

Template for comments

ECB Guideline on the supervisory approach by national competent authorities to coverage of non-performing exposures held by less significant supervised entities

Institution/Company
BFF Banking Group

Contact person

Mr/Ms

First name

Surname

Email address

Telephone number

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General comments

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ECB Guideline on the supervisory approach by national competent authorities to coverage of non-performing exposures held by less significant supervised entities

- Please enter all your feedback in this list.
- When entering feedback, please make sure that:
- each comment deals with a single issue only;
 - you indicate the relevant article/chapter/paragraph, where appropriate;
 - you indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline: 27 October 2025

ID	Article	Paragraph	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	Article 3	2	Amendment	<p>It is proposed to exclude from the 5% threshold NPE exposures classified as past due whose only sign of potential deterioration is payment delays. Specifically, it is requested to consider automatically excluded (without discretion by the National Competent Authorities) from the threshold at least those past due exposures to counterparties with no further signs of deterioration other than payment delays to public administration counterparties (central governments or central banks under Article 114 of the CRR, regional governments or local authorities under Article 115 of the CRR, public sector entities under Article 116 of the CRR).</p> <p>Indeed, in this context, in addition to the past due objective classification mechanism, a second automatic mechanism is added — in the event of default persisting for a certain period — that does not allow banks to accurately assess risk (as required by accounting principles), consisting of deductions from CET 1 for calendar provisioning on credit exposures, even in case of limited credit risk.</p>	<p>It is proposed to exclude from the 5% threshold counterparties classified as past due with no further signs of deterioration in credit risk.</p>	,	Don't publish

2	Article 4	4	Amendment	<p>It is proposed to include in the specific circumstances the NPE exposures classified as past due whose only sign of potential deterioration is payment delays. Specifically, it is requested to consider automatically included in the specific circumstances (without discretion by the National Competent Authorities) at least those past due exposures to counterparties with no further signs of deterioration other than payment delays to public administration counterparties (central governments or central banks under Article 114 of the CRR, regional governments or local authorities under Article 115 of the CRR, public sector entities under Article 116 of the CRR).</p>	<p>It is proposed to include in the specific circumstances the exposures classified as past due with no further signs of deterioration in credit risk.</p>	,	Don't publish
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