

Complementary costbenefit assessment on the Integrated Reporting Framework

Closer alignment with FINREP solo



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Executive summary

In recent years the Eurosystem has been conducting a cost-benefit analysis to assess the merits of establishing an Integrated Reporting Framework (IReF) and the features this might have. This analysis has been conducted in close cooperation with the banking industry and other relevant stakeholders, including national central banks (NCBs) in the European System of Central Banks (ESCB) as reporting agents and compilers, as well as ESCB user committees and ECB Banking Supervision. The qualitative stock-take carried out in 2018 was used to design scenarios for the IReF data collection. These were subsequently examined in the cost-benefit assessment (CBA) conducted between November 2020 and April 2021.

Following the launch of the IReF Programme and its non-IT design phase in December 2021, the Eurosystem conducted an in-depth analysis of the feedback received in the IReF CBA in order to develop the IReF. This analytical work was key to defining the main characteristics of the IReF and also showed the need for an additional assessment to be carried out together with the banking industry and other stakeholders. This would be done to resolve residual gaps and ensure that the IReF would effectively represent a first step towards integrating statistical, prudential and resolution requirements on a wider basis. This wider integration has been requested by the banking industry on several occasions and was also assessed by the European Banking Authority (EBA) in its feasibility study on integrated reporting.¹ The ESCB published its own input² into the EBA feasibility study. Questions around wider integration were addressed in the complementary CBA launched in May 2023.

The topics covered in the complementary CBA are analysed in three publications. The first, focusing on the extension of the IReF Regulation to cover country-specific requirements, was released in February 2024.³ The second report concentrates on the topics that were tested in the complementary CBA to add analytical value for users and supervisors and operationalise the IReF. This third report focuses on the possible closer alignment of the IReF with FINREP solo, detailing the banking industry's responses to various facets of this objective. The banking industry was involved in analysing the results within a workstream of the Banks' Integrated Reporting Dictionary (BIRD).

The main conclusion of these analyses is that, on a general level, the banking industry strongly supports closer alignment of the IReF with FINREP solo. However, it believes it would be costly to include the specific attributes that would make closer alignment possible. The industry therefore appears to favour a stepwise approach

¹ European Banking Authority (2021), EBA Report on a Feasibility Study of an Integrated Reporting System under Article 430C CRR, European Banking Authority, Paris.

² European Central Bank (2020), The ESCB input into the EBA feasibility report under article 430c of the Capital Requirements Regulation (CRR 2), European Central Bank, Frankfurt am Main.

³ European Central Bank (2020), Complementary cost-benefit assessment of the Integrated Reporting Framework: Extension of the IReF Regulation to cover country-specific requirements, European Central Bank, Frankfurt am Main.

towards closer alignment of the two frameworks, rather than implementing all changes at once. Further detail is provided below.

- The banking industry overall supports closer alignment of the IReF with FINREP solo. In particular, it highlights the benefits of closer conceptual alignment between the reporting frameworks.
- There is some support for extending the application of concepts already available in the IReF to all instruments that are relevant for FINREP solo, while ensuring that timeliness and frequency are taken into account.
- The industry appears hesitant about implementing extensions related to concepts not included in the IReF baseline scenario when the IReF goes live. Gross carrying amount can be seen as an exception compared with the other attributes that were assessed.
- The industry does not support aggregated collection of information on offbalance-sheet items vis-à-vis natural persons. However, it indicates collecting granular information on off-balance-sheet items vis-à-vis natural persons would have some benefits, although costs would again be high.
- Respondents highlight that dynamic adjustment of the IReF to changes in the EBA Implementing Technical Standards (ITS) would be beneficial, but associated costs would be high.

After all three reports are published, the Eurosystem will consider the feedback received from all stakeholders. It will use this input to match the costs and benefits of all proposals under consideration as a premise for defining the preferred scenarios to be implemented in the IReF. This exercise will form the basis for drafting the IReF Regulation. The results of the comparison exercise will be published to provide background information for the proposed public consultation on the draft IReF Regulation.

1 Introduction

The complementary IReF cost-benefit assessment (CBA) followed an earlier consultation on an initial CBA that was launched in 2020. The questionnaire assessed the costs and benefits for reporting agents and other relevant stakeholders in concrete scenarios that would apply to a comprehensive list of additional topics. These topics would be relevant to the definition of the structure, content and operationalisation of the framework.

The complementary CBA for the banking industry was aimed at credit institutions, deposit-taking corporations other than credit institutions (referred to as "other deposit-taking corporations" below for the sake of simplification), banking associations and service providers. National central banks (NCBs) were also addressed in their role as compilers of statistical data, while ESCB user committees and ECB Banking Supervision were invited to provide feedback in a dedicated questionnaire. All euro area countries plus Sweden participated in the exercise. The analysis presented in this report focuses on the euro area only.

The report summarises the feedback received from the banking industry on the possible closer alignment of the IReF with FINREP solo. This input, together with the feedback received from other stakeholders, will form the basis for a comprehensive matching of costs and benefits that will lead to the drafting of the IReF Regulation.

The main text analyses the responses from a euro area perspective for the banking industry as a whole. Annex A presents a decomposition of the results in terms of the group structure (referred to as "type" in the report) and size classes of the respondents. Please note that rounding may cause some minor inconsistencies of 1 percentage point between charts and text.

General question on closer alignment with FINREP solo

Closer alignment between the IReF and FINREP solo could allow more substantial use of the IReF dataset for supervisory purposes, with the potential benefit of reducing ad hoc requests to reporting agents due to a more analytical and stable dataset.

The ECB legal framework for collecting FINREP solo information (Regulation (EU) 2015/34)⁴ currently sets up four different levels of reporting for proportionality measures:

- FINREP data points;
- over-simplified FINREP;
- simplified FINREP;
- full FINREP.

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In the interests of meaningful but not excessively burdensome closer alignment with FINREP solo, the scenarios proposed in the complementary CBA aim to introduce the concepts relevant for alignment with simplified but not full FINREP solo. These concepts have been developed with reference to both FINREP solo templates under the International Financial Reporting Standards (IFRS) and national generally accepted accounting principles (nGAAP). Closer alignment does not mean that data under the IReF will be collected from reporting agents at the level of the legal entity in its entirety. Data collection would continue to follow statistical principles, with the reporting agent submitting separate reports for individual observed agents in line with the current approach in AnaCredit reporting and to comply with statistical needs.

As a first step, respondents were invited to evaluate, in general terms, closer alignment of the IReF and FINREP solo in relation to content and definitions. The assessment is provided here for all respondents as well as for FINREP solo reporters.

Proposed assessment: Would you agree to closer alignment between the IReF and FINREP solo in terms of content and definitions, also as a (technical) precondition for the potential future decommissioning of parts of FINREP solo and further integration of reporting?⁵

⁴ Regulation (EU) 2015/534 of the European Central Bank of 17 March 2015 on reporting of supervisory financial information (OJ L 86, 31.3.2015, p. 13).

⁵ Currently, in accordance with the Basel Committee on Banking Supervision's standard number 239, banks must remain responsible for their data aggregation and reporting processes. While closer alignment between the IReF and FINREP solo would involve semantic integration of data definitions, no presumptions about the possible decommissioning of FINREP templates can currently be made. Any decision on potential future decommissioning would ultimately be made by banking supervisory authorities.



General assessment on closer alignment between the IReF and FINREP solo

Notes: The percentages are calculated for each driver as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

As Chart 2.1 shows, there is support for the proposal, with 86% of respondents overall and 89% of respondents that report FINREP solo agreeing or very much agreeing with the general question. The results are fairly homogeneous by size and type of respondent (see Annex A1).

The BIRD subgroup on the IReF confirmed that possible closer alignment with FINREP solo would be an important first step in the integration between statistical, resolution and prudential reporting. In particular, they expressed strong expectations regarding the reduction of ad hoc requests from supervisors. Some subgroup members also anticipated that closer alignment with FINREP solo would promote the use of supervisory concepts for statistical purposes and therefore limit the proliferation of new statistical requirements. Members also raised the point that IReF information required for closer alignment with FINREP solo would only be collected from institutions that are currently subject to FINREP solo reporting.

The open text comments that were received in the complementary CBA show that different approaches to reporting at the level of the reporting agent may result in different expectations regarding closer alignment. For instance, while several respondents recognised the potential to create semantic integration, which could allow the decommissioning of parts of FINREP solo to be further investigated, others pointed out that consolidated FINREP is based on solo level and hence the input needed for FINREP solo would still be required for consolidated reporting. There were also several comments regarding the frequency and timeliness of the reporting of attributes needed for closer alignment with FINREP. The general expectation is that the new attributes would be reported quarterly and aligned with the FINREP solo timing. Many comments questioned which accounting standards will underpin IReF reporting, as those applicable to statistical reporting are often different from those relating to FINREP solo reporting.

Several comments highlighted the complexity of closer alignment and observed that closing the gaps between statistical and prudential requirements is a very ambitious and costly undertaking. A stepwise approach would therefore be a possibility:

integration could initially focus on common areas of the IReF and FINREP solo, while integration of areas of FINREP solo that are not relevant from a statistical perspective could follow at a later stage – i.e. after successful implementation of a harmonised IReF.

Overall, responses to the general question of whether to align the IReF and FINREP solo in terms of content and definitions were positive. Benefits are expected to materialise, especially in the long run. The critical aspects that were highlighted will be considered when developing the IReF requirements in the context of matching costs and benefits.

Extensions related to concepts already available in the IReF baseline scenario

The IReF baseline scenario includes several accounting concepts that only apply to specific financial instruments. For example, variables related to credit quality – such as performing status, default status or accumulated changes in fair value due to credit risk – are only applicable to loans to legal entities to reflect AnaCredit requirements. These accounting concepts could be extended to all instrument types included in the IReF and loans to natural persons, strengthening the links between the IReF and FINREP solo. Extension would only take place where applicable to the specific instrument type (e.g. no impairment status would apply to securities issued or derivatives).

Proposed scenario: FINREP solo concepts already available in the IReF baseline scenario would be extended to all instrument types (where applicable).

Respondents were invited to assess the benefits and costs of the proposal, taking into account the different granularity of the instrument types (granular and aggregated data).



Chart 3.1

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Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart 3.1 shows the assessment of the benefits of the proposed scenario. A majority of respondents indicate that the benefits of both granular and aggregated data would be at least moderate (67% and 61% respectively).





Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart 3.2 shows the assessment of the costs of the proposed scenario. A large majority of respondents indicate that the implementation costs for both granular and aggregated data would be at least moderate (85%). The overall assessment for regular costs was similar (76% for both granular and aggregated data), although slightly lower than for implementation costs.

Results are broadly homogeneous by size of respondent, although standalone institutions report marginally lower costs compared with the other respondents for both types of data, while the members of domestic groups indicate higher costs compared with both standalone entities and members of cross-border groups for aggregated data (see Annex A2).

The majority of the BIRD subgroup on the IReF stressed that the feedback on costs may have been negatively influenced by the lack of a detailed list of attributes to be evaluated. They suggested that the actual costs may not be as high as indicated, providing that the resulting requirements do not go beyond those for FINREP solo. In this respect, the subgroup also commented that concepts that are not relevant for closer alignment should not be included in the extension.

Overall, no clear preference is indicated in respect of the proposed scenario: respondents identified at least moderate benefits but also at least moderate implementation costs and regular costs. The assessment also shows that there would not be a significant difference between extending concepts for granular and aggregated data.

Extensions related to concepts not included in the IReF baseline scenario

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For more substantial alignment with FINREP solo, the IReF reporting could include concepts that were left out of the baseline scenario. The following extensions were considered:

- Coverage of advances that are not loans. The IReF baseline scenario foresees aggregated data collection for these items as part of remaining assets (e.g. suspense and transit items). To achieve closer alignment with FINREP solo, two options could be considered:
 - granular collection aligned with the data collection on loans;
 - aggregated collection with the addition of the attributes necessary to align the IReF with FINREP solo (e.g. performing status, impairment status, gross carrying amount).

The two options were assessed separately in the complementary CBA. Granular data collection of advances with identification of the counterparty would apply to legal entities. Granular collection of advances vis-à-vis natural persons would only apply if loans to natural persons are also collected at this level. In this case, no information that would allow direct identification of the advances' counterparties would be collected.

- Information on instruments that are part of a disposal group classified as held for sale.⁶ Here too, the requirements may be granular (e.g. loans to legal entities or holdings of securities) or aggregated (e.g. loans to natural persons, if data are collected at this level). The information is relevant because financial instruments forming part of a disposal group classified as held for sale are reported separately (see Regulation (EU) 2021/451)⁷ in FINREP solo.⁸
- Information on gross carrying amount. This (granular or aggregated) requirement refers to the gross carrying amount according to FINREP solo.⁹
- Information on the maximum amount of the collateral or guarantee that can be considered. This (granular or aggregated) requirement refers to the allocation of the protection values according to FINREP solo.¹⁰

⁶ See IFRS 5, "Non-current Assets Held for Sale and Discontinued Operations".

⁷ Commission Implementing Regulation (EU) 2021/451 of 17 December 2020 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to supervisory reporting of institutions and repealing Implementing Regulation (EU) No 680/2014 (OJ L 86, 31.3.2015, p. 13), Annex V, Part 1.3.

⁸ The measurement rules do not change for financial instruments classified as held for sale under IFRS 9, *Financial Instruments*. See IFRS 5, paragraph 5, point (c).

⁹ See Regulation 2021/451, Annex V, Part 1.34.

¹⁰ See Regulation 2021/451, Annex V, Part 2.172-174.

- Information relevant for fair value hierarchy.¹¹ This information is relevant for all instruments measured at fair value under IFRS, IFRS-compatible nGAAP and nGAAP reporters, and may therefore also refer to aggregated or granular requirements.¹²
- Additional requirements on derivatives.¹³ The additional information relates to the notional amount of derivatives, the type of market where they are exchanged (e.g. over-the-counter), and the distinction between derivatives related to trading (e.g. economic hedges) and those related to hedging (e.g. type of hedge, type of hedged risk). As data on derivatives will be collected on an aggregated basis (with the possible exception of intragroup positions, subject to the outcome of the matching of costs and benefits), the requirements would imply an additional level of detail.

Proposed scenario: FINREP solo concepts not available in the IReF baseline would be included in the reporting.

Respondents were invited to assess the costs and benefits of the proposal, considering both granular and aggregated data.

¹¹ IFRS 13, *Fair Value Measurement* requires a classification of assets and liabilities measured at fair value into three different levels (Levels 1, 2 and 3). See IFRS 13, paragraph 72.

¹² If nGAAP under the Banking Accounts Directive (BAD) require assets measured at fair value to be allocated between different levels of fair value, institutions under nGAAP must also report this information. See Regulation 2021/451, Annex V, Part 2.177.

¹³ See Regulation 2021/451, Annex V, Part 2.120-144.

Chart 4.1





Notes: The percentages are calculated for each scenario as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

As shown in Chart 4.1, feedback on the proposed scenario is balanced for all concepts. The exception appears to be the gross carrying amount, for which a majority of respondents (64%) indicate that the benefits would be at least moderate.

Results are fairly homogeneous by size and by type of respondent, although large institutions report higher benefits for almost all concepts compared with other sizes of respondent (see Annex A3).

Chart 4.2





Notes: The percentages are calculated for each scenario as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart 4.3

Regular costs



Notes: The percentages are calculated for each scenario as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Complementary cost-benefit assessment on the Integrated Reporting Framework – Extensions related to concepts not included in the IReF baseline scenario

Charts 4.2 and 4.3 show that feedback on implementation and regular costs is quite similar for all the proposed extensions, with a large majority of respondents indicating that costs would be at least moderate. Once again, the exception appears to be the gross carrying amount, for which a smaller proportion of respondents determine that costs would be at least moderate (62% for implementation costs and 56% for regular costs).

Results are fairly homogeneous by size and by type of respondent, although small institutions report lower costs compared with other sizes of respondents for advances that are not loans, in the case of both granular and aggregated data (see Annex A3).

The BIRD subgroup on the IReF mentioned that the main expected cost driver would be data quality management. Another cost driver could be a potential mismatch between the level of granularity in banks' existing reporting systems versus the required level of granularity in the IReF (e.g. if the IReF is more granular than the information available in the existing reporting layer of banks), which would require additional information to be extracted from the banks' internal systems. However, some subgroup members said it would only be possible to properly assess costs during the implementation phase, once the actual reporting scheme has been published, as costs may vary depending on how the concepts are captured in the IReF implementation models.

Overall, feedback on the proposed scenario does not appear to be fully supportive for all assessed concepts. The exception is the gross carrying amount, for which the benefits would be somewhat higher and the costs would be lower than for other concepts.

Extensions related to off-balance-sheet items vis-à-vis natural persons

The household counterparty sector is important for the monitoring of the level of bad loans and irrevocable off-balance-sheet items subject to credit risk for financial stability purposes. Collection of information on off-balance-sheet items vis-à-vis natural persons would support analysis of these issues and represent another step towards closer alignment of the IReF with FINREP solo. The information could be collected on an aggregated or granular basis. In the case of granular data collection, the data would also be relevant for microprudential purposes. Off-balance-sheet information would be collected with a technical identifier, so direct identification of the counterparty would not be necessary.

Proposed scenario: Data on off-balance-sheet items vis-à-vis natural persons would be collected in the IReF.

Respondents were invited to assess the costs and benefits of the proposal, bearing in mind that the introduction of new requirements may have a different impact depending on whether the information is collected on an aggregated or granular basis.



Chart 5.1 Benefits of the proposed scenario

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart 5.1 shows that a slight majority of respondents (53%) identify that granular data collection for off-balance-sheet items vis-à-vis natural persons would have at least moderate benefits. On the other hand, the case for aggregated data collection

is not supported, with 58% of respondents indicating at most low benefits. The results are fairly homogeneous by size and type of respondent (see Annex A4).



Chart 5.2

Costs of the proposed scenario

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated

Chart 5.2 shows the assessment of the implementation and regular costs, in the case of both granular and aggregated data collection, for off-balance-sheet items visà-vis natural persons. A clear majority of respondents indicate that the implementation costs would be at least moderate (74% for granular data and 78% for aggregated data). A majority also indicate that regular costs would be at least moderate (63% in both cases). Results are broadly homogeneous by type and size of respondent (see Annex A5).

The BIRD subgroup on the IReF highlighted that reporting aggregated data for offbalance-sheet items vis-à-vis natural persons would be redundant with the current FINREP solo reporting (i.e. template F_9), although some members observed that the IReF reporting could include additional details (e.g. exposures included in the held-for-sale portfolio).

Overall, respondents identify some benefits of granular data collection for offbalance-sheet items vis-à-vis natural persons but indicate that aggregated data collection would have more limited benefits. They assess both implementation and regular costs as being at least moderate in the case of both granular and aggregated data collection.

Dynamic adjustment of the IReF to changes in the EBA ITS

The IReF Regulation aims to fulfil the statistical data needs arising from Eurosystem tasks. Nevertheless, several concepts defined in the supervisory regulations are also used to fulfil statistical requirements. Making use of supervisory concepts fosters comparability between collections for statistical, supervisory and resolution purposes and is essential for broader integration in the future. It also simplifies the process and reduces costs for reporting agents, as they can simply refer to the same source. Alignment with the Capital Requirements Regulation (CRR), the EBA Implementing Technical Standards (ITS) on supervisory reporting and FINREP solo could be strengthened whenever this fits the scope and purpose of the IReF by introducing a dynamic amendment to the IReF subdomains or reporting instructions.

Proposed scenario: Provided it does not affect fulfilment of the Eurosystem tasks required by statistical standards, the IReF subdomains and reporting instructions will be amended dynamically to reflect updates to the ITS, CRR and/or FINREP solo.

Respondents were invited to assess the costs and benefits of the proposed scenario.



Chart 6.1

Benefits of the proposed scenario

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart 6.1 shows that there is support for the proposal, with 78% of respondents identifying at least moderate benefits. The results are fairly homogeneous by size and type of respondent (see Annex A5).

Chart 6.2





Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart 6.2 shows that a large majority of respondents indicate the costs would be at least moderate (84% for implementation costs and 75% for regular costs). The results are fairly consistent across size and type of respondent.

The BIRD subgroup on the IReF expressed support for the proposed approach and suggested that costs could be reduced by aligning the technical updates of the IReF requirements with the go-live of those requirements. This would allow the banks to internally align their testing cycles for statistical and prudential purposes.

Overall, respondents indicate that the proposal would have benefits, but that the associated costs would also be high. However, the costs appear to depend, at least partly, on the way in which the changes are coordinated. Due consideration will be given to these aspects when matching costs and benefits of the proposal.

Annex A Results by type and size of respondent

A1 General question on closer alignment with FINREP solo

This section refers to Chapter 2 of the main text.

Chart A1.1





Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A1.2

General assessment - FINREP reporters - decomposition by type of respondent



Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A1.3

General assessment - decomposition by size of respondent



Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated. Large, mid-sized and small institutions are defined as having total assets above €30 billion, between €1 billion and €30 billion, and below €1 billion respectively.

Chart A1.4

General assessment - FINREP reporters - decomposition by size of respondent



A2 Extensions related to concepts already available in the IReF

This section refers to Chapter 3 of the main text.

Chart A2.1

Benefits - granular data - decomposition by type of respondent



Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A2.2

Benefits - granular data - decomposition by size of respondent





Benefits - aggregated data - decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A2.4







Implementation costs – granular data – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A2.6







Implementation costs - aggregated data - decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A2.8

Implementation costs - aggregated data - decomposition by size of respondent





Regular costs - granular data - decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A2.10







Regular costs – aggregated data – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A2.12





A3 Extensions related to concepts not included in the IReF baseline

This section refers to Chapter 4 of the main text.

Chart A3.1

Benefits – advances that are not loans – granular collection – decomposition by type of respondent



Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.2

Benefits – advances that are not loans – granular collection – decomposition by size of respondent





Benefits – advances that are not loans – aggregated collection – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.4

Benefits – advances that are not loans – aggregated collection – decomposition by size of respondent





Benefits – instruments that are part of a disposal group classified as held for sale – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.6

Benefits – instruments that are part of a disposal group classified as held for sale – decomposition by size of respondent





Benefits – gross carrying amount – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.8







Benefits – maximum amount of the collateral or guarantee that can be considered – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.10

Benefits – maximum amount of the collateral or guarantee that can be considered – decomposition by size of respondent





Benefits - fair value hierarchy - decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.12







Benefits – derivatives requirements – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.14





None Very low Low Moderate High Very high Standalone 23% 24% Member of 13% 16% 23% domestic group Member of 14% 15% 29% cross-border group 20 40 60 80 100 0

Implementation costs – advances that are not loans – granular collection – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.16

Implementation costs – advances that are not loans – granular collection – decomposition by size of respondent




Implementation costs – advances that are not loans – aggregated collection – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.18

Implementation costs – advances that are not loans – aggregated collection – decomposition by size of respondent





Implementation costs – instruments that are part of a disposal group classified as held for sale – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.20

Implementation costs – instruments that are part of a disposal group classified as held for sale – decomposition by size of respondent



Implementation costs – gross carrying amount – decomposition by type of respondent



Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.22

Implementation costs – gross carrying amount – decomposition by size of respondent





Implementation costs – maximum amount of the collateral or guarantee that can be considered – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.24

Implementation costs – maximum amount of the collateral or guarantee that can be considered – decomposition by size of respondent





Implementation costs - fair value hierarchy - decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.26

Implementation costs - fair value hierarchy - decomposition by size of respondent



respondent

None
Very low
Low
Moderate
High
Very high
Standalone
29%
53%
19%

549

60

Implementation costs – derivatives requirements – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

40

Chart A3.28

Member of

0

domestic group Member of

cross-border group

17%

20

14%

Implementation costs – derivatives requirements – decomposition by size of respondent

26%



Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated. Large, mid-sized and small institutions are defined as having total assets above €30 billion, between €1 billion and €30 billion, and below €1 billion respectively.

23%

22%

80

100

Regular costs – advances that are not loans – granular collection – decomposition by type of respondent



Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.30

Regular costs – advances that are not loans – granular collection – decomposition by size of respondent



Regular costs – advances that are not loans – aggregated collection – decomposition by type of respondent



Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.32

Regular costs – advances that are not loans – aggregated collection – decomposition by size of respondent





Regular costs – instruments that are part of a disposal group classified as held for sale – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.34

Regular costs – instruments that are part of a disposal group classified as held for sale – decomposition by size of respondent





Regular costs – gross carrying amount – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.36





Regular costs – maximum amount of the collateral or guarantee that can be considered – decomposition by type of respondent



Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.38

Regular costs – maximum amount of the collateral or guarantee that can be considered – decomposition by size of respondent





Regular costs – fair value hierarchy – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.40







Regular costs - derivatives requirements - decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A3.42





A4 Extensions related to off-balance-sheet items vis-àvis natural persons

This section refers to Chapter 5 of the main text.

Chart A4.1

Benefits - granular data - decomposition by type of respondent



Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A4.2

Benefits - granular data - decomposition by size of respondent





Benefits - aggregated data - decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A4.4







Implementation costs – granular data – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A4.6







Implementation costs – aggregated data – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A4.8

Implementation costs - aggregated data - decomposition by size of respondent





Regular costs - granular data - decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A4.10







Regular costs – aggregated data – decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A4.12





A5 Dynamic adjustment of the IReF to changes in the EBA ITS

This section refers to Chapter 6 of the main text.

Chart A5.1

Benefits - decomposition by type of respondent



Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A5.2

Benefits - decomposition by size of respondent



Chart A5.3



Implementation costs - decomposition by type of respondent

Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A5.4

Implementation costs – decomposition by size of respondent



Chart A5.5





Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IREF Regulation to cover country-specific requirements" published on the ECB's website for information on how national results are calculated.

Chart A5.6

Regular costs – decomposition by size of respondent



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