

AnaCredit FAQ V2.0 – General Queries			
Code	Category	Question	Answer
ACGQ1	Nil Return	How should a reporting agent submit a return if they have no eligible instruments?	<p>The definition of eligible instruments under the AnaCredit Regulation is considered broad and covers many types of instruments beyond what would be typically considered loans. For example, a deposit (on the asset side of the balance sheet) is an eligible instrument. This includes deposits with related companies/branches and with national central banks/ECB. The responsibility for reporting on all eligible instruments lies with reporting agents.</p> <p>However, in the event that any resident bank (including Irish branches of credit institutions located elsewhere) does not provide any credit, they will still be required to submit a blank/empty file if there are no eligible instruments to report in that particular period.</p>
ACGQ2	Instruments	Are intra-group loans subject to reporting?	<p>Intra-group loans are subject to reporting primarily because the observed agent who extends such loans acts as creditor for these instruments.</p> <p>In fact, intra-group loans in which the observed agent acts as creditor whereas another institutional unit of the legal entity (of which the observed agent is a part) acts as debtor meet the condition in Article 4.1.(a)(i) of the AnaCredit Regulation. In this respect, it is irrelevant whether such instruments are serviced by the observed agent.</p> <p>The definition of credit risk in the AnaCredit Regulation is at the level of institutional units – in accordance with Article 1.21, ‘credit risk’ means the risk that a counterparty fails to make any payments that it is contractually obliged to make, while pursuant to Article 1.10 ‘counterparty’ means an institutional unit’.</p> <p>Intra-group loans are in principle not registered on the balance sheet, i.e. they are not assets. Consequently, no accounting information is required in the accounting dataset for such loans.</p> <p>Please also note that AnaCredit is similar to BSI reporting (the RS2 return submitted to the Statistics Division of the Central Bank of Ireland). Statistical returns are compiled on an individual (solo) basis rather than a consolidated basis, so all intra-MFI transactions must be reported.</p>

ACGQ3	Instruments	Is an overnight balance that is held with another bank deemed a loan under AnaCredit?	An overnight balance that is held with another bank is deemed a loan under AnaCredit.
ACGQ4	Instruments	Are unapproved debit balances on client current accounts deemed to be loans under AnaCredit reporting terms?	<p>Yes. Instruments with off-balance-sheet characteristics that may be withdrawn (and thus creating on-balance-sheet positions) are in the scope of the reporting requirements. Examples of such instruments are overdrafts, revolving credit and credit lines.</p> <p>Strict off-balance-sheet instruments, in contrast, are not part of the reporting requirement - examples of these include guarantees.</p>

ACGQ5	Instruments	What is the definition of credit for the purposes of AnaCredit reporting, and what type of instruments are covered?	<p>Article 4.1 of the AnaCredit Regulation states the following: Reporting agents shall report credit data of the observed agent in accordance with Article 6 for the instruments satisfying the conditions defined in Article 5:</p> <p>(a) where at any reporting reference date within the reference period the instrument:</p> <ul style="list-style-type: none"> (i) gives rise to credit risk for the observed agent, or (ii) is an asset of the observed agent, or (iii) is recognised under the relevant accounting standard used by the observed agent's legal entity and gave rise to credit risk for the observed agent in the past, or (iv) is serviced by the observed agent resident in a reporting Member State; and <ul style="list-style-type: none"> i. was granted to other institutional units of the same legal entity that the observed agent is part of, or ii. is held by a legal entity which is not a credit institution resident in a reporting member state different to the observed agent; and <p>(b) where at least one debtor is a legal entity or is part of a legal entity as defined in Article 1(5).</p> <p>Instruments to be collected comprise outstanding financing under any of the following types of credit:</p> <ul style="list-style-type: none"> • Deposits (to the extent that they may be assets, not liabilities); • Overdrafts; • Credit card debt; • Revolving credit other than overdrafts and credit card debt; • Credit lines other than revolving credit; • Reverse repurchase agreements; • Trade receivables; • Financial leases; and • Other loans
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ACGQ6	Derogations	Are we classified as a resident bank if we are a branch of a non-resident bank?	<p>All Irish resident credit institutions are subject to the reporting requirements laid out in the AnaCredit Regulation. This includes:</p> <ul style="list-style-type: none"> • Institutions incorporated and located in the Republic of Ireland, including subsidiaries of parent companies located outside the Republic of Ireland; • Branches of institutions that have their head office outside the Republic of Ireland.
ACGQ7	Derogations	What are the criteria for a small reporting agent to receive a derogation from AnaCredit reporting?	<p>Article 16 of the Regulation allows derogations to be applied to small reporting agents. A full derogation may be granted by the Central Bank of Ireland to small reporting agents, provided that the combined contribution of these reporting agents to the total outstanding amount of loans reported under the BSI Regulation (as reported in the Central Bank of Ireland RS2 return) by all reporting agents resident in Ireland does not exceed 2%.</p> <p>Furthermore, the Central Bank of Ireland is entitled to allow small reporting agents to report credit data relating to reporting reference dates prior to 1st January 2021 on a quarterly instead of a monthly basis, provided that the combined contribution of these reporting agents to the total outstanding amount of loans reported under the BSI Regulation does not exceed 4%.</p> <p>The Central Bank has taken the following decisions in relation to the above:</p> <p>(1) A full derogation has been granted to a large number of small credit unions. The total combined contribution of credit unions to the total outstanding amount of loans reported under the BSI Regulation is in excess of 2%. Therefore, a number of credit unions will still be obliged to report. No resident banks will be granted a full derogation.</p> <p>(2) A partial derogation (i.e. quarterly reporting until January 2021) has been granted to the credit unions that are outside the scope of the full derogation in (1). No resident banks will be granted a partial derogation.</p> <p>All credit unions have been notified of their reporting requirements as outlined above.</p>

ACGQ8	CCR	How does the Central Credit Register differ from AnaCredit?	<p>The Central Credit Register (CCR) is a separate project, driven by a specific piece of legislation, the Credit Reporting Act 2013. The scope and purpose of the CCR and AnaCredit projects are quite different, and Irish resident banks will be required to provide data satisfying both. There is, of course, some overlap in terms of the data requirements. During the design phase of the CCR project, the attributes and domain values were developed to align with AnaCredit where possible. The aim of this is to ensure that similar pieces of information are not requested twice using different descriptions and definitions. This work will continue as the CCR project progresses and in particular as the focus shifts from private individuals to business entities.</p> <p>Based on the preliminary analysis undertaken by the Central Bank's AnaCredit team, approximately one third of AnaCredit attributes might reuse CCR information in one of the following ways:</p> <ol style="list-style-type: none"> 1. Direct: The CCR attribute is directly aligned with the AnaCredit attribute, i.e. the CCR value meets the AnaCredit requirement; 2. Transformation: CCR attribute information can be used to meet an AnaCredit attribute requirement, however additional work or information may be required; or 3. Mapping: CCR attribute domain values can be mapped to an AnaCredit attribute domain values. <p>Note that the above reuse would not completely satisfy the AnaCredit requirements due to a difference in scope (e.g. inclusion of inter-bank activity in AnaCredit).</p>
ACGQ9	Instruments	Can the Central Bank confirm whether securitised bonds are in scope?	<p>The reporting of holdings of securities is out of scope of AnaCredit.</p> <p>In the case of a traditional securitisation of a loan, the originating credit institution usually continues to act as the servicer to the loan, even after the sale of the loan to a Special Purpose Vehicle (SPV). Therefore, the originating credit institution is still likely to be a Reporting Agent and/or Observed Agent and will take the role of servicer and originator, but no longer the creditor. The securities issued by the SPV are not in the scope of AnaCredit.</p>

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ACGQ10	Instruments	Are non-consumer mortgages are out of scope?	Loans granted for the purpose of real estate purchase are in scope, provided that the loan is granted to a legal entity.
ACGQ11	Instruments	Are Northern Irish activities in scope where a product governed by Irish law is offered to a UK legal entity, e.g. a Euro loan)?	Any AnaCredit-eligible instrument for which the Observed Agent acts as creditor and/or servicer is in scope, regardless of where the debtor is located. Therefore, if the product in question has been granted by the Irish-resident part of a credit institution or by one of its euro area resident branches, then the product is reportable for AnaCredit, regardless of the location of the debtor. Please also note that non-euro denominated instruments should be reported in euro at the exchange rate published on the ECB website .
ACGQ12	Instruments	Are commercial card products in scope?	Credit card debt is in scope for AnaCredit. Please refer to the domain values for the attribute "Type of Instrument" in the Instrument data set.
ACGQ13	Instruments	Could the Central Bank provide clarity around reporting amounts split for instruments with a plurality of creditors?	A section dedicated to syndicated loans and other multi-creditor instruments is included in Part III of the ECB AnaCredit Manual. Case 14 in the 'Complete Central Bank of Ireland reports – Case descriptions' provides an example of a syndicated loan granted by a consortium of two banks.
ACGQ14	Project Timelines	Can the Central Bank confirm the timelines and plan for testing and live reporting?	The schedule for test reporting and live reporting is available on the AnaCredit page of the Central Bank website: https://www.centralbank.ie/statistics/statistical-reporting-requirements/anacredit-in-ireland

ACGQ15	Project Timelines	Where can I find the AnaCredit Guidance Notes and Technical specifications and timelines for any outstanding releases?	The AnaCredit page on the Central Bank of Ireland website contains key information and documentation on the AnaCredit Project such as the ECB Reporting Manual, Central Bank of Ireland Guidance Notes & Case Studies, reporting templates & rules, XML schemas etc. Details regarding key project dates are also available on this page.
ACGQ16	Relationship with other Reporting Requirements	What crosschecks will be conducted against already existing statistics and reporting and what is the purpose of these checks?	<p>The ECB have indicated that they intend to undertake cross checks between the statistical reporting of banks and the AnaCredit data. The checks will essentially aggregate the AnaCredit data and compare it with certain cells on the RS2/SQ2, and potentially with the IRM. Tolerances will be applied. The crosschecks will be plausibility checks; as such, they will not be blocking rules, but they may require an explanation as to the reasons for the differences. However, there are no checks currently proposed with the CRS2 data.</p> <p>We will continue to liaise with the ECB on this, but we do not currently have a timeline on when a list of these checks will be available.</p>
ACGQ17	Foreign Branches	Do foreign observed agents outside the euro area have to report to the Central Bank of Ireland?	The Central Bank of Ireland will not require any data to be reported in relation to foreign branches located outside the euro area.
ACGQ18	Foreign Branches	Is it possible to receive a derogation on reporting to the Central Bank of Ireland due to double reporting?	After exploring other means to reduce double reporting to the greatest extent possible, some branches are no longer required to submit AnaCredit data directly to the Central Bank of Ireland. Any impacted reporting agents have been notified individually of this change to their reporting obligations. Reporting agents are encouraged to directly contact the other relevant national central bank (NCB) to confirm any reporting requirements to that NCB.

ACGQ19	Debtors	<p>Could the Central Bank provide detail on the instruments that are in scope for AnaCredit reporting and the eligibility check for determining if a product is in scope? In particular, are the below products in scope:</p> <ul style="list-style-type: none"> • Derivatives - including CDSs, options, equity trackers etc.; • Temporary overdrafts on payment accounts; • Trade Finance; • Electronic funds transfer (EFT). 	<p>Broadly speaking, if an instrument is eligible for reporting under the category of "Loans" on the RS2 return (ECB BSI reporting framework), then it is also AnaCredit-eligible. However, we would encourage reporting institutions to raise any questions or uncertainties with the Central Bank and we will endeavour to resolve these.</p> <p>In relation to the specific items mentioned:</p> <ul style="list-style-type: none"> • Derivatives are not in scope. • Overdrafts are in scope. • Trade finance is in scope, provided it matches the definition of trade receivables used in FINREP reporting, i.e. loans to other debtors granted on the basis of bills or other documents that give the right to receive the proceeds of transactions for the sale of goods or provision of services • Electronic funds transfer is a means of payment, rather than an instrument. It is the underlying instrument that is relevant, and if this is a credit facility then it could of course be AnaCredit eligible.
ACGQ20	Reporting Threshold	<p>Could the Central Bank confirm the threshold amount for instruments to be reported?</p>	<p>The threshold amount imposed by the Central Bank of Ireland is zero, or effectively zero.</p> <p>In practice, however, it may be necessary to apply a very low threshold and/or to rely on reporting agent discretion, to ensure that data reported to the Central Bank are meaningful, and do not include dormant accounts or other accounts with very low balances. If such a situation is required by a reporting institution, they should notify the Central Bank of the intended approach. In general, a deviation from a zero threshold will only be permitted if the change results in a non-material change in the reporting volumes and the economic interpretation of the reporting agents loan portfolios.</p>
ACGQ21	Foreign Counterparties	<p>Are counterparties outside of the euro area (e.g. UK and US) out of scope?</p>	<p>All legal entity counterparties are in scope, regardless of their residency. Note that the requirements for counterparty reference data are reduced if the counterparty is resident outside the euro area.</p>

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ACGQ22	Counterparties	Can the Central Bank provide guidance on instances where an individual, in addition to a legal entity, is counterparty to an instrument?	Reporting agents must report instruments where at least one debtor is a legal entity or is part of a legal entity. However, in the situation where natural persons are affiliated with an instrument reported to AnaCredit, no record for the natural persons is reported. For information on the general treatment of natural persons, please refer to Part II of the ECB Manual.
ACGQ23	Data Protection	Is the data accessible by any third parties outside of the Central Bank and ECB?	<p>The data will be available to approved ESCB users. There is some possibilities that data may be available to external parties:</p> <ul style="list-style-type: none"> • From time to time, academic users may be provided access for non-commercial research purposes. Such requests are under strict confidentiality arrangements. Any such request will be for specified research projects only. • The AnaCredit Regulation also provides for the establishment of feedback loops for industry. The Central Bank of Ireland currently has no plans to establish feedback loops using AnaCredit data as the Central Credit Register is providing this service in Ireland.
ACGQ24	Project Timelines	Regarding the submission of reference data for all legal entities active as at end-December 2017 by 31st January 2018, is there a testing period for submission of this data prior to the due date in 2018?	A test window for submission of counterparty reference data will be open from 29 September 2017 until after the first deadline for reporting counterparty data (i.e. 31 January 2018). The live system will be available from 31 October 2017 and the deadline for first reporting is 31 January 2018.
ACGQ25	Project Timelines	For data submitted during the period October 2017 to 31 January 2018 - what is the reporting date of the information, e.g. if submitting data in October 2017 should the data be as at 30 September 2017?	During the phase from October 2017 to January 2018 there will not be any strict requirements on which counterparty reference date is provided to us, so long as it is an end month date. However, by the 31 January 2018 deadline, reporting agents are required to report reference data on all counterparties as at 31 December 2017.

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ACGQ26	Counterparties	It is our understanding that Irish sole traders should not be reported to AnaCredit unless they are legal entities according to national law. How should sole proprietors across Europe be treated for the purposes of reporting?	In general, unincorporated bodies (such as sole traders/proprietors) are not regarded as legal entities as a matter of Irish law and, as such, fall outside the scope of AnaCredit. In relation to sole traders/proprietors in other countries, the ECB has published a list of all possible legal status in each country on their website, some of which specifically include sole proprietor and partnerships.
ACGQ27	National Template	What reporting agents are required to provide a National template?	All banks that are required to report National Template were informed on 24 February 2017. The first reporting date on the national reporting templates will be end-March 2019. The AnaCredit Team at the Central Bank will liaise directly with the affected reporting agents regarding timetables and further details.
ACGQ28	Credit Unions	Could you provide details on the derogations that were granted to credit unions and clarify under what circumstances a credit union may be subject to reporting in future?	<p>In order to ensure the proportionality of the reporting obligations established in this Regulation, the Central Bank of Ireland may grant derogations to small reporting agents, provided that the combined contribution of all reporting agents that are granted a derogation to the total outstanding amount of loans does not exceed 2 per cent. The combined contribution of all Credit Unions exceeds this 2 per cent threshold. As a result, not all credit unions can be granted derogations. This has resulted in 38 credit unions having reporting requirements.</p> <p>The regulation also allows national central banks to grant a temporary reduced frequency reporting to small reporting agents, as long as this does not exceed 4 per cent of total outstanding amount of loans. This will result in quarterly reporting instead of monthly, up to end-2020. We have granted this reduced reporting to the 38 credit unions who have reporting obligations.</p> <p>The Central Bank will review the reporting population each year to ensure the thresholds are being maintained. This review may result in institutions entering (or leaving) the reporting populations. We will give 18 months' notice to any institution entering the reporting population. The reasons for entering the reporting population vary and can include an institution growing in size (either organically or through mergers). It may also be the result of a decline of the total amount of loans, which will result in a decline in the amount of loans that can be granted derogations (i.e. the threshold declines if it is set at 2% of a lower number).</p>

ACGQ29	Cross Checks	Will there be any cross checks between AnaCredit and other reporting requirements?	<p>The ECB have indicated that they intend to undertake cross checks between the statistical reporting of banks and the AnaCredit data. The checks will essentially aggregate the AnaCredit data and compare it with certain cells on the RS2/SQ2, and potentially with the IRM. The crosschecks will be plausibility checks; as such, they will not be blocking rules, but they may require an explanation as to the reasons for the differences. However, there are no checks currently proposed with the CRS2 data.</p> <p>We will continue to liaise with the ECB on this, but we do not currently have a timeline on when a list of these checks will be available.</p>
ACGQ30	Testing	Are the test windows conducted on a mandatory basis?	<p>The test window is not mandatory and it is being implemented for reporting agents to use for their own testing purposes. However, it is mandatory that each bank be in a position to report at the go-live date. We recommend testing in advance to avoid unexpected difficulties that may arise during the approach to the first reporting deadline.</p>
ACGQ31	Operating Leases	Are operating leases subject to AnaCredit reporting?	<p>Operating leases are not subject to AnaCredit reporting as they do not fall within the definition of loans, but are instead included in non-financial assets by the ECB.</p>
ACGQ32	Money Market Deposits	Are Money Market Deposits subject to AnaCredit reporting?	<p>Yes, deposits (on the asset side of the balance sheet) are eligible instruments as per Article 1(23) of the Regulation.</p>

ACGQ33	Deposits with ECB	Are deposits with the ECB subject to AnaCredit reporting?	<p>Yes, deposits (or any other eligible instruments) with the ECB and National Central Banks are in scope of AnaCredit.</p> <p>Firstly, instruments exchanged between two parties where one party is, or will be, obliged to make repayments arising under the instrument are generally considered to give rise to credit risk irrespective of the degree of credit risk.</p> <p>Secondly, eligible instruments are subject to AnaCredit reporting if they are assets recognised under the relevant accounting standard used by the observed agent's legal entity, even though such instruments may not be considered to give rise to credit risk to the observed agent. "</p>
ACGQ34	Refinancing	Should refinancing be reported as a change to an existing contract or as a new contract with a debt financing purpose? Does this new contract have to be linked to the prior contract?	<p>This really depends on how the bank structures the deal internally. A new instrument should only be reported if a new instrument is created. If it is simply a restructuring of the existing instrument then the reporting agent should continue to report for that instrument. Part II of the ECB manual states that "In the case of instruments refinanced in part or in full where forbearance measures in accordance with the ITS apply (e.g. when a debt restructuring takes place) and the original instrument (or instruments) is effectively redeemed and replaced with a new one (identified by a new contract and instrument identifier), it is clarified that only the new instrument (instruments) is reported (while the original instrument in fact no longer exists and cannot therefore be subject to AnaCredit reporting). However, it is necessary to flag the new instrument(s) as forborne (by reporting the appropriate forborne value) directly from the inception date."</p>
ACGQ35	Overdrafts	Are unapproved overdrafts subject to AnaCredit reporting?	<p>All eligible instruments are in scope irrespective if they are approved or unapproved. If a reporting agent believes that this would bring in a significant amount of accounts with very low volumes then we would be happy to discuss possible approaches to dealing with these.</p>
ACGQ36	Off-balance sheet items	Are undrawn facilities that have no outstanding amount on the Balance sheet but have an Off-Balance sheet amount eligible for reporting?	<p>For instruments with an intrinsic off-balance-sheet amount, i.e. an undrawn amount, there are types of instrument where an instrument reported to AnaCredit has a zero outstanding nominal amount and a positive off-balance-sheet amount - as long as a positive outstanding nominal amount can be drawn on the basis of the credit contract under which the instrument arises, e.g. a credit card where no amount has been drawn.</p>

ACGQ37	Securitisations	How should securitisations be reported from an AnaCredit perspective?	<p>Section 6 of the ECB manual Part III, which was published in May 2017, provides detail on the treatment for specific cases of securitisation, namely:</p> <ul style="list-style-type: none"> • traditional securitisations; • synthetic securitisations; • partially securitised instruments; • loans granted to financial vehicle corporations or other counterparties in • the securitisation transfer; • self-securitisations and credit enhancements; • other special cases.
ACGQ38	Unpaid past due interest	<p>According to the Reporting Manual Part II, unpaid past due interest is included in the outstanding nominal amount. When accrued interest is not paid when due, it gives rise to interest arrears. Is the accrued interest that is due but not paid included in the outstanding nominal amount only or is it also included in the accrued interest?</p>	<p>Yes, interest due is included in the 'outstanding nominal amount' data attribute.</p> <ul style="list-style-type: none"> • Accrued interest is not included in the 'outstanding nominal amount' data attribute until it is due. • However, as soon as accrued interest is due, it is not included in the 'accrued interest' data attribute – accrued interest that is payable is moved to interest due, so to speak. • Finally, interest due that is paid is not included in the 'outstanding nominal amount' data attribute – this is because the amount has been paid and this payment has reduced the outstanding nominal amount. <p>Please note that the distinction between accrued interest and interest due is important because while debtors pay interest only periodically, say once a month, interest is continually being accrued.</p>
ACGQ39	Multiple instruments in a contract	How should a contract with multiple instruments be reported?	The reporting requirement is on an instrument level. The same contract identifier should be used for all instruments in the contract (but separate instrument identifiers should be reported).
ACGQ40	End of reporting	When should a reporting agent stop reporting a loan?	Case 19 in our 'Complete Central Bank of Ireland reports' provides an example of when a Reporting Agent should stop reporting a loan. The ECB have also clarified that only loans with write-offs need to be reported until the end of the quarter; loans repaid can stop being reported in the month that they are repaid.

ACGQ41	Criteria triggering reporting	Is an instrument eligible for reporting when it is drawn down in part or in full (settlement date) in the case of a fixed-sum credit, and from the inception date for any form of revolving credit?	Correct - See Case 2 in ECB Manual Part III for fixed-sum reporting example where reporting begins after the settlement date (and not the agreement date).
ACGQ42	Reporting agents and observed agents	Are subsidiaries of reporting agents that are not credit institutions or bank licence holders in scope as reporting or observed agents?	Subsidiaries which are credit institutions resident in a reporting Member State are reporting agents and report data on their own activity as creditor or servicer and, if applicable, on the activity of their foreign branches.
ACGQ43	Natural Persons	How should credit data related to natural persons that are joint debtors or protection providers be treated?	<p>No data on natural persons should be reported.</p> <p>Case 18 in the 'Complete Central Bank of Ireland reports – Case descriptions' on our webpage provides an example of the reporting requirements for an instrument with a guarantee by a Natural Person.</p> <p>Information on protection providers must be reported in 4 datasets:-</p> <ul style="list-style-type: none"> - Protection received dataset; - Instrument-protection dataset; - Counterparty-instrument; - Counterparty dataset <p>The ECB manual states that you should collect the information regarding the protection but not on the person. In practice this means:</p> <ul style="list-style-type: none"> • Report all the details in the protection received dataset. The protection provider ID attribute should be flagged as “non-applicable”. (Section 2.2.7 Part II of manual) • Report all details in the Instrument-protection received dataset • No information at all should be reported on the counterparty dataset • No information on the counterparty should be reported on the counterparty-instrument dataset

AnaCredit FAQ V2.0 – Dataset & Attribute Queries				
Code	Dataset	Attribute	Question	Answer
ACDA1	Instrument Data	Syndicated Contract Identifier	Would the Central Bank consider accepting a flag to identify syndicated lending as opposed to a syndicated contract identifier?	The syndicated contract identifier is an ECB requirement. The Central Bank of Ireland has no discretion in relation to this attribute.
ACDA2	Protection Received Data	Date of Protection Value	In relation to the field 'Date of Original Protection Value', could the Central Bank confirm whether instruments originated prior to 1 September 2018 are required to be reported?	This attribute is required to be reported to the Central Bank for all instruments, including those originated prior to 1st September 2018. (The Central Bank of Ireland Position on Reduced Reporting document that is available on our website details the decisions on any reductions that are at the discretion of NCBs.)
ACDA3	Protection Received Data	Original Protection Value	In relation to the field 'Original Protection Value', could the Central Bank confirm whether they will require instruments originating prior to 1 September 2018 to be reported?	This attribute is required to be reported for all instruments, including those originated prior to 1st September 2018. (The Central Bank of Ireland Position on Reduced Reporting document that is available on our website details the decisions on any reductions that are at the discretion of NCBs.)

ACDA4	ALL		If a data set is not relevant for an in-scope product, how should this reported or can it be omitted?	For certain instruments, some datasets do not have to be reported. An example of this is for instruments where there is only one debtor, so no data record at all is reported in the joint liabilities dataset. In other words, the joint liabilities dataset is not reported where there is only one debtor of an instrument (i.e. only one counterparty is liable for the instrument, disregarding protection providers).
ACDA5	Instrument Data	Recourse	In relation to the attribute 'Recourse', are the categories 'Recourse' and 'No Recourse' intended to cover every form of security e.g. letters of comfort and guarantors?	<p>Recourse instruments are these where the creditor has the right (stipulated by the contract) to seize the debtor's assets other than any protection pledged to secure the instrument. With a recourse loan (or recourse debt), the debtor is liable for any unpaid debt, and if the debtor defaults the creditor can take action to collect – even after seizing collateral. For trade receivables please refer to Part III of the Manual, which deals specifically with factoring and other trade receivables.</p> <p>With a non-recourse instrument, if the debtor defaults, the creditor can seize and sell the collateral pledged to secure the loan, but if the collateral sells for less than the debt the creditor cannot seek the deficiency balance from the debtor.</p>
ACDA6	Counterparty Reference Data	Date of Enterprise Size	In relation to the field 'date of enterprise size', could the Central Bank clarify whether the field can also be the date of account opening or date of annual review (i.e. data captured)?	Yes, this field is intended to reflect the date at which the latest data were captured by the reporting institution.

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ACDA7	Counterparty Reference Data	Address	In relation to the 'address' attributes, would the Central Bank consider an attribute that provides the opportunity for the full address as concatenated text (in line with the CCR)?	Separate reporting of each address line is a requirement of the ECB's RIAD system, which is the system to which the Central Bank will transmit all counterparty reference data.
ACDA8	Counterparty Reference Data	Name	In relation to the attribute 'Name', would the Central Bank consider accepting the name as captured on bank systems as opposed to full legal name?	No, the reporting requirement is the full legal name.
ACDA9	Counterparty Reference Data	Head Office Undertaking Identifier	In relation to the attribute 'Head office undertaking identifier', we'd ask the Central Bank to provide further detail and a worked example of the head office identifier data point in relation to counterparty information?	Information on reporting the Head Office Undertaking Identifier is provided in 4.2.6 in the Notes on Compilation. Examples of reporting this attribute can also be found in a number of the case studies in the 'Complete Central Bank of Ireland reports' Case Descriptions & Data.
ACDA10	All		For attributes such as 'Number of Employees', are exact figures required, or will reporting agents be able to select from ranges/bands?	The ECB requirement is for an exact figure to be transmitted.

ACDA11	Financial Data	Off-balance sheet amounts	Does this include guarantees?	No, the total nominal amount of off-balance-sheet exposures should not take into account any protection held.
ACDA12	Financial Data	Date of past due for the instrument	Which date is applicable for arrears that have been partially repaid, i.e. if a customer is in arrears for 3 months and makes 1 month's repayment, does the date revert to the two months arrears date or does it stay at the date the arrears commenced (3 months in this case)?	The data attribute "date of past due for the instrument" is the date of the first amount (principal, interest and expenses) due that is still unpaid at the reporting reference date.
ACDA13	Instrument Data	Purpose	Should the refinancing of a Commercial Real Estate (CRE) loan be reported as CRE purchase or debt financing?	<p>If a new instrument is issued for the purpose of refinancing a CRE loan, then the purpose should be reported as "Debt financing". The initial purpose of the refinanced instrument is not relevant.</p> <p>If the terms and conditions of an existing instrument are modified because of some form of forbearance, then the original purpose of that instrument is unchanged.</p>
ACDA14	Instrument Data	Inception Date	Is this the date the last party signs the contract? If it is not recorded on our system, can we use the loan start date?	The inception date should be the date on which the last party signs the contract. What is described here as the "loan start date" may be closer conceptually to the AnaCredit Settlement date, i.e. the drawdown date. A validation rule will ensure that the settlement date is greater than or equal to the inception date.

ACDA15	Counterparty Reference Data	Head Office/Immediate/Ultimate Parent Identifier	The definitions in the Counterparty Reference Data fields for Head Office/Immediate/Ultimate Parent refer to a 'counterparty identifier'. Do we refer to the List of National Identifiers table provided to populate these fields?	Each institutional unit will have its own 'counterparty identifier' – this should be the reporting agent's own internal identifier, which is required to be unique at reporting agent level. These identifiers should be used to populate the attributes [Head office undertaking identifier], [Immediate parent undertaking identifier] and [Ultimate parent undertaking identifier] which must be reported by the reporting agent for any debtor with at least one instrument originated at or after 1 September 2018.
ACDA16	Counterparty Reference Data	Counterparty Identifier	Will the Central Bank of Ireland system accept multiple counterparty records with the same National Identifier but different Counterparty Identifiers?	<p>The counterparty identifier must satisfy the following principles:</p> <p>Principle of uniqueness: RAs have to use these identifiers consistently across all data transmissions, and shall always use the same code for the same counterparty, even if a counterparty is reintroduced in the AnaCredit reporting after a period in which the counterparty was not subject to reporting.</p> <p>Principle of exclusivity: In no case should a counterparty identifier which was used to identify a counterparty at any point in time be re-used to identify another counterparty e.g., including when a counterparty no longer falls under the AnaCredit reporting requirements, it is not active any longer or is to be deleted from the system.</p>

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ACDA17	Counterparty Reference Data	Head Office/Immediate/Ultimate Parent Identifier	The Immediate parent & Ultimate parent attributes are only required for new customers and existing customers as new lending takes place. Will the AnaCredit database be able to accept fully populated Immediate parent & Ultimate parent attributes when the system goes live?	Yes, the database will accept these attributes even if they are not required (based on the role of the counterparty).
ACDA18	Counterparty Reference Data	Non-Irish identifier	For 'National Identifier' in some countries, we currently have a mix of Rank 1 & 2 Identifiers. Is it acceptable to report Rank 1 for one customer and Rank 2 for another customer in the same country, or is there a requirement to use only one identifier ranking per country and customer type?	For the national identifier that applies to a foreign counterparty we will accept any of the identifiers specified for that country, regardless of the rank.
ACDA19	Counterparty Reference Data	Reporting Agent Identifier	The Notes on Compilation states that the reporting agent identifier will be provided by the Central Bank to respective reporting agents. Could you confirm our reporting agent identifier?	The Central Bank has published a list of reporting agents and observed agents, which includes identifiers.

ACDA20	All	Reporting Templates	How do the ACPRD, ACR1B, ACR2B & ACR1CU data requirements differ from the AnaCredit Regulation Data Tables spreadsheet in detailing what is required for Counterparty reference data, Instrument data, etc.?	<p>The AnaCredit Regulation Data Tables outline the data requirements as per the AnaCredit Regulation. However, the Central Bank undertook a significant amount of localisation of the Counterparty Reference tables; additional attributes were included on ACPRD in order to assist in collecting and uniquely identifying all counterparties in Ireland which are not listed on Dataset 1 - Counterparty Reference Data on the 'AnaCredit Regulation Data Tables'. Further information on these can be found in the Notes on Compilation and on the Central Bank of Ireland Counterparty Template and Rules.</p> <p>In contrast, the Central Bank has made very limited deviations on ACR1B and ACR2B from the core AnaCredit tables as outlined in the ECB regulations. One additional attribute has been added to Dataset 9 – Counterparty risk data, i.e. 'Date of Probability of Default'.</p> <p>Please note that ACR1CU is only a reporting requirement for credit unions.</p>
ACDA21	All	Identifiers	Does the Central Bank have any preference on counterparty, contract, instrument, protection, or protection provider identifiers?	The identifiers to be used are at the discretion of the reporting agent. However, the identifiers must meet the principles of uniqueness and exclusivity as per section 4.2.2 of the notes on compilation.
ACDA22	Counterparty Reference Data	Role: 6.Protection Provider	Do Reporting Agents do have to report on protection providers that are not resident in a reporting Member State?	Yes; however, there are reduced requirements for this, which are outlined in the Role Req. (Non-Res) sheet of the Central Bank of Ireland Counterparty Template and Rules.

ACDA23	Counterparty Reference Data	Legal Form	Where can I access a list of legal forms in each country?	<ul style="list-style-type: none"> • The list of legal forms is available on the ECB AnaCredit page together with Part II of the Manual. • According to the Manual, the reporting instructions for the attribute [Legal form] is as follows: <ul style="list-style-type: none"> - For foreign branches, the value 'NA' (Non-applicable) is to be reported. This attribute is not applicable to foreign branches; it applies only to legal entities. In the case of counterparties which are foreign branches, information on the legal form is reported in the counterparty record of the head office undertaking which represents the legal entity; - For special funds the value 'SPFUND' (Conventional legal form for Special funds) is to be reported, unless a legal form from the relevant country list is deemed more appropriate in that specific case; - For UK (and all other non-EU) counterparties, one of the following options is reported (i.e. the one that best represents the country-specific legal form of that particular counterparty): <ul style="list-style-type: none"> - corporation; - cooperative; - partnership; - sole trader; - limited liability company; - other.
ACDA24	Instrument Data	Interest Rate Cap & Interest Rate Floor & Interest Rate Spread/Margin	Should these attributes be reported as N/A if the Interest rate is fixed?	<p>We can confirm that the N/A option should be selected for these attributes if the interest rate type for the instrument is fixed. In addition, the validation checks that will be performed on these data require that these attributes be marked as N/A for instruments with fixed interest rates.</p>

ACDA25	Instrument Data	Interest Rate Reset Frequency	Should this attribute be reported as N/A if the interest rate is fixed?	<p>This is dependent on the terms and conditions of the instrument. For example, the ECB Reporting Manual states (Part II, pg. 45) that fixed interest rates “may contain more than one constant interest rate to be applied at different periods during the life of the exposure e.g. loan with a constant interest rate during the initial fixed rate period, which then changes to a different interest rate, which is still constant, and which was known at the inception of the exposure”.</p>
ACDA26	Protection Received Data	Type of protection	Are leased assets considered as collateral?	<p>The AnaCredit Reporting Manual defines financial leases as loans from the lessor (i.e. the legal owner of an asset (for example a durable good) to the lessee (the party to whom the lessor lends this asset) enabling the lessee to rent the durable good.</p> <p>The asset, which has been lent to the lessee, is recorded as protection in the protection received dataset, and the appropriate type of protection is assigned to the protection item. In addition, the holder of the asset is reported as the protection provider.</p> <p>The “financial leases” type of instrument applies to all instruments, which meet the definition as set out in paragraphs 5.134 to 5.135 of Annex A to Regulation (EU) No 549/2013, irrespective of whether the debtor has the right to acquire possession of the asset at the end of the lease period.</p> <p>The lessor is recorded as the creditor to the instrument whereas the lessee is the debtor to the instrument. However, as discussed in Item 1 of our previous response, operating leases (being such from the perspective of the lessee) are not subject to AnaCredit reporting at the current stage of AnaCredit.</p> <p>An example of protection in the case of instruments classified as financial lease is provided in Example 55 in Part II of the AnaCredit Reporting Manual.</p>

ACDA27	Instrument Data	Purpose	Could you clarify which purpose should be reported in the case of financing provided for the purchase of real estate that is not occupied by the owner or the lessee, based on the definition of residential real estate provided in Article 4(1) (75) of Regulation (EU) 575/2013?	<p>For the purposes of AnaCredit, reporting agents should classify residential and/or commercial real estate in accordance with the classification they apply for the capital calculation in accordance with Regulation (EU) 575/2013.</p> <p>In particular, it is clarified that in accordance with Article 125(1) (a) of Regulation (EU) 575/2013, which states that, for “exposures [...] secured by mortgages on residential property which is or shall be occupied or let by the owner, or the beneficial owner in the case of personal investment companies, ...”, the data attribute “purpose” is reported as “residential real estate purchase”, including for loans provided to finance unoccupied residential real estate.</p>
ACDA28	Counterparty risk data	Probability of default	Is it mandatory to report this attribute?	<p>As per 11.4.1 of the AnaCredit Manual Part II, this data attribute is subject to AnaCredit reporting for counterparties reported to AnaCredit which are:</p> <ul style="list-style-type: none"> • debtors; • protection providers, on condition that they are at the same time the issuers of the protection (in particular, if the protection item is a financial guarantee as defined in the ITS). <p>The reporting of this data attribute to AnaCredit is not required if the reporting agent is not required to determine PD estimates for debtors and protection providers concerned in accordance with the IRB approach of the CRR.</p> <p>Credit Unions are not required to report this attribute or data set.</p>

ACDA29	Counterparty Reference Data	National Identifiers	<p>What guidance will the ECB provide for national identifiers relating to counterparties that are resident in a country that does not appear in the list of national identifiers?</p> <p>Is the national identifier listing on the ECB website the final version?</p>	<p>The list is a living document and will change as identifiers evolve. It is the current official version and can be considered comprehensive.</p> <p>If the counterparty is resident in a country which does not appear in the list of national identifiers (category marked as 'Any other country' at the bottom of the list of national identifiers'), the first available identification code from the below ranked list should be reported:</p> <ol style="list-style-type: none"> 1) Tax code; 2) VAT number; 3) Trade register number; 4) Business register number; 5) Supervisory identification number; 6) Investment/Pension fund identifier; 7) National Central Bank identifier; 8) National Statistical Institute number; 9) Public sector entity identifier; 10) Other.
ACDA30	Counterparty Reference Data		<p>In relation to the requirements to provide detailed data on counterparties (employees, balance sheet, turnover) for instruments originated prior to 1 September 2018, could detailed counterparty data be reported in agreed ranges/bands (e.g. 11-50 employees) or using agreed midpoints for those bands (e.g. 33 employees), rather than exact figures?</p>	<p>Data for the Number of Employees, Balance sheet total, and Annual turnover are only required for post 1 Sept 2018 instruments. However, the Regulation requires that exact data be reported. Please contact the Central Bank if there are specific portfolios for which this is problematic.</p>

ACDA31	Counterparty Reference Data	Economic Activity	Is it mandatory to report NACE at Level 4 granularity?	Level 4 is not necessary, but can be reported - Level 2, 3 or 4 can be reported in accordance with Regulation (EC) No 1893/2006.
ACDA32	Counterparty Reference Data	Status of Legal Proceedings	What should be included under other legal measures? Should this be based on measures taken only by the reporting or observed agents?	A value should not only be reported if the respective observed agent has taken legal action, but also when the reporting agent is aware of any legal action that has been taken against the counterparty by a third party (e.g. by a distinct reporting agent).
ACDA33	Counterparty Reference Data		Should monthly updates of counterparty reference data be limited to new or changed data or should it include all data?	The Counterparty reference data is to be submitted monthly and should include any new counterparties during that reporting period as well as any changes to existing counterparties. All counterparty records should be submitted initially as all are considered new counterparties. However, following the initial submission, only new or changed records should be reported.