



EBA/REC/2014/01 Appendix 1

29 January 2014/ Updated 27 April
2015

REC/2014/01 + Appendix 1

Compliance Table - Recommendation

Based on information supplied by them, the following competent authorities comply or intend to comply with: EBA Recommendation – EBA/REC/2014/01 on Recommendation on the use of Legal Entity Identifier (LEI) – published on 29th January 2014.

Member State		Competent authority	Complies or intends to comply	Comments
BE	Belgium	National Bank of Belgium	Yes	
BG	Bulgaria	Българска народна банка (Bulgarian National Bank)	No response	The Competent Authority failed to provide the notification of compliance
CZ	Czech Republic	Česká Národní Banka (Czech National Bank)	Yes	
DK	Denmark	Finanstilsynet (Danish Financial Supervisory Authority)	No response	The Competent Authority failed to provide the notification of compliance
DE	Germany	Bundesanstalt für Finanzdienstleistungsufsicht (Federal Financial Supervisory Authority)	No response	The Competent Authority failed to provide the notification of compliance
EE	Estonia	Finantsinspektsioon (Financial Supervision Authority)	Yes	<p>Estonian Financial Supervision Authority would like to clarify its intention to comply with the Recommendation No. EBA/REC/2014/01.</p> <p>To comply with the Recommendation Estonia has to:</p> <ol style="list-style-type: none"> 1. Implement relevant provisions in Estonian legal acts; 2. Set up proper infrastructure to introduce a pre-LEI system in Estonia.
IE	Ireland	Central Bank of Ireland	Yes	

Member State		Competent authority	Complies or intends to comply	Comments
EL	Greece	Τράπεζα της Ελλάδος (Bank of Greece)	No response	The Competent Authority failed to provide the notification of compliance
HR	Croatia	National Bank of Croatia	No response	The Competent Authority failed to provide the notification of compliance
ES	Spain	Banco de España (Bank of Spain)	Yes	
FR	France	Autorité de Contrôle Prudentiel et de Résolution (Prudential Supervisory & Resolution Authority)	Yes	
IT	Italy	Banca d'Italia (Bank of Italy)	Yes	
CY	Cyprus	Κεντρική Τράπεζα της Κύπρου (Central Bank of Cyprus)	No response	The Competent Authority failed to provide the notification of compliance
LV	Latvia	Finanšu un Kapitāla tirgus Komisija (Financial and Capital Market Commission)	No response	The Competent Authority failed to provide the notification of compliance
LT	Lithuania	Lietuvos Bankas (Bank of Lithuania)	No response	The Competent Authority failed to provide the notification of compliance
LU	Luxembourg	Commission de Surveillance du Secteur Financier (Commission)	Yes	

Member State		Competent authority	Complies or intends to comply	Comments
		for the Supervision of Financial Sector)		
HU	Hungary	Magyar Nemzeti Bank (National Bank of Hungary)	Yes	
MT	Malta	Malta Financial Services Authority	No response	The Competent Authority failed to provide the notification of compliance
NL	Netherlands	De Nederlandsche Bank (National Bank of Netherlands)	Yes	
AT	Austria	Finanzmarktaufsicht (Financial Market Authority)	Yes	
PL	Poland	Komisja Nadzoru Finansowego (Polish Financial Supervision Authority)	No response	The Competent Authority failed to provide the notification of compliance
PT	Portugal	Banco de Portugal (Bank of Portugal)	Yes	
RO	Romania	Banca Națională a României (National Bank of Romania)	Yes	
SI	Slovenia	Banka Slovenije (Bank of Slovenia)	Yes	

Member State		Competent authority	Complies or intends to comply	Comments
SK	Slovakia	Národná Banka Slovenska (National Bank of Slovakia)	Yes	
FI	Finland	Finanssivalvonta (Finnish Financial Supervisory Authority)	Yes	
SE	Sweden	Finansinspektionen (Swedish Financial Supervisory Authority)	Yes	
UK	United Kingdom	Prudential Regulation Authority (Bank of England)	Yes	<p>We have taken the view that we can comply based on information from EBA staff regarding the technical requirements for submitting data in compliance with this recommendation. Any changes to the planned technical approach may affect our ability to comply. Our ability to comply will also be dependent on a full analysis by the FCA (who operate the reporting systems we have inherited from the former FSA) of the costs and operational impacts of the required systems changes, but on the basis of the approach communicated by EBA we expect to be able to make the necessary changes within a few months, subject to final confirmation. In addition we note that, given the short timeframes involved, there are a number of challenges regarding the first reporting period in particular. Firstly, a number of firms may not have had time to secure the necessary LEIs and integrate them into their COREP reporting plans. Secondly, regarding one technical aspect of incorporating LEIs into data submissions from firms, we understand the details of this have yet to be published by the EBA, and therefore do not expect any firms will be in a position to comply with this element for the first reporting period. Thirdly, given the lead time for amendments to our data systems, it is possible that we will be unable to implement the fully automated processes</p>

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				for data transfer to EBA to include LEIs for the first reporting period. Instead we may use the manual solution to provide EBA with the LEI information in relation to COREP submissions, where available. We are currently conducting an impact analysis on the recently agreed automated solution and will have more information in due course. Given these three challenges we intend to comply with this recommendation on a best efforts basis for the first reporting period at least.
		Financial Conduct Authority (FCA)	Yes	
		Financial Services Commission (Gibraltar)	Yes	
EEA-EFTA State				
IS	Iceland	Fjármálaeftirlitið (Icelandic Financial Supervisory Authority - FME)	No response	The Competent Authority failed to provide the notification of compliance
LI	Liechtenstein	Finanzmarktaufsicht - FMA (Financial Market Authority)	Yes	EU and EEA are currently clarifying their legal relationship and therefore Liechtenstein is only admitted as temporary observer to the Board of Supervisors and is not vested with any voting rights under the EBA Regulation No. 1093/2010. Furthermore, the EBA Regulation No. 1093/2010 has not been incorporated into the EEA Agreement. Hence, at present, Liechtenstein is not required to comply with the reporting obligations to EBA under Regulation (EU) No. 575/2013. However, the Financial Market Authority Liechtenstein (the "FMA") as the competent authority in charge of the supervision of institutions subject to reporting obligations, agrees – on a voluntary basis – to secure the requirements regarding the use of (pre-) LEIs and therefore to comply with the EBA/Rec/2014/01.

Member State		Competent authority	Complies or intends to comply	Comments
NO	Norway	Finanstilsynet (Norwegian Financial Supervisory Authority)	Yes	

Notes

Article 16(3) of the EBA Regulation requires national competent authorities to inform us whether they comply or intend to comply with each guideline or recommendation we issue. If a competent authority does not comply or does not intend to comply it must inform us of the reasons. We decide on a case by case basis whether to publish reasons.

The EBA endeavours to ensure the accuracy of this document, however, the information is provided by the competent authorities and, as such, the EBA cannot accept responsibility for its contents or any reliance placed on it.

For further information on the current position of any competent authority, please contact that competent authority. Contact details can be obtained from our website (www.eba.europa.eu).

