

COREP Ref ID	Label per COREP template	EBA reference - Legal References & Comments	Expanded text - Legal References & Comments	Draft data definition	Explanatory Remarks / Queries
Scope, frequency				Proposed: template to be prepared annually at 31 December. Where a consolidation group exists the template can be prepared at consolidation group level only.	As Article 96 of CRR refers to reporting of losses in 'any given year' we recommend that the template is collated annually, as at 31 December. As data is collected for analysis rather than for individual supervision purposes, we recommend that it is collated only at consolidation group level, where such groups exist. In line with all other COREP templates, both currency and unit for reporting (i.e. '000s, millions) should be specified
N/A	Losses	None	None	Proposed definition: Losses represent amounts written off, net of any recoveries of amounts previously written off. Amounts to be reported are for the year to date.	There are many potential ways to interpret "losses". It is important that a more precise definition, such as one of those proposed, is provided, otherwise the data collected will not be comparable.
N/A	Exposures	None	None	Proposed definition: Choice of e.g. (1) Original Exposure pre conversion factors (as per column 010 of CR SA or column 030 of CR IRB); or (2) Exposure at Default (as per column 200 of CR SA or column 110 of CR IRB)	There are many ways in which exposures" could be interpreted. It is important that a more precise definition, preferably one directly taken from e.g. CR SA/CR IRB templates, is provided, otherwise the data collected will not be comparable.
<b>COLUMNS</b>					
Column 010	Sum of losses stemming from lending up to the reference percentages	Article 96 paragraph 1 lit a) and lit c) of CRR respectively, market value and mortgage lending value according to Article 4 (51) and (52) of CRR losses according to Article 4 (28) of CRR	Article 96 Specific reporting obligations 1. Institutions shall report the following data to the competent authorities: (a) losses stemming from lending collateralised, up to 80% of the market value or 80% of the mortgage lending value in any given year unless otherwise decided under Article 119(2), by residential property; (c) losses stemming from lending collateralised, up to 50% of the market value or 60% of the mortgage lending value in any given year unless otherwise decided under Article 119(2), by commercial immovable property; Article 4 Definitions (51) 'mortgage lending value' means the value of the immovable property as determined by a prudent assessment of the future marketability of the property taking into account long-term sustainable aspects of the property, the normal and local market conditions, the current use and alternative appropriate uses of the property. (52) 'market value' means for the purposes of immovable property the estimated amount for which the property should exchange on the date of valuation between a willing buyer and a willing seller in	Proposed definition: lending collateralised, up to 80% of the market value or 80% of the mortgage lending value in the case of residential property; lending collateralised, up to 50% of the market value or 60% of the mortgage lending value in the case of commercial immovable property;	Please also refer to our proposed alternative layout for the CR IP Losses template.
Column 020	of which: immovable property valued with mortgage lending value	Reporting of those losses, where the value of the collateral has been calculated as mortgage lending value	None	Proposal: DELETE COLUMN	We do not understand what is being asked for in this column or column 060, and cannot see a basis for it in Article 96 of CRR. Accordingly we propose it is deleted.
Column 030	of which: SA exposures	Reporting of those losses, where the risk weighted exposure amount of exposure the collateral has been assigned to, is calculated with the Standardised Approach of Title I chapter 2 of part 3 of CRR	Title 1, Chapter 2 of Part 3 of CRR 4 comprises Articles 94, 95 and 96. These 3 articles do not specifically cover the Standardised Approach. Please report the losses arising on Immoveable Property portfolios assessed under the Standardised Approach.	Proposal: reconfigure template such that Standardised Exposures is a category heading rather than an 'of which'.	We believe the reference percentages are relevant only to Standardised Exposures, therefore propose that the layout of the template is amended such that Standardised and IRB are separate category headings, rather than sub-analyses of other column headings. See proposed redesigned template.
Column 040	of which: IRB exposures	Reporting of those losses, where the risk weighted exposure amount of exposure the collateral has been assigned to, is calculated with the Internal Ratings Based Approach of Title I chapter 3 of part 3 of CRR	Title 1, Chapter 3 of Part 3 of CRR 4 covers the Trading Book. The guidance from EBA is misleading. Please report the losses arising on Immoveable Property portfolios assessed under the IRB Approach.	Proposal: reconfigure template such that IRB Exposures is a category heading rather than an 'of which'.	We believe the reference percentages are relevant only to Standardised Exposures, therefore propose that the layout of the template is amended such that Standardised and IRB are separate category headings, rather than sub-analyses of other column headings. See proposed redesigned template.
Column 050	Sum of overall losses	Article 96 paragraph 1 lit b) and lit d) CRR respectively, market value and mortgage lending value according to Article 4 (51) and (52) of CRR losses according to Article 4 (28) of CRR	Article 96 Specific reporting obligations 1. Institutions shall report the following data to the competent authorities: (b) overall losses stemming from lending collateralised by residential property in any given year. (d) overall losses stemming from lending collateralised collateralised by commercial immovable property in any given year. Article 4 Definitions (51) "mortgage lending value" means the value of the immovable property as determined by a prudent assessment of the future	Proposed definition: (b) overall losses stemming from lending collateralised by residential property in any given year; (d) overall losses stemming from lending collateralised collateralised by commercial immovable property in any given year. Losses represent amounts written off, net of any recoveries of amounts previously written off. Amounts to be reported are for the year to date.	
Column 060	of which: immovable property valued with mortgage lending value	Reporting of those losses, where the value of the collateral has been calculated as mortgage lending value	None	Proposal: DELETE COLUMN	We do not understand what is being asked for in this column or column 020, and cannot see a basis for it in Article 96 of CRR. Accordingly we propose it is deleted.
Column 070	of which: SA exposures	Reporting of those losses, where the risk weighted exposure amount of exposure the collateral has been assigned to, is calculated with the Standardised Approach of Title I chapter 2 of part 3 of CRR	Title 1, Chapter 2 of Part 3 of CRR 4 comprises Articles 94, 95 and 96. These 3 articles do not specifically cover the Standardised Approach. Please report the losses arising on Immoveable Property portfolios assessed under the Standardised Approach.	Proposal: reconfigure template such that Standardised Exposures is a category heading rather than an 'of which'.	We believe the reference percentages are relevant only to Standardised Exposures, therefore propose that the layout of the template is amended such that Standardised and IRB are separate category headings, rather than sub-analyses of other column headings. See proposed redesigned template.
Column 080	of which: IRB exposures	Reporting of those losses, where the risk weighted exposure amount of exposure the collateral has been assigned to, is calculated with the Internal Ratings Based Approach of Title I chapter 3 of part 3 of CRR	Title 1, Chapter 3 of Part 3 of CRR 4 covers the Trading Book. The guidance from EBA is misleading. Please report the losses arising on Immoveable Property portfolios assessed under the IRB Approach.	Proposal: reconfigure template such that IRB Exposures is a category heading rather than an 'of which'.	We believe the reference percentages are relevant only to Standardised Exposures, therefore propose that the layout of the template is amended such that Standardised and IRB are separate category headings, rather than sub-analyses of other column headings. See proposed redesigned template.
Column 090	Sum of the exposures			Proposed definition: Choice of e.g. (1) Original Exposure pre conversion factors (as per column 010 of CR SA or column 030 of CR IRB); or (2) Exposure at Default (as per column 200 of CR SA or column 110 of CR IRB) Exposures, as defined above, representing all loans collateralised by immoveable property at the reporting period date. Column 090 = column 100 + column 110	There are many ways in which exposures" could be interpreted. It is important that a more precise definition, preferably one directly taken from e.g. CR SA/CR IRB templates, is provided, otherwise the data collected will not be comparable. The definition should make some reference to the population being all loans secured by immoveable property, and not some subset (e.g. impaired loans only)
Column 100	of which: SA exposures	Reporting of those exposures, where the risk weighted exposure amount of exposure the collateral has been assigned to, is calculated with the Standardised Approach of Title I chapter 2 of part 3 of CRR	Title 1, Chapter 2 of Part 3 of CRR 4 comprises Articles 94, 95 and 96. These 3 articles do not specifically cover the Standardised Approach. Please report the losses arising on Immoveable Property portfolios assessed under the Standardised Approach.		Create a new definition for Standardised and IRB in line with the proposed new layout of the template. The definition should refer to appropriate sections from CRR dealing with Standardised approach and IRB approach to calculating credit risk.
Column 110	of which: IRB exposures	Reporting of those exposures, where the risk weighted exposure amount of exposure the collateral has been assigned to, is calculated with the Internal Ratings Based Approach of Title I chapter 3 of part 3 of CRR	Title 1, Chapter 3 of Part 3 of CRR 4 covers the Trading Book. The guidance from EBA is misleading. Please report the losses arising on Immoveable Property portfolios assessed under the IRB Approach.		Create a new definition for Standardised and IRB in line with the proposed new layout of the template. The definition should refer to appropriate sections from CRR dealing with Standardised approach and IRB approach to calculating credit risk.

ROWS					
Row 010	Residential property	Article 96 paragraph 1 lit a) and lit b) of CRR respectively,			Article 96, paragraphs 1 (a) and (b) do not provide a definition of what constitutes either "residential property" or "commercial immovable property" It would be preferable to link this definition, where possible, to existing definitions for these items. In the case of Standardised exposures, we presume the exposure class to be reported in CR IP Losses is the class "claims or contingent claims secured by mortgages on immovable property" (suitably sub-divided into residential and commercial), plus any exposures which would have been reported in this exposure class were it not for the fact that they now meet the conditions to be reported in the exposure class "Exposures in Default" under the Standardised approach? In the case of IRB exposures there is no similar exposure class which can be referred to for a definition. Accordingly we propose that a generic definition is used
Row 020	Commercial immovable property	Article 96 paragraph 1 lit c) and lit d) of CRR respectively,			See above