Report AnaCredit

Methodology used for the comparison between AnaCredit and FINREP reports up to 2023/12

Version 1.0.5

November 2023

Summary of versions

Version	Date	Comments
1.0.0	14 March 2022	Initial Version
1.0.1	27 July 2022	Update of main debtor identification, summary table and DQI threshold
1.0.2	05 October 2022	Expansion of concerned reporting population for this comparison
1.0.3	24 October 2022	Clarifications for observed agents with a legal entity outside of reporting member states have been added
1.0.4	21 June 2023	Advances which are not loans are now excluded from the calculated data points using the FINREP table F 5.01
1.0.5	13 November 2023	Small updates and introduction of the flag "DBTR_RIAD_FND"

Contents

1   Introduction

The European Central Bank (ECB) and the national central banks (NCB) have introduced a quarterly comparison report between AnaCredit and FINREP. The main objective of these reports consists in evaluating the consistency between the reports and in verifying the completeness of AnaCredit data.

From June 2022, all reporting agents with head offices in Luxembourg and reporting FINREP data to the CSSF, are subject to the above-mentioned comparison report and will have to correct any discrepancies within the data. Furthermore, also observed agents, where the head office is outside of a reporting member state, are subject to this comparison. It is important to know that the FINREP comparison will be performed at the solo entity level (N version of FINREP). This means that if a reporting agent has multiple observed agents, then the data of all the observed agents are summed up, in order to compare it to the N version of FINREP.

For reporting agents under the BCL's competency, comparisons with FINREP data will enter into force at the ECB from June 2022 onwards. The comparison will start with selected data points available in the FINREP F 18.00 template, as this one offers benchmarks for the most relevant data breakdowns and attributes.

In terms of data attributes, the benchmarks relate to:

the net carrying amount of loans and advances;

the net carrying amount of loans and advances relating to performing exposures;

the net carrying amount of loans and advances relating to non-performing exposures;

the amount of accumulated impairment and accumulated negative changes in fair value due to credit risk and provisions of loans and advances relating to non-performing exposures.

For additional information, the F 6.01 template, which includes a breakdown of the non-financials corporations by economic activity (NACE codes), will also be provided. Reporting agents, which have many counterparties not resident in a reporting member state, may find some differences since the economic activity is not mandatory for these counterparties.

In this context, the BCL wishes to inform its reporting agents of any inconsistencies detected in order to anticipate their corrections. It is important to note that the ECB relies on the reference data of the RIAD database for the classification of counterparties. It is therefore conceivable that DQIs considered acceptable at the BCL are not acceptable at the ECB. This discrepancy could possibly require a resubmission of the reporting agent.

2 Methodology

2.1 Basic principles

The comparison between AnaCredit and FINREP comprises 38 items ("aggregates") and 1 total item. With regard to FINREP aggregates, corrections are expected for the total item only from June 2022 onwards. Hence, retroactive correction of the inconsistencies is not required. Indeed, the data quality indicator (DQIs) on the total item is only going to be applied from the reference month of June 2022 onwards.

Considering branches, where the legal entity is outside of the reporting member states, differences between AnaCredit and FINREP can appear due to the fact that the carrying amount should not be reported for intracompany loans. As such, reporting agents have to analyse our feedbacks, while taking into account intracompany loans, which are not included in the FINREP Overview and are in the excluded sheet. Only the sections, where loans to "Central banks and credit institutions" should be present and the total, are impacted by intracompany loans. As such, if the only differences in your reports are due to the intracompany issue, please send us a confirmation via mail after having performed your analysis.

Furthermore, some attributes, as like the performing status, are not required for observed agents, which are not subject to capital requirements. As such, differences in the sub-aggregates could be cause by this issue.

In this comparison, the information provided on the main debtor will be taken into account for the classification of multi-debtor instruments (institutional sector / economic activity). In order to identify the main debtor, the debtor which is most indebted vis-à-vis the bank is the more relevant one. In the case that two or more debtors have the same amount of debt, the first debtor in the list will be considered as the main debtor.

Furthermore, "advances that are not loans" are included in the FINREP F 18.00 template, but are not collected in AnaCredit. In order to compare AnaCredit to the FINREP F18.00 table, we will deduct the amounts reported in the F 5.01 table, whenever this table is reported by the reporting agent to the CSSF. This correction will be performed on the following benchmarks: DP_FNRP_F1800_All_00, DP_FNRP_F1800_BNK_00,

DP_FNRP_F1800_GOV_00, DP_FNRP_F1800_OFI_00, and DP_FNRP_F1800_NFC_00. This correction cannot be done at any other sub-aggregate level, as the F 5.01 table is only split by the institutional sector.

Another exception has to be made for the accumulated impairments and negative fair value changes for loans at LOCOM (Lower of Cost or Market). As the development of the ITS has continued, moderate LOCOM assets are now cost based instruments subject to impairment, while strict LOCOM assets should be considered as instruments not subject to impairment. Moreover, in the case of non-performing strict LOCOM assets the accumulated net change in fair value due to credit risk should be reported under FINREP. As this development has not been considered at the inception of AnaCredit, differences may appear. In this case, a reporting agent would need to contact the BCL in order to find a solution. One solution in AnaCredit could consist in reporting the accumulated impairment for non-performing moderate LOCOM assets while the accumulated net change in fair value due to credit risk should be reported for strict LOCOM assets.

It is important to know that the FINREP comparison will be further developed in the near future, with additional aggregates becoming mandatory. As such, reporting agents are strongly advised to consider the sub-aggregates for possible corrections.

The level of consistency of AnaCredit reports compared to FINREP reports is assessed based on a DQI calculated by the BCL. In order for the DQI to be acceptable, the value of the DQI has to be in between 95% and 101%. As from September 2022, the DQI will have to be between 99.25% and 100.75%. The table below summarizes the qualitative requirements according to the reference periods.

Items	From June 2022	From September 2022
Total Item	95% < DQI < 101%	99.25% < DQI < 100.75%
Sub-Aggregates	Highly Recommended	Highly Recommended

Please note that the threshold of 25 kEUR applied in AnaCredit does not exist in FINREP reporting. Therefore, the amount reported in AnaCredit should never be greater than the amount shown in the FINREP report.

We would like to remind you that all attributes and acceptable values are described more in detail in manual part II.

2.2 Comparison with FINREP

2.2.1 Calculation method

The aggregates calculated for the comparison of AnaCredit and FINREP data are described in this chapter.

AnaCredit instruments are broken down based on the following attributes:

- Institutional sector (INSTTTNL_SCTR), where:
    - INSTTTNL_SCTR_MN_DBTR = the main debtor's institutional sector
- Economic Activity (ECNMC_ACTVTY), where:
    - ECNMC_ACTVTY_MN_DBTR = the main debtor's economic activity
- Recognition Status (RCGNTN_STTS)
- Accounting Classification of instrument (ACCNTNG_CLSSFCTN)
- Performing Status (PRFRMNG_STTS)

Similarly, the FINREP sub-aggregates are aggregated taking into account the following variables:

- Institutional sector
- Economic Activity
- Recognition Status
- Accounting Classification of instrument
- Performing Status

Thus, the AnaCredit-FINREP comparison will include the following 39 aggregates[1]:

Item	Description	AnaCredit	FINREP
		Condition	Rows and Columns considered
1.	**DP_FNRP_F1800_ALL_00** Net carrying amount of loans and advances for non-trading assets, vis-à-vis Central banks, General governments, credit institutions, Other financial corporations, Non-financial corporations, and it includes cash and cash balances at central banks and other demand deposits	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND CRRYNG_AMNT <> ""	{F_18.00.a;r080;c010} + {F_18.00.b;r080;c130} + {F_18.00.a;r090;c010} + {F_18.00.b;r090;c130} + {F_18.00.a;r100;c010} + {F_18.00.b;r100;c130} + {F_18.00.a;r110;c010} + {F_18.00.b;r110;c130} + {F_18.00.a;r120;c010} + {F_18.00.b;r120;c130} + {F_18.00.a;r192;c010} + {F_18.00.b;r192;c130} + {F_18.00.a;r193;c010} + {F_18.00.b;r193;c130} + {F_18.00.a;r194;c010} + {F_18.00.b;r194;c130} + {F_18.00.a;r195;c010} + {F_18.00.b;r195;c130} + {F_18.00.a;r196;c010} + {F_18.00.b;r196;c130} + {F_18.00.a;r222;c010} + {F_18.00.b;r222;c130} + {F_18.00.a;r223;c010} + {F_18.00.b;r223;c130} + {F_18.00.a;r224;c010} + {F_18.00.b;r224;c130} + {F_18.00.a;r225;c010} + {F_18.00.b;r225;c130} + {F_18.00.a;r226;c010} + {F_18.00.b;r226;c130} + {F_18.00.a;r180;c010} + {F_18.00.b;r180;c130} - ({F_18.00.a;r010;c010} + {F_18.00.b;r010;c130}) - ({F_18.00.a;r070;c010} + {F_18.00.b;r070;c130}) - ({F_05.01;r0070;c0010} + {F_05.01;r0070;c0020} + {F_05.01;r0070;c0030} + {F_05.01;r0070;c0040} + {F_05.01;r0070;c0050})
2.	**DP_FNRP_F1800_ALL_0P** Net carrying amount of performing loans and advances for non-trading assets, vis-à-vis Central banks, General governments, credit institutions, Other financial corporations, Non-financial corporations, and it includes cash and cash balances at central banks and other demand deposits	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND PRFRMNG_STTS = "11" AND CRRYNG_AMNT <> ""	{F_18.00.a;r080;c020} + {F_18.00.b;r080;c140} + {F_18.00.a;r090;c020} + {F_18.00.b;r090;c140} + {F_18.00.a;r100;c020} + {F_18.00.b;r100;c140} + {F_18.00.a;r110;c020} + {F_18.00.b;r110;c140} + {F_18.00.a;r120;c020} + {F_18.00.b;r120;c140} + {F_18.00.a;r192;c020} + {F_18.00.b;r192;c140} + {F_18.00.a;r193;c020} + {F_18.00.b;r193;c140} + {F_18.00.a;r194;c020} + {F_18.00.b;r194;c140} + {F_18.00.a;r195;c020} + {F_18.00.b;r195;c140} + {F_18.00.a;r196;c020} + {F_18.00.b;r196;c140} + {F_18.00.a;r222;c020} + {F_18.00.b;r222;c130} - {F_18.00.b;r222;c150} + {F_18.00.a;r223;c020} + {F_18.00.b;r223;c130} - {F_18.00.b;r223;c150}

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[1] Loans to debtors belonging to the institutional sector S.15 are excluded from the comparison.

			+	{F_18.00.a;r224;c020} + {F_18.00.b;r224;c130} - {F_18.00.b;r224;c150}
			+	{F_18.00.a;r225;c020} + {F_18.00.b;r225;c130} - {F_18.00.b;r225;c150}
			+	{F_18.00.a;r226;c020} + {F_18.00.b;r226;c130} - {F_18.00.b;r226;c150}
			+	{F_18.00.a;r180;c020} + {F_18.00.b;r180;c140}
			-	({F_18.00.a;r010;c020} + {F_18.00.b;r010;c140})
			-	({F_18.00.a;r070;c020} + {F_18.00.b;r070;c140})
3.	**DP_FNRP_F1800_ALL_0N** Net carrying amount of non-performing loans and advances for non-trading assets, vis-à-vis Central banks, General governments, credit institutions, Other financial corporations, Non-financial corporations, and it includes cash and cash balances at central banks and other demand deposits	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND PRFRMNG_STTS = "1" AND CRRYNG_AMNT <> ""		{F_18.00.a;r080;c060} + {F_18.00.b;r080;c150}
			+	{F_18.00.a;r090;c060} + {F_18.00.b;r090;c150}
			+	{F_18.00.a;r100;c060} + {F_18.00.b;r100;c150}
			+	{F_18.00.a;r110;c060} + {F_18.00.b;r110;c150}
			+	{F_18.00.a;r120;c060} + {F_18.00.b;r120;c150}
			+	{F_18.00.a;r192;c060} + {F_18.00.b;r192;c150}
			+	{F_18.00.a;r193;c060} + {F_18.00.b;r193;c150}
			+	{F_18.00.a;r194;c060} + {F_18.00.b;r194;c150}
			+	{F_18.00.a;r195;c060} + {F_18.00.b;r195;c150}
			+	{F_18.00.a;r196;c060} + {F_18.00.b;r196;c150}
			+	{F_18.00.a;r222;c060} + {F_18.00.b;r222;c150}
			+	{F_18.00.a;r223;c060} + {F_18.00.b;r223;c150}
			+	{F_18.00.a;r224;c060} + {F_18.00.b;r224;c150}
			+	{F_18.00.a;r225;c060} + {F_18.00.b;r225;c150}
			+	{F_18.00.a;r226;c060} + {F_18.00.b;r226;c150}
			+	{F_18.00.a;r180;c060} + {F_18.00.b;r180;c150}
			-	({F_18.00.a;r010;c060} + {F_18.00.b;r010;c150})
			-	({F_18.00.a;r070;c060} + {F_18.00.b;r070;c150})
4.	**DP_FNRP_F1800_ALL_1N** Amount of accumulated impairment and accumulated negative changes in fair value due to credit risk and provisions of non-performing loans and advances for non-trading assets, vis-à-vis Central banks, General governments, credit institutions, Other financial corporations, Non-financial corporations, and it includes cash and cash balances at central banks and other demand deposits	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND PRFRMNG_STTS = "1" AND (ACCMLTD_IMPRMNT <> "" OR ACCMLTD_CHNGS_FV_CR <> "")		{F_18.00.b;r080;c150}
			+	{F_18.00.b;r090;c150}
			+	{F_18.00.b;r100;c150}
			+	{F_18.00.b;r110;c150}
			+	{F_18.00.b;r120;c150}
			+	{F_18.00.b;r192;c150}
			+	{F_18.00.b;r193;c150}
			+	{F_18.00.b;r194;c150}
			+	{F_18.00.b;r195;c150}
			+	{F_18.00.b;r196;c150}
			+	{F_18.00.b;r222;c150}
			+	{F_18.00.b;r223;c150}
			+	{F_18.00.b;r224;c150}
			+	{F_18.00.b;r225;c150}
			+	{F_18.00.b;r226;c150}
			+	{F_18.00.b;r180;c150}
			-	({F_18.00.b;r010;c150})

			-	({F_18.00.b;r070;c150})
1.1	**DP_FNRP_F1800_BNK_00** Net carrying amount of loans and advances for non-trading assets, vis-à-vis Central banks and credit institutions and it includes cash and cash balances at central banks and other demand deposits	RCGNTN_STTS IN {"1", "2"} **AND** ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} **AND** INSTTTNL_SCTR IN {"S121", "S122_A"} **AND** CRRYNG_AMNT <> ""	 + + + + + + - - -	{F_18.00.a;r080;c010} + {F_18.00.b;r080;c130} {F_18.00.a;r100;c010} + {F_18.00.b;r100;c130} {F_18.00.a;r192;c010} + {F_18.00.b;r192;c130} {F_18.00.a;r194;c010} + {F_18.00.b;r194;c130} {F_18.00.a;r222;c010} + {F_18.00.b;r222;c130} {F_18.00.a;r224;c010} + {F_18.00.b;r224;c130} {F_18.00.a;r180;c010} + {F_18.00.b;r180;c130} ({F_18.00.a;r010;c010} + {F_18.00.b;r010;c130}) ({F_18.00.a;r070;c010} + {F_18.00.b;r070;c130}) ({F_05.01;r0070;c0010} + F_05.01;r0070;c0030})
1.2	**DP_FNRP_F1800_GOV_00** Net carrying amount of loans and advances for non-trading assets, vis-à-vis General governments	RCGNTN_STTS IN {"1", "2"} **AND** ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} **AND** INSTTTNL_SCTR IN {"S1311", "S1312", "S1313", "S1314", "S1315"} **AND** CRRYNG_AMNT <> ""	 + + -	{F_18.00.a;r090;c010} + {F_18.00.b;r090;c130} {F_18.00.a;r193;c010} + {F_18.00.b;r193;c130} {F_18.00.a;r223;c010} + {F_18.00.b;r223;c130} {F_05.01;r0070;c0020}
1.3	**DP_FNRP_F1800_OFI_00** Net carrying amount of loans and advances for non-trading assets vis-à-vis Other financial corporations	RCGNTN_STTS IN {"1", "2"} **AND** ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} **AND** INSTTTNL_SCTR IN {"S122_B", "S123", "S124", "S125_A", "S125_J", "S126", "S127", "S128", "S129"} **AND** CRRYNG_AMNT <> ""	 + + -	{F_18.00.a;r110;c010} + {F_18.00.b;r110;c130} {F_18.00.a;r195;c010} + {F_18.00.b;r195;c130} {F_18.00.a;r225;c010} + {F_18.00.b;r225;c130} {F_05.01;r0070;c0040}
1.4	**DP_FNRP_F1800_NFC_00** Net carrying amount of loans and advances for non-trading assets vis-à-vis Non-financial corporations	RCGNTN_STTS IN {"1", "2"} **AND** ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} **AND** INSTTTNL_SCTR = "S11" **AND** CRRYNG_AMNT <> ""	 + + -	{F_18.00.a;r120;c010} + {F_18.00.b;r120;c130} {F_18.00.a;r196;c010} + {F_18.00.b;r196;c130} {F_18.00.a;r226;c010} + {F_18.00.b;r226;c130} {F_05.01;r0070;c0050}
2.1	**DP_FNRP_F1800_BNK_0P** Net carrying amount of performing loans and advances for non-trading assets, vis-à-vis Central banks and credit institutions and it includes cash and cash balances at central banks and other demand deposits	RCGNTN_STTS IN {"1", "2"} **AND** ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} **AND** PRFRMNG_STTS = "11" **AND** INSTTTNL_SCTR IN {"S121", "S122_A"} **AND** CRRYNG_AMNT <> ""	 + + + + + + - -	{F_18.00.a;r080;c020} + {F_18.00.b;r080;c140} {F_18.00.a;r100;c020} + {F_18.00.b;r100;c140} {F_18.00.a;r192;c020} + {F_18.00.b;r192;c140} {F_18.00.a;r194;c020} + {F_18.00.b;r194;c140} {F_18.00.a;r222;c020} + {F_18.00.b;r222;c130} - {F_18.00.b;r222;c150} {F_18.00.a;r224;c020} + {F_18.00.b;r224;c130} - {F_18.00.b;r224;c150} {F_18.00.a;r180;c020} + {F_18.00.b;r180;c140} ({F_18.00.a;r010;c020} + {F_18.00.b;r010;c140}) ({F_18.00.a;r070;c020} + {F_18.00.b;r070;c140})
2.2	**DP_FNRP_F1800_GOV_0P** Net carrying amount of performing loans and advances for non-trading assets, vis-à-vis General governments	RCGNTN_STTS IN {"1", "2"} **AND** ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} **AND** PRFRMNG_STTS = "11" **AND** INSTTTNL_SCTR IN {"S1311", "S1312",	 + +	{F_18.00.a;r090;c020} + {F_18.00.b;r090;c140} {F_18.00.a;r193;c020} + {F_18.00.b;r193;c140} {F_18.00.a;r223;c020} + {F_18.00.b;r223;c130} - {F_18.00.b;r223;c150}

		"S1313", "S1314", "S1315"} AND CRRYNG_AMNT <> ""		
2.3	**DP_FNRP_F1800_OFI_0P** Net carrying amount of performing loans and advances for non-trading assets, vis-à-vis Other financial corporations	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND PRFRMNG_STTS = "11" AND INSTTTNL_SCTR IN {"S122_B", "S123", "S124", "S125_A", "S125_J", "S126", "S127", "S128", "S129"} AND CRRYNG_AMNT <> ""	 + +	{F_18.00.a;r110;c020} + {F_18.00.b;r110;c140} {F_18.00.a;r195;c020} + {F_18.00.b;r195;c140} {F_18.00.a;r225;c020} + {F_18.00.b;r225;c130} - {F_18.00.b;r225;c150}
2.4	**DP_FNRP_F1800_NFC_0P** Net carrying amount of performing loans and advances for non-trading assets, vis-à-vis Non-financial corporations	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND PRFRMNG_STTS = "11" AND INSTTTNL_SCTR IN {"S11"} AND CRRYNG_AMNT <> ""	 + +	{F_18.00.a;r120;c020} + {F_18.00.b;r120;c140} {F_18.00.a;r196;c020} + {F_18.00.b;r196;c140} {F_18.00.a;r226;c020} + {F_18.00.b;r226;c130} - {F_18.00.b;r226;c150}
3.1	**DP_FNRP_F1800_BNK_0N** Net carrying amount of non-performing loans and advances for non-trading assets, vis-à-vis Central banks and credit institutions and it includes cash and cash balances at central banks and other demand deposits	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND PRFRMNG_STTS = "1" AND INSTTTNL_SCTR IN {"S121", "S122_A"} AND CRRYNG_AMNT <> ""	 + + + + + + - -	{F_18.00.a;r080;c060} + {F_18.00.b;r080;c150} {F_18.00.a;r100;c060} + {F_18.00.b;r100;c150} {F_18.00.a;r192;c060} + {F_18.00.b;r192;c150} {F_18.00.a;r194;c060} + {F_18.00.b;r194;c150} {F_18.00.a;r222;c060} + {F_18.00.b;r222;c150} {F_18.00.a;r224;c060} + {F_18.00.b;r224;c150} {F_18.00.a;r180;c060} + {F_18.00.b;r180;c150} ({F_18.00.a;r010;c060} + {F_18.00.b;r010;c150}) ({F_18.00.a;r070;c060} + {F_18.00.b;r070;c150})
3.2	**DP_FNRP_F1800_GOV_0N** Net carrying amount of non-performing loans and advances for non-trading assets, vis-à-vis General governments	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND PRFRMNG_STTS = "1" AND INSTTTNL_SCTR IN {"S1311", "S1312", "S1313", "S1314", "S1315"} AND CRRYNG_AMNT <> ""	 + +	{F_18.00.a;r090;c060} + {F_18.00.b;r090;c150} {F_18.00.a;r193;c060} + {F_18.00.b;r193;c150} {F_18.00.a;r223;c060} + {F_18.00.b;r223;c150}
3.3	**DP_FNRP_F1800_OFI_0N** Net carrying amount of non-performing loans and advances for non-trading assets, vis-à-vis Other financial corporations	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND PRFRMNG_STTS = "1" AND INSTTTNL_SCTR IN {"S122_B", "S123", "S124", "S125_A", "S125_J", "S126", "S127", "S128", "S129"} AND CRRYNG_AMNT <> ""	 + +	{F_18.00.a;r110;c060} + {F_18.00.b;r110;c150} {F_18.00.a;r195;c060} + {F_18.00.b;r195;c150} {F_18.00.a;r225;c060} + {F_18.00.b;r225;c150}
3.4	**DP_FNRP_F1800_NFC_0N** Net carrying amount of non-performing loans and advances for non-trading assets, vis-à-vis Non-financial corporations	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND PRFRMNG_STTS = "0"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> ""	 + +	{F_18.00.a;r120;c060} + {F_18.00.b;r120;c150} {F_18.00.a;r196;c060} + {F_18.00.b;r196;c150} {F_18.00.a;r226;c060} + {F_18.00.b;r226;c150}

4.1	**DP_FNRP_F1800_BNK_1N** Amount of accumulated impairment and accumulated negative changes in fair value due to credit risk and provisions of non-performing loans and advances for non-trading assets, vis-à-vis Central banks and credit institutions, and it includes cash and cash balances at central banks and other demand deposits	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND PRFRMNG_STTS = "1" AND INSTTTNL_SCTR IN {"S121", "S122_A"} AND (ACCMLTD_IMPRMNT <> "" OR ACCMLTD_CHNGS_FV_CR <> "")	-1*({F_18.00.b;r080;c150} + {F_18.00.b;r100;c150} + {F_18.00.b;r192;c150} + {F_18.00.b;r194;c150} + {F_18.00.b;r222;c150} + {F_18.00.b;r224;c150} + {F_18.00.b;r180;c150} - ({F_18.00.b;r010;c150}) - ({F_18.00.b;r070;c150}))
4.2	**DP_FNRP_F1800_GOV_1N** Amount of accumulated impairment and accumulated negative changes in fair value due to credit risk and provisions of non-performing loans and advances for non-trading assets, vis-à-vis General governments	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND PRFRMNG_STTS = "1" AND INSTTTNL_SCTR IN {"S1311", "S1312", "S1313", "S1314", "S1315"} AND (ACCMLTD_IMPRMNT <> "" OR ACCMLTD_CHNGS_FV_CR <> "")	-1*({F_18.00.b;r090;c150} + {F_18.00.b;r193;c150} + {F_18.00.b;r223;c150})
4.3	**DP_FNRP_F1800_OFI_1N** Amount of accumulated impairment and accumulated negative changes in fair value due to credit risk and provisions of non-performing loans and advances for non-trading assets, vis-à-vis Other financial corporations	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND PRFRMNG_STTS = "1" AND INSTTTNL_SCTR IN {"S122_B", "S123", "S124", "S125_A", "S125_J", "S126", "S127", "S128", "S129"} AND (ACCMLTD_IMPRMNT <> "" OR ACCMLTD_CHNGS_FV_CR <> "")	-1*({F_18.00.b;r110;c150} + {F_18.00.b;r195;c150} + {F_18.00.b;r225;c150})
4.4	**DP_FNRP_F1800_NFC_1N** Amount of accumulated impairment and accumulated negative changes in fair value due to credit risk and provisions of non-performing loans and advances for non-trading assets, vis-à-vis Non-financial corporations	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND PRFRMNG_STTS = "1" AND INSTTTNL_SCTR = "S11" AND (ACCMLTD_IMPRMNT <> "" OR ACCMLTD_CHNGS_FV_CR <> "")	-1*({F_18.00.b;r120;c150} + {F_18.00.b;r196;c150} + {F_18.00.b;r226;c150})
1.4.01	**DP_FNRP_F0601_010** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: A Agriculture, forestry and fishing	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND *SUBSTR*(ECNMC_ACTVTY, 1, 2) IN {"01", "02", "03"}	{F_06.01;r010;c010} + {F_06.01;r010;c021} + {F_06.01;r010;c022}

1.4.02	**DP_FNRP_F0601_020** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: B Mining and quarrying	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND SUBSTR(ECNMC_ACTVTY, 1, 2) IN {"05", "06", "07", "08", "09"}	{F_06.01;r020;c010} + {F_06.01;r020;c021} + {F_06.01;r020;c022}
1.4.03	**DP_FNRP_F0601_030** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: C Manufacturing	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND SUBSTR(ECNMC_ACTVTY, 1, 2) IN {"10", "11", "12", "13", "14", "15", "16", "17", "18", "19", "20", "21", "22", "23", "24", "25", "26", "27", "28", "29", "30", "31", "32", "33"}	{F_06.01;r030;c010} + {F_06.01;r030;c021} + {F_06.01;r030;c022}
1.4.04	**DP_FNRP_F0601_040** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: D Electricity, gas, steam and air conditioning supply	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND SUBSTR(ECNMC_ACTVTY, 1, 2) = "35"	{F_06.01;r040;c010} + {F_06.01;r040;c021} + {F_06.01;r040;c022}
1.4.05	**DP_FNRP_F0601_050** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: E Water supply	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND SUBSTR(ECNMC_ACTVTY, 1, 2) IN {"36", "37", "38", "39"}	{F_06.01;r050;c010} + {F_06.01;r050;c021} + {F_06.01;r050;c022}
1.4.06	**DP_FNRP_F0601_060** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: F Construction	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND SUBSTR(ECNMC_ACTVTY, 1, 2) IN {"41", "42", "43"}	{F_06.01;r060;c010} + {F_06.01;r060;c021} + {F_06.01;r060;c022}
1.4.07	**DP_FNRP_F0601_070** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: G Wholesale and retail trade	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND SUBSTR(ECNMC_ACTVTY, 1, 2) IN {"45", "46", "47"}	{F_06.01;r070;c010} + {F_06.01;r070;c021} + {F_06.01;r070;c022}

1.4.08	**DP_FNRP_F0601_080** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: H Transport and storage	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND SUBSTR(ECNMC_ACTVTY, 1, 2) IN {"49", "50", "51", "52", "53"}	{F_06.01;r080;c010} + {F_06.01;r080;c021} + {F_06.01;r080;c022}
1.4.09	**DP_FNRP_F0601_090** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: I Accommodation and food service activities	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND SUBSTR(ECNMC_ACTVTY, 1, 2) IN {"55", "56"}	{F_06.01;r090;c010} + {F_06.01;r090;c021} + {F_06.01;r090;c022}
1.4.10	**DP_FNRP_F0601_100** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: J Information and communication	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND SUBSTR(ECNMC_ACTVTY, 1, 2) IN {"58", "59", "60", "61", "62", "63"}	{F_06.01;r100;c010} + {F_06.01;r100;c021} + {F_06.01;r100;c022}
1.4.11	**DP_FNRP_F0601_105** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: K Financial and insurance activities	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND SUBSTR(ECNMC_ACTVTY, 1, 2) IN {"64", "65", "66"}	{F_06.01;r105;c010} + {F_06.01;r105;c021} + {F_06.01;r105;c022}
1.4.12	**DP_FNRP_F0601_110** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: L Real estate activities	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND SUBSTR(ECNMC_ACTVTY, 1, 2) = "68"	{F_06.01;r110;c010} + {F_06.01;r110;c021} + {F_06.01;r110;c022}
1.4.13	**DP_FNRP_F0601_120** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: M Professional, scientific and technical activities	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND SUBSTR(ECNMC_ACTVTY, 1, 2) IN {"69", "70", "71", "72", "73", "74", "75"}	{F_06.01;r120;c010} + {F_06.01;r120;c021} + {F_06.01;r120;c022}

1.4.14	**DP_FNRP_F0601_130** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: N Administrative and support service activities	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND *SUBSTR*(ECNMC_ACTVTY, 1, 2) IN {"77", "78", "79", "80", "81", "82"}	{F_06.01;r130;c010} + {F_06.01;r130;c021} + {F_06.01;r130;c022}
1.4.15	**DP_FNRP_F0601_140** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: O Public administration and defense, compulsory social security	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND *SUBSTR*(ECNMC_ACTVTY, 1, 2) = "84"	{F_06.01;r140;c010} + {F_06.01;r140;c021} + {F_06.01;r140;c022}
1.4.16	**DP_FNRP_F0601_150** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: P Education	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND *SUBSTR*(ECNMC_ACTVTY, 1, 2) = "85"	{F_06.01;r150;c010} + {F_06.01;r150;c021} + {F_06.01;r150;c022}
1.4.17	**DP_FNRP_F0601_160** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: Q Human health services and social work activities	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND *SUBSTR*(ECNMC_ACTVTY, 1, 2) IN {"86", "87", "88"}	{F_06.01;r160;c010} + {F_06.01;r160;c021} + {F_06.01;r160;c022}
1.4.18	**DP_FNRP_F0601_170** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: R Arts, entertainment and recreation	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND *SUBSTR*(ECNMC_ACTVTY, 1, 2) IN {"90", "91", "92", "93"}	{F_06.01;r170;c010} + {F_06.01;r170;c021} + {F_06.01;r170;c022}
1.4.19	**DP_FNRP_F0601_180** Net carrying amount of non-trading loans and advances to Non-Financial Corporations, Sector: S Other services	RCGNTN_STTS IN {"1", "2"} AND ACCNTNG_CLSSFCTN NOT IN {"2", "3", "46"} AND INSTTTNL_SCTR = "S11" AND CRRYNG_AMNT <> "" AND *SUBSTR*(ECNMC_ACTVTY, 1, 2) IN {"94", "95", "96"}	{F_06.01;r180;c010} + {F_06.01;r180;c021} + {F_06.01;r180;c022}

2.2.2 Instruments excluded from the FINREP calculation

It is important to note that only instruments eligible for FINREP and meeting a certain level of quality are considered in the calculation of aggregates. In this regard, flags have been created in order to i) identify FINREP instruments and to ii) check the data quality. The methodology is described in detail below.

2.2.2.1 FINREP instruments identification flags

Three flags are calculated to determine the eligibility of instruments for the calculation of FINREP aggregates and they can take the value of:

- 1 (included for the calculation of FINREP aggregates)
- 0 (excluded for the calculation of FINREP aggregates)
- -1 (attribute missing)

Instruments for which at least one flag is equal to 0 or -1 are excluded from the calculation of the aggregates. These instruments are therefore listed in the excluded instruments sheet of the comparison report. The data should be checked and, if necessary, corrected.

- CRRYNG_AMNT_RPRTD

  Only instruments, where the carrying amount has been reported, are considered in the calculation of FINREP aggregates. This flag automatically excludes all intracompany loans.

  ```
  IF CRRYNG_AMNT <> ""

  THEN CRRYNG_AMNT_RPRTD = 1;

  ELSE IF (CRRYNG_AMNT = "" AND RCGNTN_STTS = "Entirely derecognised") OR

  (CRRYNG_AMNT = "" AND (HD_OFFC_UNDRT_ID_OA = HD_OFFC_UNDRT_ID_MN_DBTR))

  THEN CRRYNG_AMNT_RPRTD = 0;

  ELSE CRRYNG_AMNT_RPRTD = -1;
  ```

  Where:

  - HD_OFFC_UNDRT_ID_OA = the head office undertaking id of the observed agent
  - HD_OFFC_UNDRT_ID_MN_DBTR = the head office undertaking id of the main debtor

- RCGNTN_FLG

  Fully derecognized instruments are not considered in the calculation of FINREP aggregates.

  > **IF** RCGNTN_STTS IN ("Entirely recognised", "Recognised to the extent of the institution's continuing involvement")
  >
  > **THEN** RCGNTN_FLG = 1;
  >
  > **ELSE IF** RCGNTN_STTS = "Entirely derecognised"
  >
  > **THEN** RCGNTN_FLG = 0;
  >
  > **ELSE** RCGNTN_FLG = -1:

- ACCNTNG_PF_IDNTFCTN

  Instruments, where the accounting classifications falls into the categories "Financial assets held for trading (IFRS)", "Trading Financial assets (nGAAP)" or "Financial assets held for trading (nGAAP)" are excluded in the calculation of the FINREP aggregates.

  > **IF** ACCNTNG_CLSSFCTN NOT IN ("Financial assets held for trading (IFRS)", "Trading Financial assets (nGAAP)", "Financial assets held for trading (nGAAP)")
  >
  > **THEN** ACCNTNG_PF_IDNTFCTN = 1;
  >
  > **ELSE IF** ACCNTNG_CLSSFCTN IN ("Financial assets held for trading (IFRS)", "Trading Financial assets (nGAAP)", "Financial assets held for trading (nGAAP)")
  >
  > **THEN** ACCNTNG_PF_IDNTFCTN = 0;
  >
  > **ELSE** ACCNTNG_PF_IDNTFCTN = -1;

Finally, the flag on the FINREP eligibility of an instrument in AnaCredit is calculated taking into account the results of the three flags described above:

> **IF** CRRYNG_AMNT_RPRTD = 1 **AND** RCGNTN_FLG = 1 **AND** ACCNTNG_PF_IDNTFCTN = 1
>
> **THEN** IS_FR_INSTRMNT = 1;
>
> **ELSE** IS_FR_INSTRMNT = 0;

All instruments whose flag "IS_FR_INSTRMNT" is equal to 1 are taken into account when calculating FINREP aggregates. Conversely, instruments with a flag equal to 0 are excluded from the calculation. These are listed in the feedback "FR_EXC_INSTRMNT" (cf. chapter 2.5.1.2 below).

2.2.2.2   Data quality flags

Similar to the FINREP instrument identification flags described above, the data quality flags are first calculated individually before they are added to the global flag. The latter indicates whether the data quality of an instrument is sufficient to be included in the FINREP aggregates. The data quality flags can take three values:

- 1 (the quality is good)

  No correction is expected.

- 0 (quality cannot be measured)

  It is up to the reporting agent to verify the data if a difference is noted in the DQI.

- -1 (an error was detected)

  The data needs to be corrected.

Instruments for which at least one flag is equal to 0 or -1 are excluded from the calculation of the aggregates. These instruments are therefore listed in the excluded instruments file. The data should be checked and, if necessary, corrected.

- IS_ACCNTNG_RPRTD

  This flag checks if accounting data has been reported.

  ```
  IF INSTRMNT.INSTRMNT_ID EXISTS IN ACCNTNG.INSTRMNT_ID

  THEN IS_ACCNTNG_RPRTD = 1;

  ELSE IS_ACCNTNG_RPRTD = -1;
  ```

- IS_ECNMC_ACTVTY_RPRTD

  This flag verifies that the economic activity of the main debtor of the instrument is reported[2].

  > **IF** ECNMC_ACTVTY_MN_DBTR = "" **AND** INSTTTNL_SCTR_MN_DBTR = "S11" **AND** CNTRY_MN_DBTR in (RMS)
  >
  > **THEN** IS_ECNMC_ACTVTY_RPRTD= -1;
  >
  > **ELSE IF** ECNMC_ACTVTY_MN_DBTR = "" **AND** INSTTTNL_SCTR_MN_DBTR = "S11"
  >
  > **THEN** IS_ECNMC_ACTVTY_RPRTD= 0;
  >
  > **ELSE** IS_ECNMC_ACTVTY_RPRTD= 1;

  Where:
  - ECNMC_ACTVTY_MN_DBTR = the main debtor's economic activity
  - INSTTTNL_SCTR_MN_DBTR = the main debtor's institutional sector

- IS_INSTTTNL_SCTR_RPRTD

  This flag checks whether the institutional sector of the main debtor has been reported.

  > **IF** INSTTTNL_SCTR_MN_DBTR is not NULL
  >
  > **THEN** IS_INSTTTNL_SCTR_RPRTD = 1;
  >
  > **ELSE** IS_INSTTTNL_SCTR_RPRTD = -1;

  Where:
  - INSTTTNL_SCTR_MN_DBTR = the main debtor's institutional sector

---

[2] Because the economic activity is not required for counterparties outside of a reporting member state, a 0 will not lead to an exclusion.

All of the flags described above are used to identify quality issues. If one of these flags is equal to -1, the data quality for a specific instrument is insufficient and the instrument is excluded from the FINREP calculation. The data quality is summarized in the following flag:

IF IS_ACCNTNG_RPRTD = -1 **OR** IS_INSTTTNL_SCTR_RPRTD= -1 **OR** VLDTN_RLS = -1

THEN DQ_FLG = -1;

ELSE DQ_FLG = 1;

In addition to the flags calculated above, some validation rules are also provided in the form of flags (grouped under "VLDTN_RLS" in the box above). This is the result of data quality checks on attributes necessary for the mapping of a counterparty to RIAD. If one of these flags is equal to -1, then the counterparty cannot be associated with a counterparty in RIAD and the instruments linked to these counterparties are excluded from the calculation of the aggregates.

Finally, the feedback sheet "FR_EXC_INSTRMNT" also contains the flag "DBTR_RIAD_FND", which tells the reporting agent if a RIAD code has been found for the counterparty or not. In the case where no code was found, the reporting agent should verify the identification of the counterparty and in the case where no error is spotted contact sig@bcl.lu, with the concerned counterparty.

2.2.3   Solution indications

There are many sources of inconsistency between reports. Below are listed some recurring errors.

1   Insufficient data quality

Insufficient data quality is highlighted by the flags in chapter 2.2.2.2. Data with errors should be analysed first. As a first step, it is recommended to focus on instruments with a high outstanding nominal amount. In fact, the more the quality of an instrument with a high outstanding amount improves, the greater the impact on the DQI. It is for this reason that the instruments are sorted in descending order according to the carrying amount in the feedback "FR_EXC_INSTRMNT".

The most frequent quality deficiencies are as follows:

- Institutional sector of the main debtor not reported

-   National identifier not reported
-   National identifier type not reported and/or inconsistent national identifier

2   The portfolio is incomplete (non-reported instruments)

If the balance of instruments listed in the excluded instruments file does not explain the difference between FINREP and AnaCredit aggregates, then it is very likely that part of the AnaCredit portfolio has not been reported.

However, inconsistencies can be detected without requiring corrections. These are mainly reporting agents whose portfolio contains a large number of instruments with an outstanding nominal amount/carrying amount of less than 25 kEUR.

We would also like to remind you that positions with the BCL must be reported in AnaCredit. Furthermore, please remember that intracompany loans are excluded from the FINREP comparison.

In the case, where instruments are missing in AnaCredit, you will also have to reconsider the iBSI comparison, as it could have an impact on it.

3   Some counterparties were broken down incorrectly (diverging institutional sector)

When inconsistencies detected at the level of the sub-aggregates are substantial while the total is very similar, it is very likely that the classification of the counterparties is not correct (e.g. a non-financial corporation reported with an institutional sector "S.121").

2.3   Reports

2.3.1   Feedback provided

During the AnaCredit-FINREP comparison, one file is made available to reporting agents. This .xlsx file always includes the Overview sheet:

-   **FR_Overview** (overview of FINREP DQI results)

The feedback file can also contain two additional worksheets, namely:

-   **FR_EXC_INSTRMNT** (list of instruments excluded from FINREP calculation)
-   **FR_INC_INSTRMNT** (list of instruments included in the FINREP calculation)

The two types of "Overview" and "Excluded" worksheets are described in more detail below.

2.3.1.1 Results of the calculation of aggregates

The "Overview" file includes the aggregates calculated for AnaCredit and FINREP as well as the DQIs calculated on the comparison.

An example of an FINREP comparison table is available in Annex 4.2.1. In order to facilitate the interpretation of this table, the DQIs are coloured as follows:

- Green: the DQI is within the accepted range and no correction is expected
- Yellow: the DQI is above the required threshold. Correction is not required. However, reporting agents are strongly encouraged to correct these sub-aggregates in anticipation of more extensive requirements in 2022.
- Red: the DQI is above the required threshold. Correction is required.

2.3.1.2 List of instruments excluded from the calculation of aggregates

The "Excluded" sheet lists all the instruments excluded from the calculation of aggregates based on the flags described above. An instrument is added to the list when at least one of the two flags DQ_FLG or IS_FR_INSTRMNT is equal to 0 or -1.

The list is ordered as follows:

1   IS_FR_INSTRMNT, in descending order
2   DQ_FLG, in ascending order
3   CRRYNG_AMNT, in descending order

Therefore, it is recommended to analyse the first observations in the list first, which are most likely to have the greatest impact on the aggregates. An example of the excluded instruments table can be found in Annex 4.2.2.

2.3.2 Communication frequency and delay

The comparison reports are sent quarterly, regardless of resubmissions sent by reporting agents. Ad hoc reports can be generated upon request from reporting agents.

2.3.3 Revision deadlines

In an initial phase, the BCL will not impose any revision deadline. Reporting agents are encouraged to cooperate and analyse the inconsistencies detected within a reasonable time (+/-3 months). The main objective is to anticipate the quality checks that become effective in 2022 and to avoid a situation in which an entire reporting year would have to be resubmitted retroactively in 2023. In addition, before proceeding to a resubmission (regardless the type of report), reporting agents are asked to confirm by email the reports and the reference periods to be resubmitted.

Future submissions should already take into account any inconsistencies detected.

3   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).

4 Annexes

4.1 Glossary

COREP	Common Solvency Ratio Reporting
DQI	Data Quality Indicator
EA	Euro area
ECB	European central bank
FINREP	Financial Reporting
iBSI	Individual balance sheet items statistics (S 1.1 and S 2.5 reports in Luxembourg)
IFRS	International Financial Reporting Standards
ITS	Implementing Technical Standards
iMIR	Individual MFI interest rate statistics (S 1.5 reports in Luxembourg)
MFI	Monetary and Financial Institutions
nGAAP	National accounting standards
NCB	National central bank
NFC	Non-financial corporation
RMS	Reporting Member State

4.2 Examples of feedback reports

4.2.1 Example FINREP / AnaCredit comparison («Overview»)

OBSRVD_AGNT_CD=LUB00XXX

Aggregates per report and per reference date (in million €)	202012		
	AnaCredit	FINREP Report	DQI
For Action			
1. DP_FNRP_F1800 ALL Total	123,00	123,00	100,00 %
2. DP_FNRP_F1800 CRRYING_AMNT_PRFRMNG Total	120,00	120,00	100,00 %
3. DP_FNRP_F1800 CRRYING_AMNT_NN_PRFRMNG Total	3,00	3,00	100,00 %
4. DP_FNRP_F1800 ACCMLTD_IMPRMNT_ACCMLTD_NG_CHNG_NN_PRFRMNG Total	1,00	1,00	100,00 %
For Informatio			
F1800 (DP_FNRP_F1800 ALL Total)			
1.1 DP_FNRP_F1800 ALL Central banks and credit institutions	110,00	110,00	100,00 %
1.2 DP_FNRP_F1800 ALL General governments	.	.	.
1.3 DP_FNRP_F1800 ALL Other financial corporations	.	.	.
1.4 DP_FNRP_F1800 ALL Non-financial corporations	13,00	13,00	100,00 %
F1800 (DP_FNRP_F1800 CRRYING_AMNT_PRFRMNG Total)			
2.1 DP_FNRP_F1800 CRRYING_AMNT_PRFRMNG Central banks and credit institutions	90,00	90,00	100,00 %
2.2 DP_FNRP_F1800 CRRYING_AMNT_PRFRMNG General governments	.	.	.
2.3 DP_FNRP_F1800 CRRYING_AMNT_PRFRMNG Other financial corporations	.	.	.
2.4 DP_FNRP_F1800 CRRYING_AMNT_PRFRMNG Non-financial corporations	30,00	30,00	100,00 %
F1800 (DP_FNRP_F1800 CRRYING_AMNT_NN_PRFRMNG Total)			
3.1 DP_FNRP_F1800 CRRYING_AMNT_NN_PRFRMNG Central banks and credit institutions	.	.	.
3.2 DP_FNRP_F1800 CRRYING_AMNT_NN_PRFRMNG General governments	.	.	.
3.3 DP_FNRP_F1800 CRRYING_AMNT_NN_PRFRMNG Other financial corporations	.	.	.
3.4 DP_FNRP_F1800 CRRYING_AMNT_NN_PRFRMNG Non-financial corporations	3,00	3,00	100,00 %
F1800 (DP_FNRP_F1800 ACCMLTD_IMPRMNT_ACCMLTD_NG_CHNG_NN_PRFRMNG Total)			
4.1 DP_FNRP_F1800 ACCMLTD_IMPRMNT_ACCMLTD_NG_CHNG_NN_PRFRMNG Central banks and credit institutions	.	.	.
4.2 DP_FNRP_F1800 ACCMLTD_IMPRMNT_ACCMLTD_NG_CHNG_NN_PRFRMNG General governments	.	.	.
4.3 DP_FNRP_F1800 ACCMLTD_IMPRMNT_ACCMLTD_NG_CHNG_NN_PRFRMNG Other financial corporations	.	.	.
4.4 DP_FNRP_F1800 ACCMLTD_IMPRMNT_ACCMLTD_NG_CHNG_NN_PRFRMNG Non-financial corporations	1,00	1,00	100,00 %
F0601 (DP_FNRP_F1800 ALL Non-financial corporations)			
1.4.01 DP_FNRP_F0601 Agriculture, forestry and fishing			.
1.4.02 DP_FNRP_F0601 Mining and quarrying			.
1.4.03 DP_FNRP_F0601 Manufacturing			.
1.4.04 DP_FNRP_F0601 Electricity, gas, steam and air conditioning supply			.
1.4.05 DP_FNRP_F0601 Water supply			.
1.4.06 DP_FNRP_F0601 Construction			.
1.4.07 DP_FNRP_F0601 Wholesale and retail trade			.
1.4.08 DP_FNRP_F0601 Transport and storage			.
1.4.09 DP_FNRP_F0601 Accommodation and food service activities	30,00	30,00	100,00 %
1.4.10 DP_FNRP_F0601 Information and communication			.
1.4.11 DP_FNRP_F0601 Financial and insurance activities			.
1.4.12 DP_FNRP_F0601 Real estate activities			.
1.4.13 DP_FNRP_F0601 Professional, scientific and technical activities			.
1.4.14 DP_FNRP_F0601 Administrative and support service activities			.
1.4.15 DP_FNRP_F0601 Public administration and defence, compulsory social security			.
1.4.16 DP_FNRP_F0601 Education			.
1.4.17 DP_FNRP_F0601 Human health services and social work activities			.
1.4.18 DP_FNRP_F0601 Arts, entertainment and recreation			.
1.4.19 DP_FNRP_F0601 Other services			.

4.2.2 Example of list of excluded instruments in FINREP calculation

Left-hand side of table:

SOLO_ENTITY_ID	RPRTNG_AGNT_CD	OBSRVD_AGNT_CD	DT_RFRNC	T1M_MSG_ID	T2M_MSG_ID	T2O_MSG_ID	REF_MSG_ID	CNTRCT_ID	INSTRMNT_ID	ECNMC_ACTVTY_INSTRMNT	INSTTTNL_SCTR_INSTRMNT	CRRYNG_AMNT_RPRTD	RCGNTN_FLG	ACCNTNG_PF_IDNTFCTN	IS_FR_INSTRMNT	IS_ECN...
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C1	I1	Financial and insurance activities	Financial corporations other than credit institutions	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C2	I2	Financial and insurance activities	Financial corporations other than credit institutions	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C3	I3	Financial and insurance activities	Financial corporations other than credit institutions	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C4	I4	Financial and insurance activities	Financial corporations other than credit institutions	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C5	I5	Financial and insurance activities	Financial corporations other than credit institutions	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C6	I6	Real estate activities	Financial corporations other than credit institutions	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C7	I7	Financial and insurance activities	Financial corporations other than credit institutions	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C8	I8	Real estate activities	Non-financial corporations	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C9	I9	Wholesale and retail trade	Non-financial corporations	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C10	I10	Manufacturing	Non-financial corporations	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C11	I11	Manufacturing	Non-financial corporations	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C12	I12	Financial and insurance activities	Financial corporations other than credit institutions	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C13	I13	Real estate activities	Non-financial corporations	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C14	I14	Real estate activities	Non-financial corporations	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C15	I15	Real estate activities	Non-financial corporations	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C16	I16	Manufacturing	Non-financial corporations	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C17	I17	Manufacturing	Non-financial corporations	1	1	1	1	1
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C18	I18	Transport and storage	Non-financial corporations	1	1	1	1	1

Right-hand side of table:

...R_INSTRMNT	IS_ECNMC_ACTVTY_RPRTD	IS_INSTTTNL_SCTR_RPRTD	IS_ACCNTNG_RPRTD	CY0010	CY0011	CY0020	CY0030	CY0060	CS0010	CS0040	CS0050	CS0060	CS0080_TYP_ENTTY_NTRNL_ID	CS0080_NM_ENTTY	CS0120	CS0130	CS0140	CS0150	RI0030	RI0060	DQ_FLG	BCL_TO_CHECK_AC
1	1	1	1	1	1	1	1	1	1	0	0	1	1	1	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	0	0	1	1	1	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	0	0	1	1	1	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	0	0	1	1	1	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	0	0	1	1	1	1	0	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	0	1	1	1	1	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	0	1	1	1	1	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	-1	-1
1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	-1	-1

4.2.3 Example of list of included instruments in FINREP calculation

Left-hand side of table:

SOLO_ENTTY_ID	RPRTNG_AGNT_CD	OBSRVD_AGNT_CD	DT_RFRNC	T1M_MSG_ID	T2M_MSG_ID	T2Q_MSG_ID	REF_MSG_ID	CNTRCT_ID	INSTRMNT_ID	DP_FNRP_F1800 ALL Total	
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C1	I1	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C2	I2	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C3	I3	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C4	I4	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C5	I5	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C6	I6	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C7	I7	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C8	I8	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C9	I9	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C10	I10	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C11	I11	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C12	I12	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C13	I13	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C14	I14	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C15	I15	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C16	I16	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C17	I17	DP_FNRP_F1800_00_000	DP_FN
LUB00XXX	LUB00XXX	LUB00XXX	202012	123	123	123	123	C18	I18	DP_FNRP_F1800_00_000	DP_FN

Right-hand side of table:

ALL Total	DP_FNRP_F1800 ALL SA	DP_FNRP_F1800 CRRYING_AMNT_PRFRMNG Total	DP_FNRP_F1800 CRRYING_AMNT_PRFRMNG SA	DP_FNRP_F1800 CRRYING_AMNT_NN_PRFRMNG Total	DP_FNRP_F1800 CRRYING_AMNT_NN_PRFRMNG SA	DP_FNRP_F1800 ACCMLTD_IMPRMNT_ACCMLTD_N G_CHNG_NN_PRFRMNG Total	DP_FNRP_F1800 ACCMLTD_IMPRMNT_ACCMLTD_N G_CHNG_NN_PRFRMNG SA	DP_FNRP_F0601
DP_FNRP_F1800_00_120	DP_FNRP_F1800_0P_000	DP_FNRP_F1800_0P_120						DP_FNRP_F0601_180
DP_FNRP_F1800_00_120	DP_FNRP_F1800_0P_000	DP_FNRP_F1800_0P_120						DP_FNRP_F0601_180
DP_FNRP_F1800_00_120	DP_FNRP_F1800_0P_000	DP_FNRP_F1800_0P_120						DP_FNRP_F0601_180
DP_FNRP_F1800_00_120	DP_FNRP_F1800_0P_000	DP_FNRP_F1800_0P_120						DP_FNRP_F0601_180
DP_FNRP_F1800_00_120	DP_FNRP_F1800_0P_000	DP_FNRP_F1800_0P_120						DP_FNRP_F0601_180
DP_FNRP_F1800_00_120	DP_FNRP_F1800_0P_000	DP_FNRP_F1800_0P_120						DP_FNRP_F0601_180
DP_FNRP_F1800_00_120	DP_FNRP_F1800_0P_000	DP_FNRP_F1800_0P_120						DP_FNRP_F0601_180
DP_FNRP_F1800_00_120	DP_FNRP_F1800_0P_000	DP_FNRP_F1800_0P_120						DP_FNRP_F0601_180
DP_FNRP_F1800_00_120	DP_FNRP_F1800_0P_000	DP_FNRP_F1800_0P_120						DP_FNRP_F0601_180
DP_FNRP_F1800_00_110			DP_FNRP_F1800_0N_000	DP_FNRP_F1800_0N_110	DP_FNRP_F1800_1N_000	DP_FNRP_F1800_1N_110		
DP_FNRP_F1800_00_110			DP_FNRP_F1800_0N_000	DP_FNRP_F1800_0N_110	DP_FNRP_F1800_1N_000	DP_FNRP_F1800_1N_110		
DP_FNRP_F1800_00_110			DP_FNRP_F1800_0N_000	DP_FNRP_F1800_0N_110	DP_FNRP_F1800_1N_000	DP_FNRP_F1800_1N_110		
DP_FNRP_F1800_00_110			DP_FNRP_F1800_0N_000	DP_FNRP_F1800_0N_110	DP_FNRP_F1800_1N_000	DP_FNRP_F1800_1N_110		
DP_FNRP_F1800_00_110			DP_FNRP_F1800_0N_000	DP_FNRP_F1800_0N_110	DP_FNRP_F1800_1N_000	DP_FNRP_F1800_1N_110		
DP_FNRP_F1800_00_110			DP_FNRP_F1800_0N_000	DP_FNRP_F1800_0N_110	DP_FNRP_F1800_1N_000	DP_FNRP_F1800_1N_110		
DP_FNRP_F1800_00_110			DP_FNRP_F1800_0N_000	DP_FNRP_F1800_0N_110	DP_FNRP_F1800_1N_000	DP_FNRP_F1800_1N_110		
DP_FNRP_F1800_00_110			DP_FNRP_F1800_0N_000	DP_FNRP_F1800_0N_110	DP_FNRP_F1800_1N_000	DP_FNRP_F1800_1N_110		
DP_FNRP_F1800_00_110			DP_FNRP_F1800_0N_000	DP_FNRP_F1800_0N_110	DP_FNRP_F1800_1N_000	DP_FNRP_F1800_1N_110		