



EUROPEAN CENTRAL BANK
BANKING SUPERVISION

Template for comments

ECB Guide on the notification of securitisation transactions

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Please tick here if you do not wish your personal data to be published.

General comments

We are concerned with the fact that the proposed reporting procedures may ultimately impact the costs of the product financed, especially for SME transactions as those usually have smaller transaction size but the reporting requirements are the same as for the bigger transactions.

It is important that the proposed reporting do not duplicate data points that are already reported by the credit institution through COREP or SECR towards the supervisor. New reporting requirements should be implemented in the existing formats to prevent separate reporting procedures and data mirroring.

Template for comments

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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: 5/1/2022

ID	Chapter	Section	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	Annex Section A	Section A	8	Clarification	Items 5&6: We understand that only initial amounts on the closing date have to be reported and not the updates during the life of the transaction. Is this interpretation correct?		Alarcon Abeti, Rafael	Publish
2	Annex Section B	Section B	10	Clarification	Item 5: The reference is made to loans only. Does this mean that only transactions including loans as underlying assets have to be reported?		Alarcon Abeti,	Publish
3	Annex Section C	Section C	10	Clarification	Item 1: There are transactions with no legal final maturity or annual renewals. What kind of reporting is expected for those transactions?		Alarcon Abeti,	Publish
4	Annex Section C	Section C	10	Clarification	Item 4: We would expect a question with reference to the retention holder, as there are different requirements as a result.		Alarcon Abeti,	Publish
5	Annex Section C	Section C	10	Clarification	Item 10: This reporting requirement is unclear as Article 8(4) is referencing re-securitisations. Could you provide further input on what data need to be reported?		Alarcon Abeti, Rafael	Publish
6	Annex Section D	Section D	11	Clarification	Item 3: This requirement is not included in the SECR. We also think that the expected renewal period is too strict. Could you provide more details on what is expected to be reported under this requirement?		Alarcon Abeti, Rafael	Publish