



## Reporting templates under Recommendation ESRB/2020/8

### Template 3

On 27 May 2020, the ESRB General Board issued a Recommendation on monitoring the financial stability implications of debt moratoria, and public guarantee schemes and other measures of a fiscal nature taken to protect the real economy in response to the COVID-19 pandemic (ESRB/2020/8)<sup>1</sup>. Recommendation B states that “National macroprudential authorities are recommended to regularly report to the ESRB the information necessary for the ESRB to monitor and assess the implications of the national measures referred to in Recommendation A for financial stability in the Union. This should include information necessary to monitor and assess the cross-border and cross-sectoral implications, as made available to national macroprudential authorities through existing reporting arrangements with financial institutions and any additional information made available by fiscal authorities and other government agencies engaged in the delivery of the measures.” Recommendation ESRB/2020/8 also establishes that “To ensure the coordination of reporting under Recommendation B, the ESRB will publish relevant templates by 30 June 2020” and that “The first report should be submitted by 31 July 2020”.

The aim of this document is to publish the reporting templates referred to under Recommendation ESRB/2020/08. Please note that this document is not intended to be used for reporting to the ESRB under Recommendation ESRB/2020/8. For any query on the process of actual reporting, including requests for the reporting tools and detailed reporting instructions, please contact directly the ESRB Secretariat at [Notifications@esrb.europa.eu](mailto:Notifications@esrb.europa.eu).

The reporting templates are composed of 3 templates covering the features of the measures, their uptake and qualitative information:

- T1 – template to report features of the measures.
- T2 – template to report the uptake of measures (loan moratoria, public guarantees, public loans, equity participation, direct grants, tax measures, public support for credit insurance).
- T3 – template for a qualitative questionnaire.

This document describes Template 3, as approved by the ESRB General Board on 24 June 2020 and amended on 25 March 2021.

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<sup>1</sup> Recommendation ESRB/2020/8 on monitoring the financial stability implications of debt moratoria, public guarantee schemes and other measures of fiscal nature taken to protect the real economy in response to the COVID-19 pandemic

## Template 3 on Qualitative Questions

Reporting through **Template 3.1** shall be submitted **by 31 July 2020**.

Reporting through **Template 3.2** shall be submitted **for the first time by 30 October 2020** with reference date 30 September 2020 and subsequently on a quarterly basis. From 16 April 2021 it is replaced by Template 3.3, as approved by the General Board on 25 March 2021.

Reporting through **Template 3.3** shall be submitted **for the first time by 30 April 2021** and subsequently on a quarterly basis.

### T3.1 Qualitative Questionnaire 1

Template T3.1, as approved by the General Board of the ESRB on 24 June 2020.

All questions should be answered by **31 July 2020**.

#### 1 - Questions on monitoring framework

*1.1 - Based on your experience, are templates 1 and 2 focusing on the right supporting measures and encompass their relevant features? Is there any issue you find irrelevant or are there still gaps that need to be addressed? If yes, please specify and suggest how to adjust the templates.*

*(limit 400 characters)*

*1.2 - Which monitoring tools is your institution using for identifying and assessing frictions in the implementation of the support measures that might have implications for financial stability?*

*(limit 400 characters)*

*1.3 In which monitoring areas is coordination and sharing of best practices among ESRB's Member States most useful?*

*(limit 400 characters)*

#### 2 - Questions on cross-sectoral implications among the financial system

*2.1 - Do you observe that some financial institutions (e.g. banks, insurance companies, pension funds) are more affected by the implementation of the support measures than others? Going forward, which indicators or areas should the ESRB focus on to monitor potential asymmetries in the impact of the support measures on the financial sector?*

*(limit 400 characters)*

#### 3 - Questions on cross-border implications

*3.1 - Which issues have you already identified from the supporting measures implemented in your jurisdiction that affected or will likely affect other Member States?*

*(limit 400 characters)*

*3.2 - Which issues have you already identified from the supporting measures implemented in other jurisdictions that have affected or will likely affect your jurisdiction in terms of financial stability?*

*(limit 400 characters)*

*3.3 - Which issues should the ESRB monitoring of cross-border implications focus on going forward?*

*(limit 400 characters)*

## T3.2 Qualitative Questionnaire 2

Template T3.2, as approved by the General Board of the ESRB on 24 June 2020.

Questions 1.3, 2.4 and 2.5 should be answered on a best effort basis, while the other questions are mandatory.

### 1 - Questions on liquidity, solvency, indebtedness and the flow of funding to the non-financial sector

1.1 - What effects of the support measures on the non-financial sector are you monitoring? On which variables do you focus your attention?

(limit 400 characters)

1.2 - Which supporting measures have implications for the standard financial stability indicators used to monitor the liquidity, solvency and indebtedness positions of the different segments of the non-financial sector? Please explain.

When answering please consider:

- Impact of measures on credit demand
- Impact of measures on household and NFC leverage
- Impact of state guarantees on the indebtedness of SMEs and large corporates
- Impact of state guarantees on the debt service to income ratio of SMEs and large corporates
- Impact of tax deferrals on the liquidity position of SMEs and large corporates
- Impact of tax reliefs and direct grants on the indebtedness of households

(limit 400 characters)

1.3 - (Non-mandatory) Please indicate the two most important measures for each of the three sectors applied in your jurisdiction.

	Not applied	NFC - SMEs	NFC - Large corporates	Households
Direct grants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Equity participations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Payment moratoria	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public guarantees of loans	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public loans	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tax reliefs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tax deferrals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public support for trade credit insurance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**2 - Questions on soundness of financial institutions**

2.1 - What effects of the support measures on the financial sector are you monitoring? On which variables do you focus your attention?

(limit 400 characters)

2.2 - Describe the effect of the supporting measures on the standard financial stability indicators used to monitor the liquidity, solvency and indebtedness position of the different segments of the financial sector.

When answering please consider:

- Impact of guarantees on credit supply
- Impact of guarantees on bank risk-taking
- Impact of moratoria on NPLs
- Impact of state guarantees on risk weights

(limit 400 characters)

2.3 - Please indicate the two most important measures for each of the three sectors applied in your jurisdiction.

- Direct grants
- Equity participations
- Payment moratoria
- Public guarantees of loans
- Public loans
- Tax reliefs
- Tax deferrals
- Public support for trade credit insurance

Not applied	Banks	Insurers	Funds
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2.4 - (Non-mandatory) In relation to liquidity risk, evaluate the overall levels of risk in each of the following segments of the financial sector, after taking into account the expected impact of the supporting measures implemented in your jurisdiction:

- Banks
- Insurance companies
- Pension funds
- Investment funds

No risk	Low risk	Medium risk	High risk
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2.5 - (Non-mandatory) In relation to solvency risk (incl. debt sustainability), evaluate the overall levels of risk in each of the following segments of the financial sector, after taking into account the expected impact of the supporting measures implemented in your jurisdiction:

- Banks
- Insurance companies
- Pension funds
- Investment funds

No risk	Low risk	Medium risk	High risk
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<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### T3.3 Qualitative Questionnaire 3

Template T3.3, as approved by the General Board of the ESRB on 25 March 2021.

All questions should be answered on a best effort basis.

**Section A: Adjustments of COVID-19 support measures towards supporting solvency of NFC**  
 Please provide information about recent or planned adjustments to COVID-19 support measures and their expected impact on the solvency of non-financial corporations in your jurisdiction.

1. Have measures supporting liquidity been modified or replaced by measures aiming to provide better solvency support to non-financial corporates? Please specify cases where these measures have already been implemented or are currently planned and/or discussed. Liquidity measures include loan moratoria, public guarantees to loans, public loans or tax deferral and solvency measures include direct grants, tax relief or equity participation. Examples of these changes could be a conversion of public guarantees or loans into non-refundable direct grants or a conversion of repayable debt into equity participation instruments.

2. Have new measures been introduced or previous measures been modified in order to provide more targeted support? Please specify cases where these measures have already been implemented or are currently planned and/or discussed. Enhanced targeting could be achieved for example by focusing on the sectors most affected during the pandemic or through an assessment of firms' expected viability after COVID-19, possibly with the involvement of private lenders.

3. Are there any assessments of the financial stability implications of the phasing out/ better targeting of fiscal measures available for your jurisdiction? Please include any links to public sources.

**Section B: Changes to debt restructuring processes and their implications for corporate insolvencies**  
 Please describe any recently introduced or planned legislative measures or private initiatives regarding debt restructuring processes in your jurisdiction.

4. Regarding loan moratoria schemes, do you see any actions from banks to initiate restructuring of loan terms with clients before the moratoria expire? If yes, please specify.

5. Regarding public guarantees to loans, do you see any implications for a potential debt restructuring of loans, for example a delay or even an impediment of early restructuring? If yes, please specify.

6. Regarding the expiry of support measures in general, do you see any other evidence that banks or other private creditors are preparing for debt restructuring needs ahead of the expiry? If yes, please specify. Examples could be initiatives taken by governments or private stakeholders (e.g. bank associations or business associations) to encourage private creditors to anticipate restructuring needs of private corporations.

7. What changes to the legal framework for restructuring - that have been introduced in the aftermath of the COVID-19 pandemic or are planned - could have a mitigating effect on insolvencies when there is a phase-out of support measures? Examples of such measures could be (a) changes to legal rules affecting the likelihood of debt restructuring, including conditions for creditor-initiated insolvency filings, veto powers of creditors, or the role of courts; (b) specific provisions for SMEs. The purpose of the question is not to provide a description of all changes due under the 2019 Restructuring Directive (<http://data.europa.eu/eli/dir/2019/1023/oj>) but any additional changes made specifically due to the COVID-19 pandemic.

**Section C: Financial stability risks from corporate insolvencies**  
 To better monitor how the withdrawal of measures could affect financial stability, please provide information on corporate insolvencies in your jurisdiction.

8. Are there assessments of the impact of fiscal measures on corporate insolvencies available in your jurisdiction? If available, please include any links to public sources.

9. What are the numbers of corporate insolvencies in your jurisdiction? Please provide the numbers in the following table on a best effort basis and indicate if they are estimates. Provide the maximum length of time series available. By corporate insolvency we refer to the number of legal units (including sole entrepreneurs) that have started the procedure of being declared bankrupt, by issuing a court declaration, at any time during the reference period (this declaration is often provisional and does not always mean cessation of an activity)

Year	Number	Source(s)	Link(s) to public source(s)	Comments (e.g. identify if it is an estimate, underlying assumptions for estimates, additional relevant quarterly or sectoral data, scope of legal entities, break in series, particular events, etc.)
2022				
2021				
2020				
2019				
2018				
2017				
2016				
2015				
2014				
2013				
2012				
2011				
2010				
2009				