BANQUE CENTRALE DU LUXEMBOURG
EUROSYSTÈME

Report AnaCredit
Reporting instructions

Version 4.5

January 2025

Summary of versions

Version	Date	Comments
1.0	26 April 2017	Initial version
2.0	20 July 2017	Updated reporting dates
2.1	26 October 2017	Description of the test phases
2.1.1	10 November 2017	Minor changes
2.3	11 January 2018	Added data collection operation Added data quality management
2.3.1	2nd February 2018	Updated test phases
2.3.2	26 March 2018	Minor changes
2.3.3	9 April 2018	Minor changes
2.3.4	4 May 2018	Changes related to the starting date of the second test phase
2.3.5	9 August 2018	Resident counterparts without national identifier International organisations Submission types
2.3.6	17 December 2018	Action “Delete” Use of Deltas
2.4	23 September 2019	Use of “dummy values” Key attributes Elaboration of the data flows Extended use of the “Full replacement” transmission type
2.4.1	24 October 2019	Link to the guidance on non-EU entities identifiers search SDMX schemas versioning LEI codes reporting
2.4.2	8 June 2020	Updated schema on data flows Clarification concerning quality report types Chapter on DQIs Clarification concerning international organisations
2.5	22 Mars 2021	Restructuring of chapters on feedbacks Clarifications concerning the DQIs
3.0	14 March 2022	General update on the instructions New functioning of resubmissions
4.0	10 October 2022	New data quality framework from September 2022 onwards
4.1	27 January 2023	Update of feedbacks
4.2	8 March 2023	Information about the limitation of 10’000 errors per feedback added
4.3	27 November 2023	Minor update on the feedbacks sent
4.4	6 February 2024	Update of the deadline for T2Q Update of the correction timeline for any comparison with AnaCredit

4.5	3 January 2025	Update of the DQIs

Contents

1 Introduction

1.1 Legal basis and reporting perimeter

The legal basis for the AnaCredit report is Regulation (EU) 2016/867 of the European central bank of 18 May 2016 on the collection of granular credit data and credit risk data (ECB/2016/13) (henceforth “the Regulation”). Moreover, the Regulation is transposed in Luxembourg by circular 2017/240 “Introduction of the collection of granular credit data and credit risk data”.

The Regulation defines reporting agents’ reporting requirements, while the purpose of the reporting instructions below consists solely in providing clarifications on those points in the Regulation which are discretionary. In case of potential divergences or contradictions, only the Regulation is binding.

1.2 Reporting population and reporting requirements

In line with Article 3 of the Regulation, the reporting population in Luxembourg covers all credit institutions and foreign branches resident in Luxembourg (henceforth “reporting agents”), independently of their legal status. However, Article 6 states that in order to avoid double reporting, the competent national central banks (NCBs) can coordinate data collection if both the legal entity and its foreign branch are resident in a reporting Member State. The coordination between competent NCBs consists in granting derogations to the respective branches, if applicable, in order to make sure that only one competent NCB collects the data in question.

Against this background, reporting agents which are legal entities (as per Article 1.5 of the Regulation) will transmit to the Banque centrale du Luxembourg (BCL) the entire data set as laid out in Annex I of the Regulation. If these reporting agents have foreign branches (as per Article 1.4 of the Regulation) resident in another reporting Member State, they will also transmit to the BCL the entire data set laid out in Annex 1 for these foreign branches, with the exception of those branches that have been granted a derogation. Such a derogation is granted if, and

only if, the NCB of another reporting Member State already collects the entire data. If applicable, the concerned reporting agents shall be contacted individually by the BCL.

As for foreign branches located in Luxembourg, these branches shall also transmit the entire data set as laid out in Annex 1 of the Regulation. As with foreign branches resident in another reporting Member State, a derogation shall be granted to foreign branches located in Luxembourg if, and only if, another NCB already collects the entire data. If that is the case, the concerned reporting agents shall be contacted individually by the BCL. It should be noted that the concept of the "single branch" (as per Article 1.4 of the Regulation) is applicable.

The BCL has published on its website a comprehensive list of all reporting Member States.

1.3 Reporting frequency and deadlines

The AnaCredit report consists of several data sets as defined in Annex I of the Regulation. The BCL establishes and publishes, on its website, a calendar with remittance dates for the AnaCredit report (Reporting dates). Sections 1.3.1 to 1.3.2 below provide complementary information. It should be noted that all reporting deadlines are provisional and may be subject to revisions.

1.3.1 Monthly transmission to be carried out

Data sets 1, 2, 3, 4, 5, 7, 8, 9 and 10 from Annex I of the Regulation shall be transmitted to the BCL on a monthly basis, at the latest on the 15th working day after the end of the reference period to which they pertain. In this context, it should be emphasised that according to Table 1 from Annex II several data attributes may not be required under specific circumstances (see also Section 1.4 below).

1.3.2 Quarterly transmission to be carried out

Data set 6 from Annex I of the Regulation shall be transmitted to the BCL on a quarterly basis at the latest on the 15th working day after the end of the reference period to which it pertains, in order to provide enough time for the correction of discrepancies within the comparisons with S1.1/S1.5/FINREP. In this context, it should be emphasised that according to Table 1 from

Annex II several data attributes may not be required under specific circumstances (see also Section 1.4 below).

1.4 Specific reporting requirements

1.4.1 Provisions relating to Annex II and III of the Regulation

According to Table 1 from Annex II, as well as Tables 2 and 3 from Annex III, case-specific reporting requirements apply under particular circumstances which do not call for the transmission of the entire data set.

The three above-mentioned tables distinguish between two classifications:

1 The information is required, and

2 X – the information is not required.

Reporting agents can transmit information classified as “X”, on a voluntary basis, to the BCL. However, it should be noted that once the information classified “X” has been transmitted to the BCL, it is the responsibility of the reporting agents to provide it for each period and with the same quality of the information specifically required by the AnaCredit Regulation. Indeed, this information will be subject to the same qualitative requirements as the mandatory data.

Furthermore, in the context of the provisions in chapter 12.1.3.1 of the AnaCredit Manual – Part II, it should be noted that the BCL has decided to use its right to collect entire reference data on non-debtor MFIs.

1.4.2 Special cases

With regard to the reporting of the “Currency” attribute, the breakdowns are based on the ISO 4217 currency codes. For the particular case of the CNH currency code, it should be noted that the instruments denominated in CNH are to be reported with the CNY currency code and to be converted into Euro at the applicable EUR / CNY rate.

In addition, to convert currencies into Euro, please refer to the ECB's website. In the event that a currency does not appear on the latter, please use the exchange rates provided by Bloomberg.

2 The data to be reported

The data that must be reported, as well as the conditions that must be met with regard to the instruments to be reported, are defined in the Regulation, in particular in Articles 4, 5 and 6. Moreover, Annexes I, II, III and IV of the Regulation provide comprehensive explanations regarding the data attributes that have to be reported.

The BCL decided not to extend the reporting perimeter beyond the requirements set out in the Regulation.

Additional information and guidance regarding the data to be reported are available on the website of the European central bank by clicking on the following link:
https://www.ecb.europa.eu/stats/money/aggregates/anacredit/html/index.en.html

The section entitled “AnaCredit Manual” in particular addresses many conceptual and methodological issues.

2.1 The counterparty identifiers to be used

In line with Article 9 of the Regulation, all counterparties have to be identified by means of their Legal Entity Identifier (LEI) whenever the latter is available. If no LEI code has been assigned, the attribute should be reported as “not applicable” (NEVS = 0) and not with the LEI code of the parent company for example. Furthermore, a national identifier must be reported for each counterparty, even if a LEI has been provided.

The list of national identifiers is available on the ECB’s website (List of national identifiers), as well as a guidance on non-EU entities identifiers search (Generic identifiers). For counterparties resident in Luxembourg, the identification number from the Trade and Companies Register (“the RCS number”) must be used for the data attribute “National identifier” defined in the Regulation. This identifier should be reported as it appears in the Trade and Companies Register and should not have its structure modified.

Each observed agent under the competency of the BCL should be identified with the national identifier listed in the list of reporting agents.

As regards the particular case of public administrations and other public entities for which no RCS number exists, they should be identified by their international VAT number. This also applies to the BCL (VAT number: 15444328).

Regarding investment funds, SIF and SICAR, we draw the attention of reporting agents to the fact that credit granted to these entities must be declared at the level of the sub-funds, unless these entities have a traditional structure.

With regard to the identification of investment funds and their sub-funds, they must be declared using their number assigned by the Commission de surveillance du secteur financier (the "CSSF matricule").

- Number assigned by the CSSF to UCIs, SIFs, SICARs and sub-funds: the identification number of UCIs, FIS and SICAR is defined by 6 characters and the identification number of the sub-funds is defined by 5 characters.

For example:

- A traditional investment fund without any sub-fund is identified by the ECB by the "CSSF matricule" consisting of: OxxxxxxC00000.
- A sub-fund of an investment fund is identified as: OxxxxxxCxxxxx.

It should be noted that these identification numbers serve as a basis for the establishment of the RIAD code, which is available on the ECB's website (Official list ECB). However, for the purposes of AnaCredit reporting, the LU prefix is not to be reported.

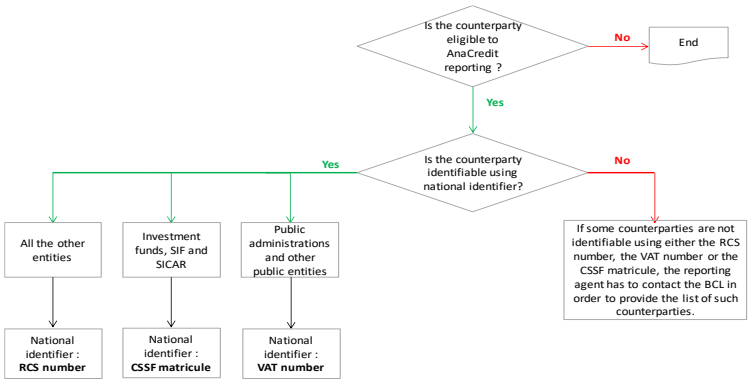
Moreover, for all counterparties, whether resident or not, reporting agents must report the data attribute "Counterparty identifier"[1], which is a unique internal identifier attributed by each

[1] See, for instance, data set "1. Counterparty reference data", Template 1, Annex I of the Regulation

reporting agent. It should be noted that this data attribute may, under specific circumstances, overlap with one or several of the following identifiers:

- Reporting agent identifier
- Observed agent identifier
- Head office undertaking identifier
- Immediate parent undertaking identifier
- Ultimate parent undertaking identifier
- Protection provider identifier

Some resident counterparties are not identifiable[2] with the regular national identifiers including RCS number, VAT code and CSSF code for investment funds, SIF and SICAR. In such cases, a list of those non-identifiable counterparties has to be sent to the BCL in order to assign them a RIAD code. The reference data reporting for resident counterparties is described hereafter:



2.2 Special values (Non applicable – Not required)

In addition to values as defined in Annex IV of the Regulation, the attributes can also take the following values:

- “Non applicable”
- “Not required”

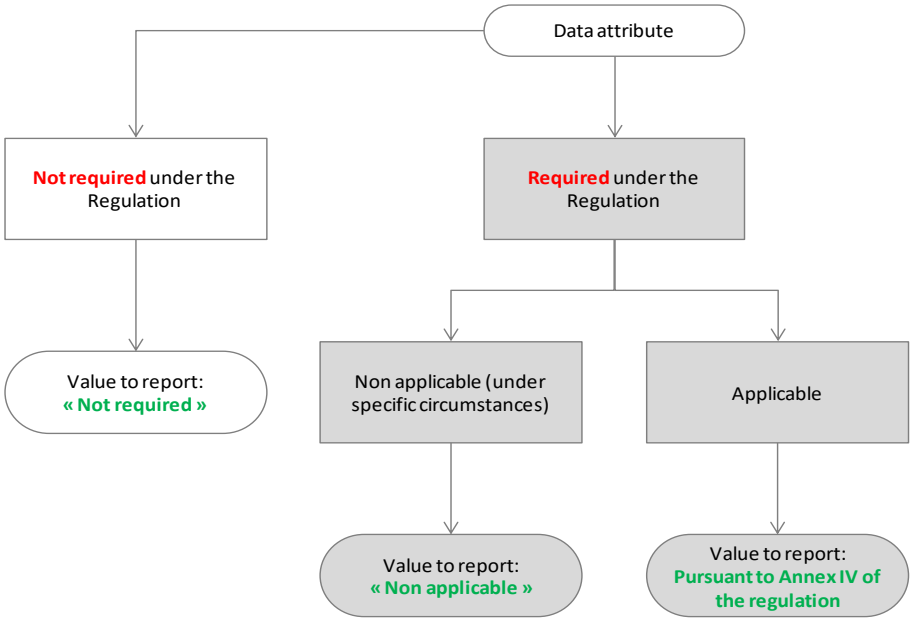
Specifically, if a data attribute is not required by the Regulation (tables 2 and 3 of Annex III) or by the BCL validation rules (completeness part), then the data attribute has to be reported as

[2] This situation is extraordinary. A resident counterparty should be identifiable with the requested national identifier.

"Not required". However, if no value can actually be provided for an attribute which is considered as required by the Regulation, the value "Non applicable" is accepted.

As an example, the attribute postal code is required by the Regulation. However, for some addresses the postal code doesn't exist. Therefore, the value "Non applicable" can be used for the attribute postal code.

Moreover, the BCL has limited the use of "Non applicable" values. Please refer to the validation rules, sheet "Non applicable". The following chart explains the use of special values:



2.3 International organisations

In accordance with the regulation, the BCL does not require all reference attributes for international organisations. Indeed, the reporting agent has to provide the unique code (RIAD code) published by the ECB (List of international organisations). This code has to be sent using the attribute "ENTTY_RIAD_CD". In addition, the following data are also requested:

- Name
- City
- Country

3 Data collection operation

3.1 Transmission channels

The data must be transmitted to the BCL via the usual secure transmission channels, namely:

- the data transmission platform “e-file”
- the application “SOFIE”

3.2 Transmission principles

3.2.1 Transmission standards

The statistical information exchange standard used for AnaCredit is the SDMX[3] (Statistical Data and Metadata eXchange) format. This standard describes and formalizes the statistical data exchange and provides standard data formats, content guidelines and IT architecture for the data exchange. For AnaCredit, the SDMX-ML exchange format (using XML syntax) is required.

A dedicated technical document is available on the BCL’s website. The purpose of this document is to describe the formats to be used for AnaCredit.

3.2.2 Submission of SDMX-ML files

One SDMX-ML file must be reported for each:

- Reporting agent (hereafter “RA”)
- Observed agent (hereafter “OA”) – for data sets 2 to 10 (credit data)
- Survey (section 3.2.3)
- Reference period
- Submission type

[3] Statistical Data and Metadata eXchange (SDMX) is an initiative sponsored by seven institutions (BIS, ECB, Eurostat, IMF, OECD, UN and World Bank) to provide standards for statistical information exchange.

3.2.3 Characteristics of the transmitted data

AnaCredit data are divided into ten sets, taking into account the static or dynamic properties of the attributes. The following table describes the ten data sets according to their variables' types (dynamic or static):

Datasets		Variable type	Survey
1	Counterparty reference data	Static data	BCL_ANCRDT_T1_REF
2	Instrument data	Static data	Template 1 monthly BCL_ANCRDT_T1M
3	Financial data	Dynamic data	
4	Counterparty-instrument data	Static data	
5	Joint liabilities data	Dynamic data	
7	Protection received data	Static data	Template 2 monthly BCL_ANCRDT_T2M
8	Instrument-protection received data	Dynamic data	
9	Counterparty risk data	Dynamic data	
10	Counterparty default data	Dynamic data	
6	Accounting data	Dynamic data	Template 2 quarterly BCL_ANCRDT_T2Q

Static variables group attributes whose values are initialized during the first data transmission and they are in principle assumed to remain constant throughout the life of the instrument. Conversely, a dynamic variable is reset on each monthly transmission.

For example, data set 2 "Instrument data" includes static attributes such as the currency, the date of creation or the floor rate of the instrument, variables which are not likely to change. In data set 3 "Financial data", accounting for accrued interest is considered dynamic.

3.2.4 Resubmissions

In case of resubmissions related to a correction of the data initially sent by a reporting agent, **the report(s) triggering the errors** are to be reported as "Full replacement", always using the version of the SDMX schemas valid at the reference date. An exception exists for all submissions and resubmissions for the reference periods before April 2023, which have to be transmitted in the SDMX schemas version 1.0.7.

The list of applicable SDMX schemas per reference date can be found on the site of the BCL (Applicable SDMX Schemas per RD).

3.2.5 Key attributes

The attributes “Observed Agent Identifier”, “Counterparty Identifier”, “Contract Identifier”, “Instrument Identifier” et “Protection identifier” are consider as key attributes. Therefore, they must be unique and invariable over time. In the event of a change of application or IT provider, it is the responsibility of the reporting agent to continue to provide the BCL with identical key attributes.

4 Data quality management

4.1 Reporting agents’ awareness regarding data quality

Reporting agents should be aware of the importance regarding the quality of the data submitted to the BCL and of the need to submit the data in accordance with the validation rules available on the BCL’s website. Only a rigorous control carried out as soon as the data is produced will enable the quality requirements to be met within the given deadlines. This is all the more important as the data collected will be monitored by the ECB.

As such, prior to their reception at the BCL, the files are checked by the transmission channels SOFIE and e-file if they are **XSD compliant**. In the case where a file is not XSD valid, the file is rejected and the reporting agent is informed by the transmission channel SOFIE or e-file.

If no XSD errors are detected at level of the transmission channels, the files are received at the BCL, where additional **technical validations** are performed (e.g. checking if the name of the file is unique). Regardless of the result of these technical validations, a technical feedback will be sent to the reporting agents.

In case there are no technical errors, the files will be loaded into the “AnaCredit” application, where a **business data quality check** will be performed on the set of files received. In any case, a business feedback per survey will be sent to the reporting agents, which will inform them if errors have been detected or not. The dimensions of the data quality checks are defined

in chapter 4.2. Furthermore, only the first 10'000 errors will be shown in the data quality feedbacks.

We would also like to recall that the use of "dummy values", namely a technically correct value but which is reported when the true value is not known (for example, a date equivalent to 31/12/9999), is prohibited. Reporting agents using dummy values are invited to contact the BCL as soon as possible and to correct the data already reported. Furthermore, the "advanced data quality checks" will scan all datasets for the excessive usage of dummy values.

4.2 Dimensions of the business data quality checks

The different AnaCredit validation rules can be classified into several dimensions:

1 Referential integrity (RI)
2 Consistency (CN and CS)
3 Completeness (CT and CY)
4 Uniqueness (UQ and UN)
5 Data compliance (TR)
6 Plausibility (GCMA and PC)
7 Comparisons with other statistical and prudential reports
8 Referential data quality check
9 Advanced data quality checks

Note:

The checks presented below may be subject to change. Other validation rules will later complement the document mentioned above. They will include consistency checks with other statistical reports in particular.

4.2.1 Referential integrity

Quality checks regarding the referential integrity of the data ensures that all the attributes of each of the ten data sets exist and are consistent with each other. More specifically, the purpose of these validation rules is to verify that the mutual dependencies between attributes of the same instrument are respected.

4.2.2 Consistency

The consistency rules ensure that the logic of the AnaCredit model is respected. Consequently, the primary objective of these rules is not the verification of individual requirements but the consistency between the reported data. It is therefore necessary to check that the values of one data set are compatible with the values of another data set.

The syntax and notation used are as follows:

Descriptions	Symbols	Algorithms
Assigning a value to an attribute	=	[Dataset.Attribute] = 'Value'
If an attribute must be different from a predefined value	<>	[Dataset.Attribute] <> 'Value'
If multiple values can be assigned to a single attribute	IN	[Dataset.Attribute] IN {'Value1', 'Value2', 'Value…'}
Adding conditions with logical operators	IF, THEN, WHERE,…	IF [Dataset1.Attribute1] = 'Value1' THEN [Dataset2.Attribute2] = 'Value2'
Empty cell	{ }	[Dataset1.Attribute1] <> { }

4.2.3 Completeness

The purpose of these validation rules is to ensure that all the attributes required by the Regulation are submitted to the BCL.

4.2.4 Uniqueness

The uniqueness rules ensure that, depending on the granularity defined, each declared record is uniquely identifiable by a combination of attributes. To do this, the following attributes are considered as "key attributes":

1 Reference date
2 RA identifier
3 OA identifier
4 Counterparty identifier
5 Instrument identifier
6 Contract identifier

4.2.5 Data Compliance

These rules enable to check mainly if the AnaCredit header of the files is correctly reported. As an example if the correct schemas are used and if the message id is unique.

4.2.6 Plausibility

Plausibility checks are also implemented. These checks include outlier detection and monitoring the monthly evolution of the credit portfolio.

4.2.7 Comparison with other statistical and prudential reports

The comparison with other statistical reports is currently limited to the comparison of AnaCredit data to the iBSI (S 1.1), iMIR (S 1.5) reports and FINREP (a future comparison with COREP is planned as well). The methodology used for these comparisons is published on the website of the BCL and a link can be found within the annexes of this document.

4.2.8 Referential data quality check

Ad hoc quality checks are performed on the referential data received. These checks allow the BCL to identify possible inconsistencies of certain key variables, which are needed for the allocation of a RIAD code. Key variables include:

- Country
- Type of national identifier and the corresponding identifier
- LEI code

4.2.9 Advanced data quality checks

For the continuous improvement of AnaCredit data quality, the BCL/ECB have introduced specific checks on important attributes (concentration and units of scale checks). Additional checks have been introduced (e.g. on the interest rate), which scan the AnaCredit datasets for excessive usage of dummy values and non-plausible values.

4.3 Data quality reports

If the data reported do not meet the qualitative requirements of the BCL or the ECB, a negative report is sent to the reporting agent notifying him of the attributes to be corrected and re-submitted. In case the data reported satisfy the qualitative requirements of the BCL and the ECB, a positive report, in the form of a DQI report, is sent to the reporting agents to notify them of the correct and valid submission of their data to the ECB. The thresholds of the DQIs are described in chapter 4.6 and 4.7.

It should be noted that the BCL and the ECB might return to reporting agents following the transmission to the ECB, even though a positive report has been sent before, in case important issues have been detected through additional checks (examples: plausibility of data, detection of “dummy values” or abnormal values).

Feedbacks will only be sent via the transmission channels SOFIE and e-file (Circulaire BCL 2021/243). The nomenclature of the feedbacks is the following one:

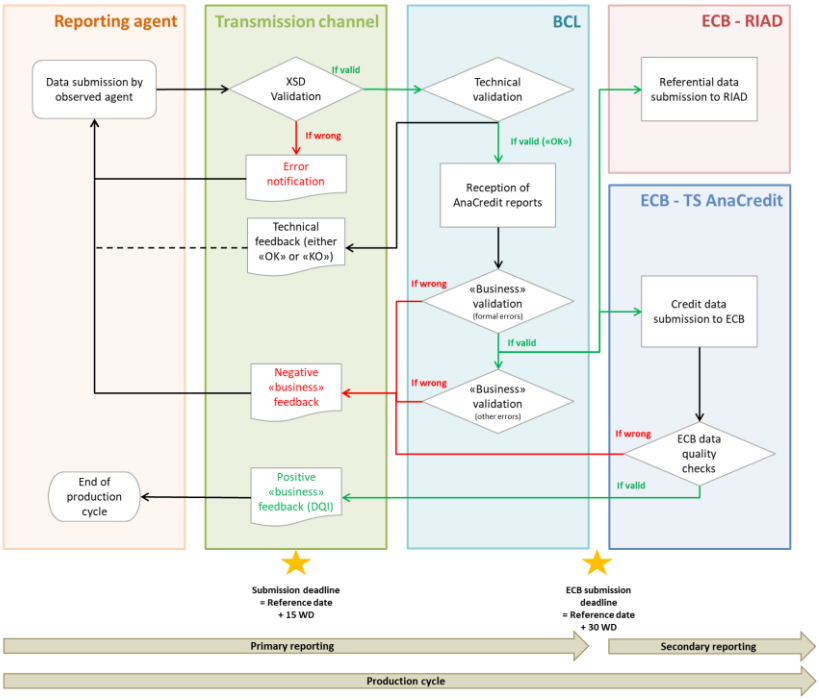
- Technical feedback:
  FDBTECH_{OK,KO}_[DATE_OF_FEEDBACK]_[NAME_OF_ENTRY_FILE]_[BCL_EXCHANGE_ID].[EXTENSION]
- Business feedback:
  FDBBUSI_[DATE_OF_FEEDBACK]_[NAME_OF_ENTRY_FILE]_[FEEDBACK_TYPE]_[BCL_EXCHANGE_ID].[EXTENSION]

Concerning the technical feedbacks, it is the responsibility of the reporting agents to verify that the whole set of files has received a positive technical feedback and to correct and resend files, which received a negative technical feedback. Only files, which received a positive technical feedback, are considered as received by the BCL (necessary condition for determining if a reporting agent is compliant with the reporting calendar).

In addition, it should be noted that multiple business feedbacks are provided for each file transmitted to the BCL. Even though the name of the business feedbacks is very similar, the content of those files could be on different data quality dimensions (please consider chapter

4.2). The content of the files is specified by the [FEEDBACK_TYPE] included in the name of the feedback:

- FRML-VLDR (Formal validation and business validation on reference data)
- FDB-FRML (formal feedback on credit data)
- ADHC-FDB (Ad-hoc feedback on referential data and credit data)
- RA-RIAD (Comparison between different referential sources)
- VLD-RSLT (business validation on credit data)
- DQI-DTL (detailed DQIs)
- DQ-RPRT (DQI Summary)
- BSI-MIR (iBSI/iMIR comparison feedback)
- CR-FR (COREP/FINREP comparison feedback)



4.4 Error types

This section discusses actions to be taken when detecting errors in data sets sent by reporting agents. Different measures should be considered, depending on the severity of the errors. The degree of severity is determined by the potential impact of an error on the data quality. The severity of the errors is assessed as follows:

- 1st Priority Class: Checks related to the major AnaCredit items/building blocks, namely instruments, counterparties and protections, including the overall top AnaCredit data quality priority, to ensure that the complete portfolio is reported.
- 2nd Priority Class: Including checks for the most important AnaCredit attributes.
- Other Priority Class: Remaining checks on AnaCredit attributes.

The error type is indicated for each validation rule and is available on the website of the BCL. Errors, which are within the first and second priority class are mandatory to be corrected for all periods. From March 2025 onwards, validation rules within the “other” priority class also will have to be corrected.

4.5 Revision deadlines and data preservation

Files containing XSD errors or technical errors have to be corrected as a priority, since these files cannot be injected in the “AnaCredit” application at the BCL.

Regarding the business feedbacks, a distinction is made between formal errors and other types of errors. Please note that every formal error has to be corrected within 3 working days following the reception of the feedback. Any error other than formal errors (e.g. validation rules, etc.) has to be corrected within 5 working days following the reception of the feedback. If the correction of those errors (except for formal errors) is not possible within 5 working days, the reporting agent has to communicate the reasons to the BCL and furthermore provide a precise resubmission schedule (to be communicated within 5 working days following the reception of the feedback). Due to the new non-compliance procedure at the ECB, for any comparison between AnaCredit and another dataset, the reporting agent has 20 working days to correct the data.

Reporting agents must keep AnaCredit data and related documents for twenty-four months. The BCL reserves the right to request corrections up to twenty-four months since the last notification of errors.

4.6 Data quality indicators before the reference date of September 2022

The data quality of the reports submitted by reporting agents is measured based on data quality indicators (DQI). Typically, these indicators are calculated by dividing the number of errors by the number of observations (e.g. 5 CY0010 errors out of 100 counterparties reported result in a DQI of 5%). Next, a weighted average of all DQIs is calculated for each dimension. Currently, the DQIs are calculated on the following dimensions:

- Reporting population (report received, XSD validation, data compliance etc.)
- Referential integrity (RI)
- Completeness – counterparty reference data (CY)
- Completeness – credit data (CT)
- Consistency (CN)
- Outliers (GCMA and PC)
- Comparison with iBSI and iMIR reports (S 1.1/S 1.5 in Luxembourg)[4]
- Comparison with COREP and FINREP reports

The main objective of these DQIs is to provide an overall assessment of the quality of the reports, regardless of the size of the reporting agent's portfolio. If all the DQIs of a reference period are below the predefined thresholds, the quality of the data for this same period is considered satisfactory. Therefore, no resubmission is required.

Dimension	**From January 2020[5]**
All (except iBSI/iMIR and COREP/FINREP comparison)	2[6] %
iBSI/iMIR and COREP/FINREP comparison	Please consider the methodology of the comparisons.

The table below shows the thresholds applicable by reference period:

As long as no information on the DQIs of a reference month has been communicated, the reporting agents are expected to continue resubmitting corrected reports based on the feedback submitted.

[5] The BCL reserves the right to request further corrections if they are deemed necessary.
[6] However, a 0 % thresholds is applied to referential integrity errors.

4.7 Data quality indicators from the reference date of September 2022 onwards

The data quality of the reports submitted by reporting agents is measured based on data quality indicators (DQI). These indicators are sub-divided into first class, second class and other priorities. As long as there are first class and second class issues above the communicated threshold, the focus should be on them and only afterwards the work should be continued on the "other" priorities. The thresholds applicable to each class are calculated as the weighted sum of the outstanding nominal amount (ONA) (affected ONA per type of error divided by the total ONA of the observed agent).

Priority Class	Threshold	Requirement
First Class	<0.75%	Loan portfolio to be complete No missing counterparties Correct debtor and creditor identification No missing instrument data – e.g. accounting No missing protections No inconsistencies compared to the Total in the comparison reports (iBSI, FINREP) Completeness of submission (i.e. no missing files) No referential integrity errors
Second Class	<2.5%	Most relevant AnaCredit attributes to end-users The following errors can be found in this class: • Inconsistencies compared to Sub-Agg. of comparison reports (iBSI) • Missing attributes (CY and CT errors) • Inconsistent attributes (CN and CS errors) • Outliers (GCMA and PC errors) • Concentration • Units of scale
Other	<3 %	From 2025-03 onwards: Remaining errors

Example:
Bank LUB00XXX has 10’000 instruments in its portfolio of 100 million euro ONA. Within that portfolio, some RI0060 errors (First class priority) have been identified. Those RI errors are related to instruments totalling up to 50 million euro of ONA. As a result, 50% (50 million euro/100 million euro) of the ONA is affected by the RI0060 (First class error) errors. Since the threshold for first class priority errors is 0.75%, the RI0060 errors need to be corrected.

The main objective of these new DQIs is to focus on important data quality issues, which have an impact on a significant portion of the portfolio of an observed agent. If all the DQIs of a reference period are below the predefined thresholds, the quality of the data for this same period is considered satisfactory. Therefore, no resubmission is required.

Considering additional RI errors at the ECB, which are not present in your reports, those are counterparties, which could not be identified. Multiple cases are possible:

- No national identifier or LEI reported
- New counterparty and not created in RIAD yet
- Closed counterparty in RIAD

As such, reporting agents are always asked when there are RI errors to first checks their validation errors if some are related to the identification of counterparties.

As long as no information on the DQIs of a reference month has been communicated, the reporting agents are expected to continue resubmitting corrected reports based on the feedback submitted.

5 Contact data at the BCL

For any question related to the AnaCredit report, please contact the AnaCredit team at the BCL (reporting.anacredit@bcl.lu).

For any question, which concerns more precisely referential data, please contact the referential data team at the BCL (sig@bcl.lu).

6 Summary of existing documentation

In the context of AnaCredit, the BCL and the ECB make available the following documents:

Type of document	Entity	Link
Reporting instructions	BCL	[1]
iBSI/iMIR Comparison Methodology	BCL	[2]
COREP/FINREP Comparison Methodology	BCL	[3]
REGULATION (EU) 2016/867 OF THE EUROPEAN CENTRAL BANK of 18 May 2016 on the collection of granular credit and credit risk data (ECB/2016/13)	ECB	[4]
Circular 2017/240 of 21 April 2017	BCL	[5]
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