectors. For example, insurers are important investors in equity and debt instruments issued by banks, which creates important linkages that need to be analysed. The use of a harmonized sector classification will undoubtedly increase the value added by this information.
- The importance of information on **minimum guarantees** to policyholders is highlighted: in a low return environment, insurers might face difficulties in meeting such guarantees, which might have systemic stability consequences.
- Finally, information on liquidity risks for the sector, namely regarding the use of liquidity swaps and derivatives requiring collateral, is necessary for macropruential purposes as well.

(b) Second, the financial stability of the insurance sector is highly dependent on its financial performance and soundness. In this regard, a comprehensive set of **profit and loss** as well as **capital adequacy data** is needed for standard ratio analysis and for a forward-looking analysis on the impact of financial performance and soundness of insurers on the stability of the sector and its impact on financial markets and counterparts. The requested information includes not only the composites of key performance ratios (e.g. loss and combined ratio, return on equity and assets), but also items necessary for the monitoring of the evolution of reserves.

(c) Third, macroprudential analysis, surveillance and assessment is typically carried out on the basis of **consolidated financial information of insurance groups** in order to capture all the risks that may arise from its business lines and affiliates. From a systemic risk perspective, **large insurance groups** should receive special attention in this regard and therefore timely consolidated reporting would be a minimum requirement for the ESRB.

(d) Fourth, enhanced monitoring requires **timely data on quarterly basis**. In order

	for the data to feed into the regular input required by the ESRB (covering, as a minimum, meetings of the Advisory Technical Committee and the General Board), the concept of timeliness could be operationalised to at most 45 calendar days after the reference date, for availability to the final users (implying, ideally, availability at the ESRB for statistical production at around T+33 calendar days). For macroprudential policy, the latest information available is of the utmost importance and this information should be made available to policy makers on a timely basis. Otherwise, it loses its value. Market conditions may change abruptly in short periods of time and the macroprduential authorities must not lag behind the markets in regarding the availability of information. Deviations from the quarterly reporting frequency should be based on the result of an orderly cost assessment which shows that quarterly reporting is excessively costly for a particular item. (e) Fifth, the mandate of the ESRB, as defined by Regulation 1092/2010, covers the EU and not only the euro area. **Harmonized and fully comparable information** on insurers of all countries in the EU is therefore essential for the macro-prudential tasks of the ESRB. (f) Finally, from a systemic risk perspective, **reinsurance activities**, as far as they imply a transfer of risks, and the securitization of insurance risks deserve special attention since they may threat the financial stability of the sector in a different way. Accordingly, specific reporting could be needed to monitor this segment of the insurance business, which is in some aspects different from the classical life and non-life activities (namely data on exposures to reinsurers, guarantees provided for reinsurance recoverable and upcoming reinsurance programs).	
3.1	See 7.1 Q3	
3.2		
3.3		
3.4		

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
3.5		
3.6		
3.7	See 7.1 Q5	
3.8		
4.1	See 7.1 Q3	
4.2		
4.3		
4.4	See 7.1 Q5	
4.5	The timely transmission of the information to EIOPA, as well as the timely release of information to the ESRB, and to the ECB which provides statistical and analytical support for the ESRB, is deemed as very important.	
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6.16	Complete and harmonised information is a precondition for using supervisory data for providing statistical support to the ESRB. The ESRB stresses the importance of harmonization and compatibility also with a view to minimising duplicated efforts and risk of error.	
6.17		
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6.19		
6.20	The ESRB strongly supports the proposal for quarterly information on Solvency Capital Requirements (SCR) which is essential for a timely and continous monitoring of the sector. If that is considered too burdensome for all insurers, it should be applied at least to those undertakings subject to financial stability reporting. *Dissenting opinion: one member of the ESRB considers that the quarterly reporting of the SCR would be complex and burdensome for entities and could also trigger communication problems. This ESRB member also questions the relevance of the quarterly SCR for financial stability purposes, as a quarterly SCR is not reported currently for micro-supervisory purposes (only on an ad-hoc basis in specific cases such as a possible breach of SCR). Therefore, in the opinion of this member of the ESRB, the ESRB should consider alternative indicators for quarterly needs.*	
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6.28	A calculation method that reflects the major source of quartely changes of SCRs and keeps, for the purpose of simplification, elements that are sufficiently stable constant during the year would be acceptable. However, the requirement for a quarterly update of capital charges for market risks should be accompanied by some level of desagregation (e.g. per sub-risks) on the reporting template. This would allow for a follow up of the evolution of capital requirements due to market movements.	
6.29		
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7.1		
7.1 Q1 *[How to perform a quarterly SCR calculation?]*	From a systemic risk perspective, as a minimum requirement, consolidated quarterly reporting of SCR and other capital adequacy information would be required for large insurance groups. The ESRB is aware of the costs that the calculation of the whole SCR on a quarterly basis would have, so it can also support option 2, whereby only the most volatile parts of the SCR would be updated on a quarterly basis (see 6.28).	
7.1 Q2 *[How you consider the feasibility of including a few public accounting profit&loss figures in this reporting?]*	The ESRB welcomes the inclusion of public accounting profit and loss figures, in particular for those profit and loss items that cannot be (at least indirectly) derived from existing Solvency II templates. The impact of using public accounting figures on the comparability of the data needs, however, to be analysed. In general, the profit and loss items that the ESRB would need are: • Premiums earned – by type of scheme and pension plan; • Claims incurred; • Net change in technical reserves: reserve for premiums unearned, reserves for life insurance, reserve for claims outstanding;	

	• Other operating income: commissions received, real estate income, operating income; • Investment income and Premium supplements: interest received on deposits, debt securities, financial derivatives, listed/unlisted shares; • Gains/losses, value adjustments on financial assets; • Profit/loss on ordinary activities; • Tax; • Profit/loss. These items should be taken, when possible, from Solvency II statements and, only when they are not available there, they could be obtained from the accounting financial statements of insurers. *Dissenting opinion: one member of the ESRB considers that the request for quarterly accounting data from the profit and loss account is not relevant for many issuers, which do not produce such data. According to this member, premiums, claims and other data already available in Solvency II quarterly reporting should be sufficient. In the same vein, this member of the ESRB argues that a measure of the pass through ratio of losses / gains may have no reality on a quarterly basis and that an additional cost-benefit analysis should be carried out before requesting such data.*	
7.1 Q3 *[How you consider the scope threshold (EUR 6 bn total balance* *sheet) and the phasing in and phasing out?]*	The ESRB understands that the scope of the current proposal under consultation covers only large insurance groups and large solo undertakings not belonging to a group. Therefore it is acknowledged that using thresholds in terms of absolute balance sheet figures will, in some countries with small insurance sectors, exclude from the quarterly reporting for financial stability purposes all but those undertakings that belong to multinational groups having total assets in the balance sheet of more than EUR 6 bn. In particular, the threshold might not be suitable for getting information on items which are not covered elsewhere in the reporting (e.g. profit and loss, duration of liabilities). A threshold of EUR 6 bn might then have a negative impact on the sector coverage for small and medium sized countries, specially in the case of those whose	

	insurers are not part of a multinational group. For these variables, the possibility of establishing a threshold relative to the national sector size could be also assessed by EIOPA, ensuring that a representative coverage of the market is achieved in all countries while not increasing significantly the reporting burden of insurers. In order to have a reporting population as stable as possible, the ESRB welcomes the proposal to grant admission or deletion from the sample using a phasing in/out process. Also, the current proposal of 6bn could be revised after some time in order to guarantee that it is still appropriate, after the first years of use.	
7.1 Q4 *[How you consider the additional administrative burden and other relevant aspects of increased quarterly reporting requirements as compared to* *other reporting requirements?]*	In order to minimise as much as possible the reporting burden of insurers, the ESRB intends to the extent possible to base its analysis on statistics derived from an appropriate sub-set of the Solvency II quantitative reporting templates, following always the provisions in Article 36 of the EIOPA Regulation (http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:331:0048:0083:EN:PDF) and Article 15 of the ESRB Regulation (http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:331:0001:0011:EN:PDF). While the information needs of supervisors (micro-perspective) may differ from statistical and macroprudential requirements, the reporting burden on undertakings can be reduced by aligning supervisory (both micro and macro) and statistical reporting to the extent possible, with differences (in concepts and definitions) being clearly identified. In this case, the ideal solution for the long-term would be to develop a single data collection system for supervisory, macroprudential and statistical purposes. In the short-term, the ESRB supports all efforts to avoid possible dual data collection from reporting agents. Timely quarterly reports are an essential precondition for using Solvency II quantitative data for financial stability purposes. The ESRB supports that smaller insurers report at semi-annual or even annual frequency. However, no complete exemptions should exist at annual level, as annual benchmark results will be needed from all undertakings, in order to be able to use grossing-up methods for incomplete quarterly reporting.	

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
7.1 Q5 *[What is your preference for regular quarterly reporting and minimizing ad hoc reporting instead of recurrent ad hoc reporting, having regard to the proposed reporting timelines (following ordinary solo reporting timelines)?]*	Quarterly information both on a solo and group basis is essential for macroprudential analysis. Experience from other statistics shows that regular reporting – after the implementation work is finalised – may be less burdensome than fequent and changing ad hoc requests, and may provide results that are also of use for the industry. The ESRB welcomes the proposal to set the same deadline for the submission of the information for financial stability purposes as for solo undertakings fulfilling other supervisory reporting requirements. The timeliness highlighted as important by the ESRB is T+45 calendar days to the final users (implying, ideally, availability at the ESRB for statistical production at around T+33 calendar days). It is understood that it is planned that quarterly solo reporting would have to be provided by undertakings 5 weeks after the end of the reporting period. A timeliness of T+5 weeks would still be acceptable but it is important to maintain this planned reporting timeliness for both the solo and group information required by the ESRB. Otherwise, the information would lose much of its relevance, as it will be outdated with respect to the market conditions under which macroprudential policy is conducted. The ESRB is aware of the costs that such timeliness may impose to reporting insurers. In this respect, EIOPA may consider appropriate to conduct an impact assessment to weight the benefits against the costs. *Dissenting opinion: one member of the ESRB considers that these time limits, aligned to those applicable to the Solvency II reporting of solo undertakings, are 6 weeks shorter than those for Solvency II reporting as provided for in the draft Solvency II implementing measures. In the opinion of this member of the ESRB, this fact raises an important concern on the legal basis and in terms of additional burden versus additional benefits of this request.*	

Technical Annex		
FS 1 - A1	The ESRB welcomes the inclusion of quarterly lapse/surrender rate indicators, to monitor potential liquidity drains (see also answer to FS1 – A2).	
FS 1 – A2	The ESRB welcomes the inclusion of quarterly lapse/surrender rate indicators, to monitor potential liquidity drains, and considers that information on the ratio of *volume* of contracts lapsed to average volume of contracts is more useful than the analogue information for the *number* of lapsed contracts.	
FS 1 – A3	(See also reply to question 2). Profit and loss items are not always clearly identifiable within the draft templates, what makes it difficult to distinguish internal financing developments based on them. The inclusion of profit and loss information would help bridge this gap. The information needs of the ESRB with respect to profit and loss items may be fulfilled either by providing profit and loss data from statutory accounts or, to some extent, through the provision of the Variation Analysis (VA) templates for financial stability purposes (i.e. group data with quarterly frequency and reduced time lag). This regime may be revisited after a number of years of use, in order to assess how the intepretation of figures based on Solvency II (Variation Analysis) and of accounting figures (from the profit and loss account) works.	
FS 1 – A4	(See also the reply to question 2 and FS 1 – A3) The ESRB welcomes the inclusion of statutory balance sheet information, as a complement to profit and loss statutory accounts.	
FS 1 – A5	(See also the reply to question 2 and FS 1 – A3) The ESRB welcomes the inclusion of statutory information on capital and reserves information, as a complement to profit and loss statutory accounts.	

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
FS 1 – A6	The ESRB welcomes the inclusion of a measure of the pass through ratio of losses/gains – however, the ESRB proposes to have this indicator on a quarterly basis.	
FS 1 – A7	The ESRB welcomes the inclusion of information on the duration of life insurance liabilities for the reasons set out by EIOPA.	
FS 1 – A8	The ESRB welcomes the inclusion of non-life insurance liabilities for the reasons set out by EIOPA.	
FS 1 – A9	(See also reply to question 1) Quarterly information on solvency capital requirements (SCR) is an essential requirement for financial stability analysis. Therefore the ESRB welcomes the proposal to request SCR information on a quarterly basis for large groups. For financial stability purposes quarterly aggregations of the SCR should be available for size classes, countries, and insurance types (life, non-life, reinsurance, composite).	
Overview FS Needs - all tab	The ESRB welcomes the initiative to have more information, in a timely and frequent manner, for large insurance groups. In particular, we strongly support the EIOPA proposals of having the following data sets with quarterly frequency and with a reduced time lag: (a) Data on premiums, claims and expenses; (b) Information on SCR; (c) Information on investments, in particular on an security-by-security basis (Assets – D); (d) Profit and Loss data – which can be derived either from statutory accounts or from the Variation Analysis (VA) templates; (e) Information on reinsurance.	
Cover - A1Q- cell A1		
Cover - A1Q- cell A2		
Cover - A1Q- cell A3		

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
Cover - A1Q- cell A4		
Cover - A1Q- cell A5		
Cover - A1Q- cell A6		
Cover - A1Q- cell A7		
Cover - A1Q- cell A8		
Cover - A1Q- cell A9		
Cover - A1Q- cell A10		
Cover - A1Q- cell A11		
Cover - A1Q- cell A12		
Cover - A1Q- cell B13		
Cover - A1Q- cell B14		
Cover - A1Q- cell B15		
Cover - A1Q- cell B16		
Cover - A1Q- cell D1		
Cover - A1Q- cell D2		
Cover - A1Q- cell D3		
Cover - A1Q- cell D4		
Cover - A1Q- cell D5		
Cover - A1Q- cell D6		
Cover - A1Q- cell D7		
Cover - A1Q- cell D8		
Cover - A1Q- cell D9		
Cover - A1Q- cell D10		
Cover - A1Q- cell D11		
Cover - A1Q- cell D12		
Cover - A1Q- cell D13		

Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes		Deadline 20 February 2012
Cover - A1Q- cell D14		
Cover - A1Q- cell D15		
Cover - A1Q- cell D16		
Cover - A1Q- cell H1		
Cover - A1Q- cell H2		
Cover - A1Q- cell H3		
Cover - A1Q- cell H4		
Cover - A1Q- cell H5		
Cover - A1Q- cell H6		
Cover - A1Q- cell H7		
Cover - A1Q- cell H8		
Cover - A1Q- cell H9		
Cover - A1Q- cell H10		
Cover - A1Q- cell H11		
Cover - A1Q- cell H12		
Cover - A1Q- cell H13		
Cover - A1Q- cell H14		
Cover - A1Q- cell H15		
Cover - A1Q- cell H16		
Cover - A1Q- cell H1Z		
Cover - A1Q- cell H2Z		
Cover - A1Q- cell H3Z		
Cover - A1Q- cell H4Z		
Cover - A1Q- cell H5Z		
Cover - A1Q- cell H6Z		
Cover - A1Q- cell H7Z		

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
Cover - A1Q- cell H8Z		
Cover - A1Q- cell H9Z		
Cover - A1Q- cell H10Z		
Cover - A1Q- cell H11Z		
Cover - A1Q- cell H12Z		
Cover - A1Q- cell H13Z		
Cover - A1Q- cell H14Z		
Cover - A1Q- cell H15Z		
Cover - A1Q- cell H16Z		
Cover - A1Q- cell H1F		
Cover - A1Q- cell H1G		
Cover - A1Q- cell I1		
Cover - A1Q- cell I2		
Cover - A1Q- cell I3		
Cover - A1Q- cell 13A		
Cover - A1Q- cell 13B		
Cover - A1Q- cell I4		
Cover - A1Q- cell I5		
Cover - A1Q- cell I6		
Cover - A1Q- cell K1		
Cover - A1Q- cell K2		
Cover - A1Q- cell K3		
Cover - A1Q- cell K3A		
Cover - A1Q- cell K3B		
Cover - A1Q- cell K4		
Cover - A1Q- cell K5		

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
Cover - A1Q- cell K6		
Cover - A1Q- cell N1		
Cover - A1Q- cell N2		
Cover - A1Q- cell N3		
Cover - A1Q- cell N3A		
Cover - A1Q- cell N3B		
Cover - A1Q- cell N4		
Cover - A1Q- cell N5		
Cover - A1Q- cell N6		
Cover - A1Q- cell N1Z		
Cover - A1Q- cell N2Z		
Cover - A1Q- cell N3Z		
Cover - A1Q- cell N3AZ		
Cover - A1Q- cell N3BZ		
Cover - A1Q- cell N4Z		
Cover - A1Q- cell N5Z		
Cover - A1Q- cell N6Z		
Cover - A1Q- cell R		
Cover - A1Q- cell S1		
OF - B1Q- cell A13		
OF - B1Q- cell A50		
OF - B1Q- cell B50		
OF - B1Q- cell C50		
OF - B1Q- cell D50		
OF - B1Q- cell E50		
OF - B1Q- cell A51		

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
OF - B1Q- cell B51		
OF - B1Q- cell C51		
OF - B1Q- cell D51		
MCR - B4A- cell A31		
MCR - B4B- cell A31		
Assets - D1Q- cell A1 (list)		
Assets - D1Q- cell A2 (list)		
Assets - D1Q- cell A3 (list)		
Assets - D1Q- cell A4 (list)		
Assets - D1Q- cell A5 (list)		
Assets - D1Q- cell A6 (list)		
Assets - D1Q- cell A7 (list)		
Assets - D1Q- cell A8 (list)		
Assets - D1Q- cell A9 (list)	The ESRB would, in principle, be in favour of having those asset components reported as aggregates and as a detailed list of items brokendown by sector, following a classification by institutional sector according to the European System of Accounts (ESA classification; a classification by activity/NACE is not a high priority), as it would further align this reporting with the information collected for statistical purposes. Furthermore, a breakdown of invested amounts by geographic counterpart, financial instrument and maturity should also be considered. A possibility would be to keep the complementary identification code (CIC) and the other items as defined by EIOPA and provide conversion tables and rules for bridging between EIOPA classifications and ESRB classification following international statistical standards (e.g. revised ESA).	
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Assets - D1Q- cell A11 (list)		

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
Assets - D1Q- cell A12 (list)		
Assets - D1Q- cell A13 (list)		
Assets - D1Q- cell A15 (list)		
Assets - D1Q- cell A16 (list)		
Assets - D1Q- cell A17 (list)		
Assets - D1Q- cell A18 (list)		
Assets - D1Q- cell A20 (list)		
Assets - D1Q- cell A22 (list)		
Assets - D1Q- cell A23 (list)		
Assets - D1Q- cell A24 (list)		
Assets - D1Q- cell A25 (list)		
Assets - D1Q- cell A26 (list)		
Assets - D1Q- cell A28 (list)		
Assets - D1Q- cell A30 (list)		
Assets - D2O- cell A1		
Assets - D2O- cell A2		
Assets - D2O- cell A3		
Assets - D2O- cell A4		
Assets - D2O- cell A5		
Assets - D2O- cell A6		
Assets - D2O- cell A7		
Assets - D2O- cell A8		
Assets - D2O- cell A9		
Assets - D2O- cell A10		
Assets - D2O- cell A11		
Assets - D2O- cell A13		

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
Assets - D2O- cell A14		
Assets - D2O- cell A15		
Assets - D2O- cell A16		
Assets - D2O- cell A17		
Assets - D2O- cell A19		
Assets - D2O- cell A20		
Assets - D2O- cell A21		
Assets - D2O- cell A22		
Assets - D2O- cell A23		
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Assets - D2O- cell A26		
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Assets - D2O- cell A29		
Assets - D2O- cell A31		
Assets - D2O- cell A32		
Assets - D2O- cell A33		
Assets - D2O- cell A34		
Assets - D2O- cell A35		
Assets - D3- cell A1		
Assets - D3- cell A3		
Assets - D3- cell A4		
Assets - D3- cell A6		
Assets - D3- cell A7		
Assets - D3- cell A8		

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
Assets - D3- cell A15		
Assets - D4- cell A1		
Assets - D4- cell A2		
Assets - D4- cell A3		
Assets - D4- cell A4		
Assets - D4- cell A5		
Assets - D4- cell A6		
Assets - D4- cell A7		
Assets - D4- cell A8		
Assets - D5- cell A1		
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Assets - D5- cell A5		
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Assets - D5- cell A7		
Assets - D5- cell A8		
Assets - D5- cell A9		
Assets - D5- cell A10		
Assets - D5- cell A11		
Assets - D5- cell A12		
Assets - D5- cell A13		
Assets - D5- cell A14		
TP - F1Q- cell A1		
TP – F1Q- cell A3		
TP – F1Q- cell A5		

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
TP – F1Q- cell A6		
TP – F1Q- cell A7		
TP – F1Q- cell A9		
TP – F1Q- cell A10		
TP – F1Q- cell A12		
TP – F1Q- cell A13		
TP – F1Q- cell A14		
TP - F1Q- cell B1		
TP - F1Q- cell B2		
TP - F1Q- cell B3		
TP - F1Q- cell B4		
TP - F1Q- cell B5		
TP - F1Q- cell B6		
TP - F1Q- cell B7		
TP - F1Q- cell B9		
TP - F1Q- cell B10		
TP - F1Q- cell B11		
TP - F1Q- cell B12		
TP - F1Q- cell B13		
TP - F1Q- cell B14		
TP - F1Q- cell C1		
TP - F1Q- cell C2		
TP - F1Q- cell C3		
TP - F1Q- cell C4		
TP - F1Q- cell C5		
TP - F1Q- cell C6		

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
TP - F1Q- cell C7		
TP - F1Q- cell B9		
TP - F1Q- cell C10		
TP - F1Q- cell C11		
TP - F1Q- cell C12		
TP - F1Q- cell C13		
TP - F1Q- cell C14		
TP - F1Q- cell E1		
TP - F1Q- cell E2		
TP - F1Q- cell E4		
TP - F1Q- cell E6		
TP - F1Q- cell E7		
TP - F1Q- cell E9		
TP - F1Q- cell E10		
TP - F1Q- cell E12		
TP - F1Q- cell E13		
TP - F1Q- cell E14		
TP - F3- cell A21		
TP - F3- cell A30		
TP - E1Q- cell A11		
TP -E1Q- cell B11		
TP -E1Q- cell C11		
TP - E1Q- cell D11		
TP -E1Q- cell E11		
TP -E1Q- cell F11		
TP - E1Q- cell G11		

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
TP -E1Q- cell H11		
TP -E1Q- cell I11		
TP - E1Q- cell L11		
TP -E1Q- cell M11		
TP -E1Q- cell N11		
TP - E1Q- cell P11		
TP - E1Q- cell P11		
TP -E1Q- cell Q11		
TP - E1Q- cell R11		
TP - E1Q- cell **Q11**		
TP - E1Q- cell A12		
TP -E1Q- cell B12		
TP -E1Q- cell C12		
TP - E1Q- cell D12		
TP -E1Q- cell E12		
TP -E1Q- cell F12		
TP - E1Q- cell G12		
TP -E1Q- cell H12		
TP -E1Q- cell I12		
TP - E1Q- cell L12		
TP -E1Q- cell M12		
TP -E1Q- cell N12		
TP - E1Q- cell O12		
TP - E1Q- cell P12		
TP -E1Q- cell Q12		
TP - E1Q- cell R12		

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
TP - E1Q- cell **Q12**		
TP - E1Q- cell A13		
TP -E1Q- cell B13		
TP -E1Q- cell C13		
TP - E1Q- cell D13		
TP -E1Q- cell E13		
TP -E1Q- cell F13		
TP - E1Q- cell G13		
TP -E1Q- cell H13		
TP -E1Q- cell I13		
TP - E1Q- cell L13		
TP -E1Q- cell M13		
TP -E1Q- cell N13		
TP - E1Q- cell O13		
TP - E1Q- cell P13		
TP -E1Q- cell Q13		
TP - E1Q- cell R13		
TP - E1Q- cell **Q13**		
Re - J2- cell H1		
Re - J2- cell X1		
Re - J2- cell Y1		
Re - J2- cell AG1		
Re - J2- cell AP1		
Re - J3- cell B1		
Re - J3- cell N1		
Re - J3- cell O1		

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Re - J3- cell S1		