

Cyprus's Banking Industry Comments
on the Consultation Paper on Common Reporting

The Banking Industry is supportive of efforts to introduce greater commonality of reporting so as to reduce the Industry's compliance burden.

In General the Industry believes that:

- Common reporting should be harmonised around the minimum requirements necessary to arrive at a meaningful solvency ratio;
- CoRep proposals must be aligned with other initiatives currently under way such as common Financial Reporting (FinRep) and the results of CEBS Taxonomies Working Group;

More specifically

1. The industry feels that as CEBS' proposals for common reporting are currently drafted there is a real risk that the level of detail and the extensiveness of the required information render the proposals more burdensome for banks, than is currently the case.
2. The Industry feels that the focus should be on the essential components required to inform supervisors of a given institution's solvency ratio.
3. The Industry is concerned about the risk that CEBS would harmonise requirements at the maximal level of what is currently required to capture all current practices across Europe. The industry supports that common requirements should be harmonised at the minimum level of reporting with the content and volume of reports restricted to the strictest minimum necessary.
4. The Industry supports that both the CoRep and FinRep proposals should be aligned so to avoid requiring banks to report the same figure twice, thus archiving a key stated objective of the exercise i.e. to standardise and reduce the reporting burden on Europe's banking industry.

5. In addition the industry supports that there should be a direct relationship between the complexity of business and the content and volume of reports banks are required to submit. This in direct relation to the aspired reduction of costs for banks using common reporting.
6. The Industry feels that country and supervisor specific information requests ought to be either common throughout Europe, or local or sector wide taxonomies (category C), as well as Country Specific requirements (category D) be kept to a minimum.
7. The Industry supports CEBS' statement "common reporting should aim at minimising the number of different templates, being aware that this is achievable at the cost of losing some information". In addition the industry suggests that Memoranda included in the Templates be eliminated. Where the information contained in the Memoranda is deemed necessary these should be included in the Templates themselves otherwise they should be scrapped all together.

27 April, 2005

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