



EUROPEAN CENTRAL BANK

EUROSYSTEM

# Complementary cost-benefit assessment of the Integrated Reporting Framework

Additional analytical value and operational aspects

April 2024



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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 scale. These questions were addressed in the complementary CBA launched in May 2023.

The topics covered in the complementary CBA are analysed in three publications. The first of these, focusing on the extension of the IReF Regulation to cover country-specific requirements, was released in February 2024. This second report concentrates on the topics that were tested in the complementary CBA for the purpose of adding analytical value for users and supervisors and operationalising the IReF. The 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 report details only the responses from the banking industry on these various topics. The banking industry was also involved in the analysis of the results in the context of a workstream of the Banks' Integrated Reporting Dictionary (BIRD).

The main conclusion drawn for items relating to additional analytical value is that support from the banking industry would tend to be limited on many issues. This is because the additional information is often perceived as being costly or difficult to source, even where respondents indicate it to be beneficial. With regard to operational aspects, the banking industry favours the baseline scenarios presented in the CBA to any of the alternatives and appears to favour full replacement reporting. The feedback from the banking industry on the relevant issues was examined further by the BIRD subgroup on IReF with a view to providing additional context on the interpretation of responses.

Aspects relating to additional analytical value are listed below.

- The banking industry does not appear to support the **splitting of the outstanding nominal amount of loans** into its components. This topic needs

to be investigated further, with regard to the relevance of the components. This should define an approach to be taken to the collection at a granular level of data on loans that would limit the reporting burden.

- Banks provided balanced feedback on **tracking changes in instrument identifiers** in IReF; benefits are recognised but costs also appear to be material.
- The banking industry indicates some support for including future granular requirements on **statistics related to climate change** in IReF, where they fit within the scope of consolidation (i.e. unconsolidated data at the level of the institutional unit). However, the banking industry does not appear supportive of including any specific attributes that could be of interest in this context already at this stage, with the possible exception of the address of the real estate collateral and the NACE code.
- The feedback is not definitive on the addition of information on **the amount of the protection allocated value eligible for credit risk mitigation (CRM)**. Here, banks also indicate that the collection might be beneficial to some extent, but it would also be costly.
- The banking industry does not appear supportive of **the inclusion of information about the country whose law governs a loan agreement**. Costs seem particularly high in relation to instruments that would be issued before the IReF is adopted.
- The collection of **information on protection issuers and the protection value associated with them** does not appear to be supported, especially given the cost involved.
- The banking industry does not appear to support the collection of **additional types of probabilities of default (PDs)** that are already available to reporting agents. However, additional investigations may be undertaken to understand what the cost drivers are and how they could possibly be handled. Collecting PDs flexibly at counterparty or instrument level does not appear to be supported either. Discussions with the banking industry indicate that the feedback may be due to the possible misunderstanding that the flexibility would only be connected to the collection of the additional types of PD that were assessed.

Operational aspects are outlined below.

- The banking industry appears to support the full replacement **submission type** for both revisions and data transmissions relating to new periods.
- The assessment of the **reporting schedules** shows that the baseline scenario (i.e. data collected at two frequencies, with monthly data transmitted at T+10-12 working days (WDs) and T+20-24 WDs, and quarterly data at T+20-24 WDs) remains the most supported by the banking industry.

- **Early transmission of reference data** as elaborated in the proposed alternative scenarios would not be supported.

After all three reports are published, the Eurosystem will take into account the feedback received from all stakeholders. It will use this input to match the costs and benefits of all topics 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) consisted of a supplementary questionnaire to that launched in 2020, in which the costs and benefits for reporting agents and other relevant stakeholders were assessed in concrete scenarios. These costs and benefits would apply to a comprehensive list of additional topics that are 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 simplicity), 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 took part in the exercise. The analysis presented in this report focuses on the euro area only.

This report summarises the feedback received from the banking industry on additional features to optimise the analytical value of the IReF and on the operational aspects of IReF reporting. 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 an ECB regulation on the IReF.

This report is structured as follows. Section 1 focuses on the additional features that could enhance the analytical value of the information collected under the IReF. Section 2 reviews the responses on the splitting of the outstanding nominal amount of loans into its underlying elements. Section 3 analyses the responses on tracking changes in instrument identifiers at observed agent level. Section 4 discusses the assessment of statistical attributes to monitor risks related to climate change. Sections 5 to 8 assess the responses on the costs and benefits of various risk and accounting attributes that could be covered in the IReF in relation to granular loans.

The analyses then focus on the operational aspects of IReF reporting. Traditionally, NCBs have made different choices on how data are collected from reporting agents, for example in terms of the type of data submission or the way reporting schedules are organised. Sections 9 to 11 formulate proposals for standardising the approach to data transmission across the Eurosystem. Section 9 reviews the responses on how reporting agents will transmit data for both new reporting periods and revisions to previous reporting periods. Section 10 relates to the definition of the IReF reporting calendars, while Section 11 focuses on the early submission of counterparty reference data.

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 as regards 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.

## 2 Splitting the outstanding nominal amount of loans

The 2020-21 CBA showed that the banking industry generally supported the collection of data on all loans to legal entities at a granular level, thus lowering the threshold of €25,000 specified in the AnaCredit Regulation.<sup>1</sup> At the same time, the banking industry has underlined the need to avoid collecting granular data on small negative balances, which would be classified as “loans” under statistical definitions.

Currently, the outstanding nominal amount of a loan is collected in AnaCredit net of accumulated write-offs and accrued interest. It comprises three elements:

- **Principal balance:** the amount lent by the creditor, net of repayments;
- **Unpaid past-due interest:** the accumulated amount of interest outstanding at the reporting date which is contractually due but has not been paid;
- **Other balances:** the residual amount covering, for example, fees applied by the creditor for originating and/or servicing the loan (origination fees, late payment fees, etc.).

From a statistical compilation perspective, the main drawback of the current practice is that other balances cannot be excluded from loan transactions, as is the case under international statistical standards. In addition, information on the principal balance can be important for identifying dormant accounts (i.e. accounts not actively used that go into overdraft due to fees being charged).

The complementary CBA invited respondents to assess the benefits and costs of collecting the components of outstanding nominal amounts individually under the IReF. This distinction would apply to both granular and aggregated information on loans, as applicable. The principal balance would include accumulated write-offs. The measure on outstanding nominal amounts would be removed from the reporting scheme for loans, as it could be derived from the new information by deducting the accumulated write-offs collected monthly under the IReF (subject to the final outcome of the matching of costs and benefits).

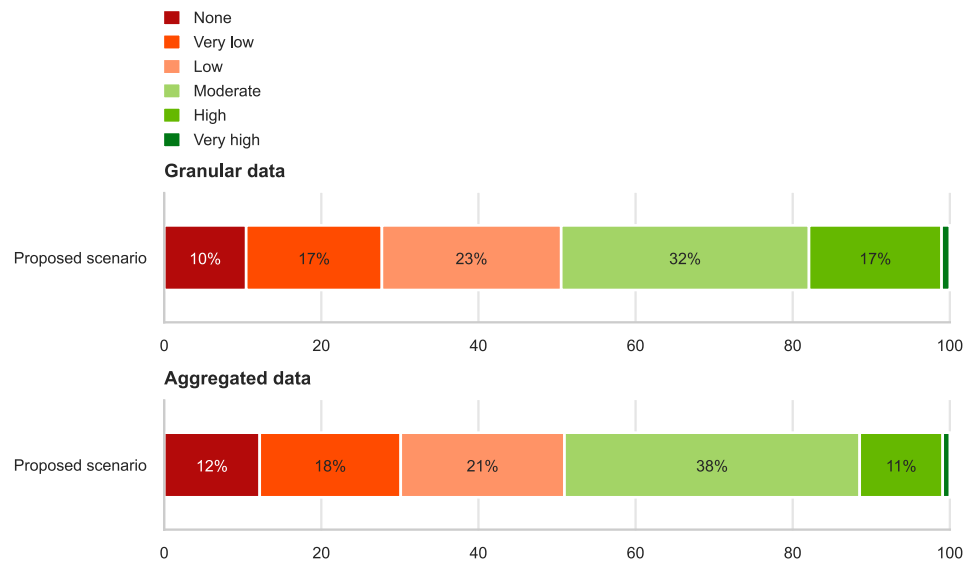
**Proposed scenario:** Collect the individual components of the outstanding nominal amounts – i.e. principal balance (gross of accumulated write-offs), unpaid past-due interest and other balances for loans to legal entities and natural persons.

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<sup>1</sup> Regulation (EU) No 867/2016 of the ECB of 18 May 2016 on the collection of granular credit and credit risk data (ECB/2016/13), OJ L 144, 1.6.2016, p. 44.



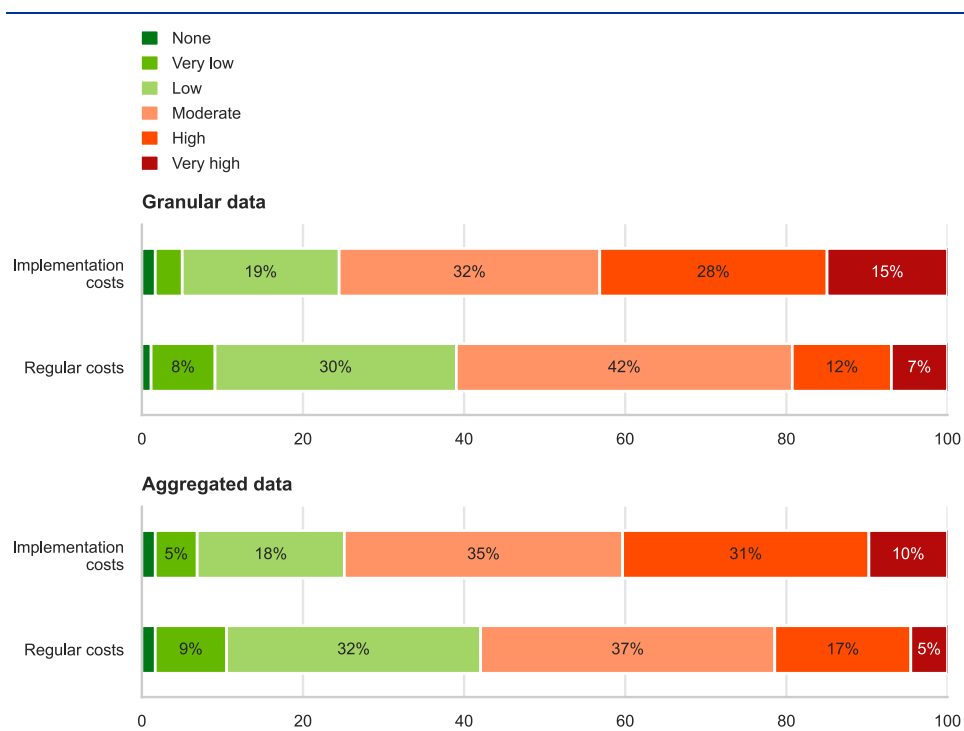
**Chart 2.1**  
Benefits of the proposed scenario



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.

As can be seen in Chart 2.1, the feedback from the banking industry on the benefits of the proposed scenario is balanced; around half of respondents indicate that benefits would be at most low and the other half indicate that benefits would be at least moderate (51% vs 49% for both types of data). The results are broadly homogeneous by size and type of institution (see Annex A1).

**Chart 2.2**  
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 2.2 shows the feedback from the banking industry on implementation costs and regular costs for the proposed scenario, which is similar for both aggregate and granular data. A clear majority of respondents indicate that implementation costs would be at least moderate (76% for granular and 75% for aggregated data). A majority of respondents indicate that regular costs would be at least moderate (61% for granular and 58% for aggregated data). As shown in Annex A1, results are again broadly homogeneous by size and type.

According to the feedback received from the BIRD subgroup on the IReF, the relatively high costs are due to the complex aspects of putting the proposal into operation. The principal balance, as defined in the IReF, does not include interest accruals and fees. However, banks have indicated that, should interest and fees that have been unpaid over a pre-defined period of time be 'capitalised' and added to the principal balance of the loan, it would be difficult to disentangle these components. The IReF collection mechanism will need to balance these complexities against the banking industry's preference to exclude small negative balances, while also satisfying the analytical needs of users.

Overall, the results of the complementary CBA do not indicate support for splitting the outstanding nominal amount into its components. However, there is no evidence of strong objection either. The benefits are indicated as being mixed, while implementation costs and regular costs are at least moderate for a majority of the respondents.

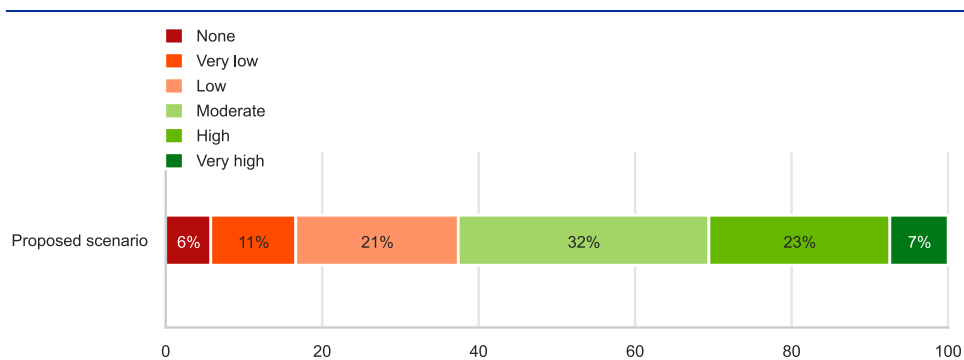
### 3 Tracking changes in instrument identifiers

Instrument identifiers used in banks' internal systems may change over time, for example, due to corporate events or changes in IT systems. It is current practice in AnaCredit not to collect information on changes in loan identifiers. The complementary CBA assessed the possibility of adapting the IReF data model in order to allow banks to report bridging between new and old instrument identifiers.

The information collected in the IReF for all granular requirements could be beneficial. Instruments could be better tracked over their lifetime (thereby preserving their information value over time) and reporting practices across NCBs could be standardised. The bridging would support statistical compilation as, for instance, the new identifier could be used to make corrections to past reporting dates. From an analytical perspective, this approach would also ensure that it would still be possible to link IReF data with other non-IReF based datasets using these identifiers (for example Eurosystem collateral risk management data) after a change of identifier.

**Proposed scenario:** Adapt the IReF data model to enable banks to report bridging between new and old instrument identifiers.

**Chart 3.1**  
Benefits of the proposed scenario

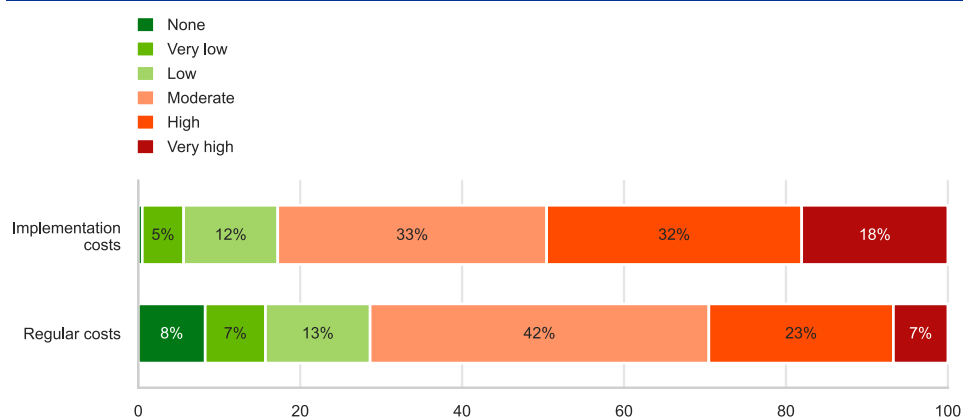


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published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

Chart 3.1 shows the feedback from the banking industry on the benefits of the proposed scenario, with a majority of respondents indicating that benefits would be at least moderate (63%). The results are homogeneous by size and type of institution (see Annex A2).

### Chart 3.2

#### 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 3.2 shows the banking industry's assessment of the costs. A majority of the respondents indicate that implementation costs and regular costs would be at least moderate (83% and 71% respectively). The results are mostly homogeneous by type and size (see Annex A2).

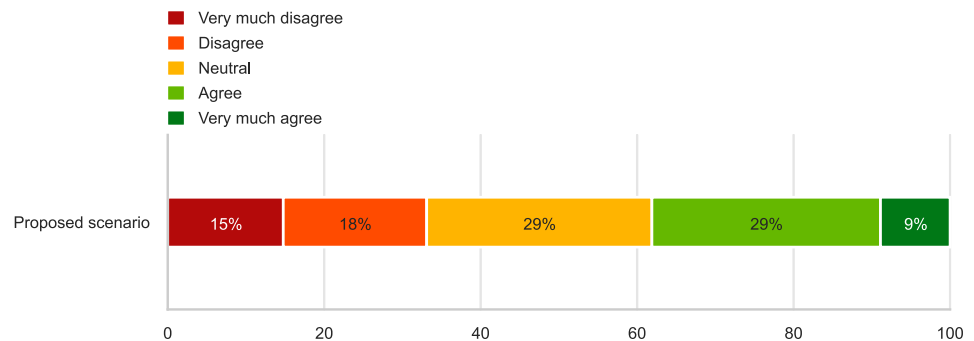
Overall, the feedback on whether to include tracking changes in instrument identifiers is inconclusive, even though the benefits appear to be lower relative to costs. Taking the feedback of the banking industry on board, in the event of a positive assessment of the matching of costs and benefits on this item, an operational structure would be chosen to minimise regular costs by reporting any change in identifier only once at the time of change. Additionally, such changes should be relatively irregular.

## 4 Statistics related to climate change

In line with its mandate, the ECB is committed to addressing the risks posed by climate change. On 8 July 2022 it presented an action plan to include climate change considerations into its monetary policy strategy. The Statistics Committee of the ESCB has been tasked with developing statistical indicators on climate change. The complementary CBA asked respondents to provide a general assessment of the possibility of including climate change statistics in the IReF, provided they fit within its scope of consolidation (i.e. unconsolidated data at the level of the institutional unit). This could avoid the need to set up separate data collection processes that could potentially introduce redundancies and inefficiency. However, as many of the concepts are still under development, it might take some time to define the statistical framework. Requirements would be introduced at a later stage, following a detailed assessment of the costs and benefits.

**Proposed scenario:** Would you agree that the IReF reporting scheme should include granular data requirements related to climate change statistics, to the extent they relate to the same scope of consolidation?

**Chart 4.1**  
General assessment



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.

As shown in Chart 4.1, there appears to be some narrow support for including future granular requirements on climate change statistics where they fit within the scope of consolidation. The proportion of respondents that agree is slightly larger than the proportion of those that disagree (38% vs 33%). Almost a third of respondents are neutral (29%).

The banking industry was also invited to assess some concrete potential requirements in the complementary CBA. These elements can be seen as a minimum set of requirements that would undoubtedly apply in the future with regard to collecting climate change statistics and refer to:

- **information relating to the real estate collateral used for loans**, including address, building use, primary energy use, insurance value and specificities, and the identification number of the building according to the [INSPIRE Directive](#);
- **information relating to the carbon footprint of counterparties** and specifically the NACE 4 classification;
- **information relating to the sustainable activities and the climate objectives of the loans.**<sup>2</sup>

While some heterogeneities are observed by size and type of institution, they are not commented on extensively in this section due to the large number of decompositions for each type of instrument information. Please see Annex A3 for more details.

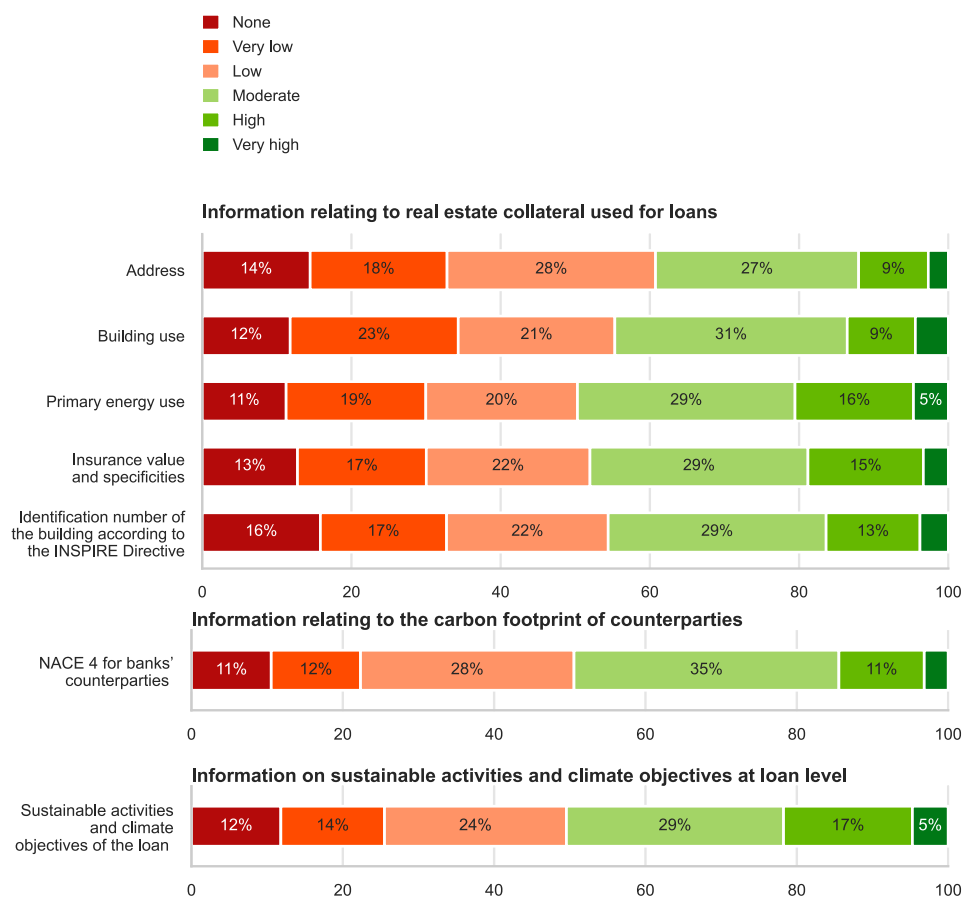
**Proposed scenario:** The IReF reporting scheme would include indicators relating to the real estate collateral used for loans, the carbon footprint of counterparties, and the sustainable activities and the climate objectives of the loans.

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<sup>2</sup> For additional information on the definition and the rationale of the specific indicators, please refer to the complementary CBA.

## Chart 4.2

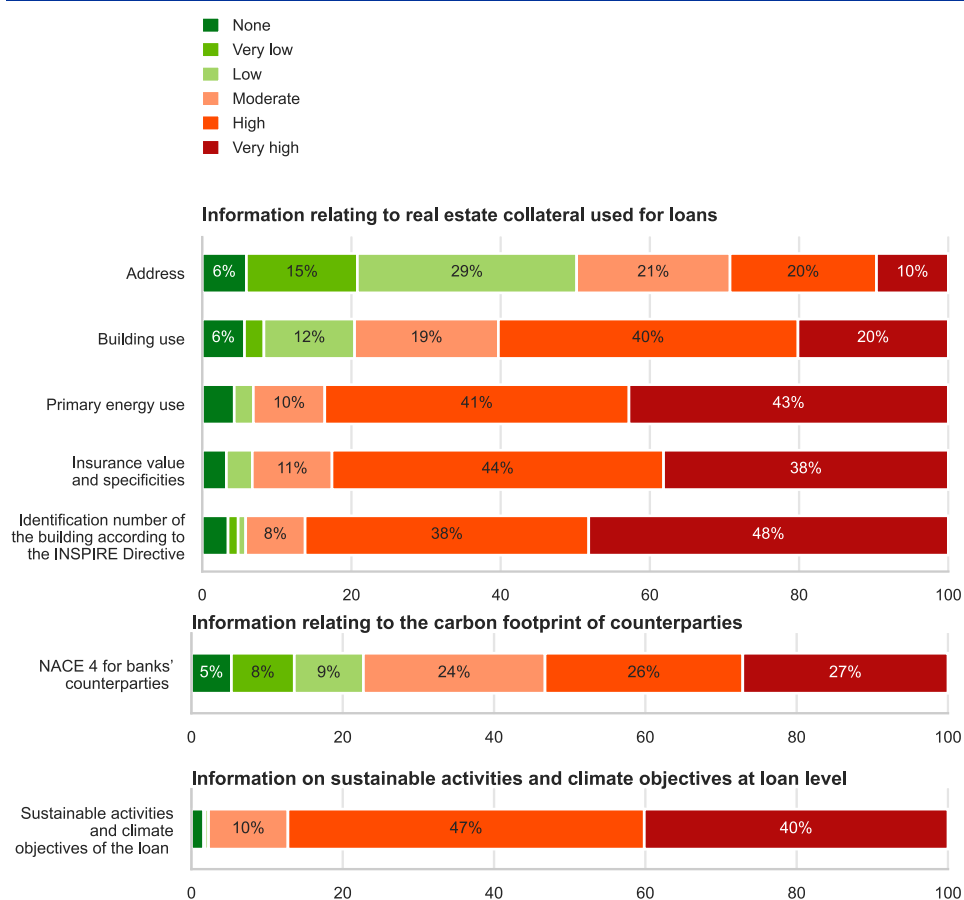
### Benefits



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 4.2 assesses the benefits of including various specific indicators. A majority of respondents indicate that benefits would be at most low for address (61%) and building use (55%). A small majority of respondents indicates that benefits would be at most low for insurance value and specificities (52%) and identification number of the building according to the INSPIRE Directive (54%). Feedback is balanced for the benefits of including primary energy use, NACE 4 for banks' counterparties and sustainable and climate objectives of the loan. In this case, about half of respondents indicate that benefits would be at most low and half indicate that benefits would be at least moderate for all three attributes.

**Chart 4.3**  
Implementation costs

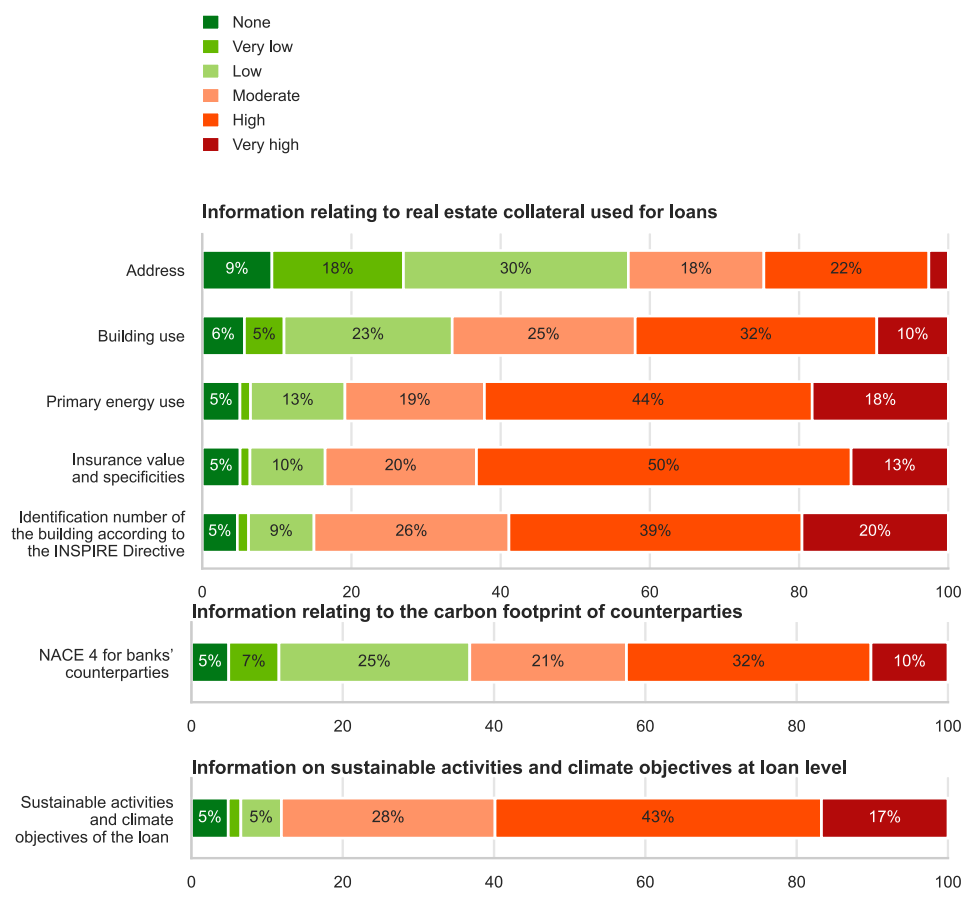


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published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

Chart 4.3 assesses the implementation costs of including the specific indicators. A very large majority of respondents indicate that implementation costs would be at least moderate for primary energy use (94%), sustainable activities and climate objectives of the loan (97%), insurance value and specificities (93%) and identification number of the building according to the INSPIRE Directive (94%). For all of those indicators, at least 80% of respondents indicated that costs would be high or very high. In relation to the remaining indicators, a majority of respondents indicate at least moderate implementation costs for building use (79%) and NACE 4 (77%). Feedback is more balanced for address, with half of respondents indicating at most low implementation costs and half of respondents indicating at least moderate implementation costs.



**Chart 4.4**  
Regular costs



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 4.4 assesses the regular costs of including the various specific indicators. A large majority of respondents indicate that regular costs would be at least moderate for primary energy use (81%), insurance value and specificities (83%), identification number of the building according to the INSPIRE Directive (85%) and sustainable activities and climate objectives of the loan (88%). Additionally, for all of those attributes, more than half of respondents indicate regular costs would be high or very high. A majority of respondents indicate that regular costs for NACE 4 and building use would be at least moderate, although relatively smaller than the previous attributes (63% and 67% respectively). In contrast, a majority indicates that address would incur at most low costs (57%).

The BIRD subgroup on the IReF expressed concerns about the implementation of statistics related to climate change at this stage of the IReF and suggested waiting until the requirements would be considered mature and stable (i.e. well-defined requirements). The BIRD subgroup members also expect challenges arising from lack of availability and sourcing of information. These two factors are considered as major cost drivers. The BIRD subgroup notes that statistics related to climate change are strategic for the ECB and the European Union, and will therefore be

implemented in the future. To ease the reporting burden of the banking industry, subgroup members suggest striving for the semantic integration between the different taxonomies (e.g. EU taxonomy, European Banking Authority (EBA) taxonomy) as well as the possibility to access shared databases with relevant information.

Taking all things into consideration, the banking industry does not appear supportive of any specific attributes, with the possible exception of the address of the real estate collateral. According to the INSPIRE Directive, primary energy use, insurance value and specificities, information on sustainable activities and climate objectives of the loan, and identification number of the building are not supported due to low or mixed benefits, high implementation costs and high regular costs. Building use does not appear to be supported either, with at most low benefits, high implementation costs and at least moderate regular costs. Feedback for NACE 4 for banks' counterparties is more balanced. NACE 4 has mixed feedback on benefits, but lower implementation costs and regular costs relative to other indicators. The inclusion of address may be supported, as benefits are marginally reported as low, as are implementation and regular costs.

## 5 Protection allocated value eligible for credit risk mitigation under the CRR

Current AnaCredit reporting does not contain information on the amount of the protection value that is eligible for credit risk mitigation (CRM) under the Capital Requirements Regulation (CRR).<sup>3</sup> More specifically, under the current AnaCredit requirements:

- the **protection value** is defined as the value of the collateral in its entirety before applying any adjustments;
- the **protection allocated value** is defined as the maximum amount of the protection value that is considered as credit protection for the instrument by the institution's internal risk management, when accounting for third-party priority claims, haircuts, other protection available, etc.

Under the CRR requirements (Pillar 1), however, when calculating risk-weighted exposure amounts, a bank can allocate part of the protection value to the exposure (i.e. reduce the risk-weighted exposure amounts) provided the protection is eligible to be used as a CRM technique. The bank determines how much of the protection value is allocated to the loan value according to CRR rules.<sup>4</sup>

As this information is relevant for micro- and macro-prudential purposes, the following scenario has been assessed in the complementary CBA.

**Proposed scenario:** Collect information on the amount of the protection allocated value which is eligible for CRM under the CRR in Pillar 1, when available.

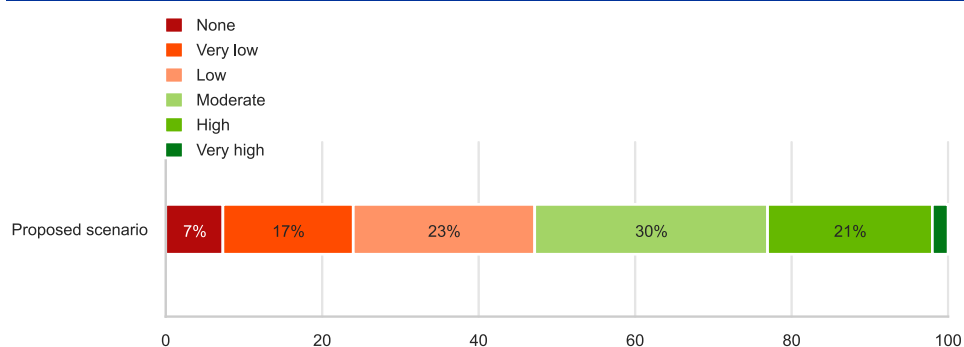
Data would only be reported when it is already available to the reporting agents. This means that the reporting requirement would not lead to an obligation on the part of the bank to provide the information if it has been derogated from the reporting of prudential requirements on an individual basis.

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<sup>3</sup> [Regulation \(EU\) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation \(EU\) No 648/2012.](#)

<sup>4</sup> For a more detailed explanation and example of protection allocated value eligible for credit risk mitigation, please see section 4.4 of the [complementary CBA questionnaire](#).

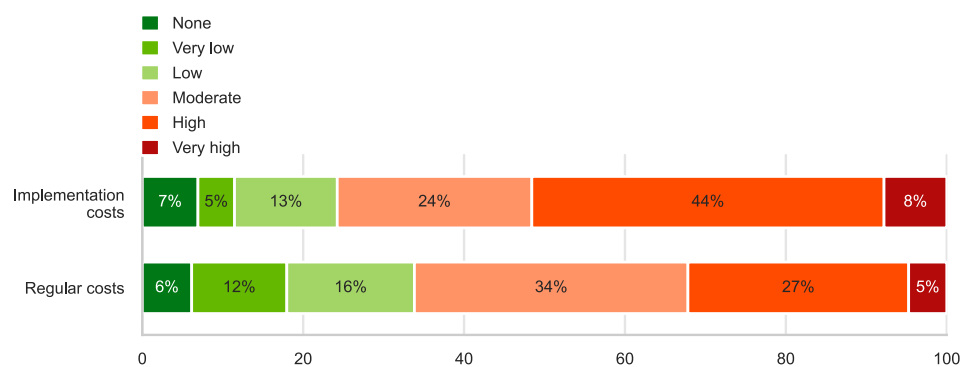
**Chart 5.1**  
Benefits of the proposed scenario



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.

As shown in Chart 5.1, feedback is balanced on the proposed scenario, with a small majority of respondents indicating that benefits would be at least moderate (53%). Results are broadly homogeneous by size, although members of cross-border groups report marginally lower benefits relative to standalone entities or members of domestic groups (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 costs of the proposed scenario. A large majority of respondents indicate that implementation costs would be at least moderate (76%), with more than half indicating they would be high or very high (52%). In respect of regular costs, a majority of respondents indicate that they would be at least moderate (66%). As seen in Annex A4, results are broadly homogeneous by size, although members of cross-border groups report marginally lower implementation and regular costs relative to standalone entities or members of domestic groups.

The discussion with the BIRD subgroup on the IReF confirmed that banks apply different principles for the reporting of the protection allocation value. The BIRD

subgroup members highlighted that, if the requirements would be applied in substitution of the current approach in AnaCredit, there might be some loss of information on the protections due to the strict CRR eligibility criteria (i.e. non-eligible protections may be excluded from the reporting). Moreover, the timeliness of the requirement in the IReF (monthly at T+10-12 working days (WDs)) will be more demanding than in COREP (quarterly at T+30-32 WDs).

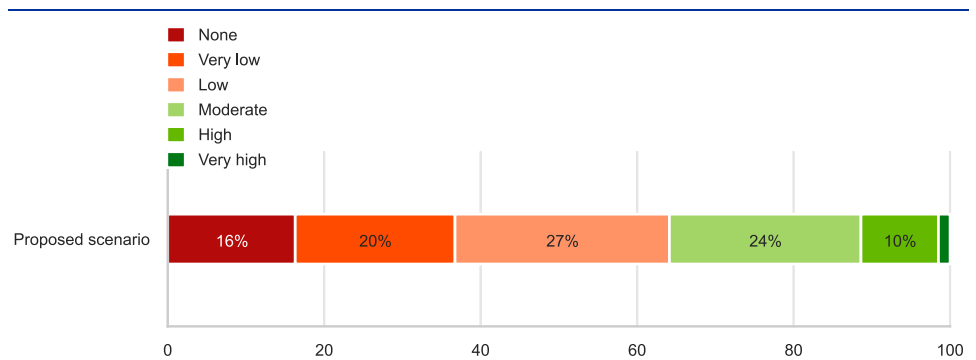
Overall, the feedback is not fully conclusive on the addition of information on the amount of the protection allocated value eligible for CRM, since benefits as well as implementation and regular costs are at least moderate. At the same time, costs appear to outweigh benefits.

## 6 Governing law of loan agreements

The current AnaCredit reporting does not contain any information on the countries whose legislation governs loan agreements. As this information is relevant for micro- and macro-prudential purposes as well as monetary policy operations and risk management, the following scenario has been tested in the complementary CBA.

**Proposed scenario:** Collect information about the country whose law governs a loan agreement.

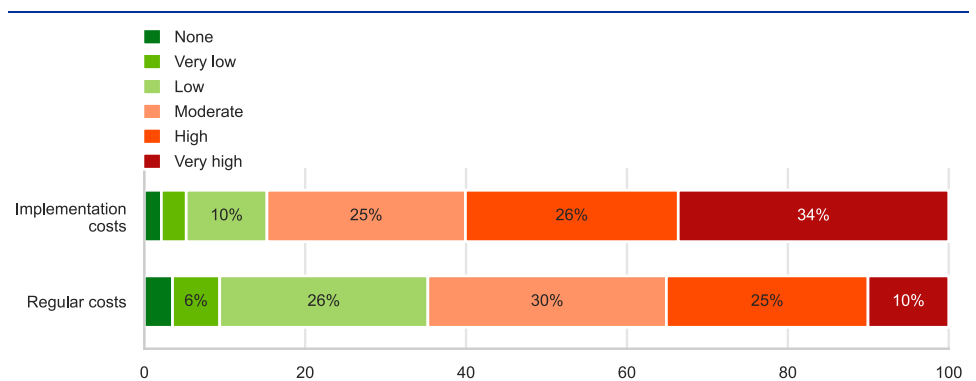
**Chart 6.1**  
Benefits of the proposed scenario



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.

Most respondents (64%) perceive the benefits of the proposed scenario to be low at most, as shown in Chart 6.1. Results are broadly homogeneous by size with slightly higher benefits for mid-sized institutions. With regard to type of institution, standalone entities report marginally lower benefits relative to members of domestic groups or of cross-border groups (see Annex A5).

**Chart 6.2**  
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 6.2 shows that implementation costs would be at least moderate for a large majority of the respondents (85%). In particular, 60% of the respondents indicate that implementation costs would be high or very high. A majority of the respondents also indicate that regular costs would be at least moderate (65%). Annex A5 shows that the results are fairly homogeneous across the different types and sizes classes, although members of cross-border groups and large institutions seem to report higher implementation and regular costs.

According to the qualitative feedback received from the banking industry in the questionnaire, implementation costs may be high due to the fact that the information may not be already available in banks' systems and would therefore need to be digitalised. Costs would be particularly significant for instruments originated before the go-live of the IReF reporting.

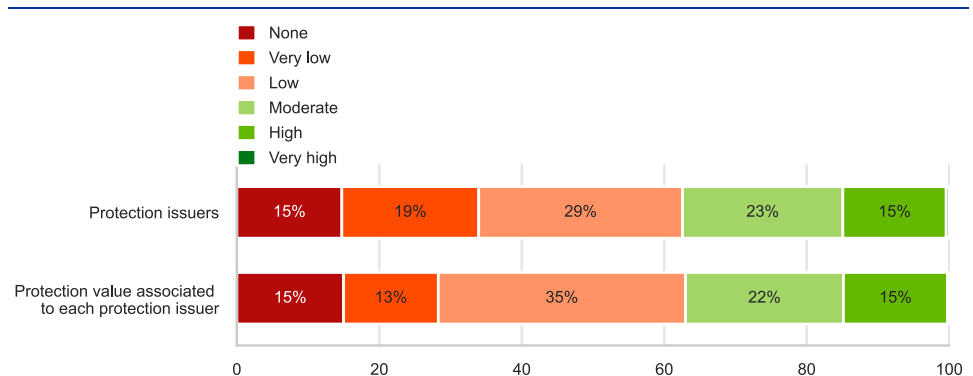
Due to low benefits, high implementation costs and moderate regular costs, the banking industry does not appear to support the inclusion information on the countries whose legislation governs loan agreements, in particular for loans collected before the go-live of the IReF reporting.

## 7 Reporting protection issuers

The current AnaCredit reporting collects information on the protection provider of a loan, requiring only the identity of the main protection provider in the case of multiple guarantors. The collection of information on multiple protection providers was already tested in the CBA questionnaire and was supported by stakeholders. In contrast, AnaCredit does not collect information on protection issuers. As this information is relevant for micro- and macro-prudential purposes, the following scenario has been tested in the complementary CBA.

**Proposed scenario:** Collect information on protection issuers and the protection value associated with them.

**Chart 7.1**  
Benefits of the proposed scenario



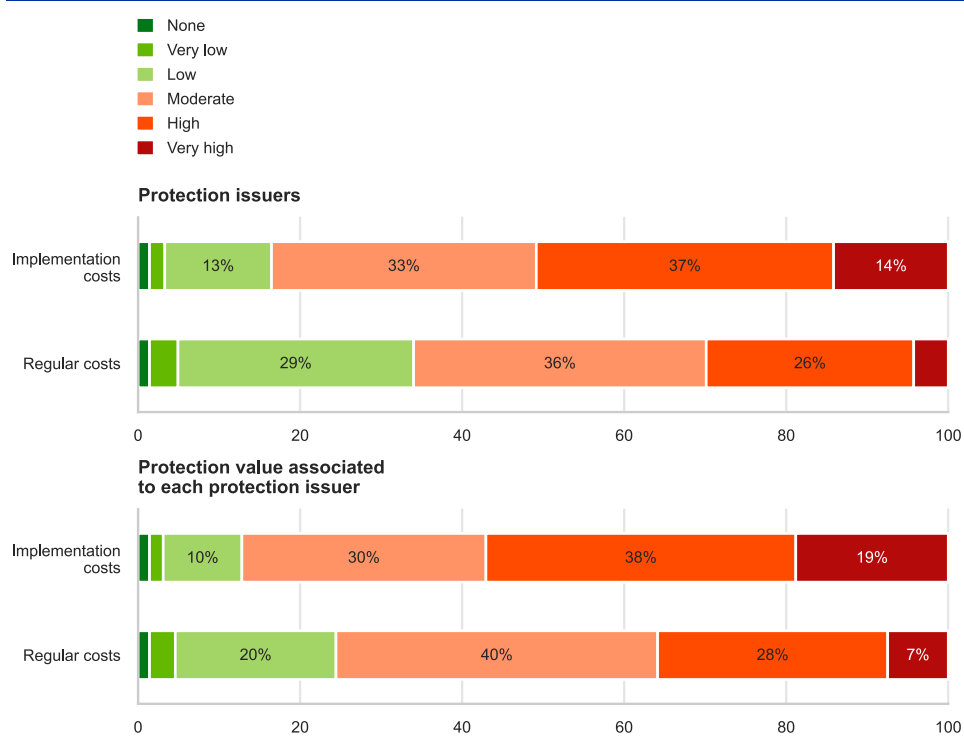
Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published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

The benefits of the proposed scenario are perceived by most respondents to be low at most, as shown in Chart 7.1. The majority of respondents (62%) reported none to low benefits for the collection of information on both protection issuers and the protection value associated with them. For both sets of information, results are broadly homogeneous by size, with slightly lower benefits for mid-sized institutions. Regarding the type of institution, members of domestic groups report marginally higher benefits relative to standalone entities or members of cross-border groups (see Annex A6).



**Chart 7.2**

**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.

In turn, Chart 7.2 shows that implementation costs for the collection of the protection issuers and for the collection of the protection value associated to each protection issuer would be at least moderate for 84% and 87% of respondents, respectively. In particular, 51% and 57% of respondents indicate that implementation costs would be high or very high. The regular costs are also perceived as being at least moderate by a large majority of respondents for both sets of information. Annex A6 shows that the results are fairly homogeneous across the different types and sizes.

The BIRD subgroup on the IReF noted that the lack of perceived benefits for the proposal may be due to the novelty of the requirement rather than the difficulty in sourcing the information in the bank's internal IT systems. In accordance with the results, the BIRD subgroup members indicated that the costs are driven mostly by the proposal to report the protection value associated to each protection issuer rather than the identification of the protection issuers themselves.

Overall, the collection of information on protection issuers and the protection value associated with them does not appear to be supported by the banking industry, due to low benefits and high costs (especially those related to implementation).

## 8 Reporting probabilities of default

The current [draft IReF reporting scheme](#) follows the approach used by the AnaCredit Regulation, where a counterparty's twelve-month probability of default (PD) is determined in accordance with the rules and definitions of the CRR. This implies that only internal ratings-based (IRB) regulatory PDs approved by supervisors would be reported. Following AnaCredit, the draft IReF reporting scheme requires the exposure-weighted average of instruments' PDs to be collected, whenever no counterparty-level PD is computed for the obligor.

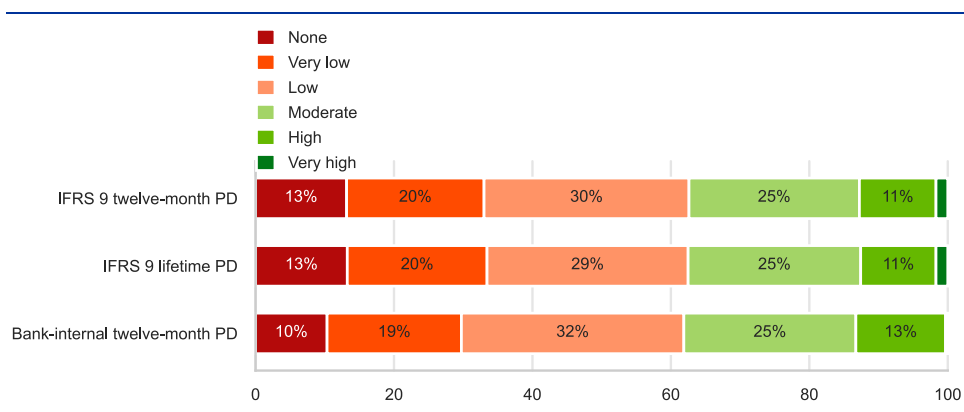
The complementary CBA invited respondents to evaluate the possibility of reporting other types of PDs in addition to the twelve-month IRB ones. If the information is included in the IReF, data would only be reported where available. The following information could be collected:

- **IFRS 9 twelve-month PD:** The twelve-month PD underlying the calculations of the expected credit losses under IFRS 9 for both IRB and non-IRB counterparties.
- **IFRS 9 lifetime PD:** The lifetime PD underlying the calculations of the expected credit losses under IFRS 9, along with the expected lifetime of the instruments for both IRB and non-IRB counterparties.
- **Bank-internal twelve-month PD:** The twelve-month PD assigned by the internal risk management of the bank (only for non-IRB counterparties).

The information is relevant for analytical purposes, especially in the prudential area (e.g. analysis of banks' sensitivity to risks). Respondents were invited to assess the costs and benefits of reporting the additional information (where applicable), taking the aforementioned elements into consideration.

**Chart 8.1**

Benefits of the collection of additional types of PD

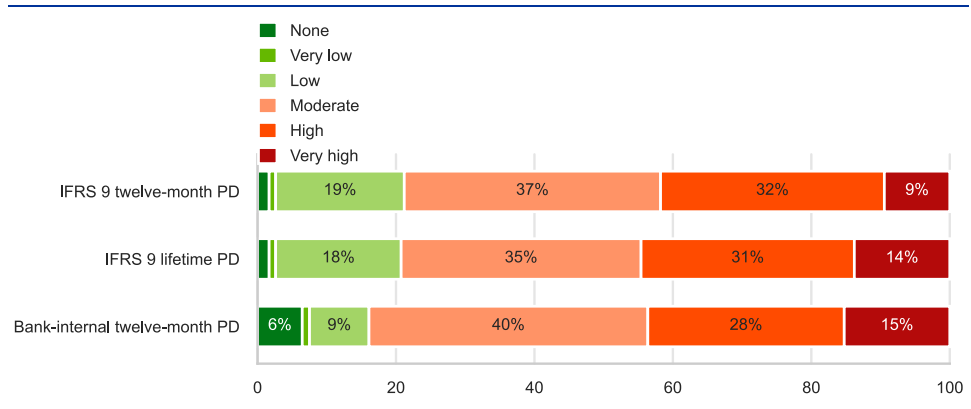


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published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

The benefits of collecting additional types of PD are perceived by a majority of respondents to be at most low, as shown in Chart 8.1 (62%- 63% for all types.) Results are somewhat heterogeneous by size and type of institution, with large institutions and members of cross-border groups less likely to indicate benefits for all types of PD (see Annex A7).

### Chart 8.2

Implementation costs for the collection of additional types of PD

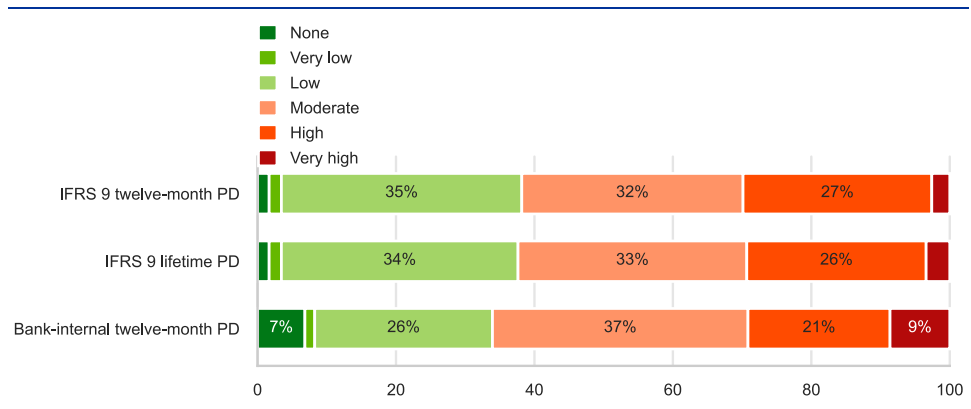


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published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

Chart 8.2 shows the implementation costs for the various types of PD, which are indicated as at least moderate by a broad majority of respondents (79%- 84% for all types). Again, some heterogeneities are observed by type and size of institutions, with small institutions and standalone entities more likely to indicate higher implementation costs (see Annex A7).

### Chart 8.3

Regular costs for the collection of additional types of PD



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 8.3 shows the regular costs for collecting the various types of PD, which are indicated as at least moderate by a majority of respondents (62-66% for all types).

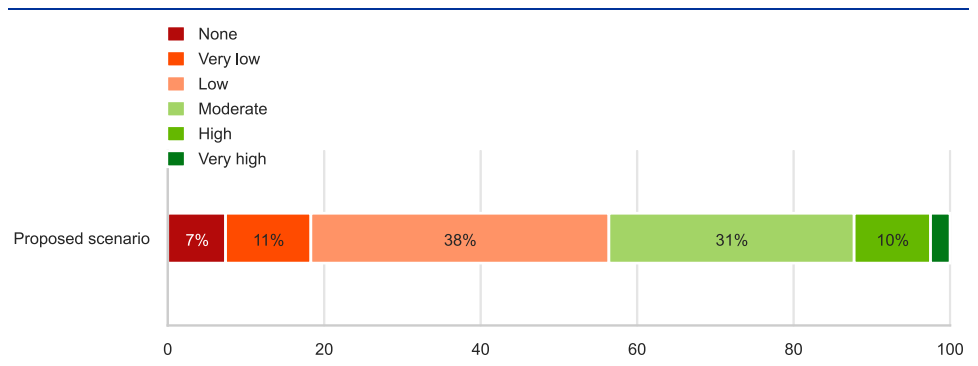
Again, small institutions and standalone entities are more likely to indicate higher regular costs (see Annex A7).

Overall, the inclusion of the various types of PDs does not appear to be supported by the banking industry due to at most low benefits, at least moderate implementation and regular costs, with implementation costs in particular being relevant for a large majority of respondents. Investigations will be carried out within the banking industry via the BIRD subgroup on the IReF to identify the possible drivers of such negative feedback.

Additionally, in contrast to the current AnaCredit requirements, it was also proposed in the complementary CBA that information on PDs (whether originating from AnaCredit or from the complementary CBA) would be collected in the IReF at either obligor or instrument level, where available, with the reporting agent given the option of which method to use. This should require less data transformation on the reporting agent side. The IReF data model would then be generalised to allow PDs to be collected at the instrument level where applicable.

**Proposed scenario:** Information on PDs would be collected flexibly at the level of the counterparty or at the level of the instrument, where these are available to the reporting agent.

**Chart 8.4**  
Benefits of flexibility in reporting the PD information

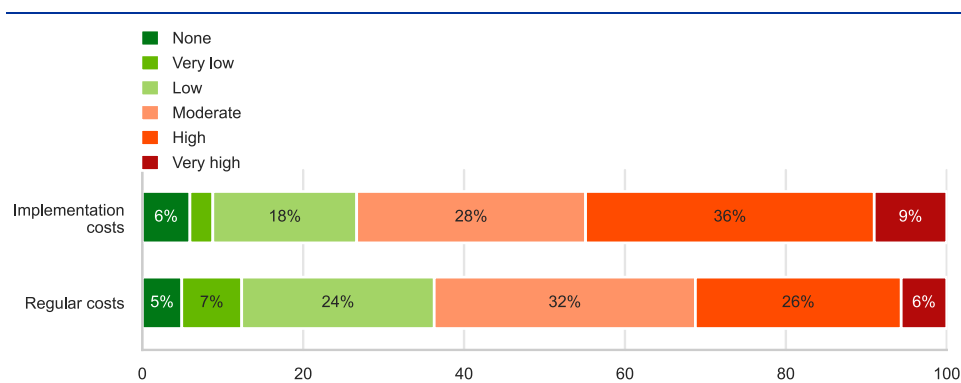


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published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

Chart 8.4 shows the benefits by the banking industry on collecting PDs at the level of the counterparty or of the instrument. A small majority indicate that the benefits would be at most low (56%). Feedback was somewhat heterogeneous by size of institution, with large institutions less likely to report benefits relative to small or mid-sized institutions (see Annex A7).

**Chart 8.5**

Costs of flexibility in reporting the PD information



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 8.5 shows implementation and regular costs for the proposed scenario. A majority of respondents indicate that both implementation and regular costs would be at least moderate (73% and 64% respectively). Feedback was heterogeneous by size and type of institution. Members of cross-border groups report slightly lower implementation and regular costs (see Annex A7).

The BIRD subgroup's view on the IReF, relating to the feedback in complementary CBA, suggests that the results may have been influenced by the request to report information on additional types of PDs. This refers to where the assessment of the costs and benefits in the proposed scenario on collecting the PD at the level of counterparty or of instrument (e.g. for project finance loans) might be more positive, if it was explicitly assessed solely in relation to PDs already required by AnaCredit and not in close proximity to several new PD types. It may not have been clear to respondents whether this flexibility would be linked to reporting the newly assessed PDs.

Overall, collecting PDs at the level of the counterparty or of the instrument does not appear to be supported by the banking industry, as benefits are reported as at most low, while both implementation and regular costs are reported as at least moderate. Also in this case, additional investigations will be carried out with the banking industry via the BIRD subgroup on IReF before proceeding with matching costs and benefits of the proposed scenario.

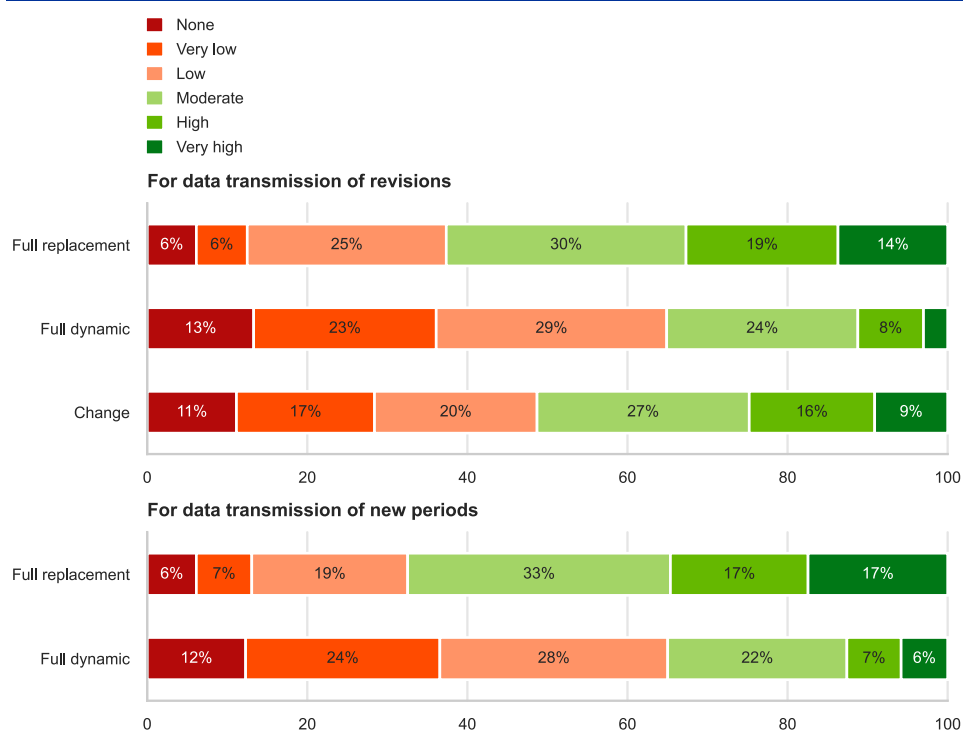
## 9 Types of data submission

The complementary CBA assessed how reporting agents will transmit data for both new reporting periods and corrections to previous reporting periods. The following three main types of data submissions are broadly applicable in statistical collections. A distinction is made between static attributes (such as the inception date of a loan) and dynamic attributes (for example the outstanding nominal amount).

- **Full replacement:** For transmissions referring to both a new reporting period and revisions, a new block of records is transmitted for all attributes (i.e. both static and dynamic). For revisions, the new block replaces the whole dataset for the period concerned.
- **Full dynamic:** For transmissions referring to new reporting periods, a new block of records is transmitted for dynamic attributes (i.e. full replacement), while static attributes should be transmitted on the first occurrence only. This is because NCBs can use the attributes from the previous periods for future occurrences. This is based on the assumption that the dataset is complete for previous periods. For revisions, static attributes have to be explicitly appended, replaced or deleted while for dynamic attributes, full replacement for the affected period is required.
- **Change:** This method applies to revisions and can therefore be applied in combination with the full replacement or the full dynamic option (needed for transmissions referring to a new reporting period). It is applied at the level of each record and allows items to be appended, deleted or replaced for each period.

The assessment was performed separately for each type of data submission.

**Chart 9.1**  
Benefits of the proposed scenarios



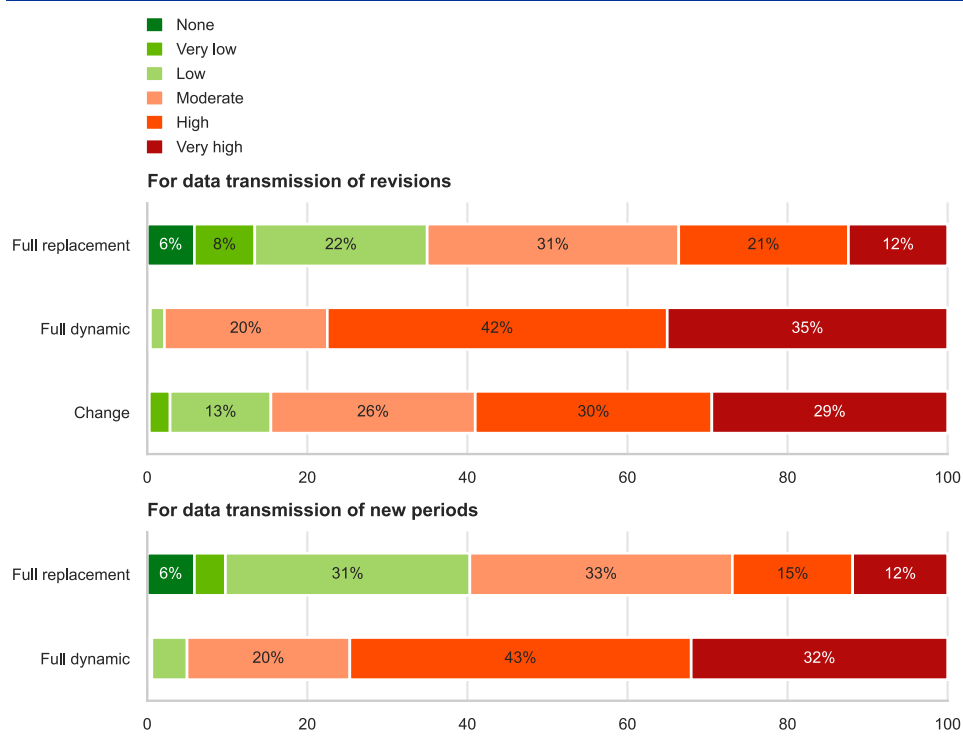
Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published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

Chart 9.1 shows the distribution of responses regarding the benefits of the proposed scenarios. As regards the transmission of revisions, a majority of the respondents from the banking industry indicate that the benefits of full replacement would be at least moderate (63%), while a smaller proportion indicates benefits would be at least moderate for full dynamic and change (35% and 51% respectively). Regarding the data transmission relating to new periods, the majority of the respondents indicate that benefits are at least moderate for full replacement (68%), while a much smaller proportion assesses the benefits to be at least moderate for full dynamic (35%).

The results are rather homogenous by size and type of institution, although a smaller proportion of standalone institutions reports lower benefits of full replacement for both types of data transmission relative to members of domestic groups and of cross-border groups (see Annex A8).

**Chart 9.2**

**Implementation costs of the proposed scenarios**



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.

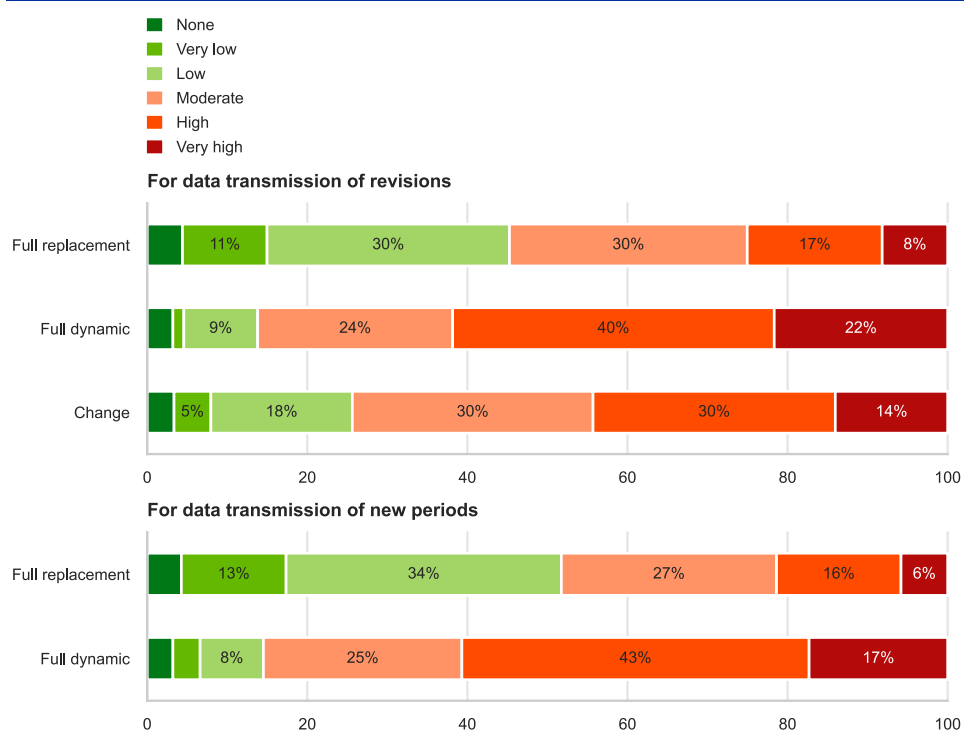
Charts 9.2 and 9.3 show the distribution of responses regarding implementation and regular costs of each type of submission for both data transmissions. Regarding the transmission of revisions, a large majority of respondents indicate that the costs of full dynamic and change would be at least moderate (98% and 85% respectively for implementation costs and 86% and 74% for regular costs). However, in case of full replacement, costs would seem lower (65% indicate that implementation costs would be at least moderate and 55% indicate that regular costs would be at least moderate). The feedback received regarding the data transmission of new periods is similar, with a clear support for full replacement compared with the full dynamic type of data submission (95% and 85% indicate at least moderate implementation and regular costs for full dynamic, while a smaller majority of respondents indicate costs at least moderate for full replacement (60% and 49%).

Results are quite heterogeneous by size and type of institution, with a smaller proportion of members of domestic groups reporting higher implementation and regular costs of full replacement for both data transmissions relative to standalone institutions and members of cross-border groups (see Annex A8).



**Chart 9.3**

Regular costs of the proposed scenarios



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.

Overall, the banking industry appears to support the full replacement as type of submission for both revisions and new periods. The benefits of the full replacement are significantly higher than the other methods, and the associated costs are generally lower.

## 10 Reporting schedules

Following the results of the CBA, the complementary CBA defined various alternative scenarios on how the reporting schedules could be organised compared with the baseline that was proposed in the CBA. The alternatives were developed taking into account the need to (i) ensure data consistency across frequencies in a situation where revisions are collected to increase accuracy over time, and (ii) simplify the reporting process by not splitting the IReF implementation model into too many modules.

**Scenario 1 (baseline):** IReF data are collected at two frequencies: monthly and quarterly. The monthly data are transmitted at two deadlines, at T+10-12 WDs and T+20-24 WDs. The quarterly data are transmitted at T+20-24 WDs.<sup>5</sup>

**Scenario 2:** IReF data are collected at two frequencies: monthly and quarterly. All monthly data are transmitted at the earliest deadline of T+10-12 WDs and, where needed, updated at the subsequent monthly deadline of T+20-24 WDs. Quarterly data are transmitted at T+20-24 WDs.

**Scenario 3:** IReF data are collected at two frequencies: monthly and quarterly. All monthly data are transmitted at the earliest deadline of T+10-12 WDs and, where needed, updated at a subsequent quarterly deadline together with the quarterly data transmission at T+20-24 WDs.

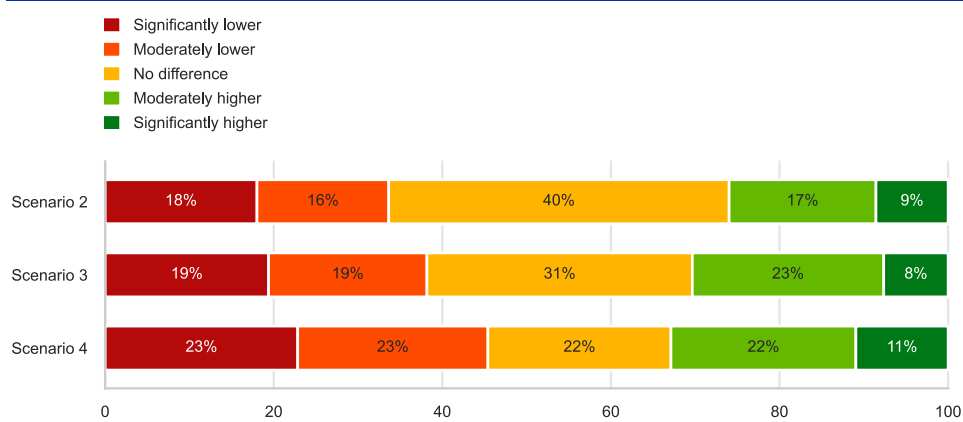
**Scenario 4:** The entire IReF dataset (i.e. all monthly and current quarterly data) is collected monthly at T+10-12 WDs and, where needed, updated at a subsequent quarterly deadline at T+20-24 WDs.

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<sup>5</sup> Institutions are expected to submit quarterly FINREP information to competent authorities by close of business on the following remittance dates: 12 May, 11 August, 11 November and 11 February. If the remittance day is a public holiday in the Member State of the competent authority to which the report is to be provided, or a Saturday or a Sunday, data must be submitted on the following working day. On average, this represents a lag of about 30-32 WDs in 2022 from the end of the reference period, which is more generous than the 20-24 WDs currently foreseen for the IReF.

**Chart 10.1**

**Benefits of the alternative scenarios compared with Scenario 1**

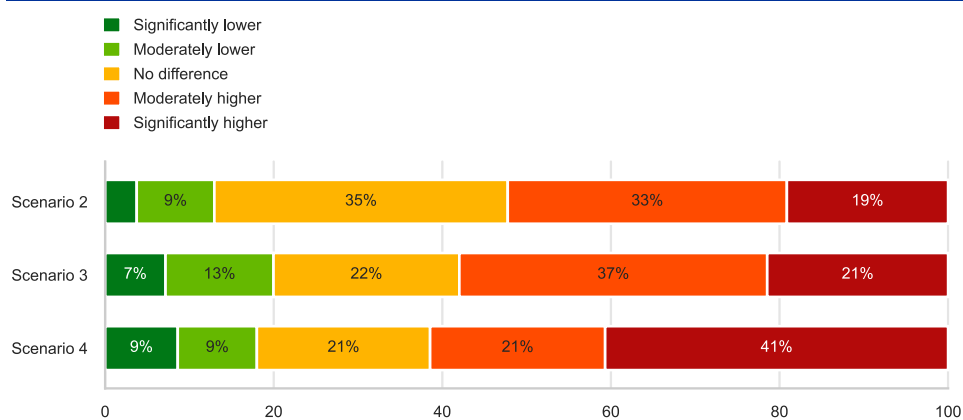


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published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

Chart 10.1 shows an assessment of the benefits of the three scenarios compared with Scenario 1. Higher proportions of respondents from the banking industry indicate that the benefits of the alternative scenarios would be lower (34%, 38% and 46% respectively for Scenarios 2, 3 and 4) compared with those that indicate that the benefits of the alternative scenarios would be higher (26%, 30 and 33% respectively for Scenarios 2, 3 and 4). It is worth noting that the proportion of respondents that are indifferent is significant, especially for Scenarios 2 and 3 (40% and 32% respectively). The results are quite homogenous by type and size of institution, with only 2% of the standalone entities indicating at least moderately higher benefits for Scenario 2 (see Annex A9).

**Chart 10.2**

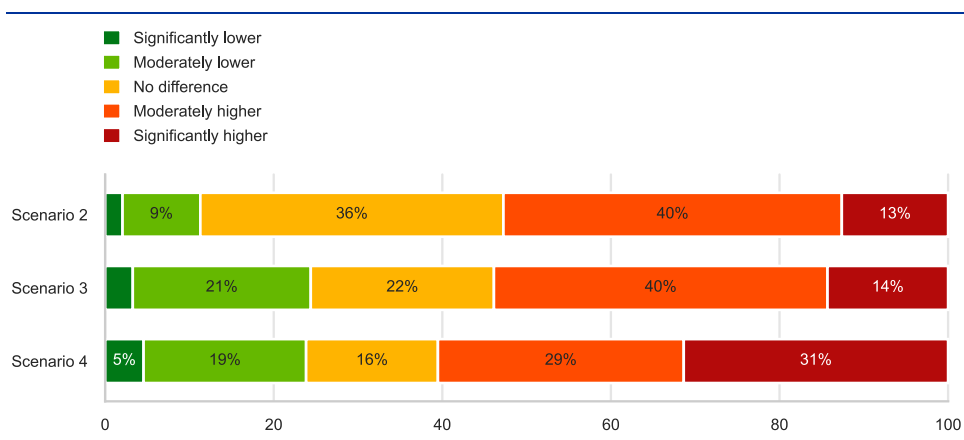
**Implementation costs of the alternative scenarios compared with Scenario 1**



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 10.3**

**Regular costs of the alternative scenarios compared with Scenario 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.

Charts 10.2 and 10.3 show an assessment of the implementation and regular costs of the three alternative scenarios compared with Scenario 1. An absolute majority of respondents from the banking industry indicate that the costs of Scenarios 2, 3 and 4 would be higher than under the baseline scenario (52%, 58% and 62% respectively for implementation costs and 53%, 54% and 61% respectively for regular costs). The results are largely homogenous by type and size (see Annex A9).

The BIRD subgroup on the IReF suggested that the alignment of the quarterly data transmission to the EBA Implementing Technical Standards (ITS) deadline for financial reporting (FINREP) would be beneficial for the banking industry.

Overall, the feedback received from the banking industry shows that the baseline scenario remains the most supported by the industry.

# 11 Early submission of counterparty reference data

As explained in the CBA, the compilation of derived datasets from the IReF will rely substantially on reference datasets such as RIAD. Similar to AnaCredit and Securities Holdings Statistics,<sup>6</sup> the IReF counterparty reference data (i.e. legal entities) will be used to enrich the granular information reported. The quality of this reference data is crucial, and it is particularly important that any gaps are identified as early as possible. Discussions within the ESCB have revealed strong support in the complementary CBA for assessing the possibility of an early submission of a subset of counterparty reference data under the IReF, with the aim of supporting the compilation process.

The complementary CBA considered different approaches to the submission of counterparty reference data to be compared with the status quo, where no early submission takes place.

**Scenario 1 (baseline):** No early submission of counterparty reference data. Relevant counterparty reference data are reported as part of the IReF dataset required at T + 10-12 WDs only.

**Scenario 2:** The relevant subset of counterparty reference data attributes is submitted by reporting agents *for all legal entities* at T + 6-8 WDs after the end of the reference period (i.e. four days before the deadline for submitting the IReF dataset for early statistics compilation). All remaining reference information attributes relevant for early statistics compilation are submitted at T + 10-12 WDs (as in Scenario 1).

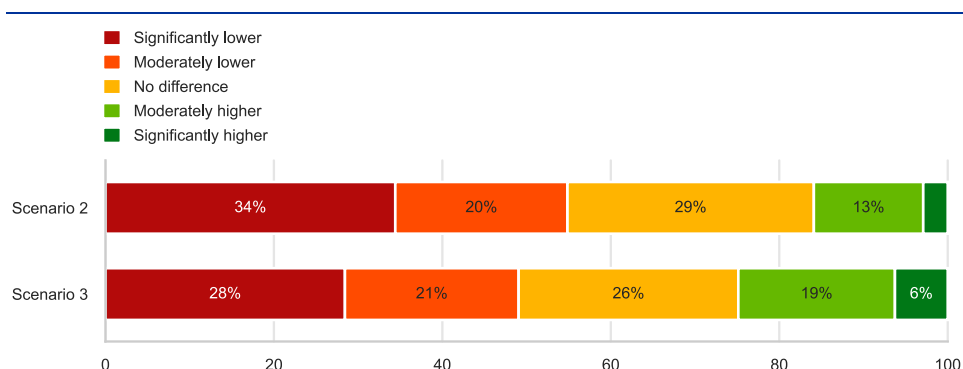
**Scenario 3:** The relevant subset of counterparty reference data attributes is submitted *only for changes or new legal entities* at T + 6-8 WDs after the end of the reference period (i.e. four days before the deadline for submitting the IReF dataset for early statistics compilation). All remaining reference information attributes relevant for early statistics compilation are submitted at T + 10-12 WDs (as in Scenario 1).

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<sup>6</sup> Regulation (EU) No 1011/2012 of the European Central Bank of 17 October 2012 concerning statistics on holdings of securities (ECB/2012/24) OJ L 305, 1.11.2012, p. 6.

**Chart 11.1**

**Benefits of the alternative scenarios compared with Scenario 1**

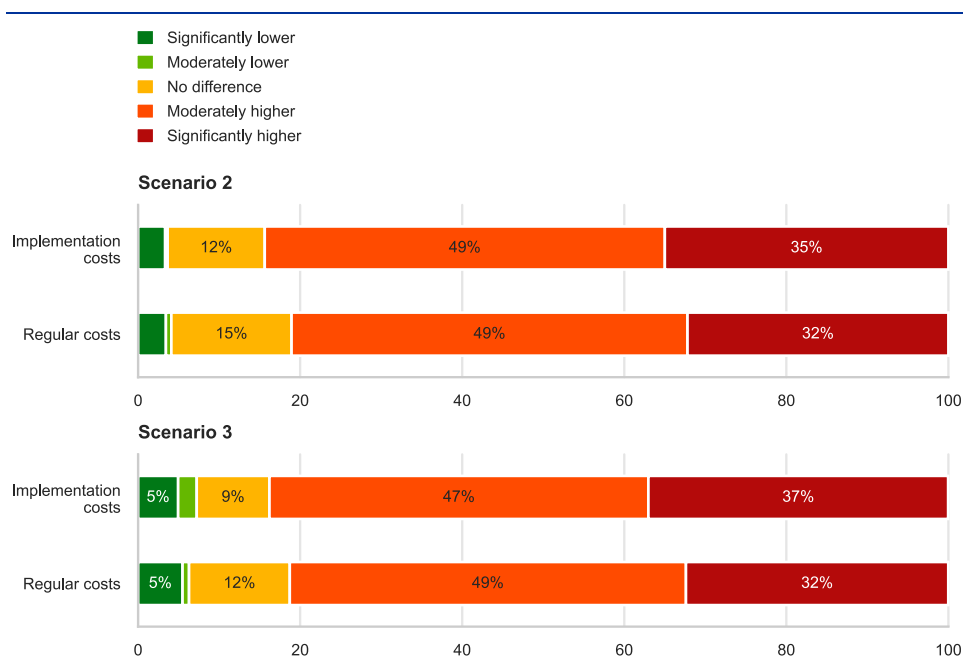


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published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

Chart 11.1 indicates the benefits of the two scenarios compared with Scenario 1. A much higher proportion of respondents from the banking industry indicate that the benefits of the scenarios would be lower than for Scenario 1 (55% and 49% for Scenarios 2 and 3 respectively) compared with those indicating that benefits would be higher (16% and 25% for Scenarios 2 and 3 respectively). About a third of the respondents declare there is no difference between Scenario 2 and Scenario 3 compared with Scenario 1 (29% and 26%). The results are quite homogenous by type and size, with more than 40% of large institutions assessing significantly lower benefits for Scenario 2 and Scenario 3 (see Annex A10).

**Chart 11.2**

**Costs of the alternative scenarios compared with Scenario 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.

Charts 11.2 shows an assessment of the implementation and regular costs of the two scenarios compared with Scenario 1. The absolute majority of respondents indicate that the costs of Scenario 2 and Scenario 3 would be higher compared with Scenario 1 (84% for implementation costs and 81% for regular costs for both alternative scenarios). The results are largely homogenous by type and size (see Annex A10).

The BIRD subgroup on the IReF stated that the main cost drivers are the uncertainty of the overall business process for counterparty reference data, the management of multiple submissions and the definition of a strict deadline for early reporting. The BIRD subgroup considers the possibility of consulting the RIAD dataset and the flexibility to submit counterparty reference data at any point in time to be important features to mitigate the reporting costs and enhance the quality of reported counterparty information.

Overall, the feedback received suggests that the banking industry is hesitant to support an early transmission of reference data as elaborated in the proposed alternative scenarios.

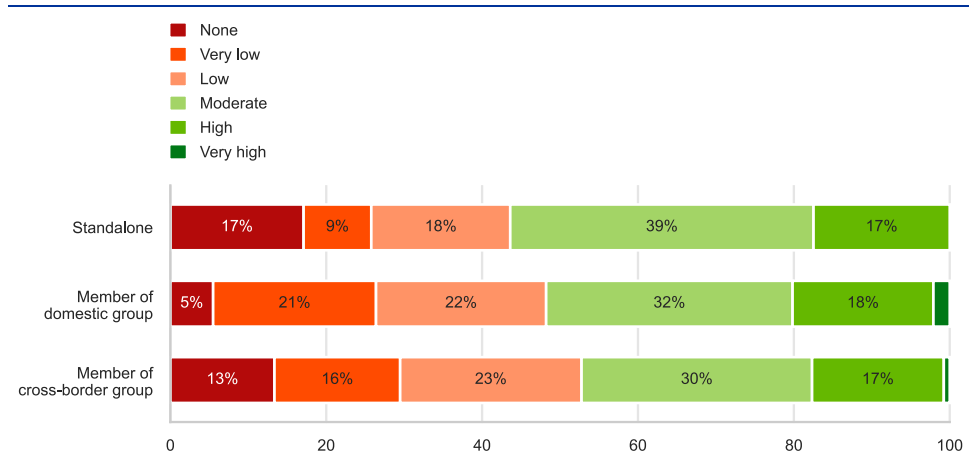
# Annex A

## Results by type and size of respondent

### A1 Splitting the outstanding nominal amount of loans

**Chart A1.1**

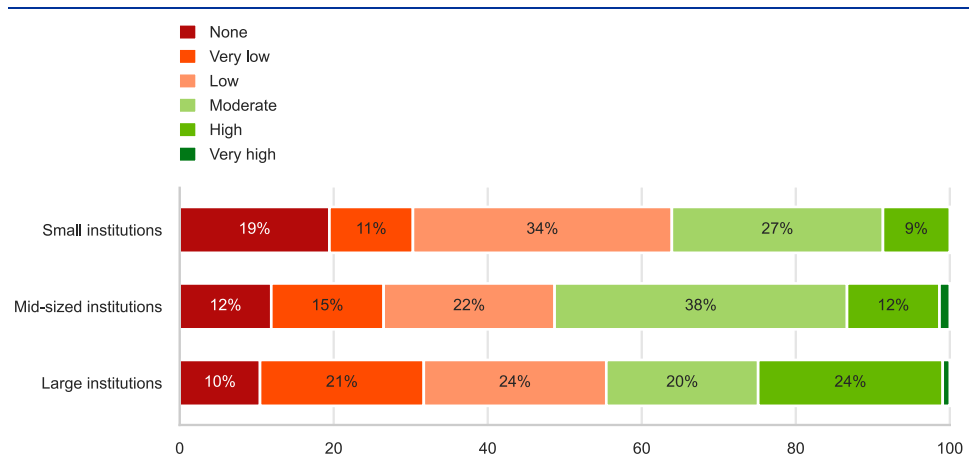
Benefits – granular loan data – decomposition by type of respondent



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 A1.2**

Benefits – granular loan data – decomposition by size of respondent

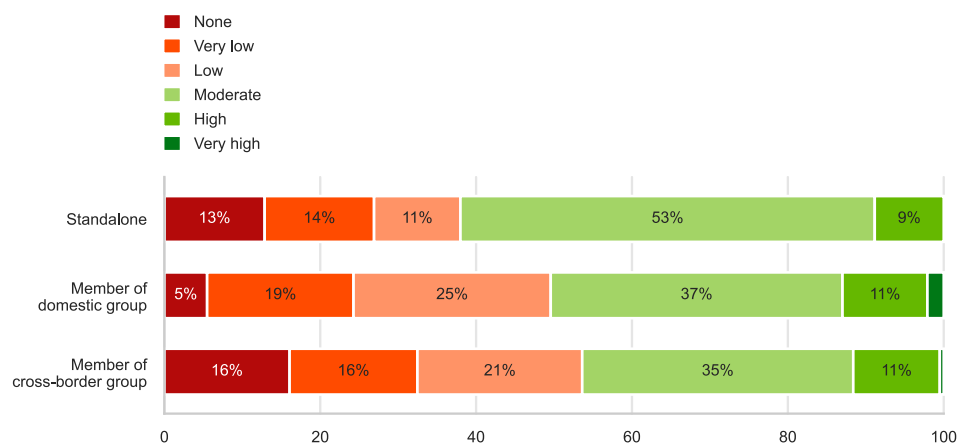


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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 A1.3

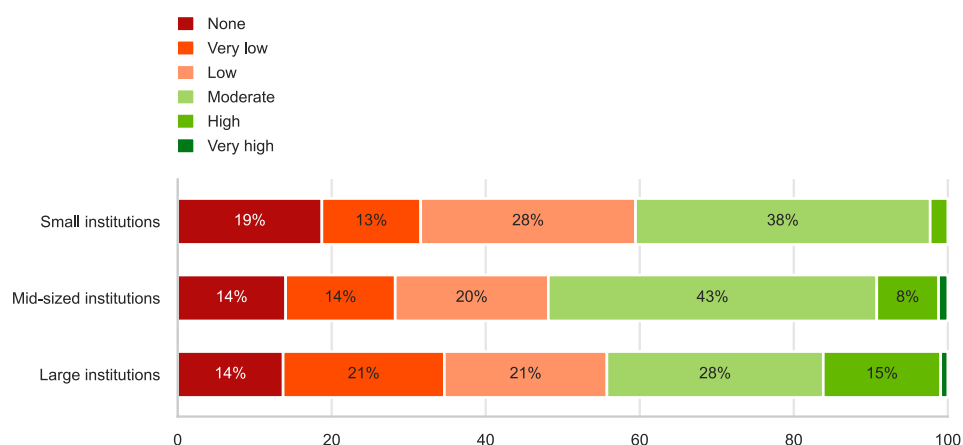
#### Benefits – aggregated loan data – decomposition by type of respondent



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 A1.4

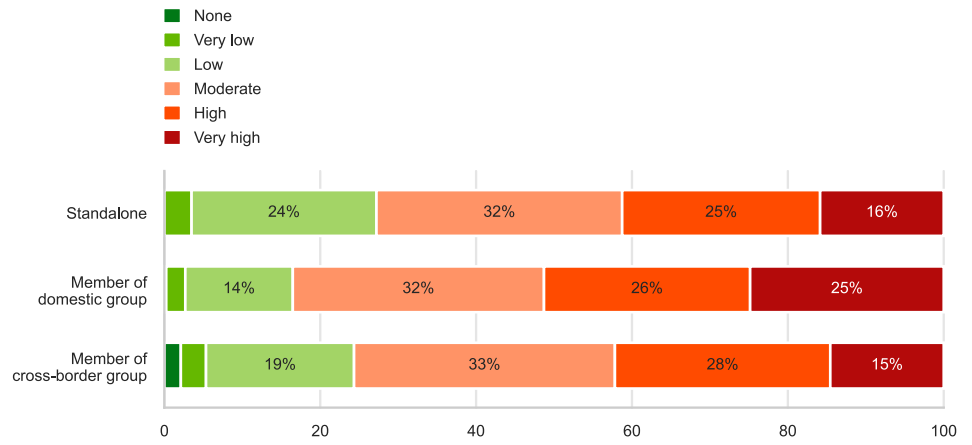
#### Benefits – aggregated loan data – decomposition by size of respondent



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 A1.5**

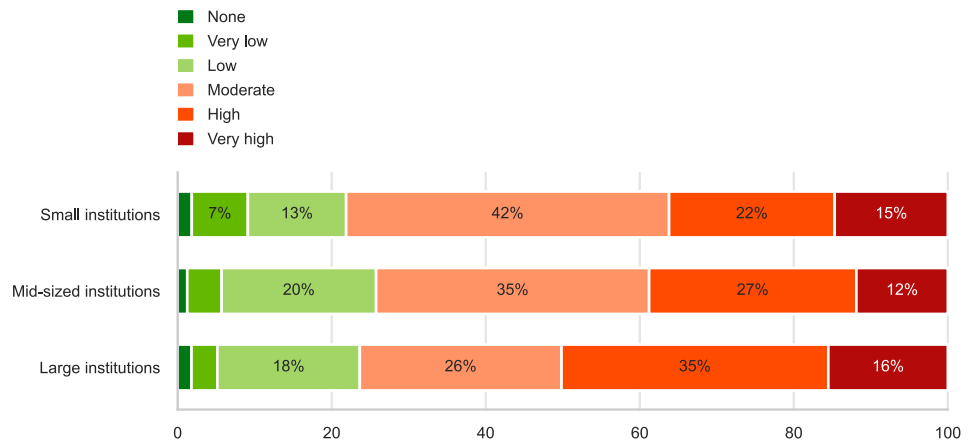
Implementation costs – granular loan data – decomposition by type of respondent



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 A1.6**

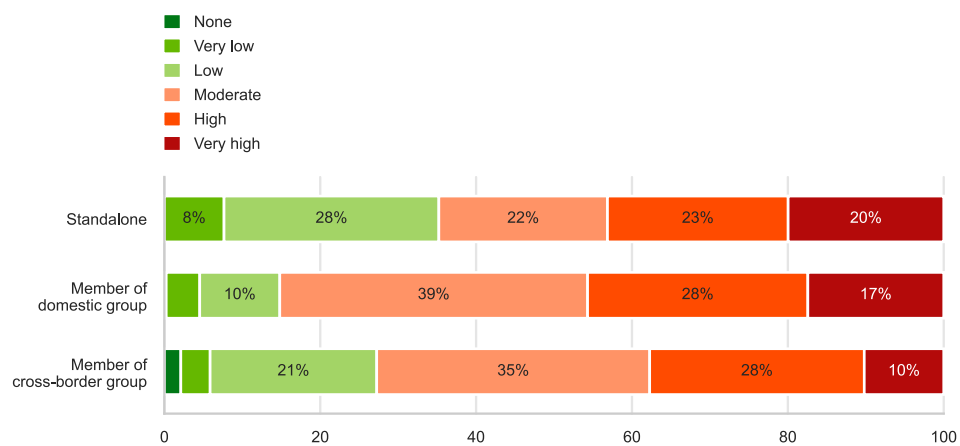
Implementation costs – granular loan data – decomposition by size of respondent



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 A1.7**

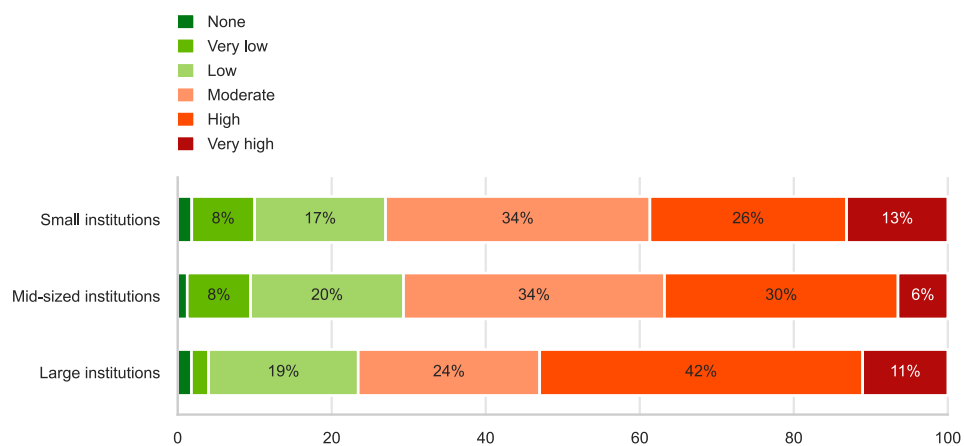
Implementation costs – aggregated loan data – decomposition by type of respondent



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 A1.8**

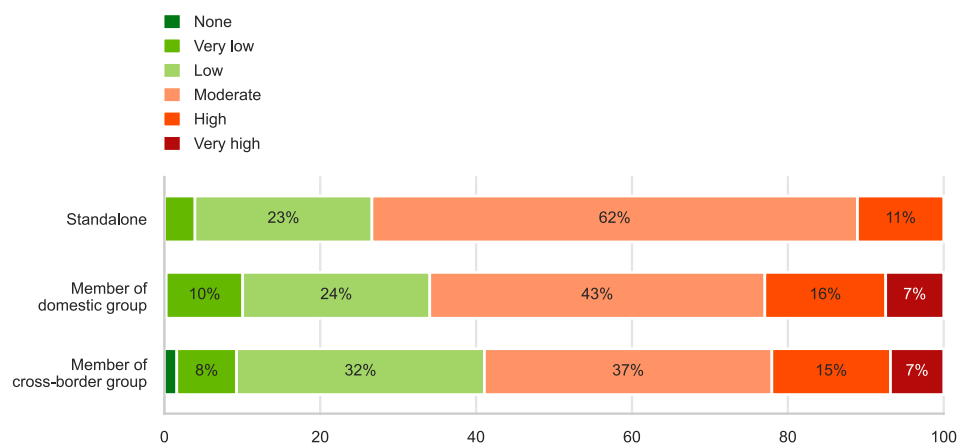
Implementation costs – aggregated loan data – decomposition by size of respondent



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 A1.9**

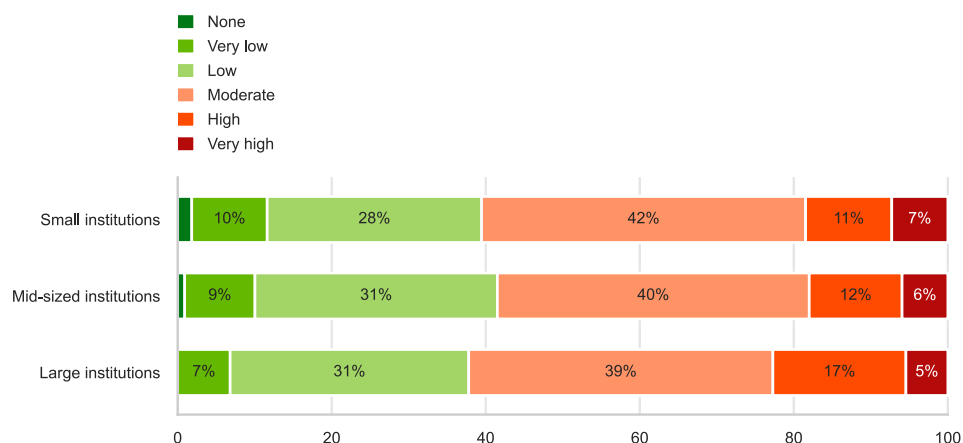
Regular cost – granular loan data – decomposition by type of respondent



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 A1.10**

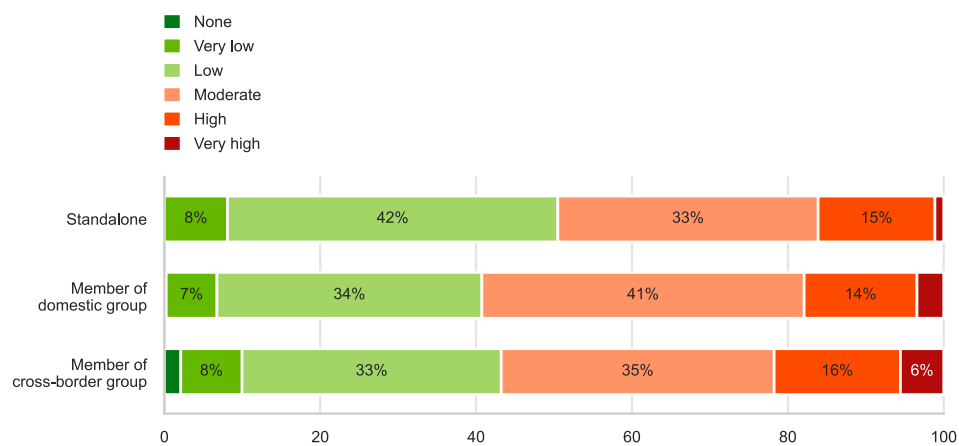
Regular costs – granular loan data – decomposition by size of respondent



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 A1.11**

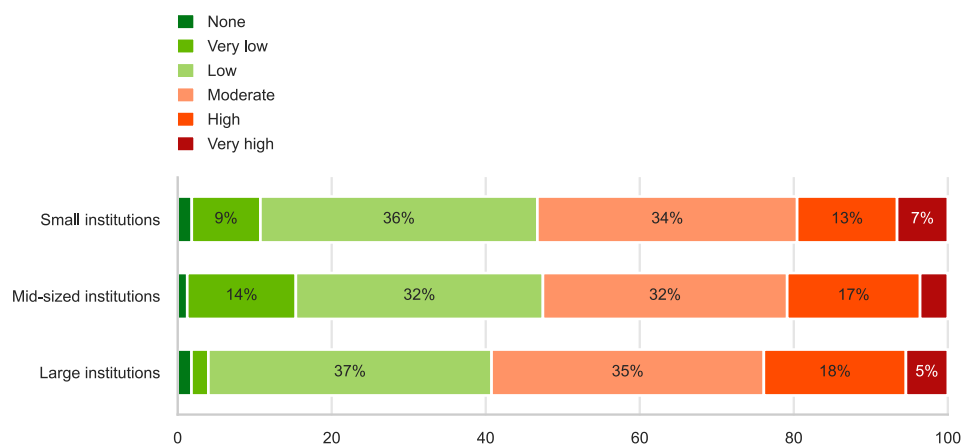
Regular costs – aggregated loan data – decomposition by type of respondent



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 A1.12**

Regular costs – aggregated loan data – decomposition by size of respondent

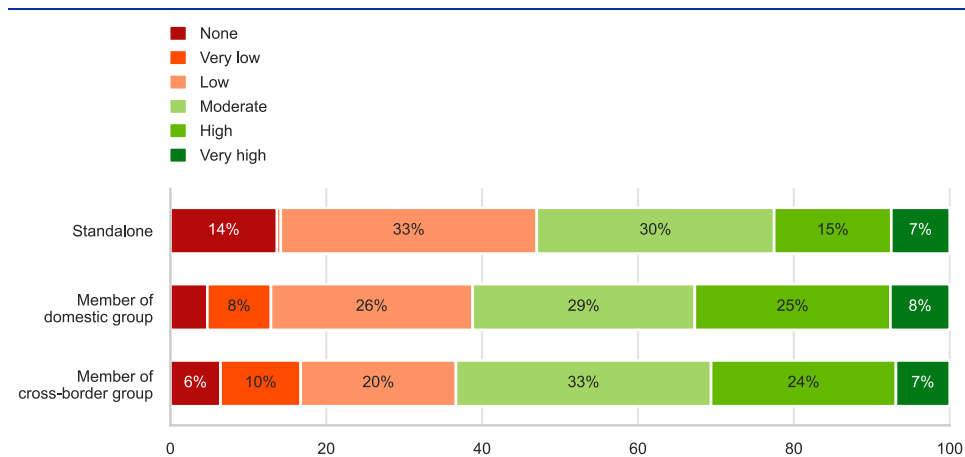


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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.

## A2 Tracking changes in instrument identifiers

### Chart A2.1

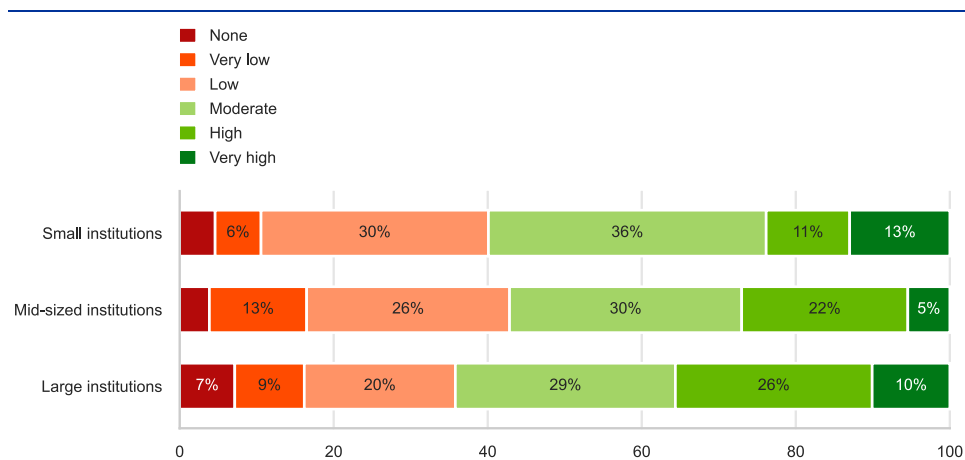
#### Benefits – decomposition by type of respondent



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 A2.2

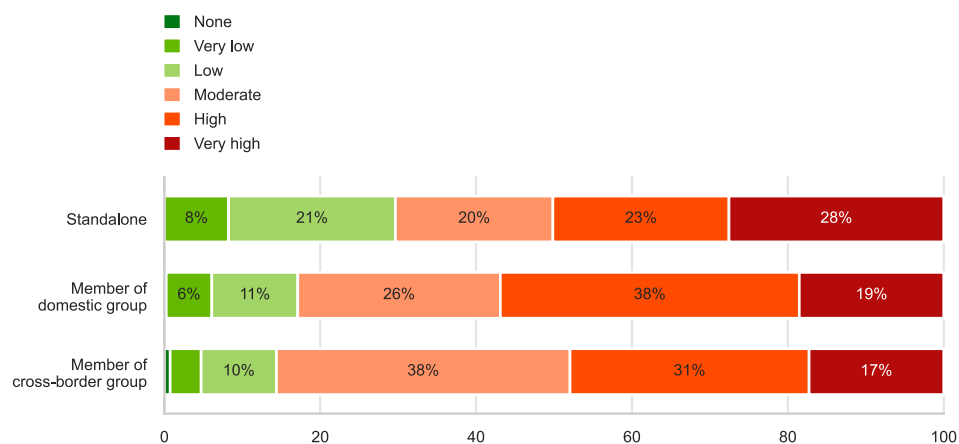
#### Benefits – decomposition by size of respondent



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 A2.3**

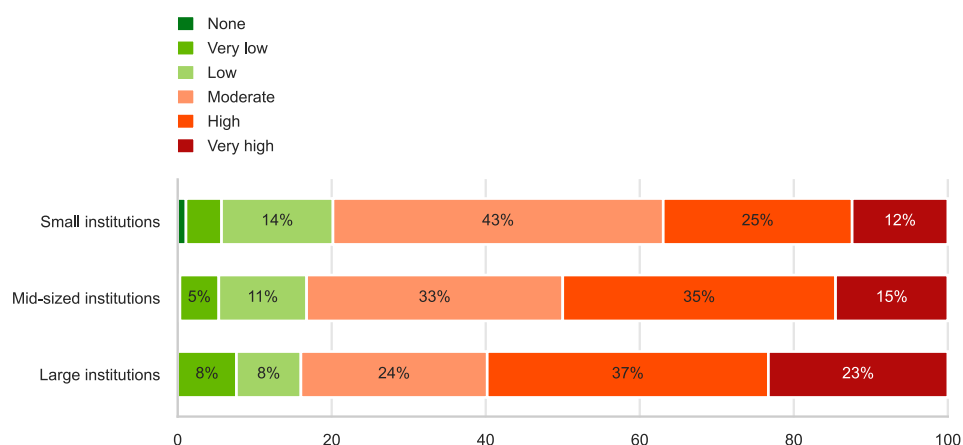
Implementation costs – decomposition by type of respondent



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 A2.4**

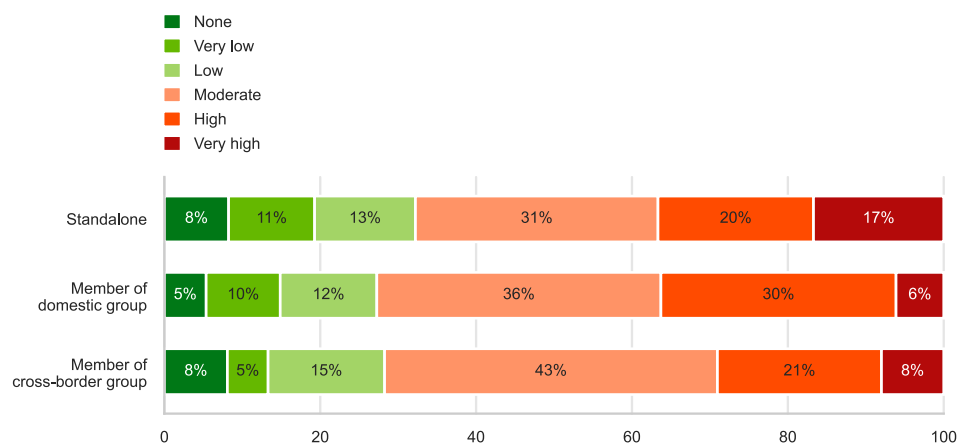
Implementation costs – decomposition by size of respondent



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 A2.5**

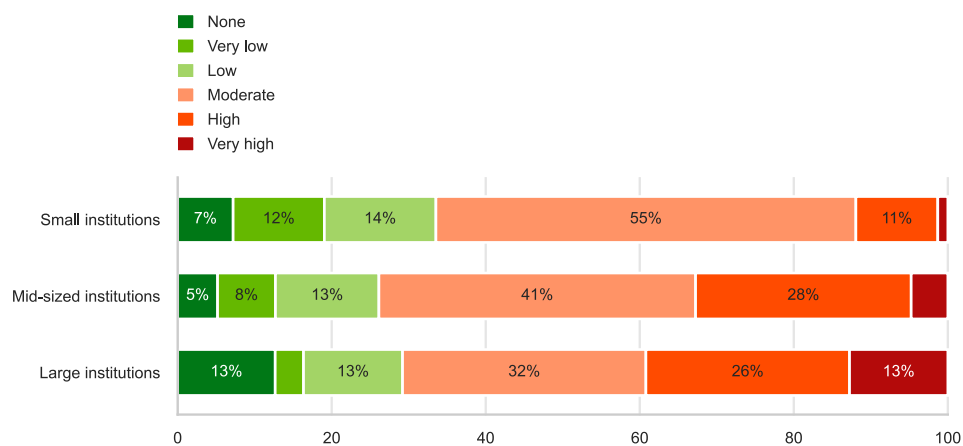
Regular costs – decomposition by type of respondent



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 A2.6**

Regular costs – decomposition by size of respondent



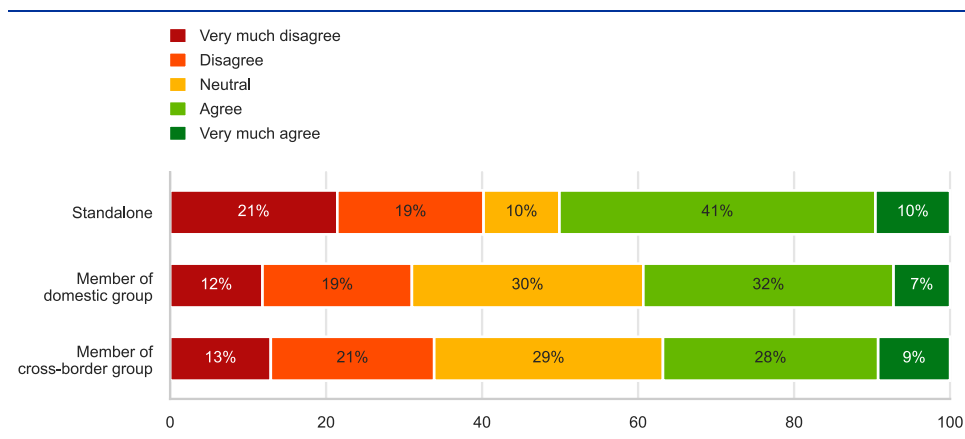
Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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.



## A3 Statistics related to climate change

**Chart A3.1**

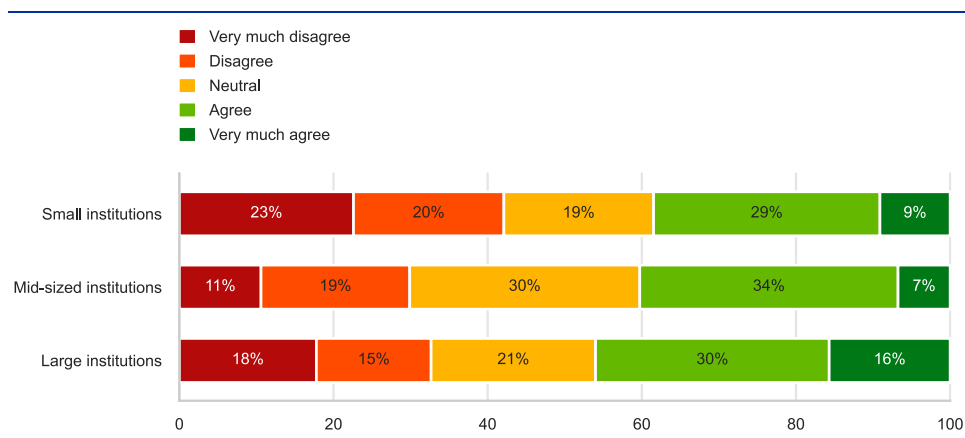
General question on climate change statistics – decomposition by type of respondent



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**

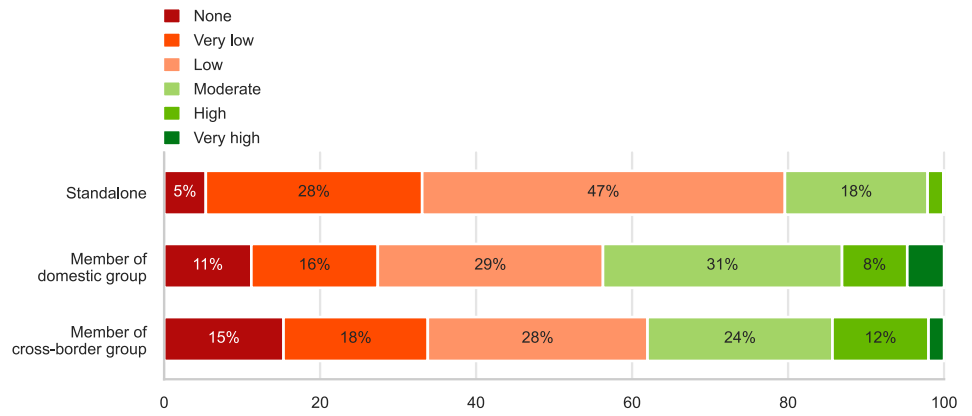
General question on climate change statistics – decomposition by size of respondent



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 A3.3**

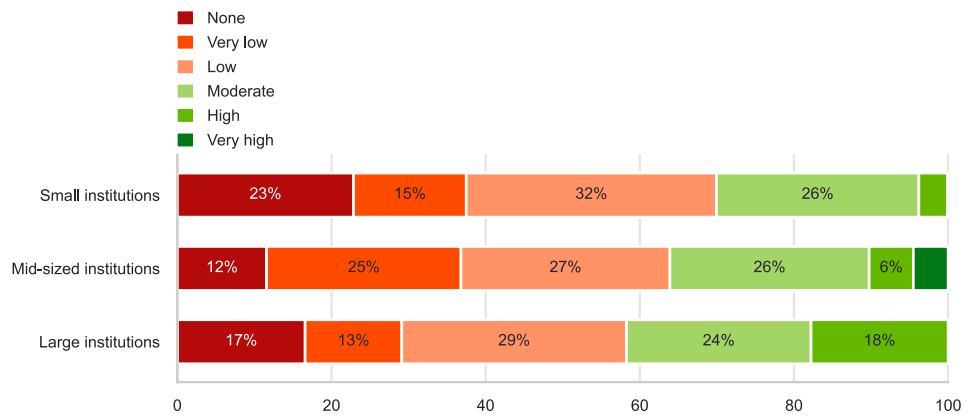
**Benefits – address – decomposition by type of respondent**



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**

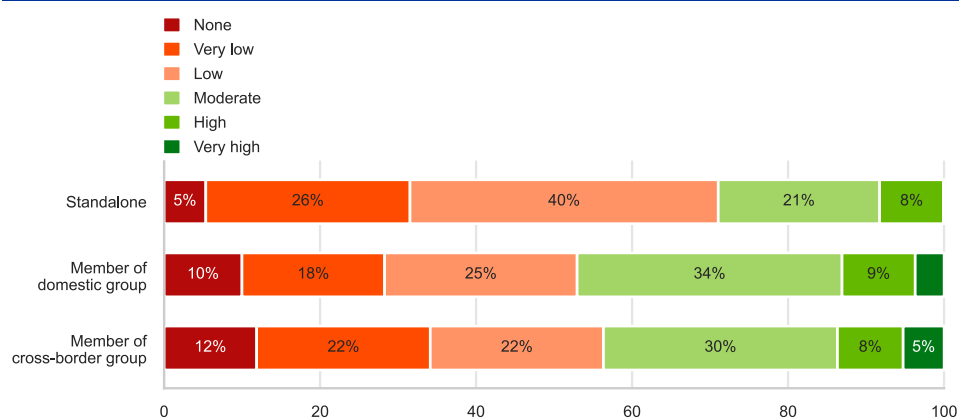
**Benefits – address – decomposition by size of respondent**



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 A3.5**

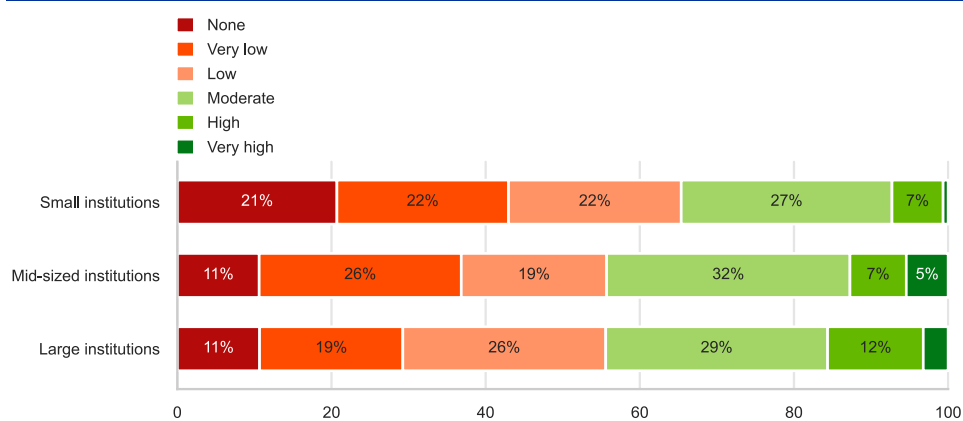
**Benefits – building use – decomposition by type of respondent**



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**

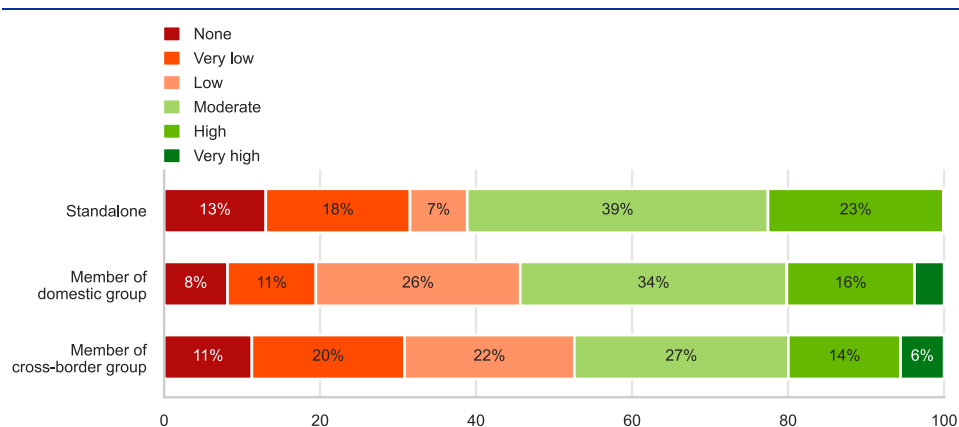
**Benefits – building use – decomposition by size of respondent**



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 A3.7**

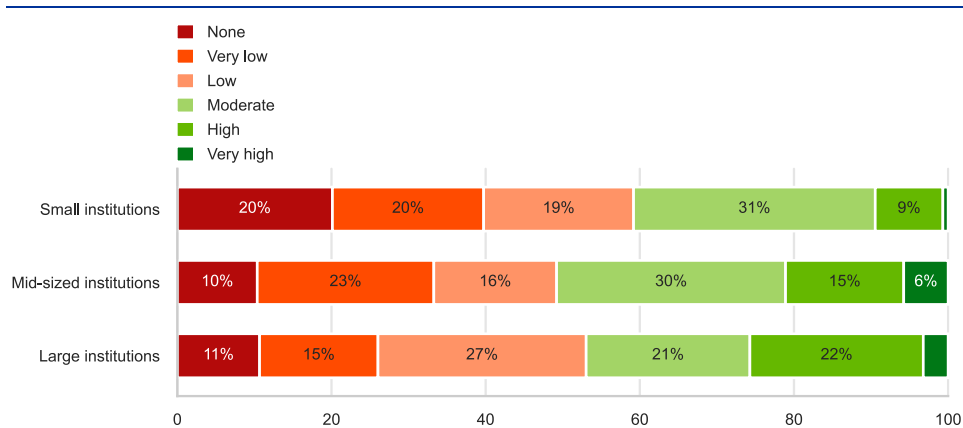
**Benefits – primary energy use – decomposition by type of respondent**



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**

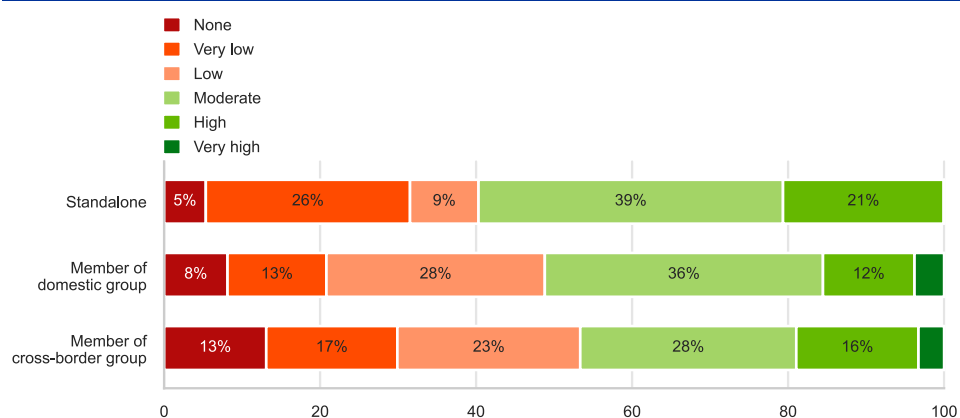
**Benefits – primary energy use – decomposition by size of respondent**



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 A3.9**

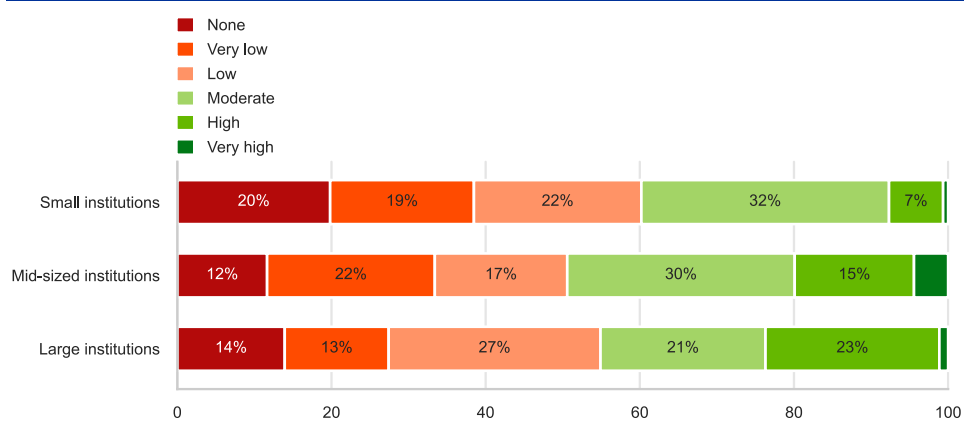
**Benefits – insurance value and specificities – decomposition by type of respondent**



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**

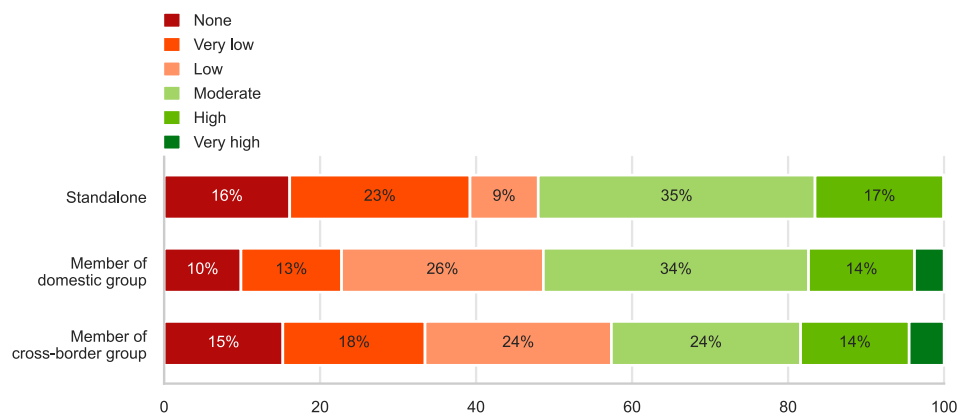
**Benefits – insurance value and specificities – decomposition by size of respondent**



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 A3.11**

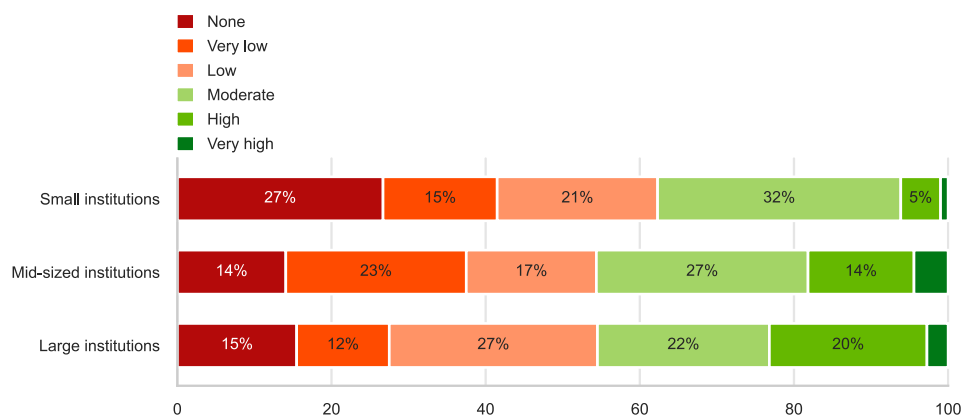
Benefits – identification number of the building according to the INSPIRE Directive – decomposition by type of respondent



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**

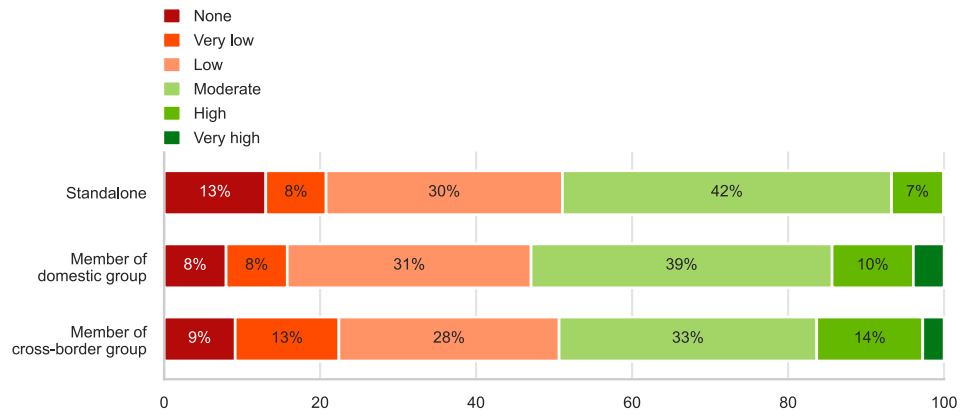
Benefits – identification number of the building according to the INSPIRE Directive – decomposition by size of respondent



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 A3.13**

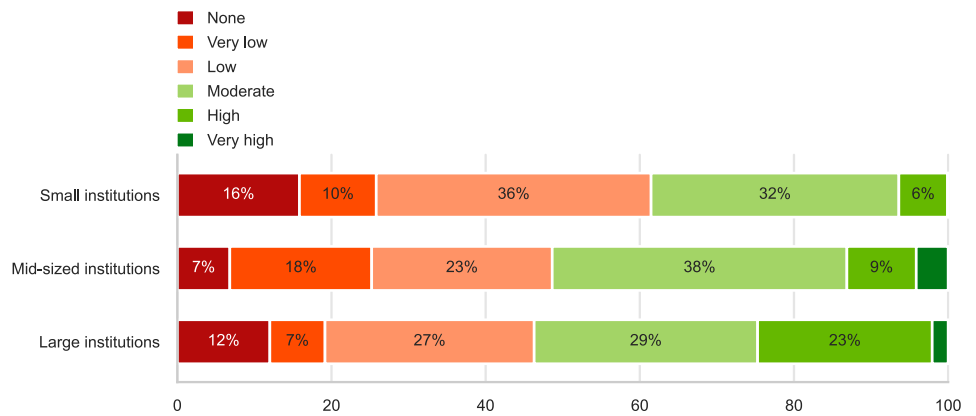
Benefits – NACE 4 for banks' counterparties – decomposition by type of respondent



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**

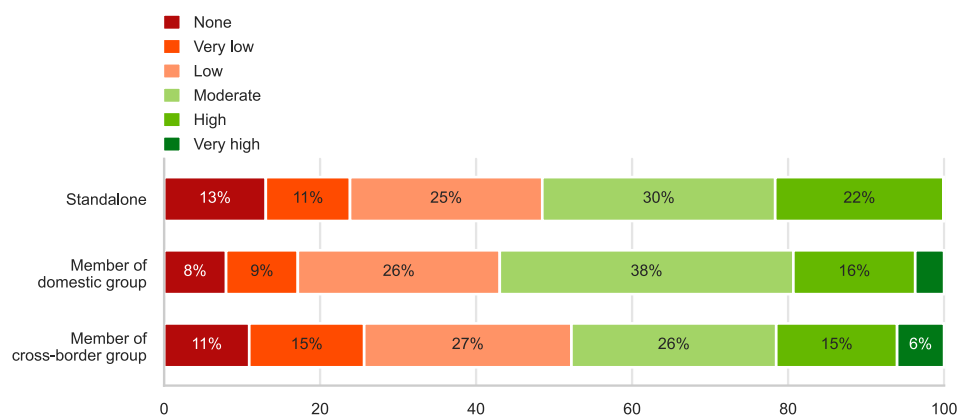
Benefits – NACE 4 for banks' counterparties – decomposition by size of respondent



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 A3.15**

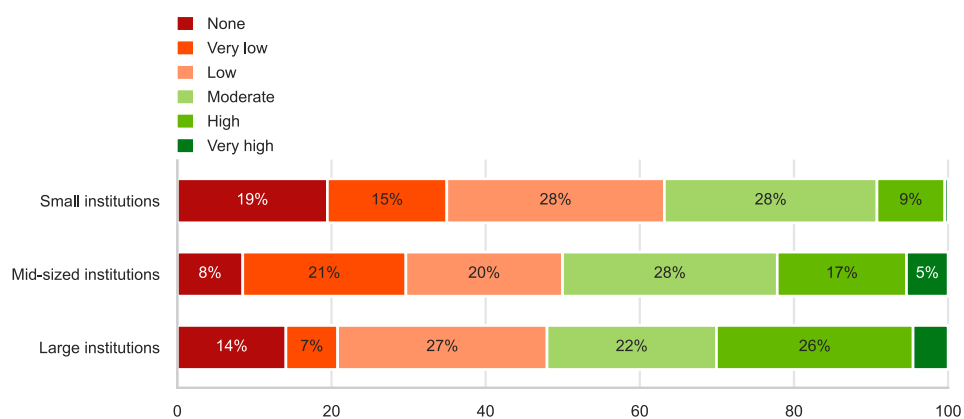
Benefits – sustainable activities and climate objectives of the loan – decomposition by type of respondent



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**

Benefits – sustainable activities and climate objectives of the loan – decomposition by size of respondent

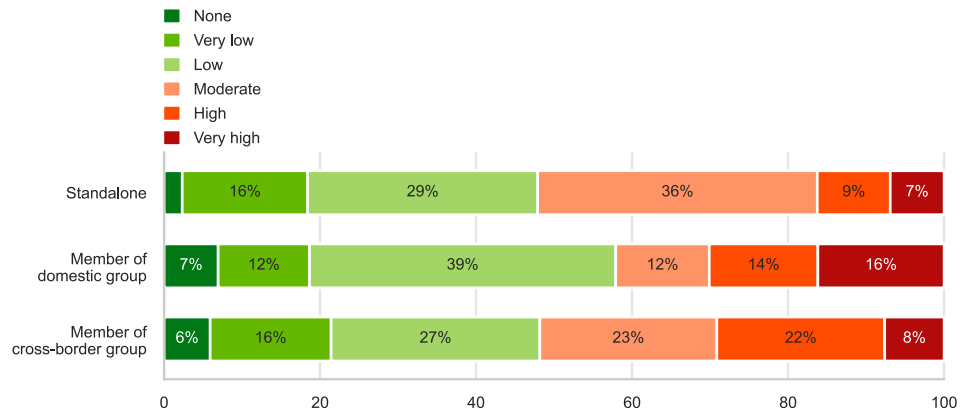


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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 A3.17**

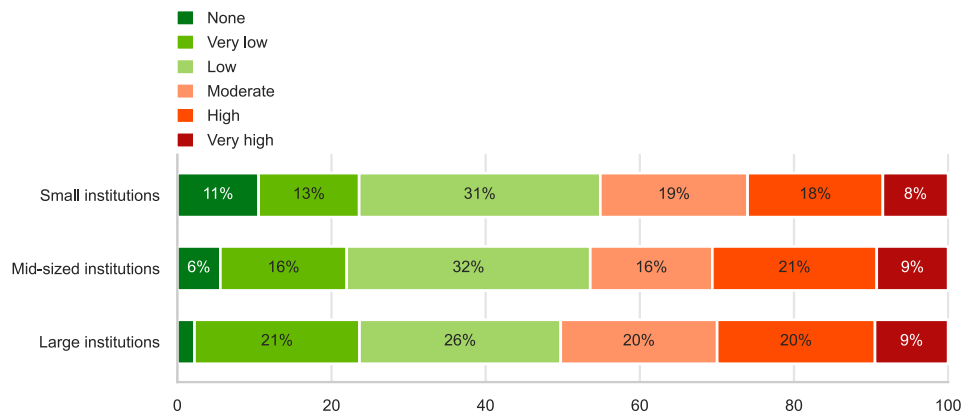
Implementation costs – address – decomposition by type of respondent



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**

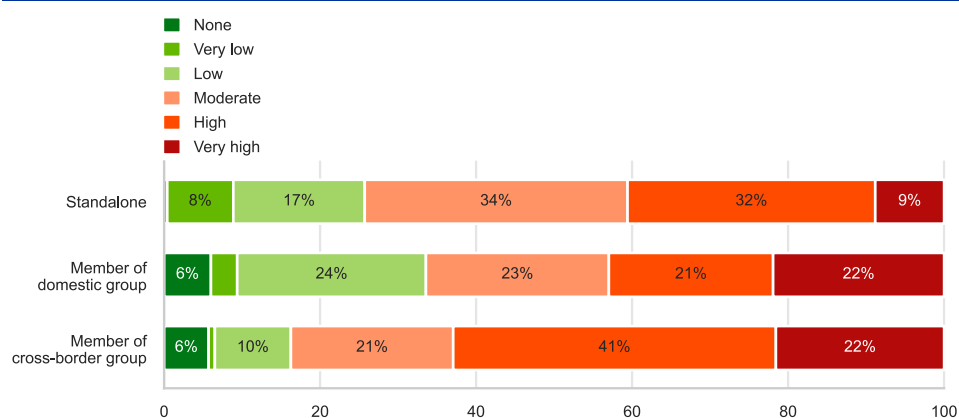
Implementation costs – address – decomposition by size of respondent



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 A3.19**

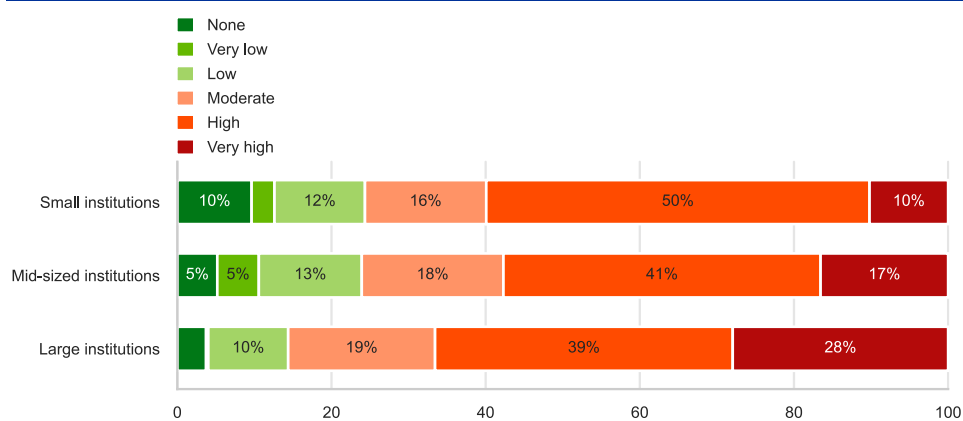
Implementation costs – building use– decomposition by type of respondent



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**

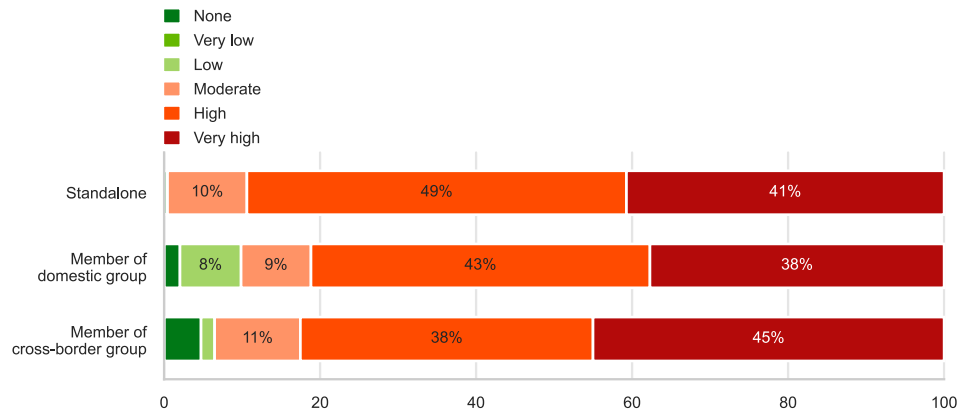
Implementation costs – building use – decomposition by size of respondent



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 A3.21**

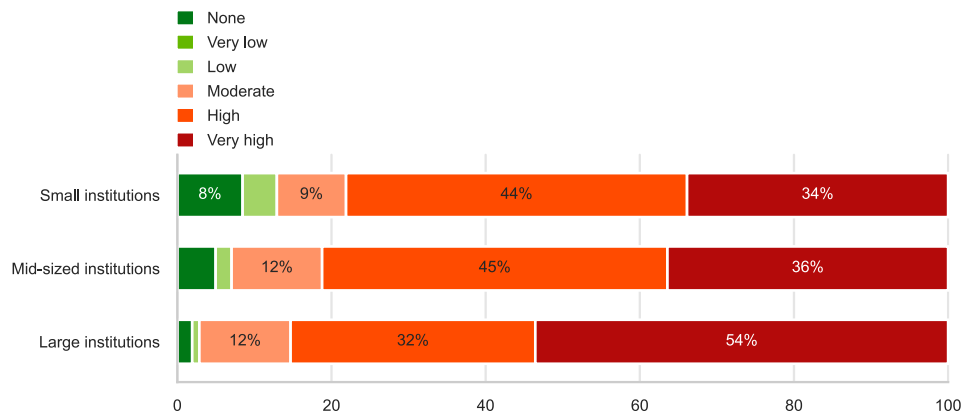
Implementation costs – primary energy use – decomposition by type of respondent



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**

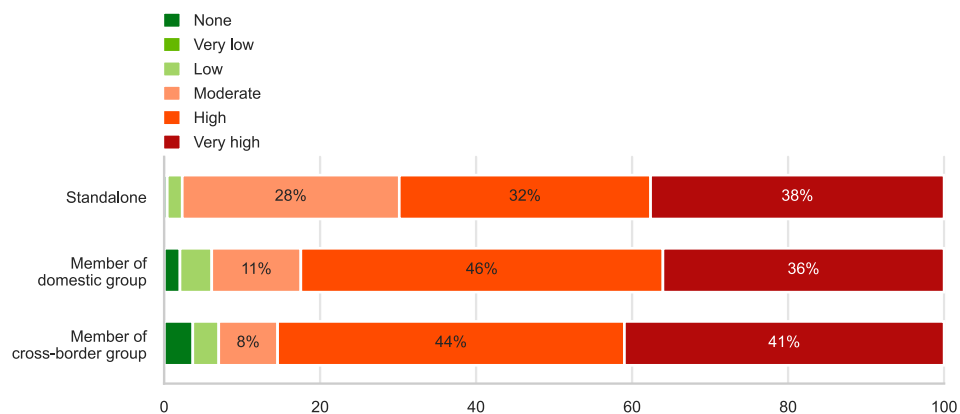
Implementation costs – primary energy use – decomposition by size of respondent



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 A3.23**

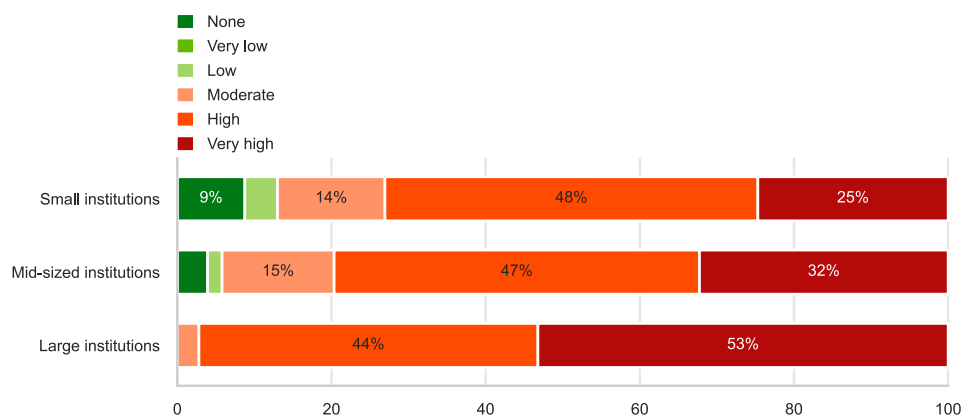
Implementation costs – insurance value and specificities – decomposition by type of respondent



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**

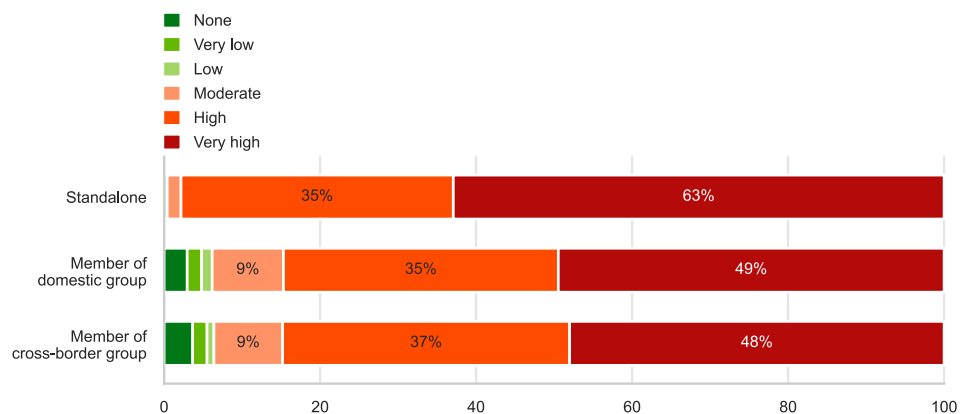
Implementation costs – insurance value and specificities – decomposition by size of respondent



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 A3.25**

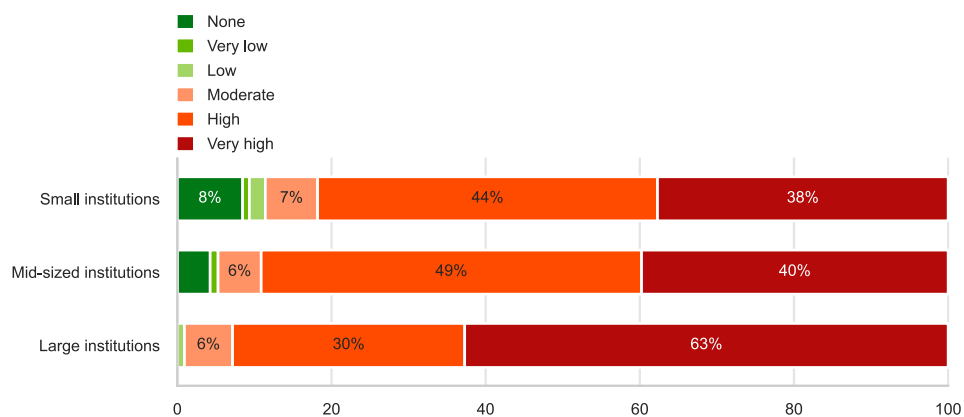
Implementation costs – identification number of the building according to the INSPIRE Directive – decomposition by type of respondent



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**

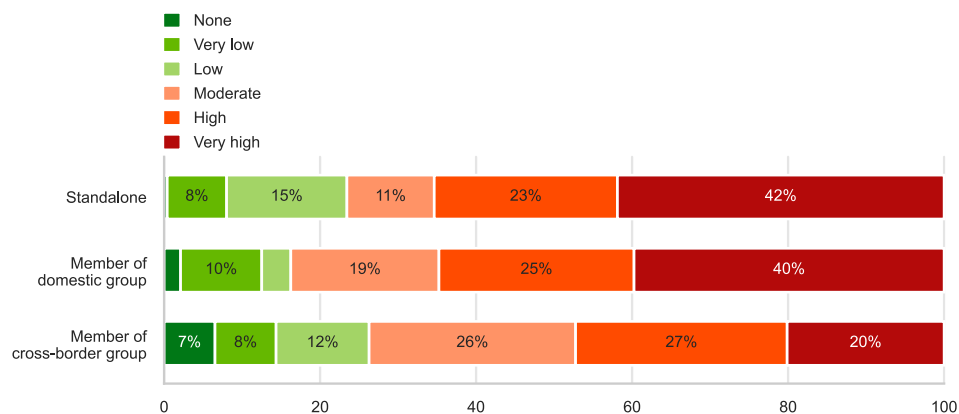
Implementation costs – identification number of the building according to the INSPIRE Directive – decomposition by size of respondent



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 A3.27**

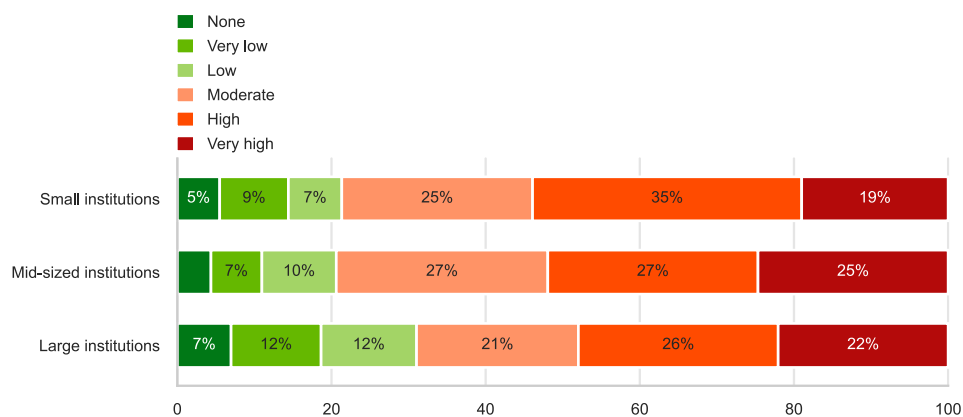
Implementation costs – NACE 4 for banks' counterparties – decomposition by type of respondent



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 A3.28**

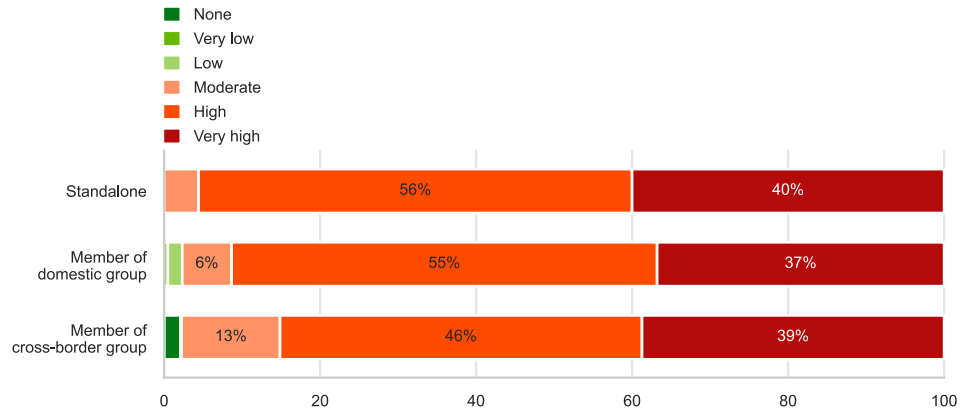
Implementation costs – NACE 4 for banks' counterparties – decomposition by size of respondent



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 A3.29**

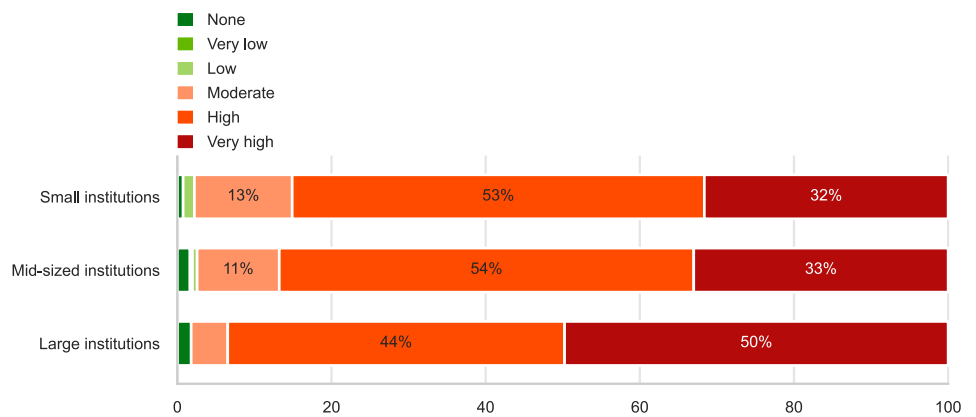
Implementation costs – sustainable activities and climate objectives of the loan – decomposition by type of respondent



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**

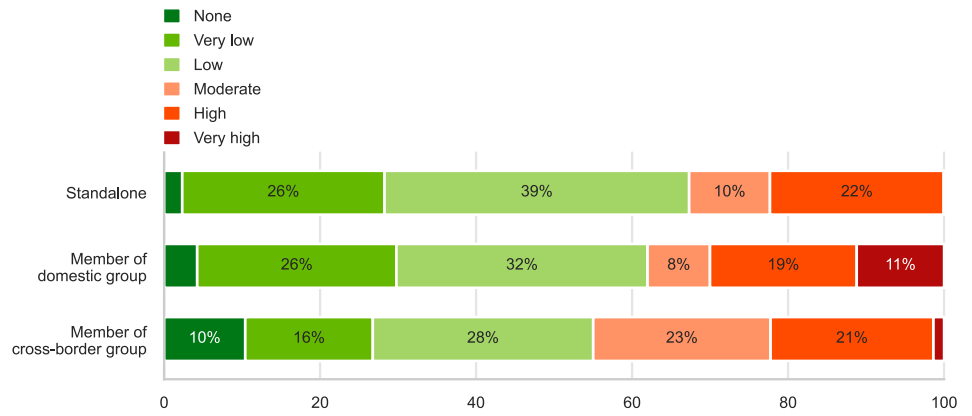
Implementation costs – sustainable activities and climate objectives of the loan – decomposition by size of respondent



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 A3.31**

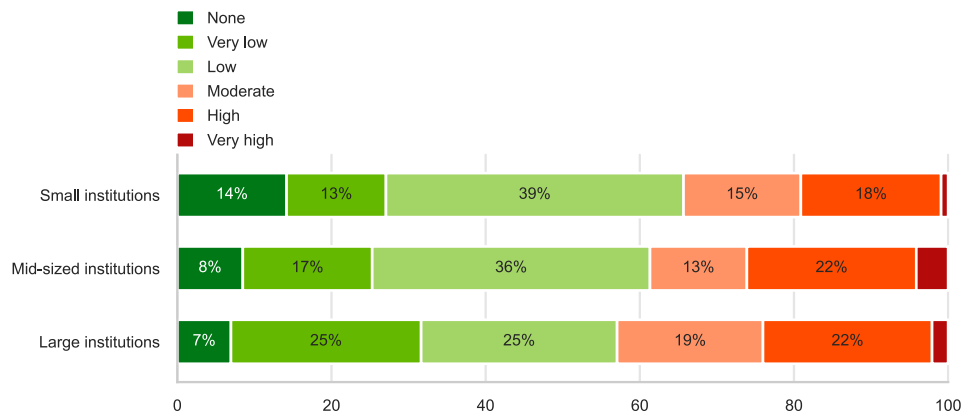
Regular costs – address – decomposition by type of respondent



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 – address – decomposition by size of respondent

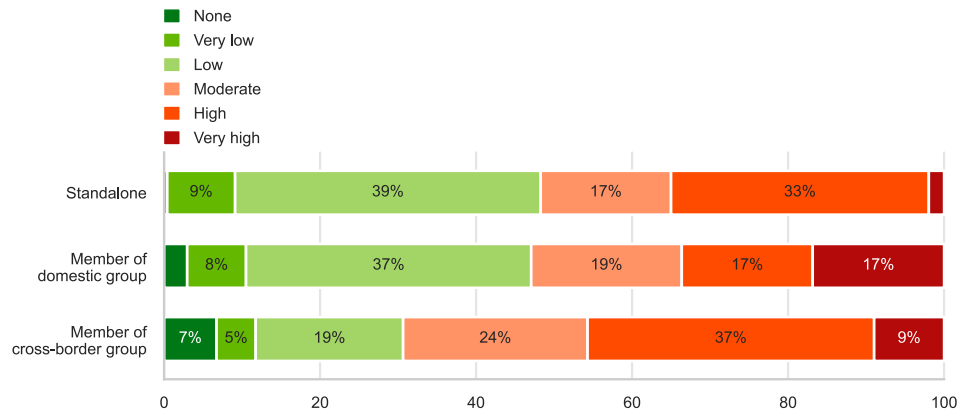


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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 A3.33**

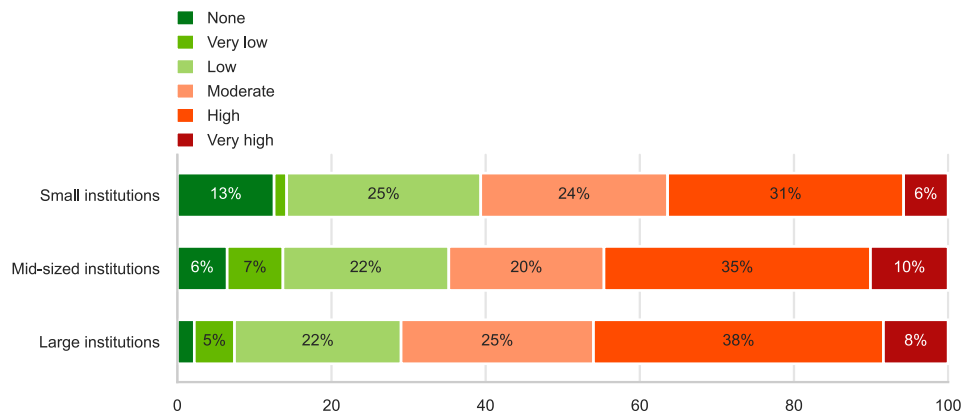
Regular costs – building use – decomposition by type of respondent



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**

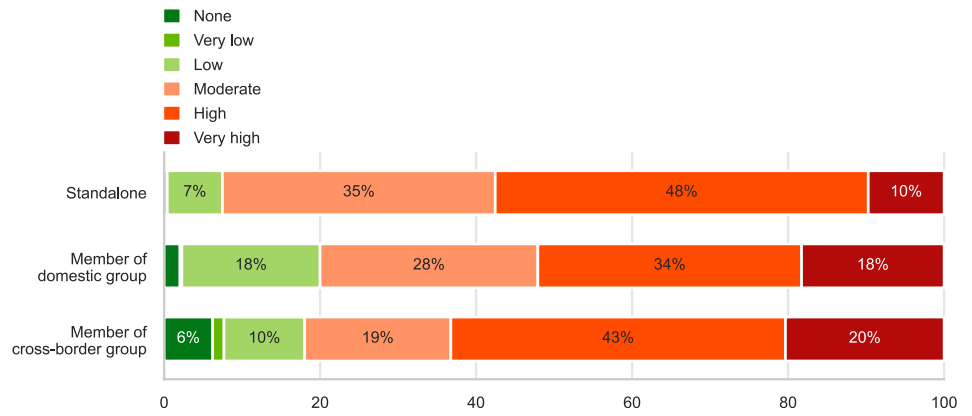
Regular costs – building use – decomposition by size of respondent



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 A3.35**

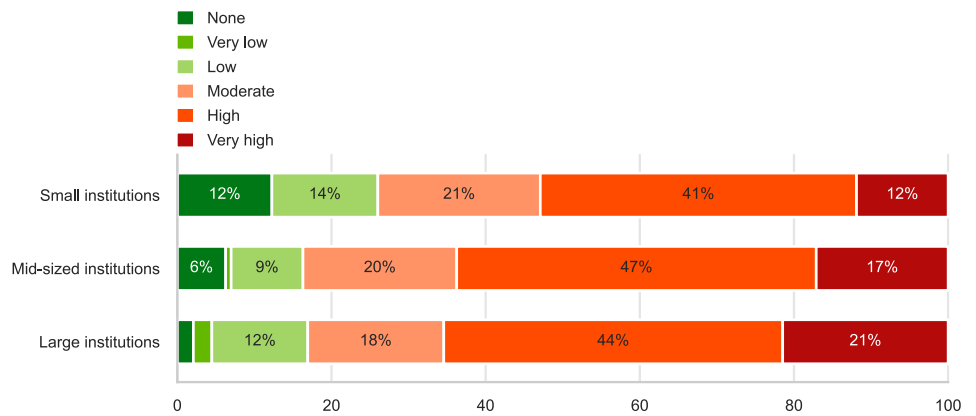
Regular costs – primary energy use – decomposition by type of respondent



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**

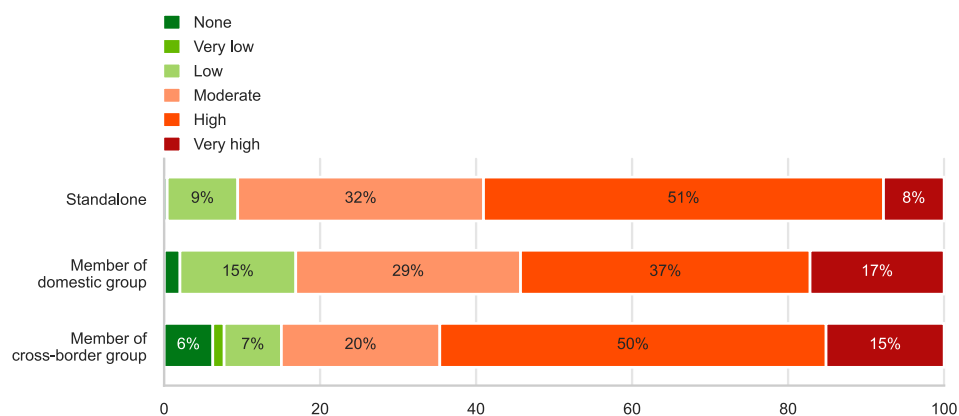
Regular costs – primary energy use – decomposition by size of respondent



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 A3.37**

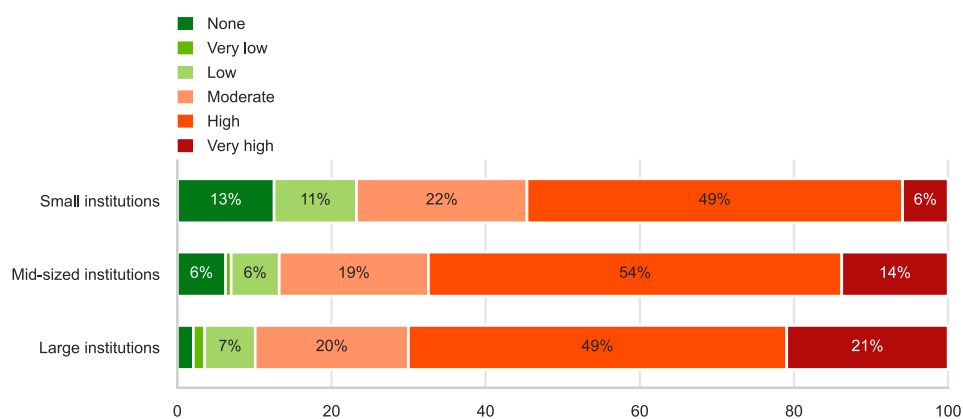
Regular costs – insurance value and specificities – decomposition by type of respondent



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**

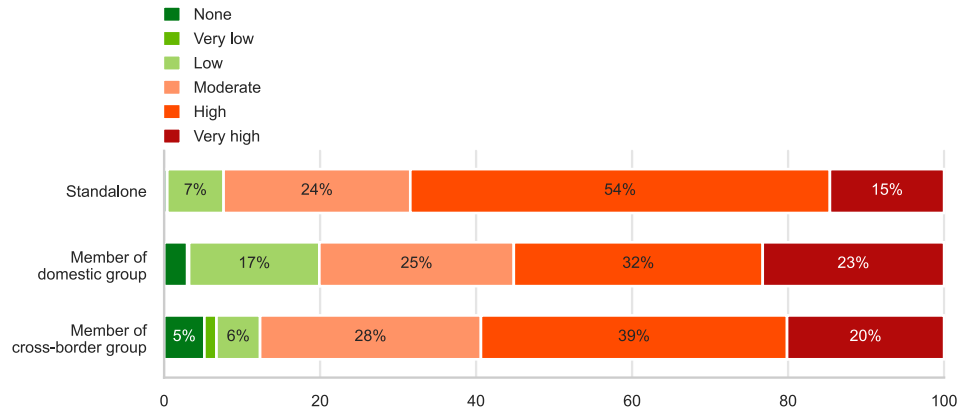
Regular costs – insurance value and specificities – decomposition by size of respondent



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 A3.39**

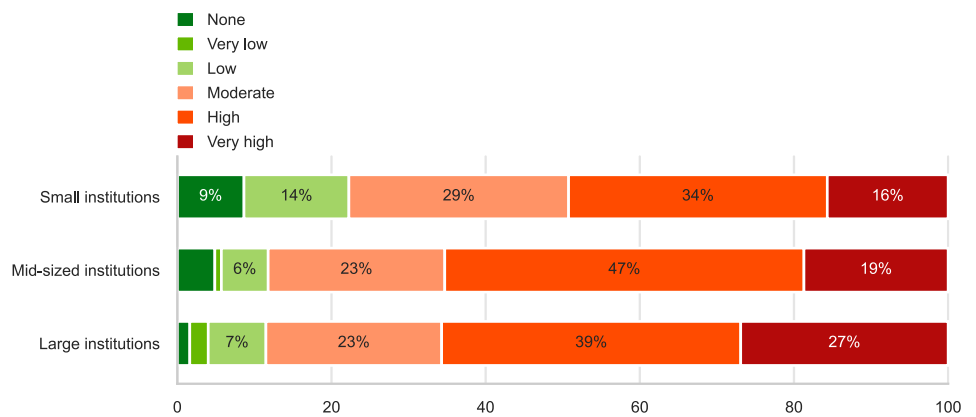
Regular costs – identification number of the building according to the INSPIRE Directive – decomposition by type of respondent



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**

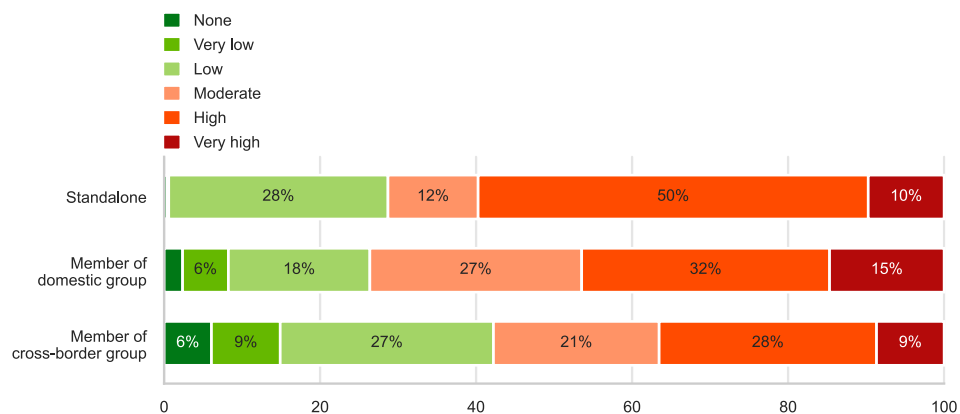
Regular costs – identification number of the building according to the INSPIRE Directive – decomposition by size of respondent



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 A3.41**

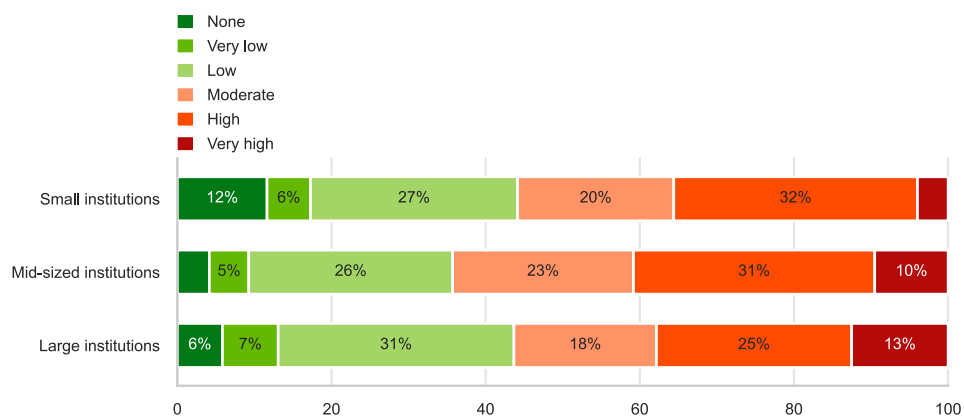
Regular costs – NACE 4 for banks' counterparties – decomposition by type of respondent



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**

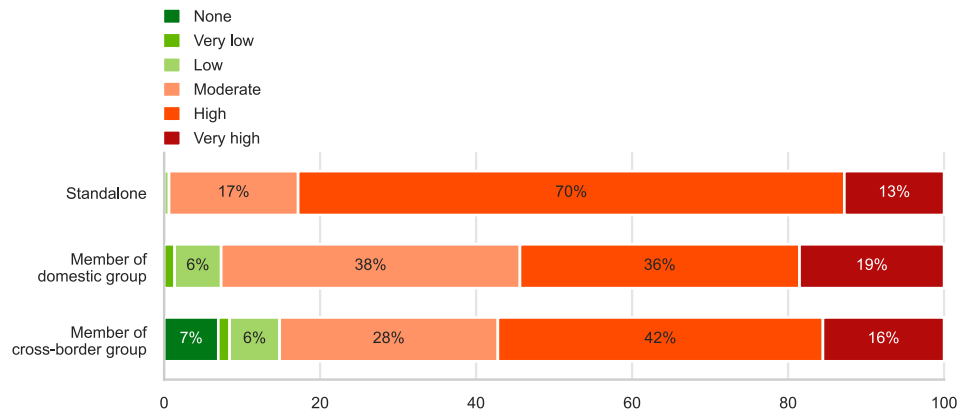
Regular costs – NACE 4 for banks' counterparties – decomposition by size of respondent



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 A3.43**

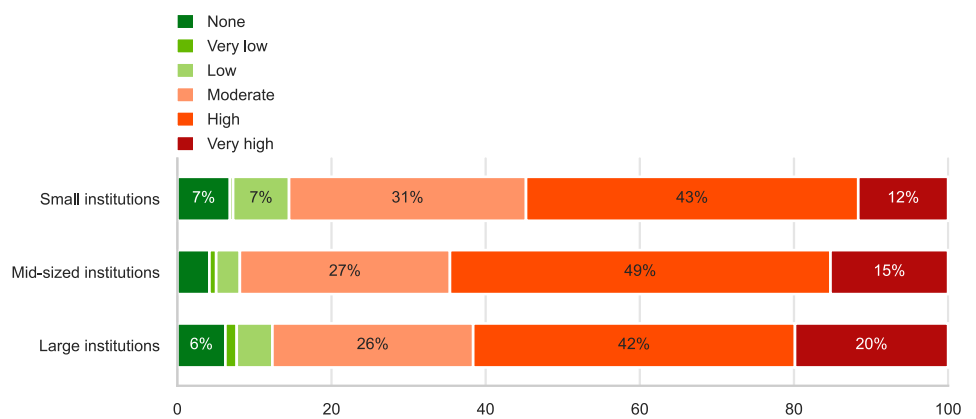
Regular costs – sustainable activities and climate objectives of the loan – decomposition by type of respondent



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 A3.44**

Regular costs – sustainable activities and climate objectives of the loan – decomposition by size of respondent

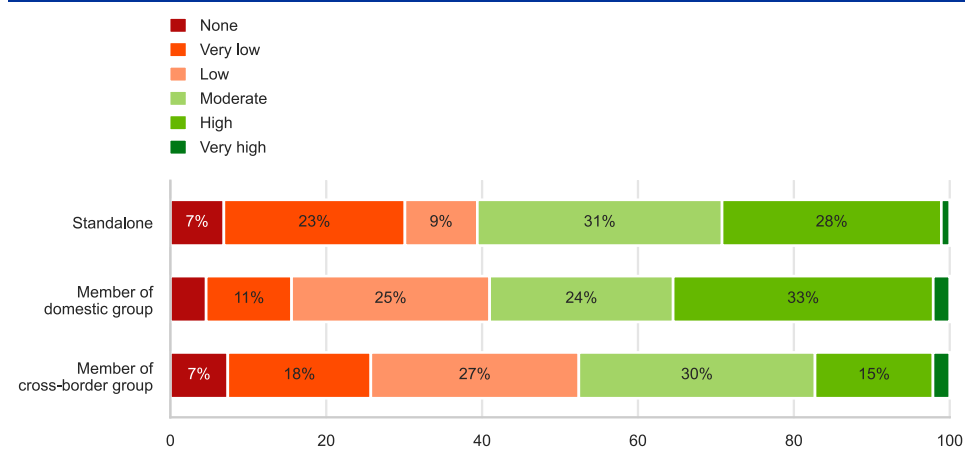


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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.

## A4 Protection allocated value eligible for credit risk mitigation under the CRR

### Chart A4.1

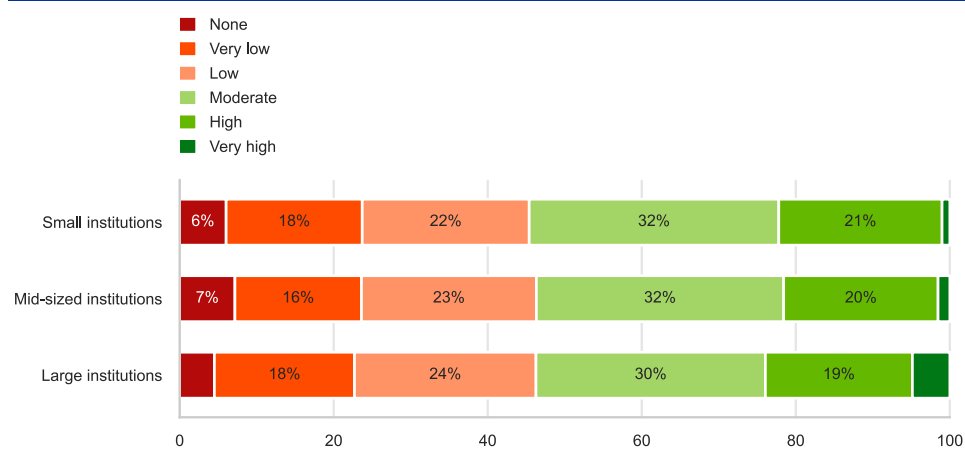
Benefits – decomposition by type of respondent



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 A4.2

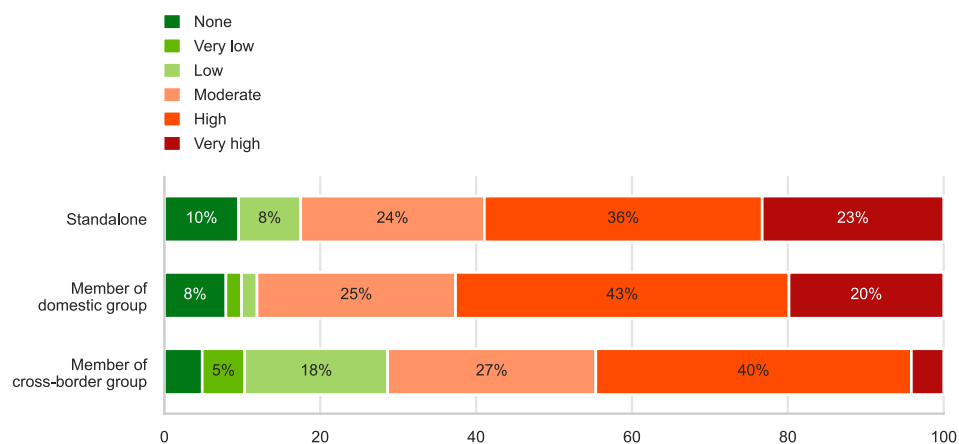
Benefits – decomposition by size of respondent



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 A4.3**

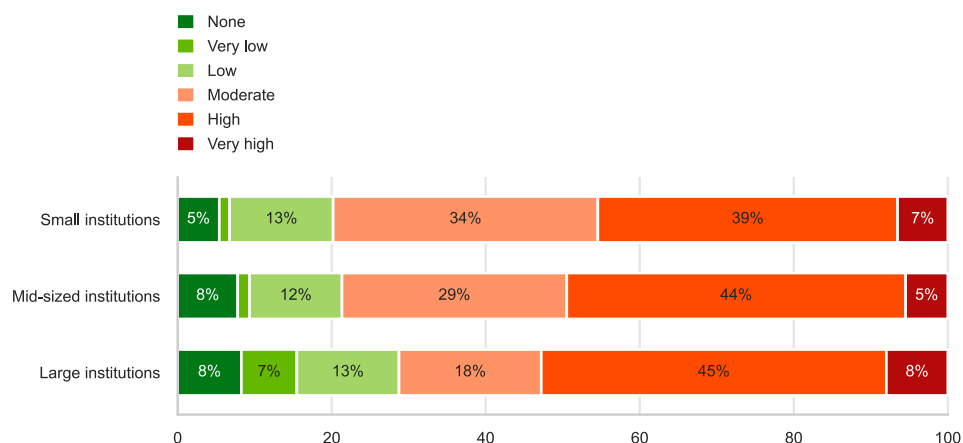
Implementation costs – decomposition by type of respondent



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 A4.4**

Implementation costs – decomposition by size of respondent

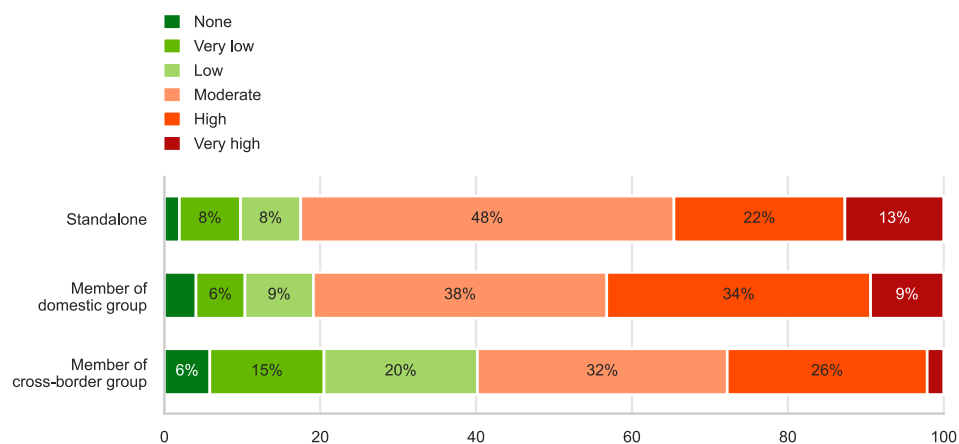


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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 A4.5**

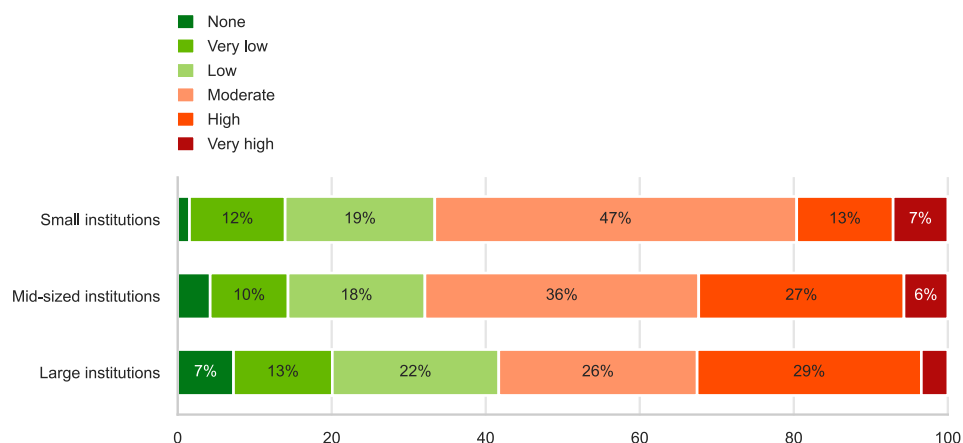
Regular costs – decomposition by type of respondent



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 A4.6**

Regular costs – decomposition by size of respondent

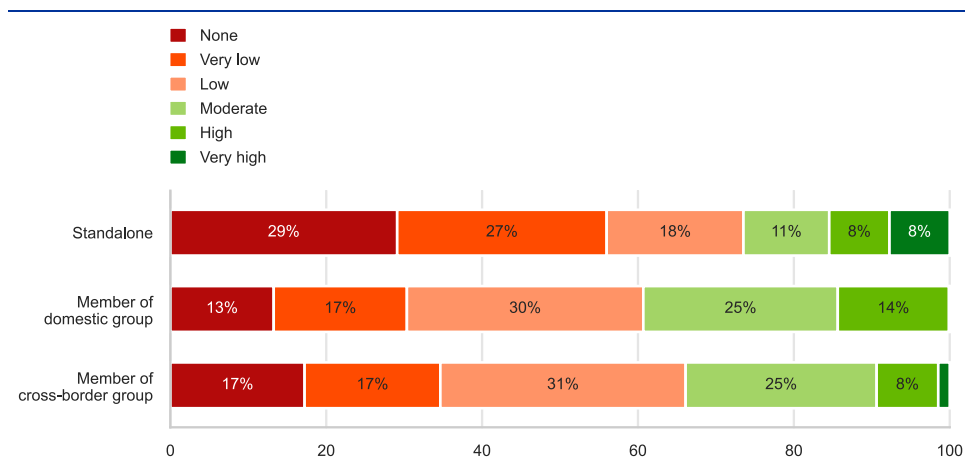


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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.

## A5 Governing law of loan agreements

### Chart A5.1

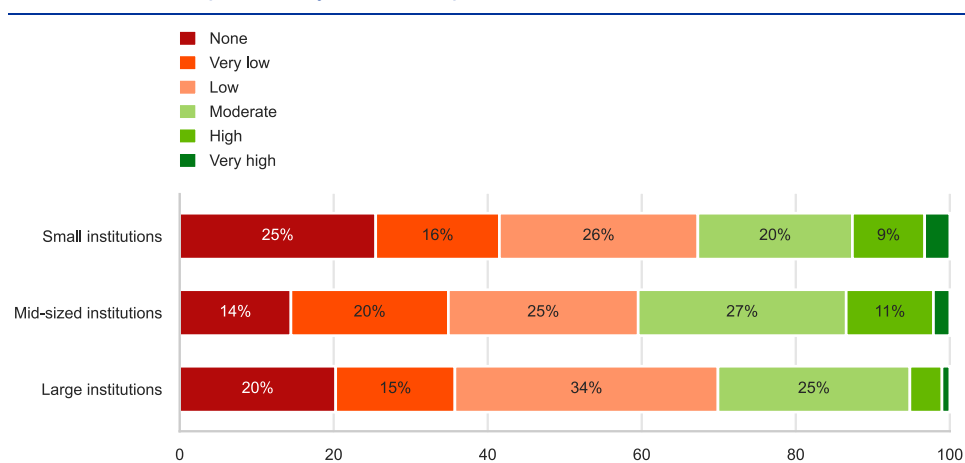
Benefits – decomposition by type of respondent



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

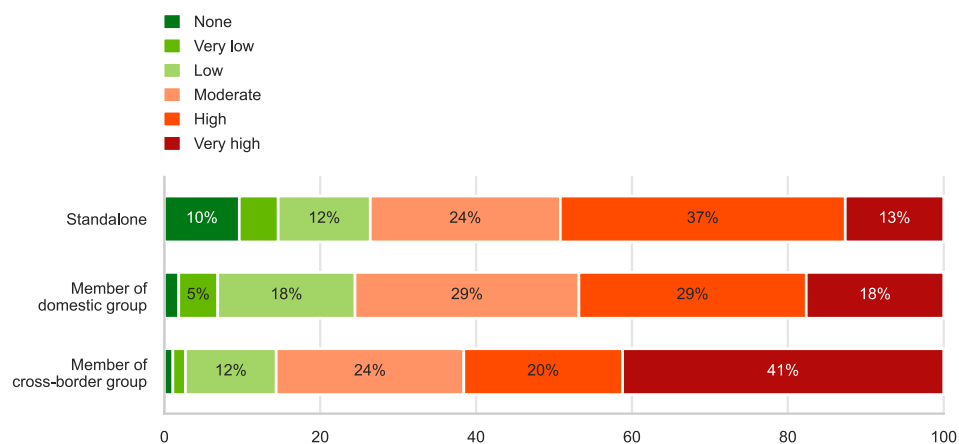
Benefits – decomposition by size of respondent



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 A5.3**

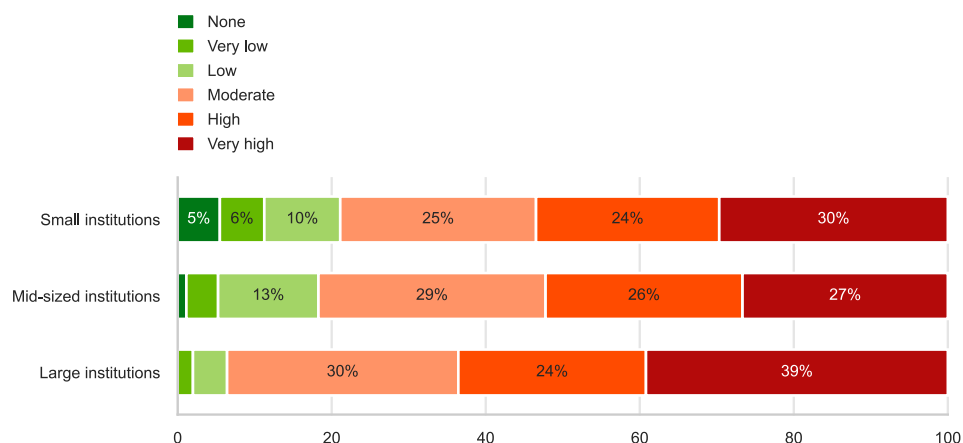
Implementation costs – decomposition by type of respondent



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**

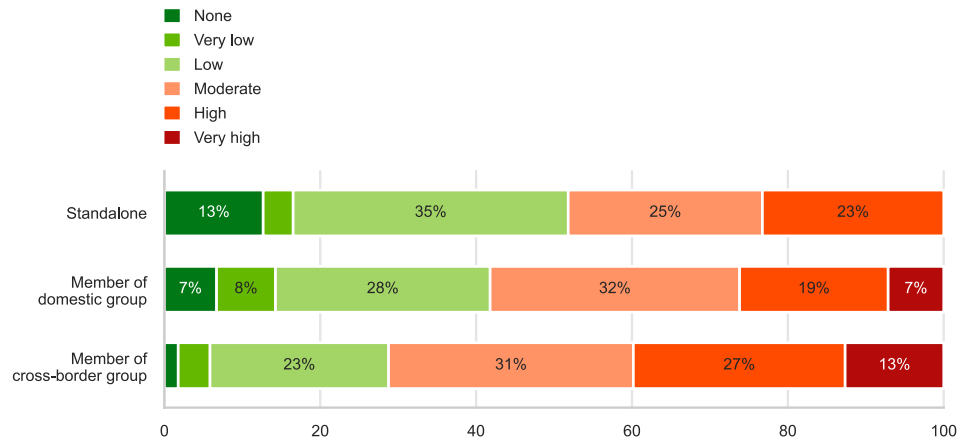
Implementation costs – decomposition by size of respondent



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 A5.5**

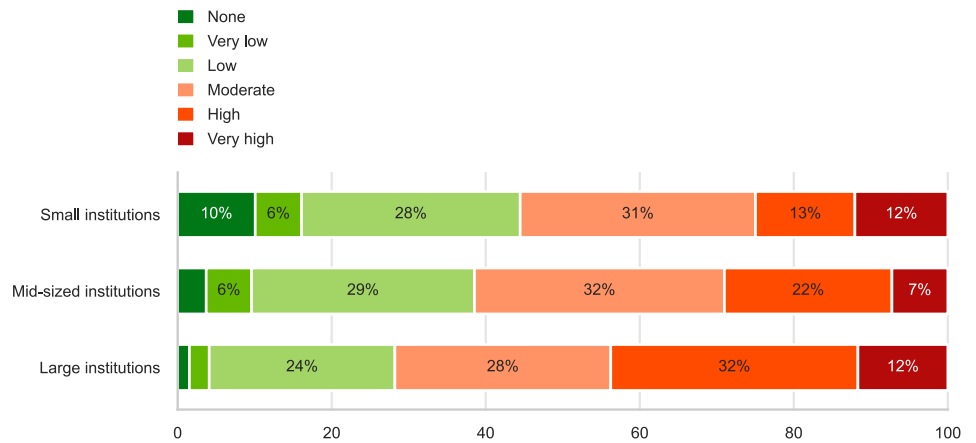
Regular costs – decomposition by type of respondent



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 A5.6**

Regular costs – decomposition by size of respondent

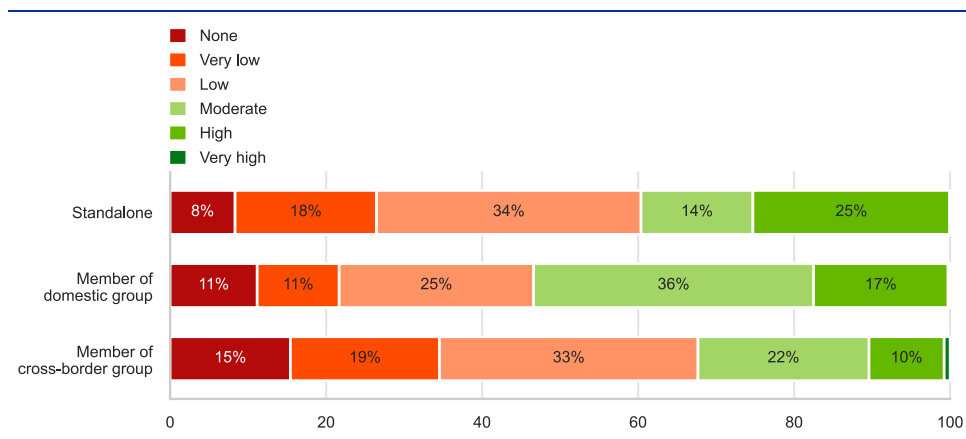


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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.

## A6 Reporting protection issuers

### Chart A6.1

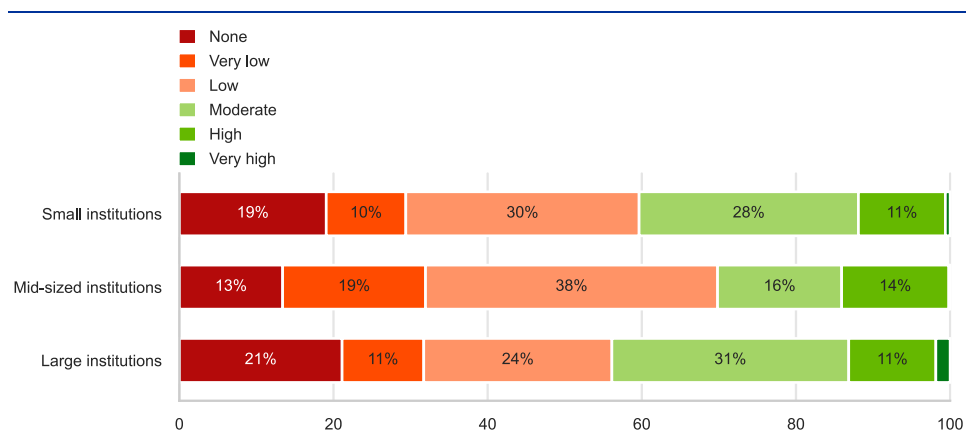
Benefits – protection issuers – decomposition by type of respondent



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 A6.2

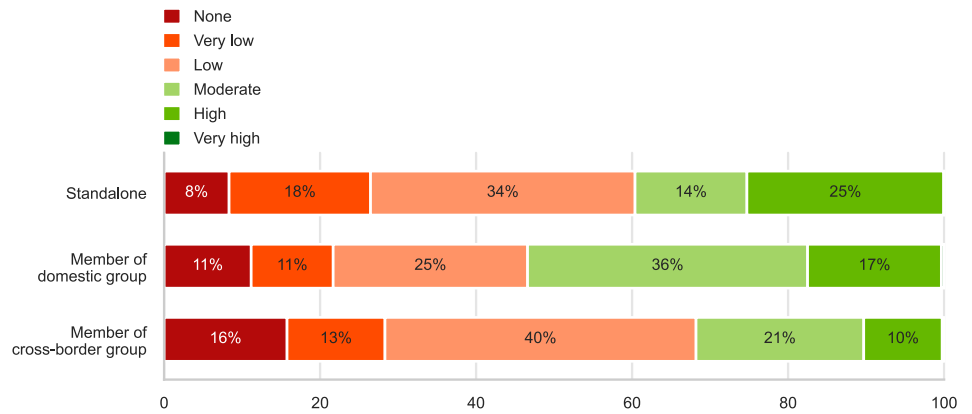
Benefits – protection issuers – decomposition by size of respondent



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 A6.3**

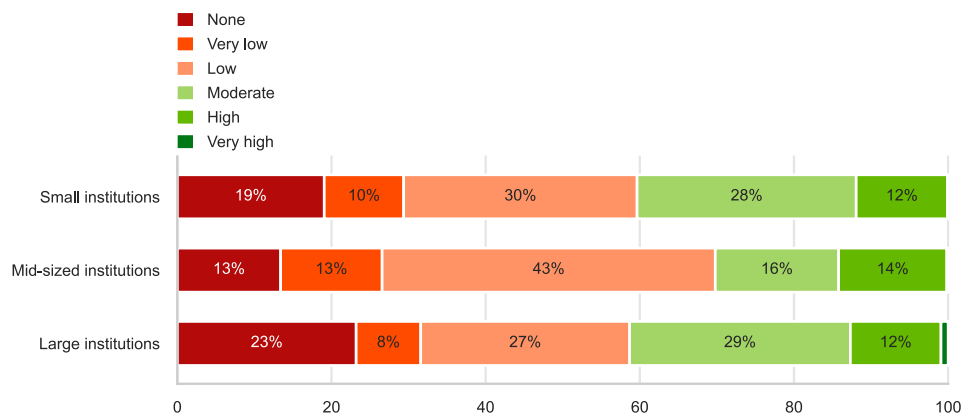
Benefits – protection value associated to each protection issuer – decomposition by type of respondent



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 A6.4**

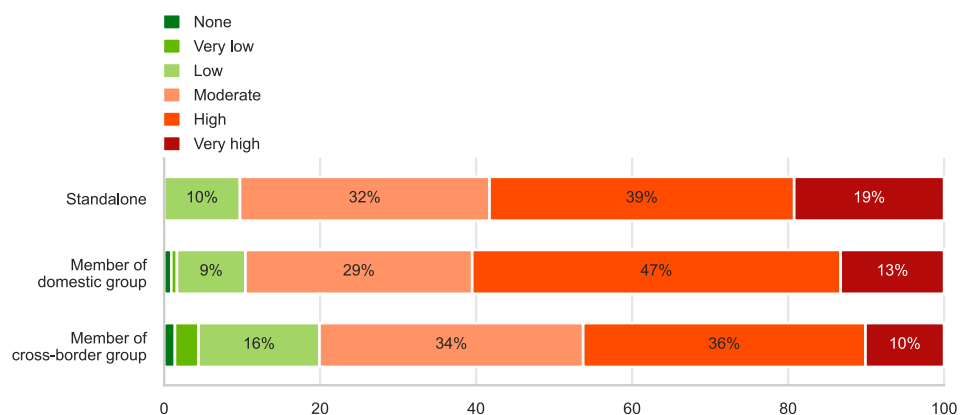
Benefits – protection value associated to each protection issuer – decomposition by size of respondent



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 A6.5**

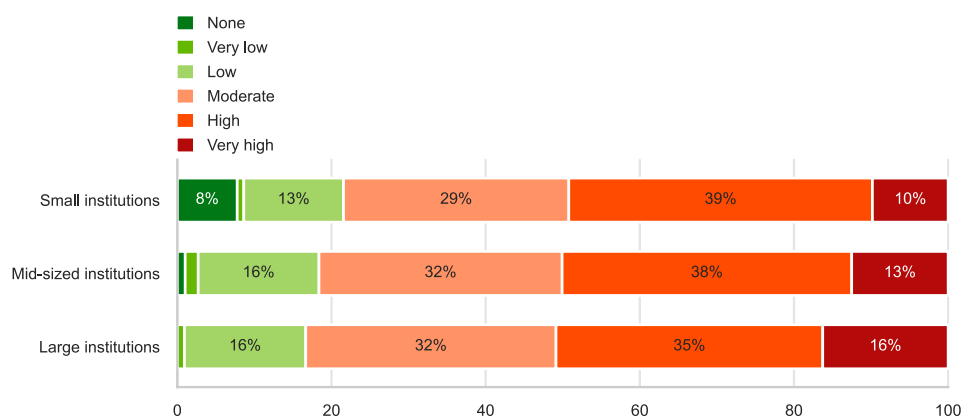
Implementation costs – protection issuers – decomposition by type of respondent



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 A6.6**

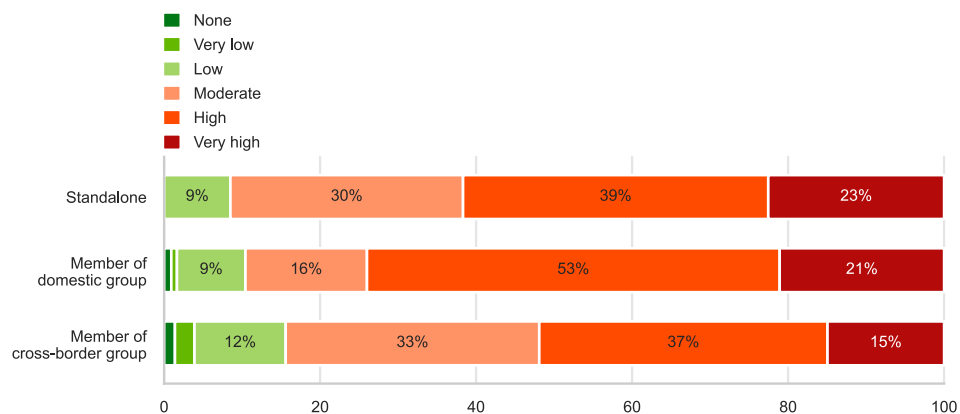
Implementation costs – protection issuers – decomposition by size of respondent



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 A6.7**

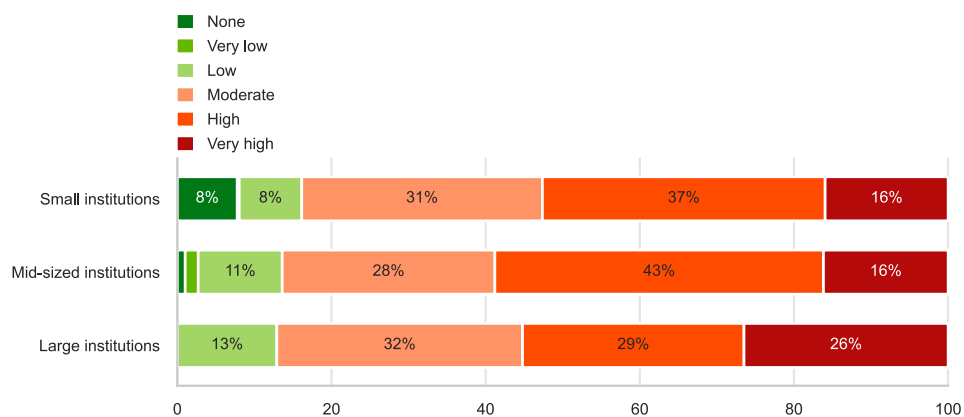
Implementation costs – protection value associated to each protection issuer – decomposition by type of respondent



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 A6.8**

Implementation costs – protection value associated to each protection issuer – decomposition by size of respondent

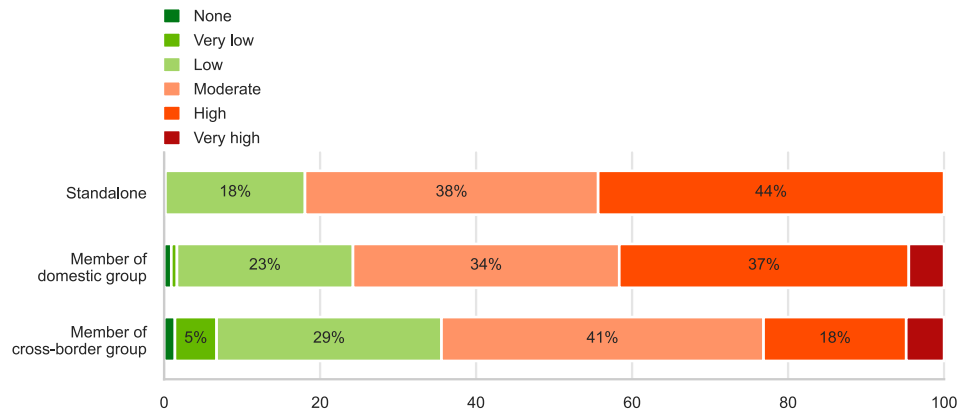


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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 A6.9**

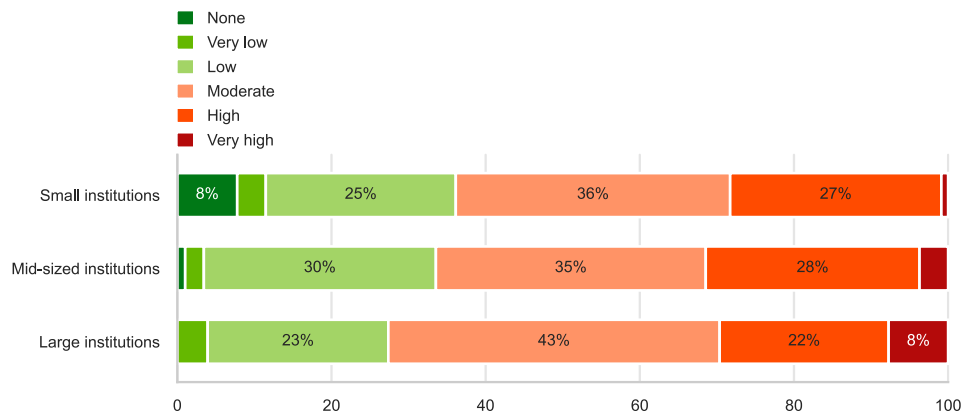
Regular costs – protection issuers – decomposition by type of respondent



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 A6.10**

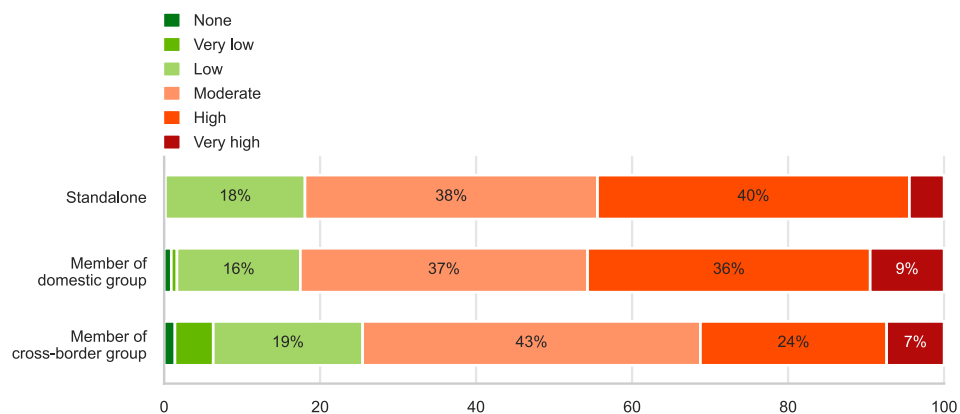
Regular costs – protection issuers – decomposition by size of respondent



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 A6.11**

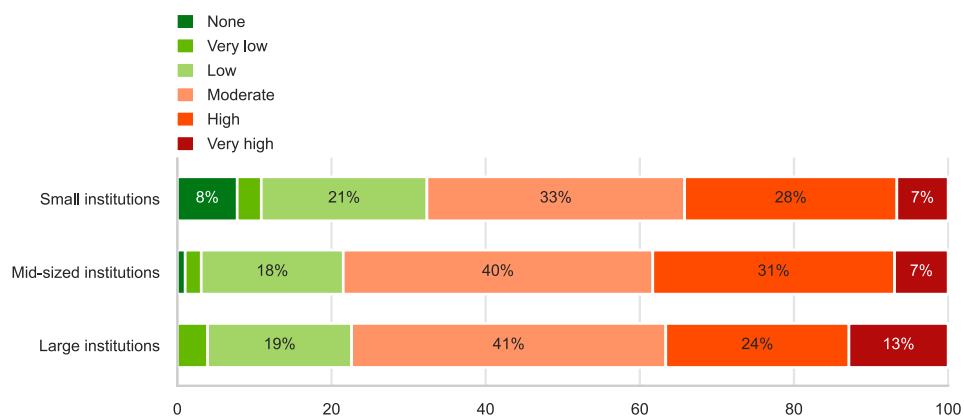
Regular costs – protection value associated to each protection issuer – decomposition by type of respondent



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 A6.12**

Regular costs – protection value associated to each protection issuer – decomposition by size of respondent

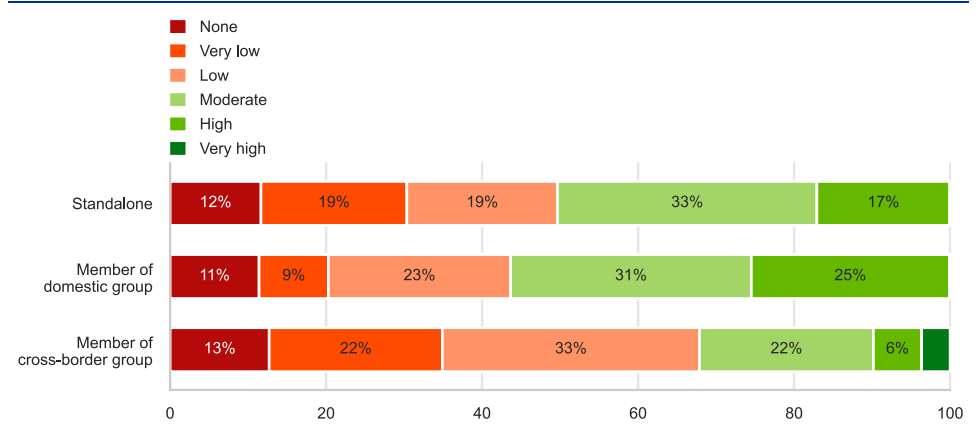


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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.

## A7 Reporting probabilities of default

**Chart A7.1**

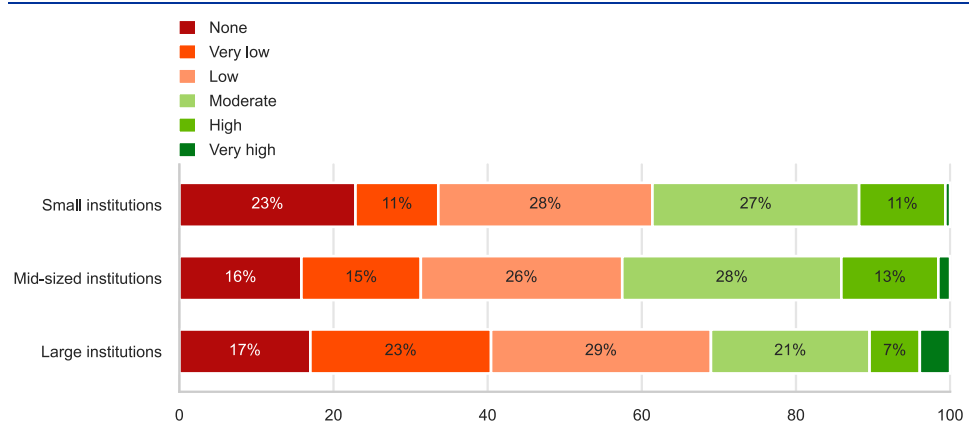
Benefits – IFRS 9 twelve-month PD – decomposition by type of respondent



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 A7.2**

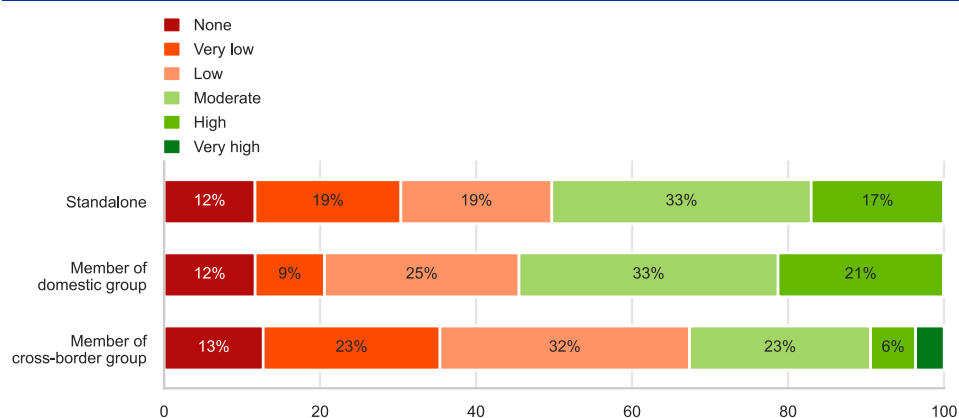
Benefits – IFRS 9 twelve-month PD – decomposition by size of respondent



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 A7.3**

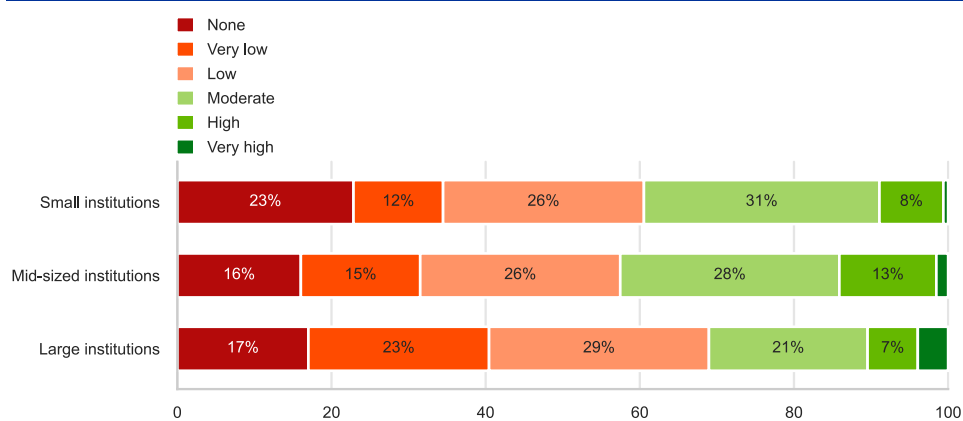
**Benefits – IFRS 9 lifetime PD – decomposition by type of respondent**



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 A7.4**

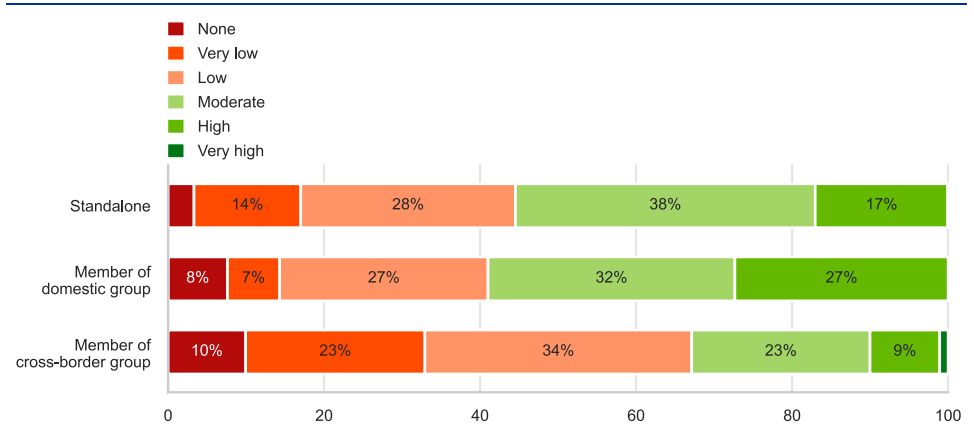
**Benefits – IFRS 9 lifetime PD – decomposition by size of respondent**



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 A7.5**

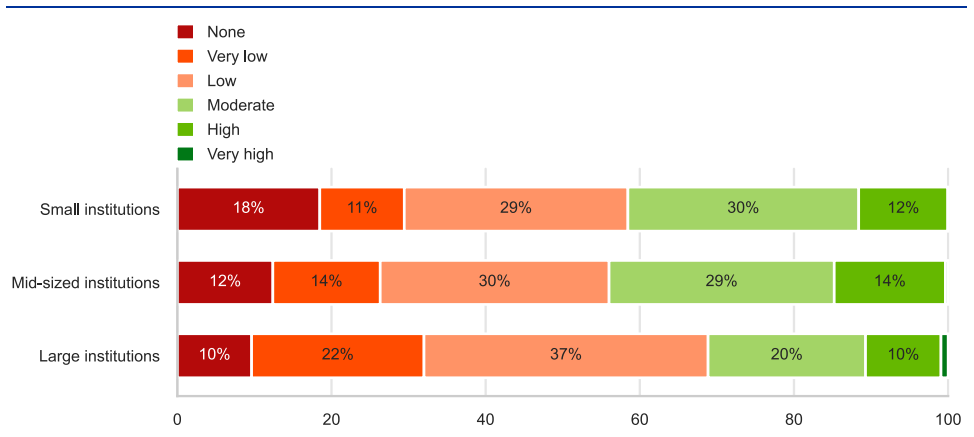
Benefits – bank-internal twelve-month PD – decomposition by type of respondent



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 A7.6**

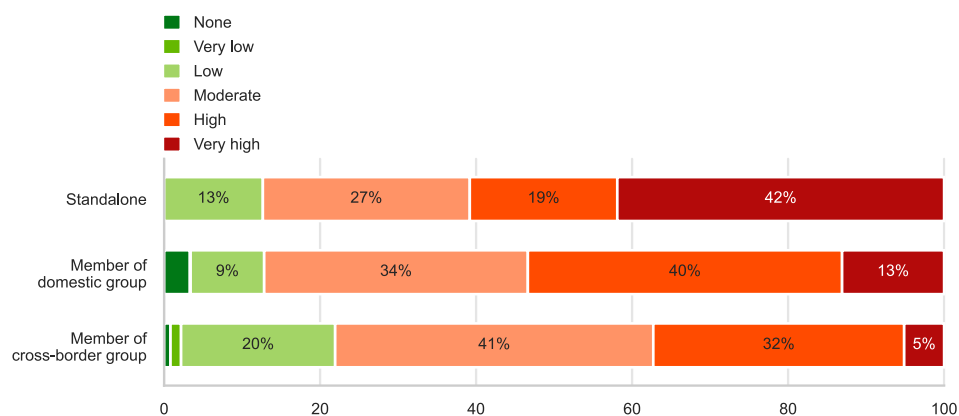
Benefits – bank-internal twelve-month PD – decomposition by size of respondent



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 A7.7**

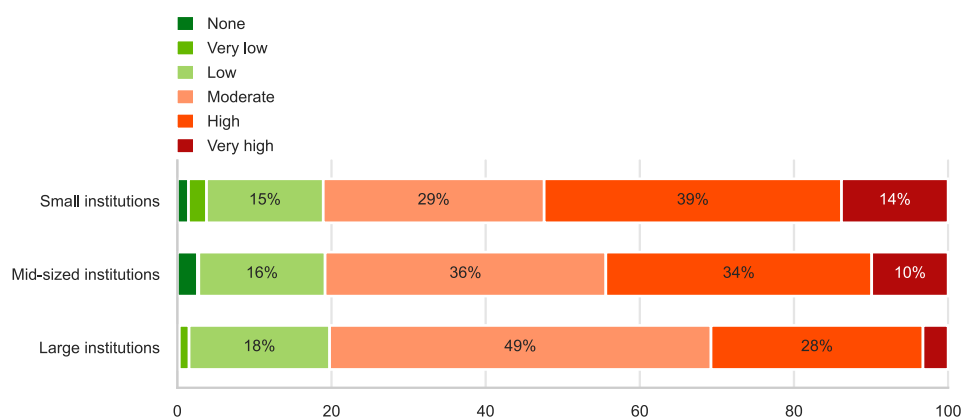
Implementation costs – IFRS 9 twelve-month PD – decomposition by type of respondent



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 A7.8**

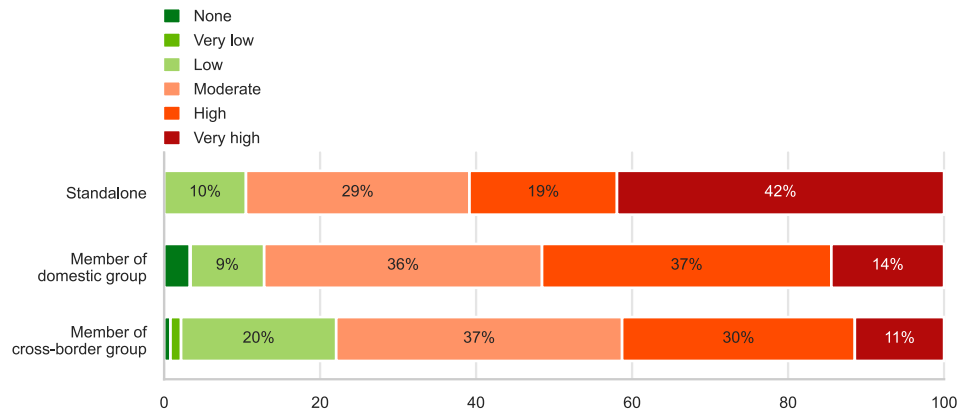
Implementation costs – IFRS 9 twelve-month PD – decomposition by size of respondent



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 A7.9**

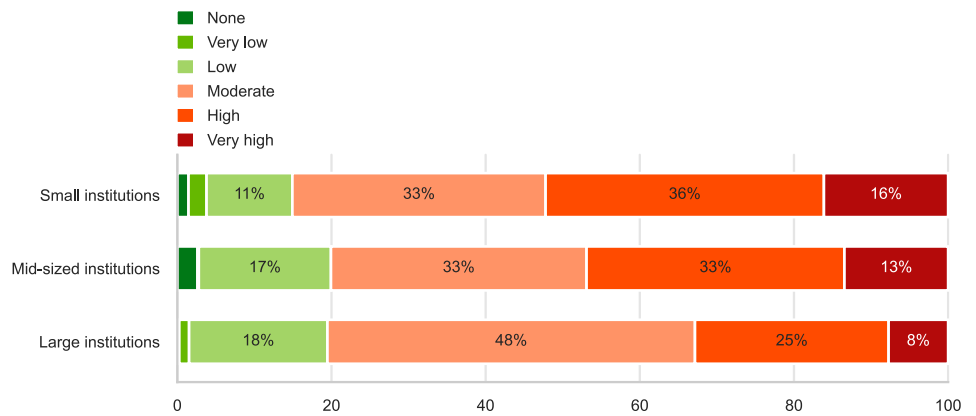
Implementation costs – IFRS 9 lifetime PD – decomposition by type of respondent



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 A7.10**

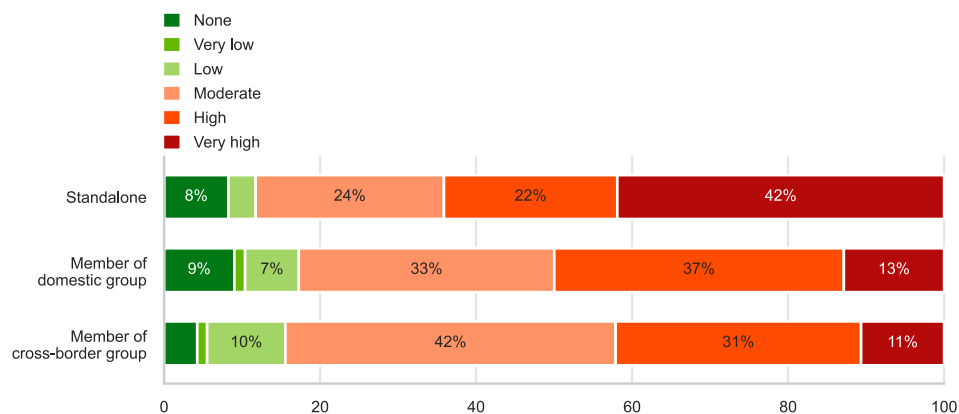
Implementation costs – IFRS 9 lifetime PD – decomposition by size of respondent



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 A7.11**

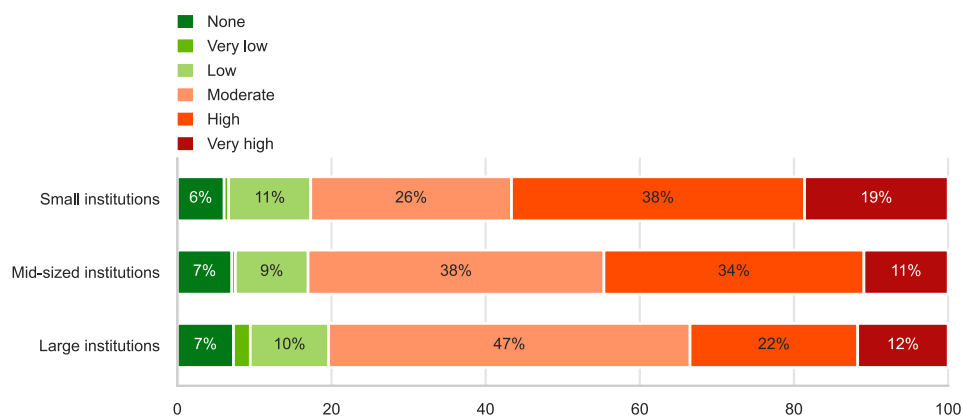
Implementation costs – bank-internal twelve-month PD – decomposition by type of respondent



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 A7.12**

Implementation costs – bank-internal twelve-month PD – decomposition by size of respondent

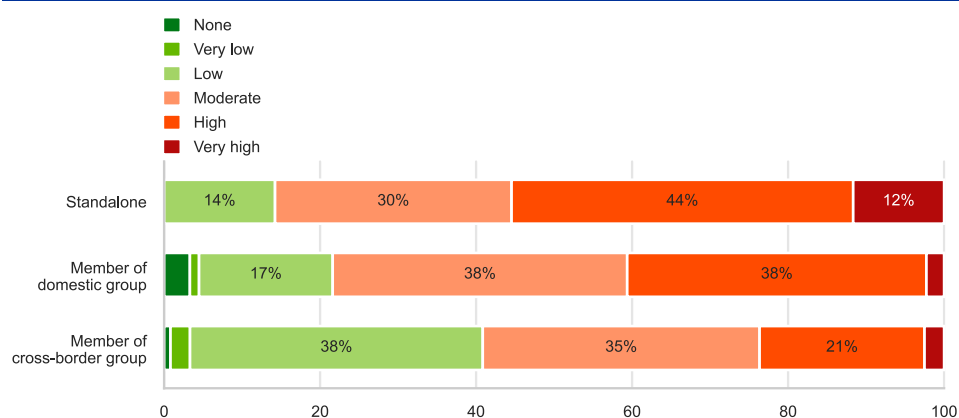


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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 A7.13**

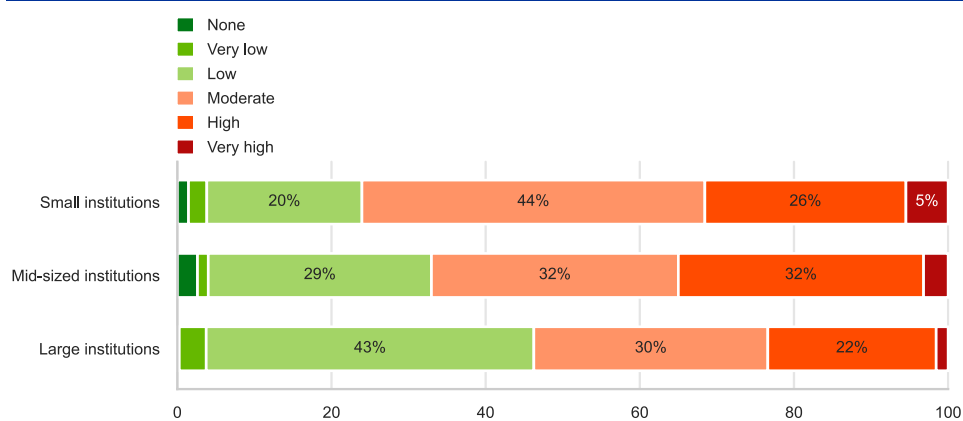
Regular costs – IFRS 9 twelve-month PD – decomposition by type of respondent



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 A7.14**

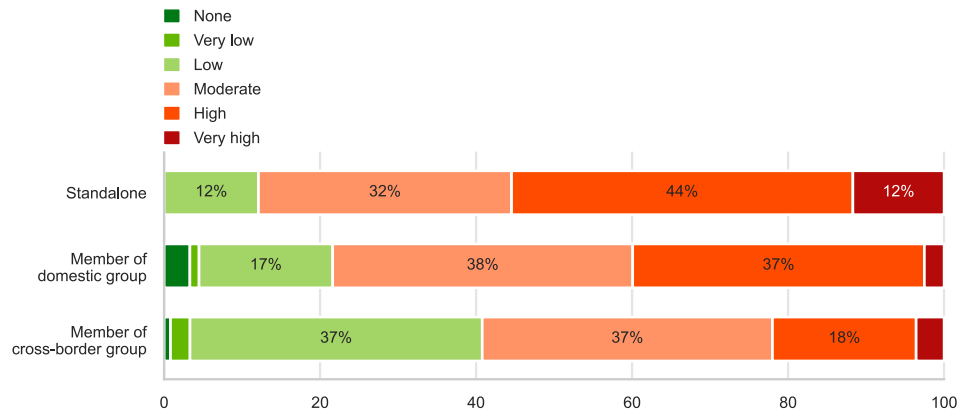
Regular costs – IFRS 9 twelve-month PD – decomposition by size of respondent



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 A7.15**

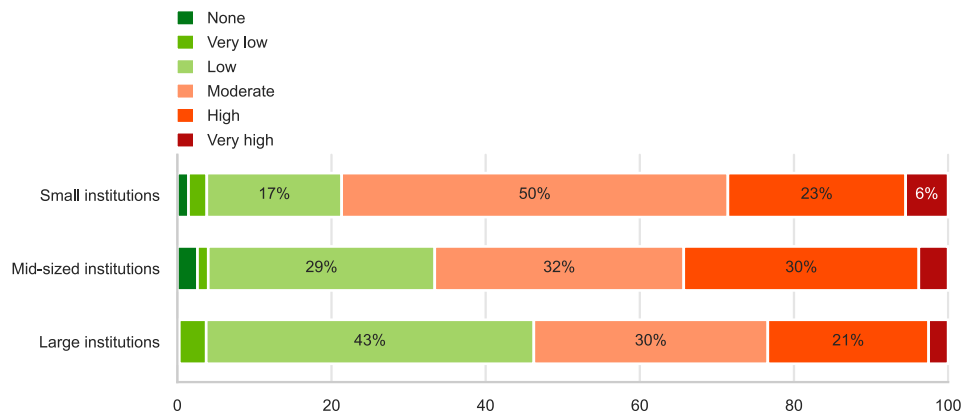
Regular costs – IFRS 9 lifetime PD – decomposition by type of respondent



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 A7.16**

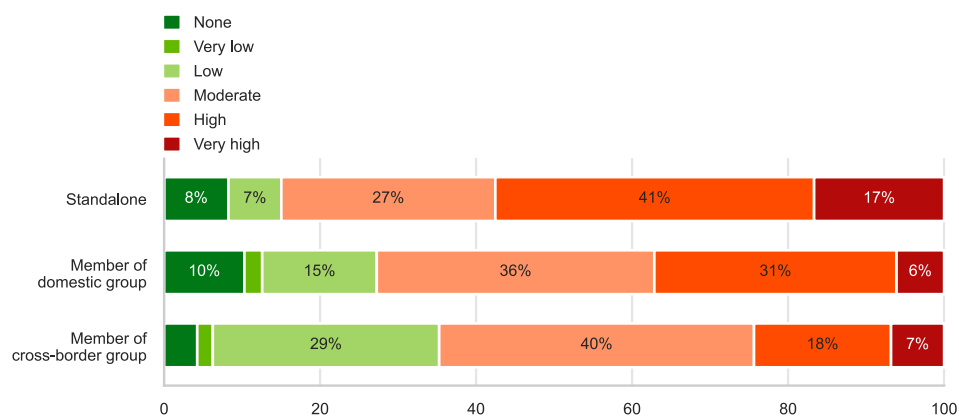
Regular costs – IFRS 9 lifetime PD – decomposition by size of respondent



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 A7.17**

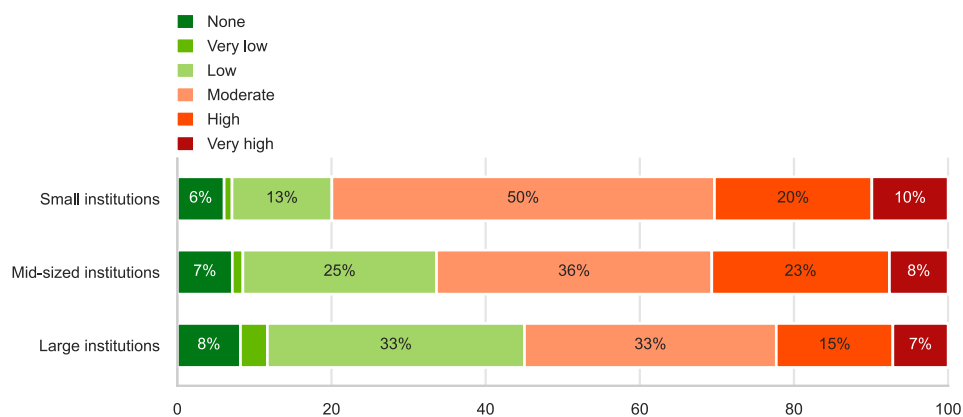
Regular costs – bank-internal twelve-month PD – decomposition by type of respondent



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 A7.18**

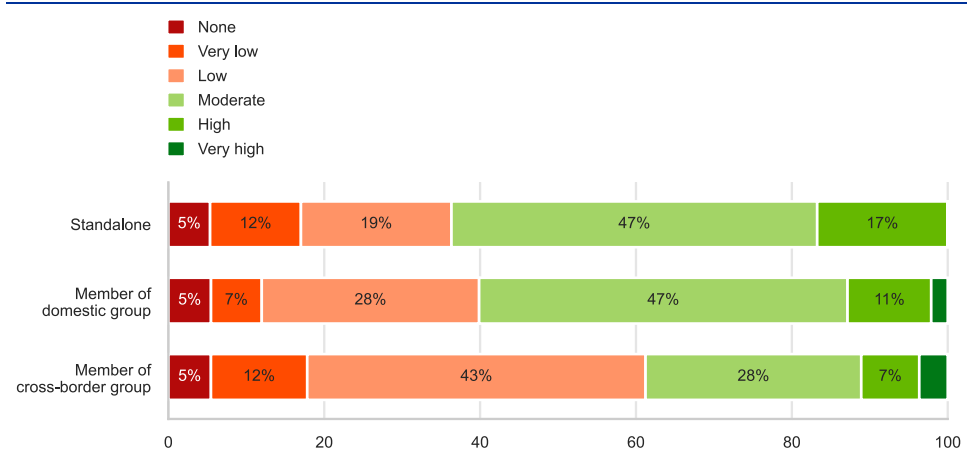
Regular costs – bank-internal twelve-month PD – decomposition by size of respondent



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 A7.19**

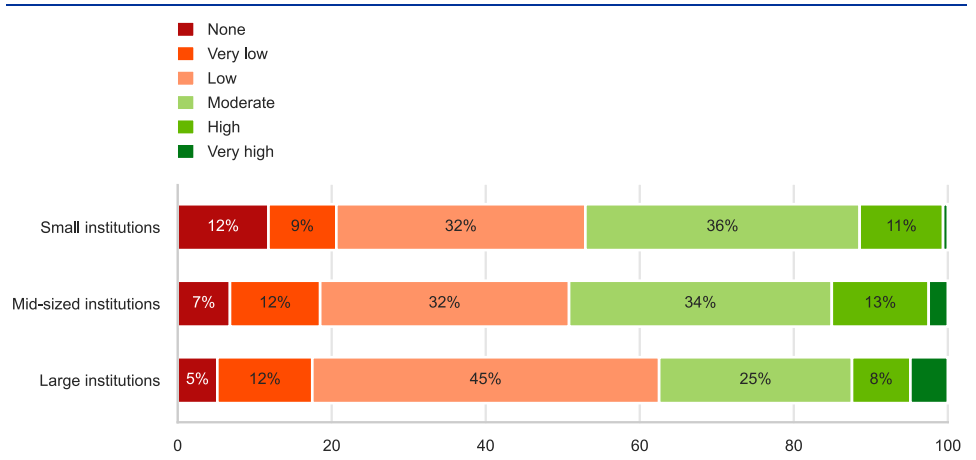
Benefits of flexibility in reporting the PD information – decomposition by type of respondent



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 A7.20**

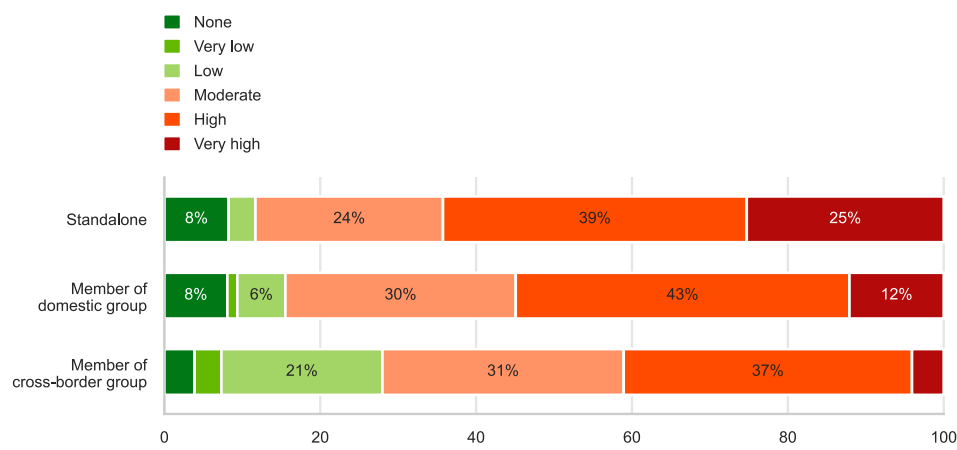
Benefits of flexibility in reporting the PD information – decomposition by size of respondent



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 A7.21**

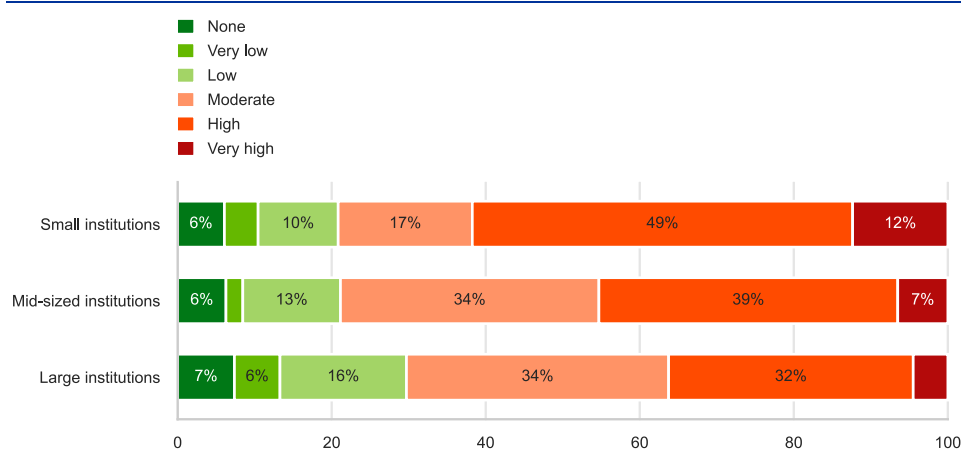
Implementation costs of flexibility in reporting the PD information – decomposition by type of respondent



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 A7.22**

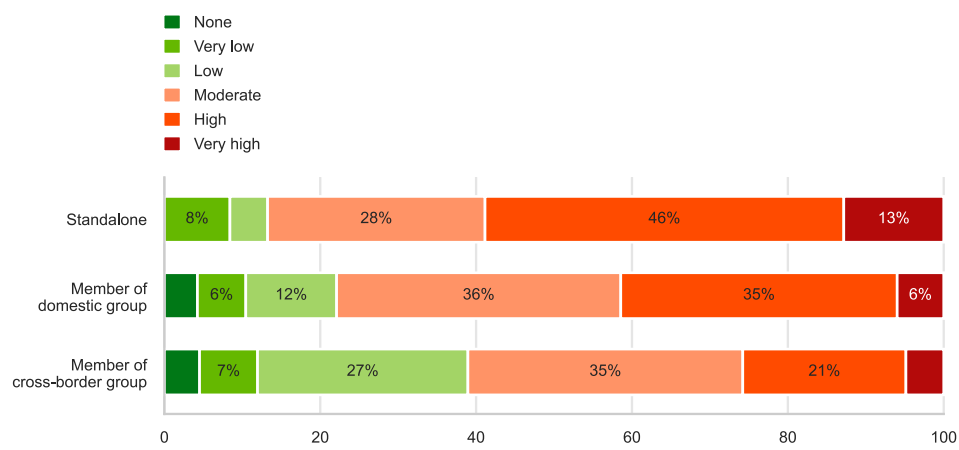
Implementation costs of flexibility in reporting the PD information – decomposition by size of respondent



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 A7.23**

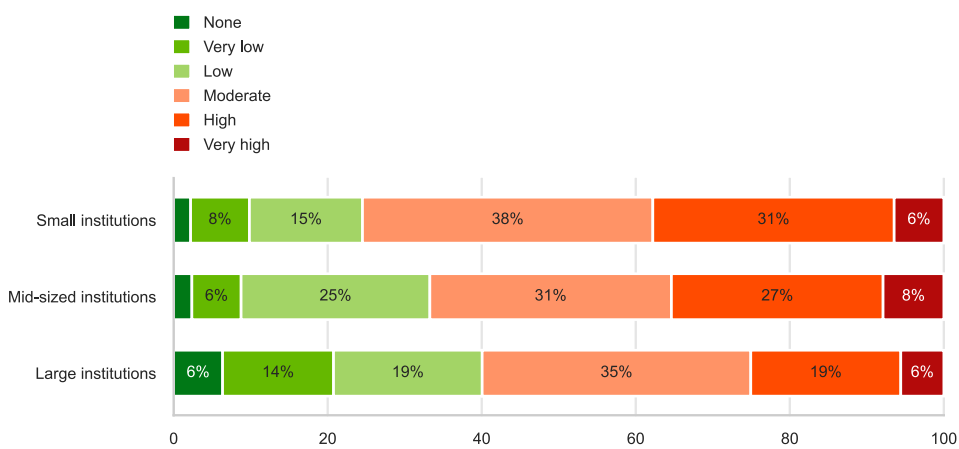
Regular costs of flexibility in reporting the PD information – decomposition by type of respondent



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 A7.24**

Regular costs of flexibility in reporting the PD information – decomposition by size of respondent

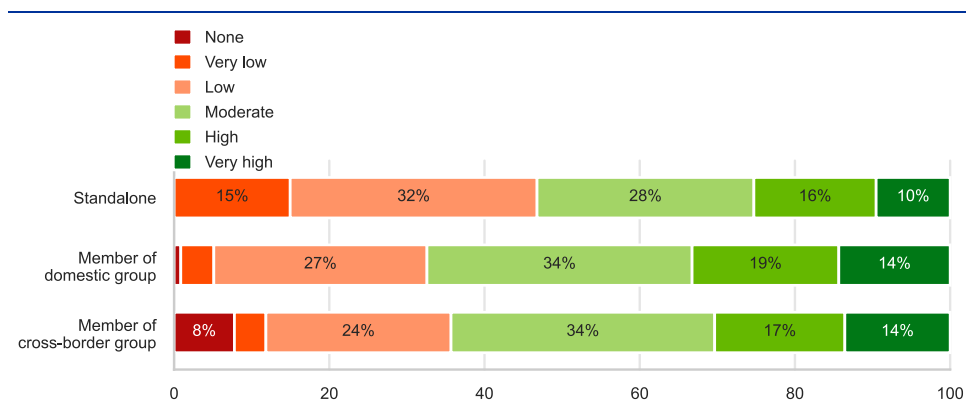


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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.

## A8 Types of data submission

**Chart A8.1**

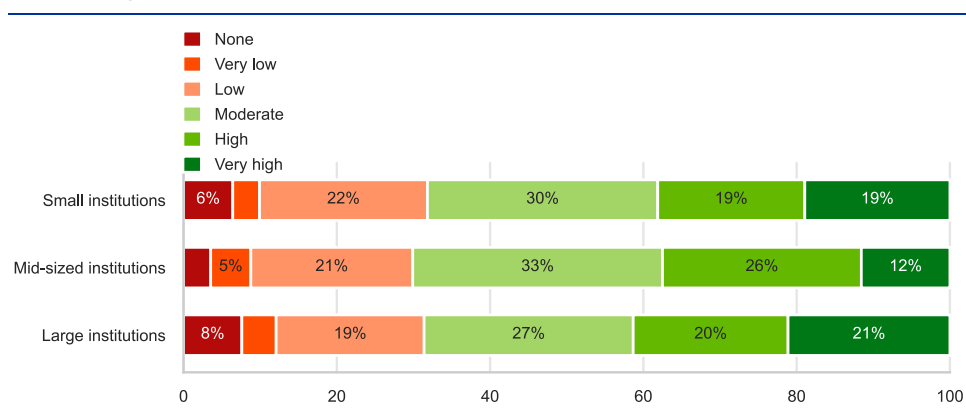
Benefits for data transmission of revisions – full replacement – decomposition by type of respondent



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 A8.2**

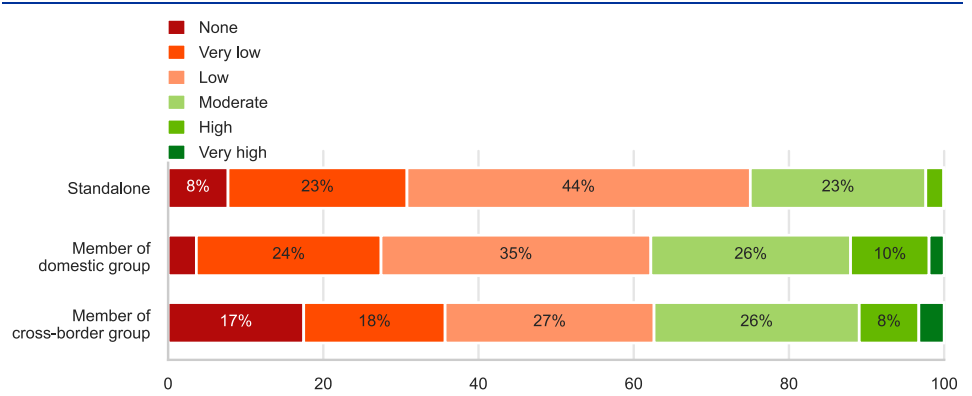
Benefits for data transmission of revisions – full replacement – decomposition by size of respondent



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 A8.3**

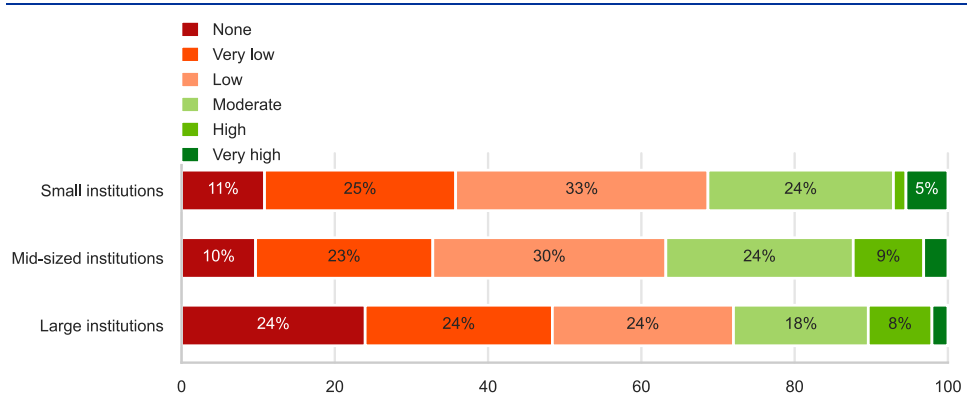
Benefits for data transmission of revisions – full dynamic – decomposition by type of respondent



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 A8.4**

Benefits for data transmission of revisions – full dynamic – decomposition by size of respondent

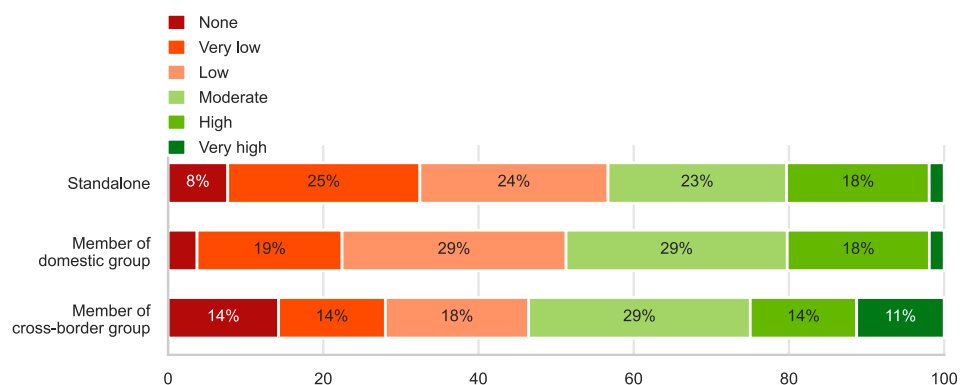


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published 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 A8.5

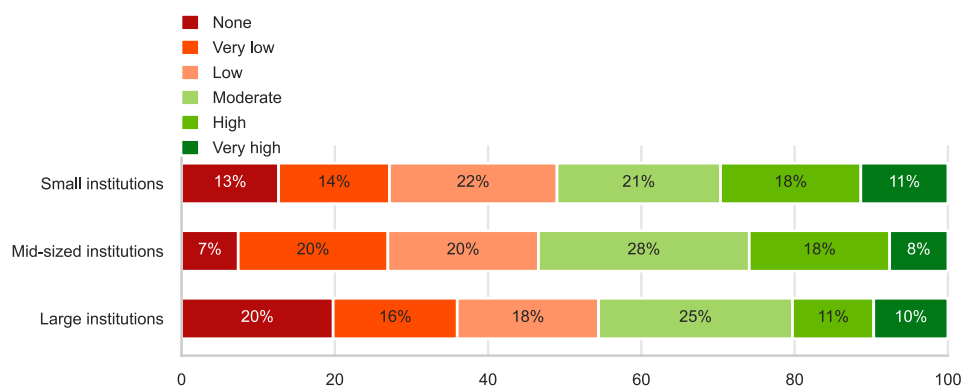
#### Benefits for data transmission of revisions – change – decomposition by type of respondent



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 A8.6

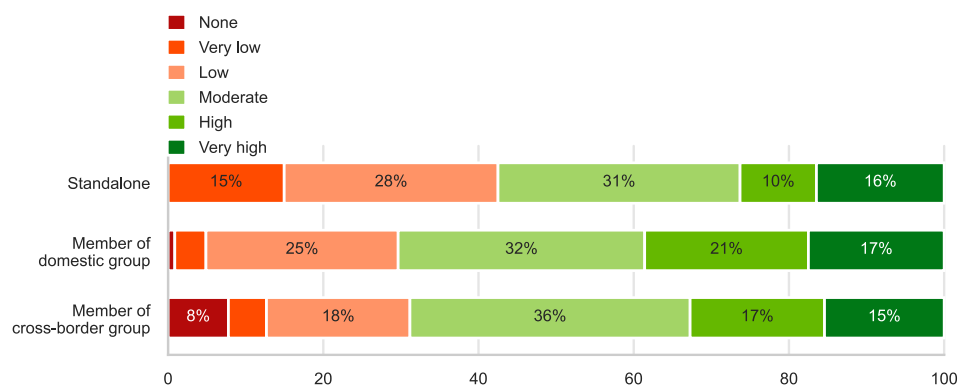
#### Benefits for data transmission of revisions – change – decomposition by size of respondent



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 A8.7

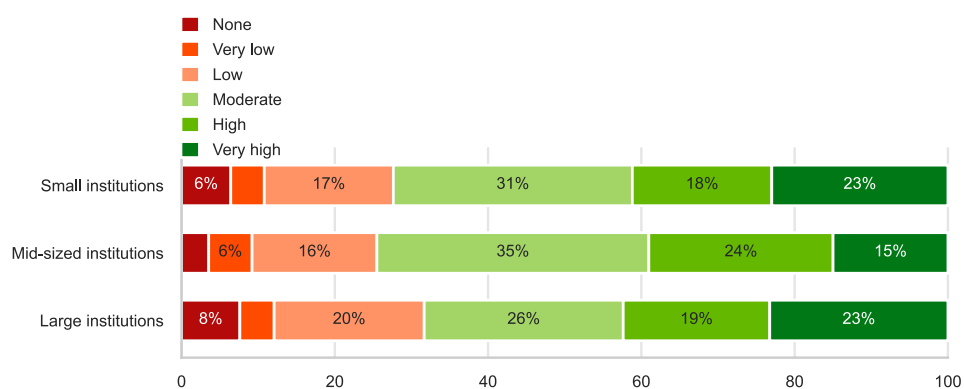
Benefits for data transmission of new periods – full replacement – decomposition by type of respondent



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 A8.8

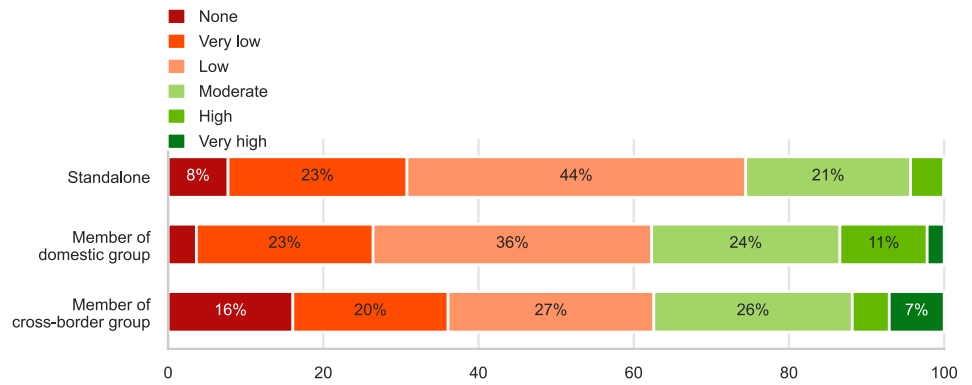
Benefits for data transmission of new periods – full replacement – decomposition by size of respondent



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 A8.9**

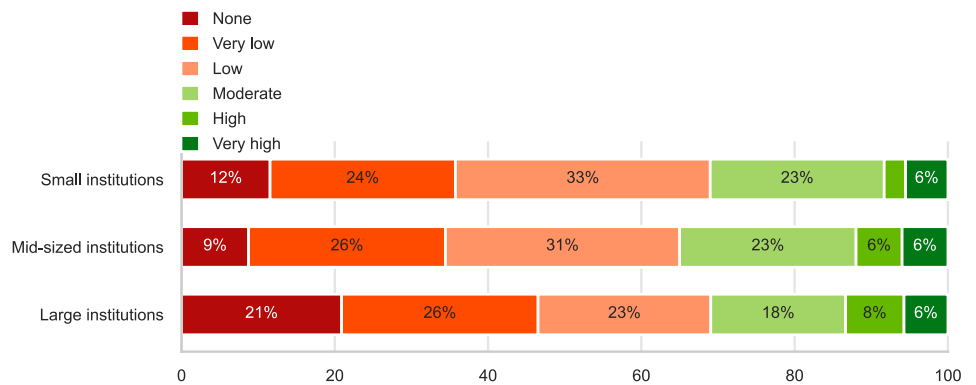
Benefits for data transmission of new periods – full dynamic – decomposition by type of respondent



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 A8.10**

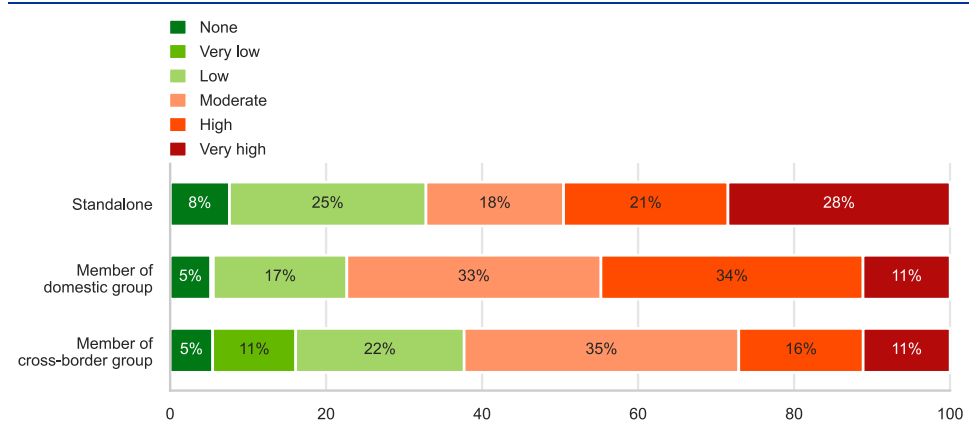
Benefits for data transmission of new periods – full dynamic – decomposition by size of respondent



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 A8.11**

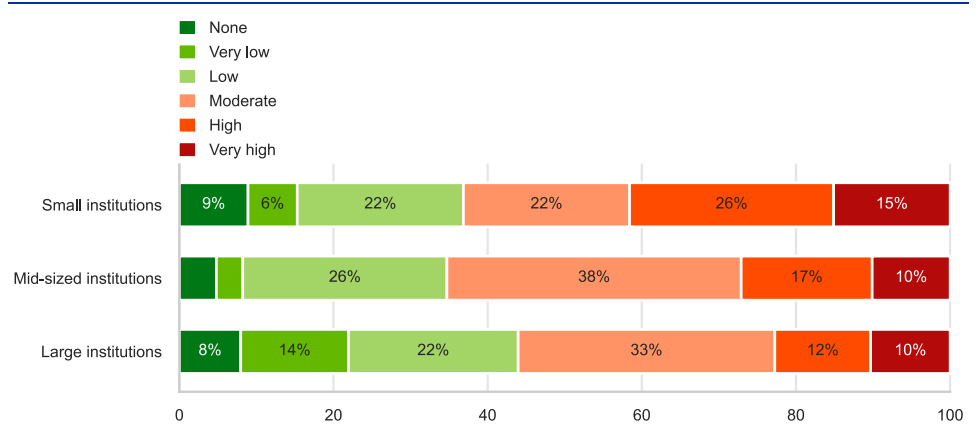
Implementation costs for data transmission of revisions – full replacement – decomposition by type of respondent



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 A8.12**

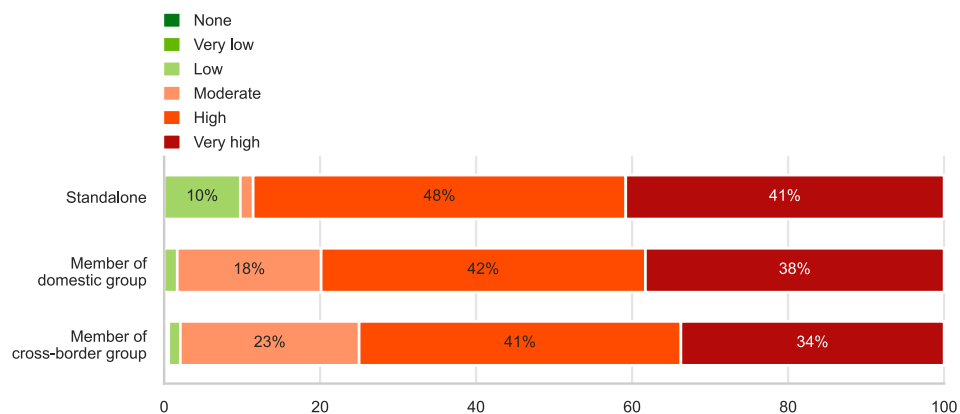
Implementation costs for data transmission of revisions – full replacement – decomposition by size of respondent



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 A8.13**

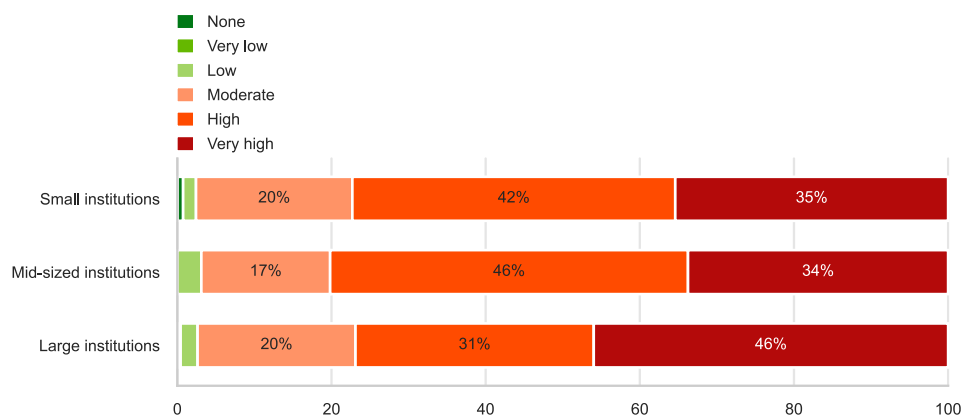
Implementation costs for data transmission of revisions – full dynamic – decomposition by type of respondent



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 A8.14**

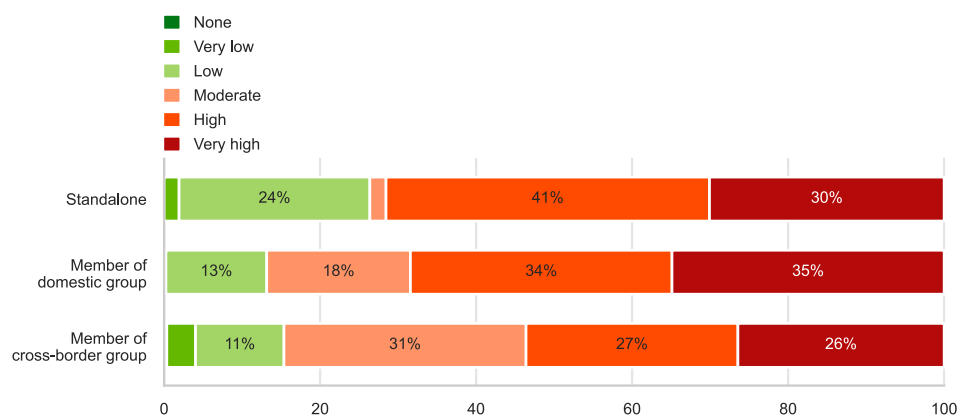
Implementation costs for data transmission of revisions – full dynamic – decomposition by size of respondent



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 A8.15**

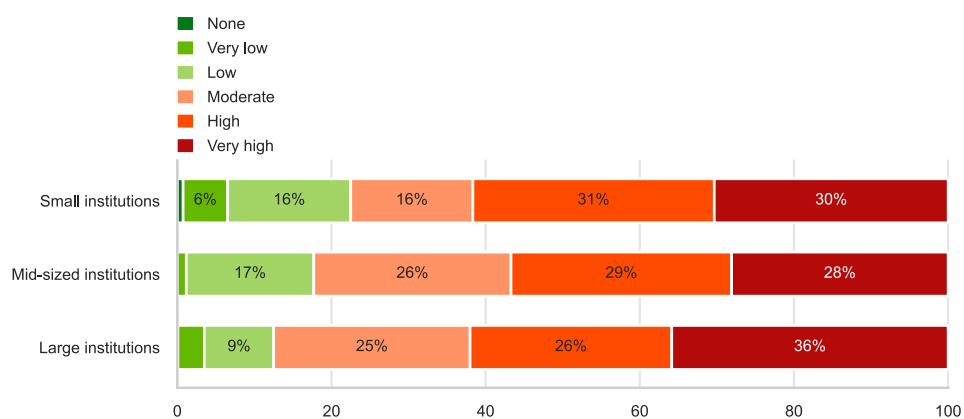
Implementation costs for data transmission of revisions – change – decomposition by type of respondent



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 A8.16**

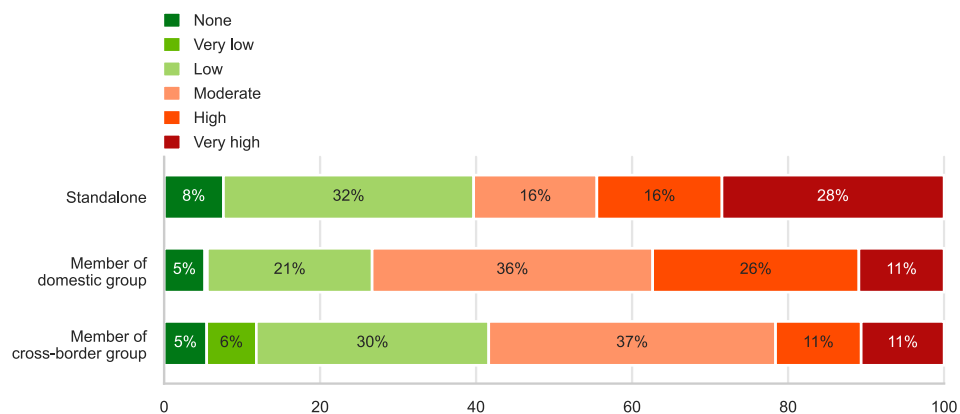
Implementation costs for data transmission of revisions – change – decomposition by size of respondent



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 A8.17**

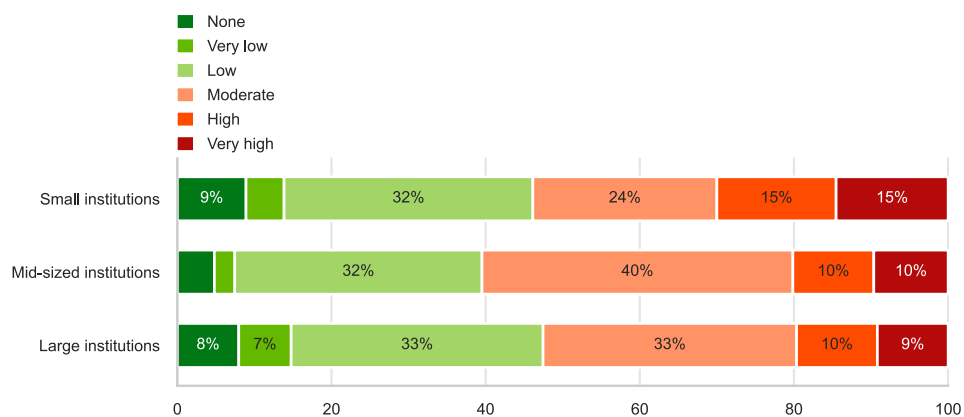
Implementation costs for data transmission of new periods – full replacement – decomposition by type of respondent



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 A8.18**

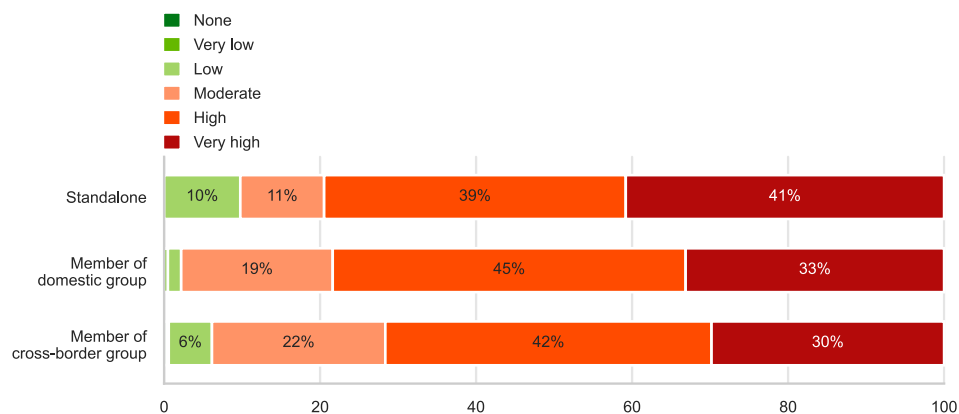
Implementation costs for data transmission of new periods – full replacement – decomposition by size of respondent



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 A8.19**

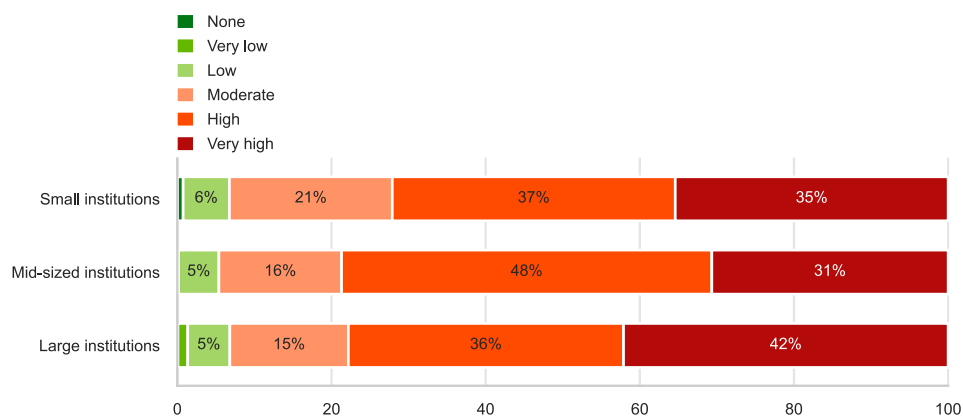
Implementation costs for data transmission of new periods – full dynamic – decomposition by type of respondent



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 A8.20**

Implementation costs for data transmission of new periods – full dynamic – decomposition by size of respondent

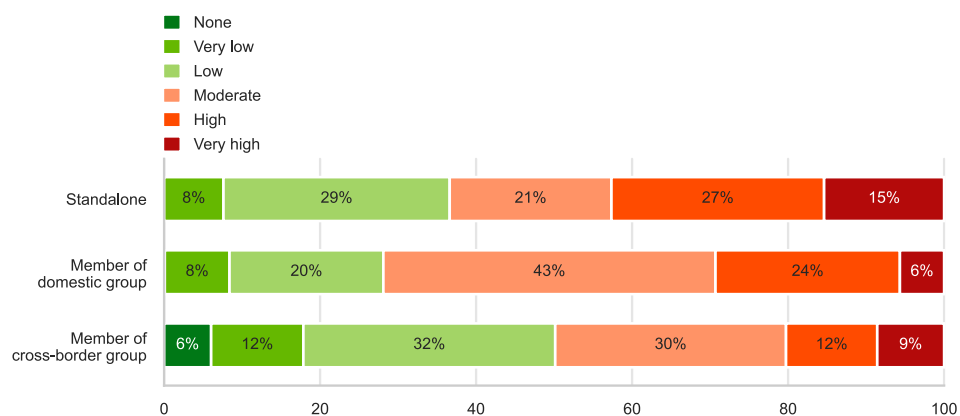


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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 A8.21**

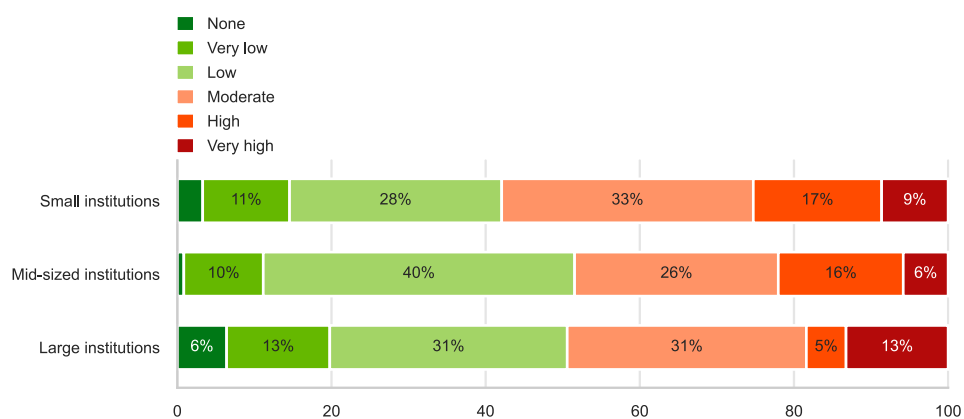
Regular costs for data transmission of revisions – full replacement – decomposition by type of respondent



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 A8.22**

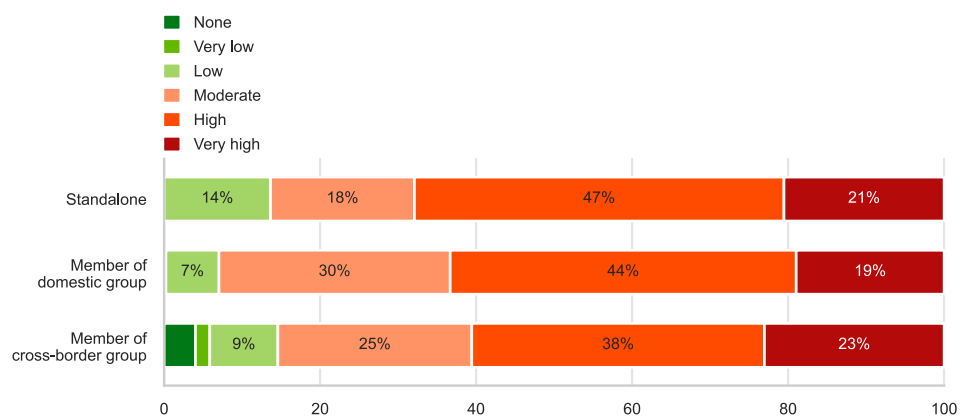
Regular costs for data transmission of revisions – full replacement – decomposition by size of respondent



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 A8.23**

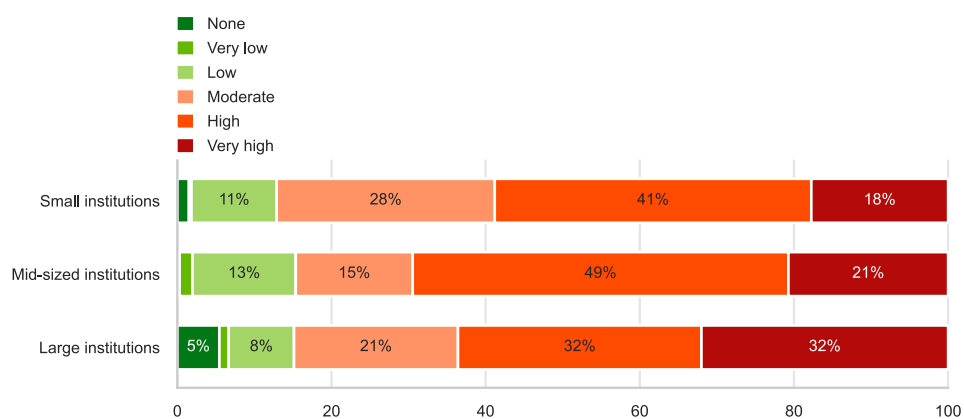
Regular costs for data transmission of revisions – full dynamic – decomposition by type of respondent



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 A8.24**

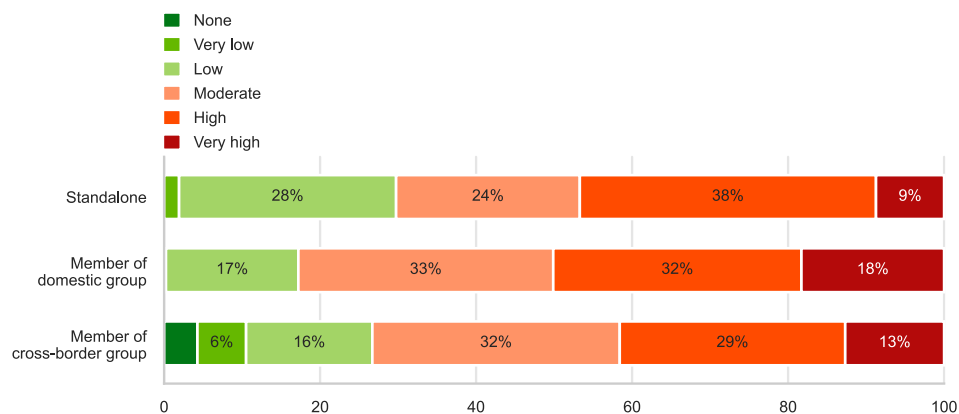
Regular costs for data transmission of revisions – full dynamic – decomposition by size of respondent



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 A8.25**

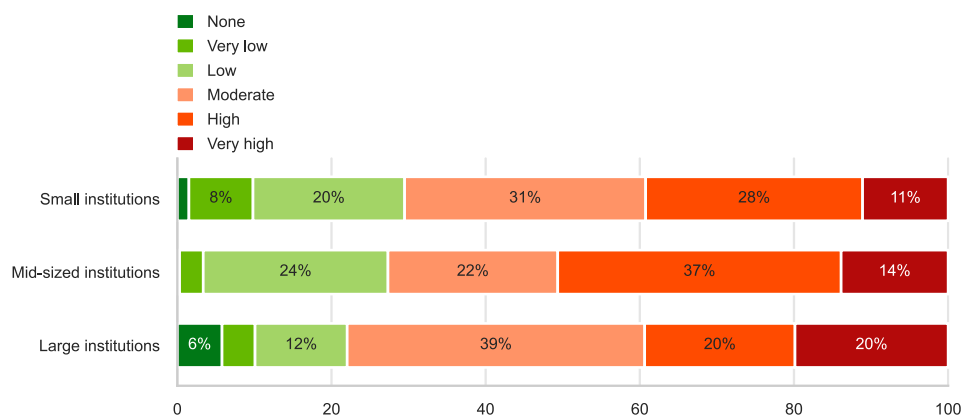
Regular costs for data transmission of revisions – change – decomposition by type of respondent



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 A8.26**

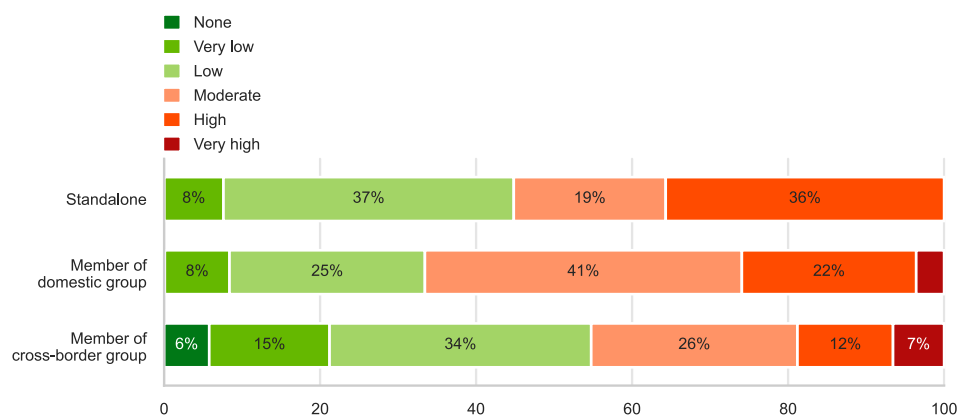
Regular costs for data transmission of revisions – change – decomposition by size of respondent



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 A8.27**

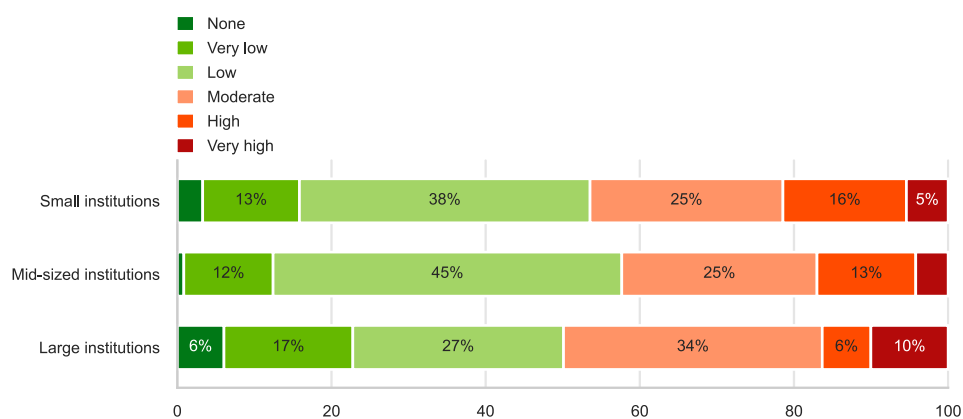
Regular costs for data transmission of new periods – full replacement – decomposition by type of respondent



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 A8.28**

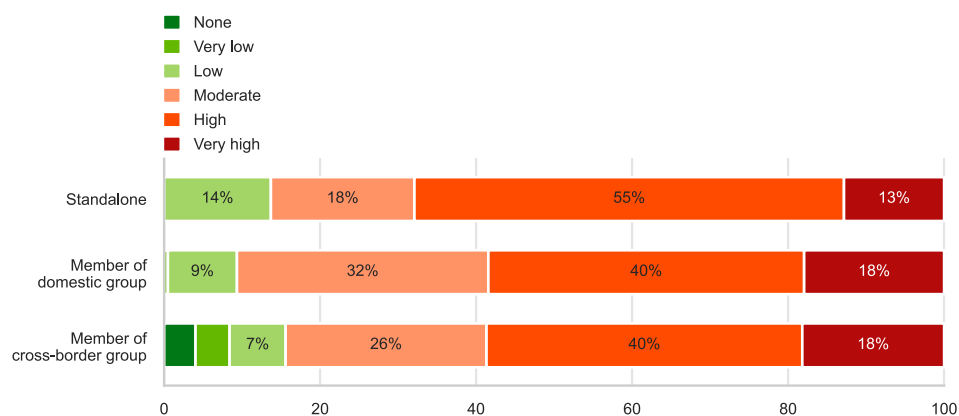
Regular costs for data transmission of new periods – full replacement – decomposition by size of respondent



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 A8.29**

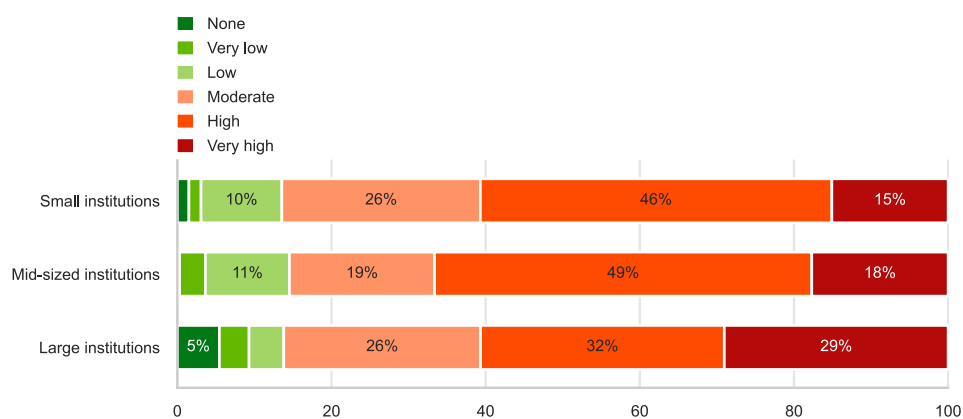
Regular costs for data transmission of new periods – full dynamic – decomposition by type of respondent



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 A8.30**

Regular costs for data transmission of new periods – full dynamic – decomposition by size of respondent

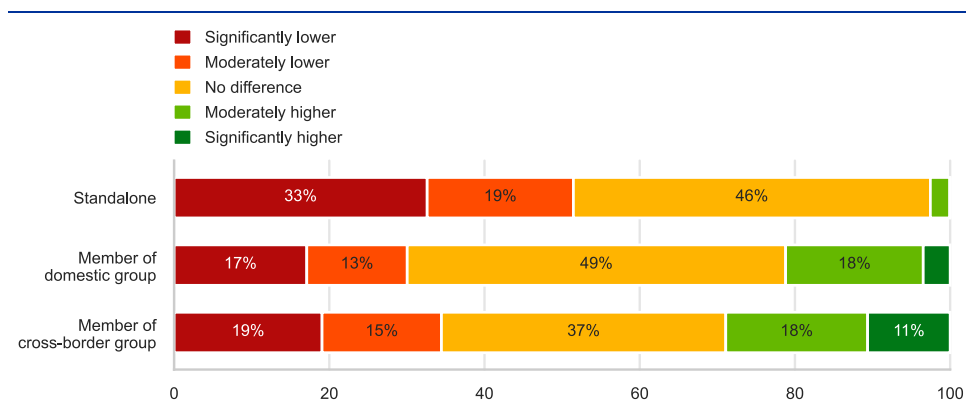


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report “Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements” published 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.

## A9 Reporting schedules

**Chart A9.1**

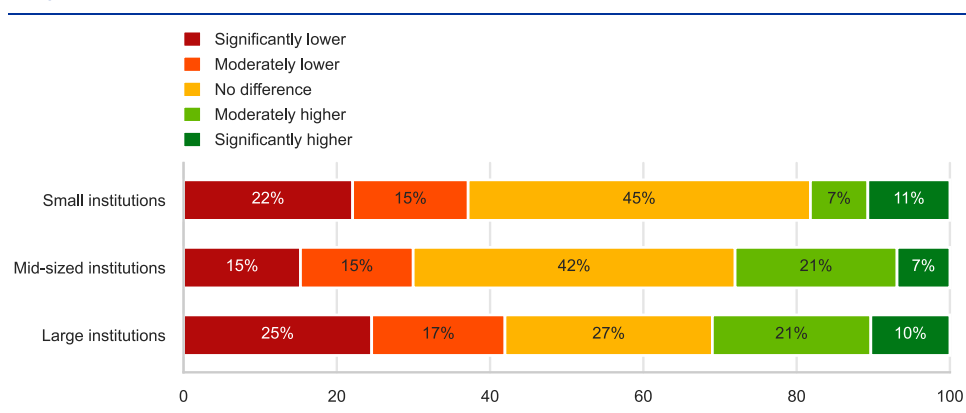
Benefits of Scenario 2 compared with Scenario 1 – decomposition by type of respondent



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 A9.2**

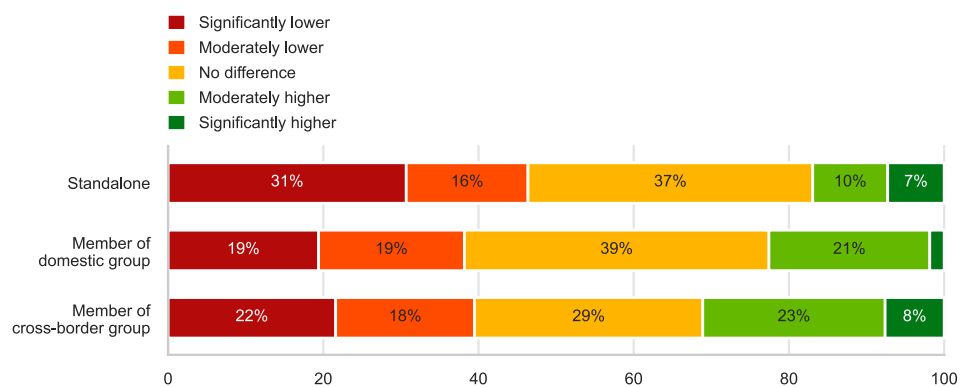
Benefits of Scenario 2 compared with Scenario 1 – decomposition by size of respondent



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 A9.3

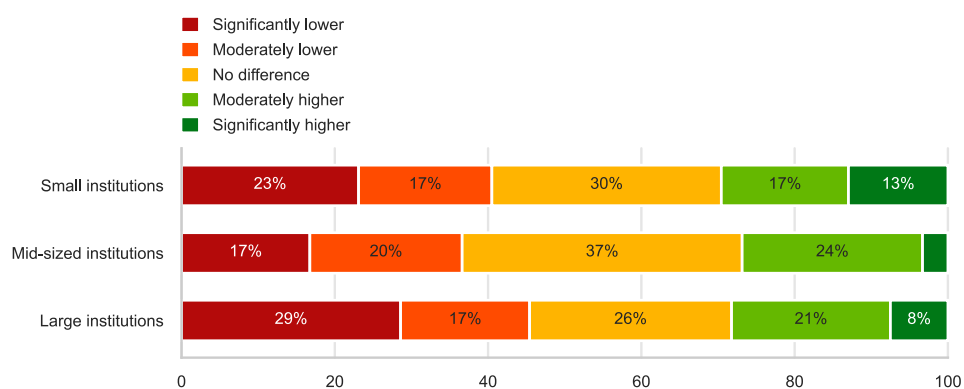
#### Benefits of Scenario 3 compared with Scenario 1 – decomposition by type of respondent



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 A9.4

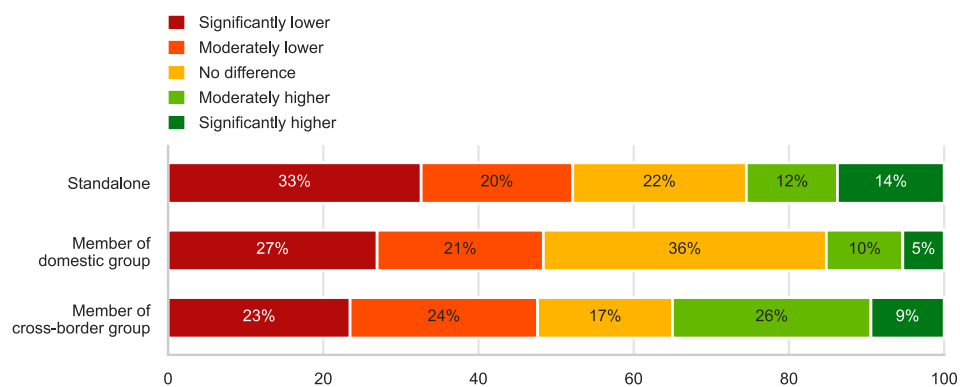
#### Benefits of Scenario 3 compared with Scenario 1 – decomposition by size of respondent



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 A9.5

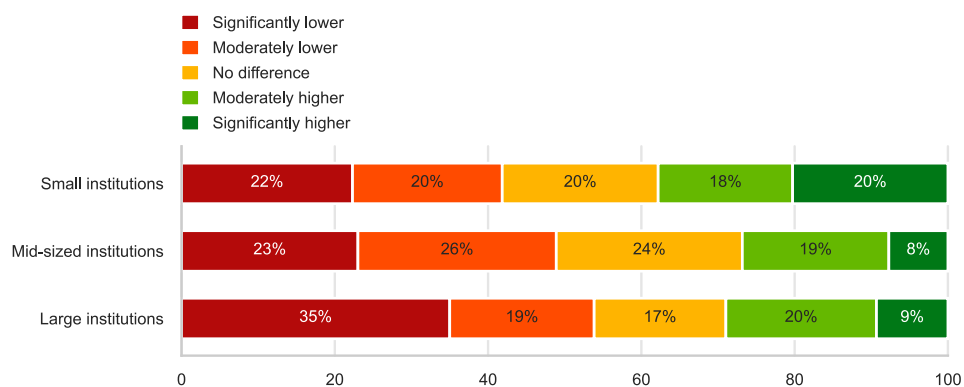
#### Benefits of Scenario 4 compared with Scenario 1 – decomposition by type of respondent



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 A9.6

#### Benefits of Scenario 4 compared with Scenario 1 – decomposition by size of respondent

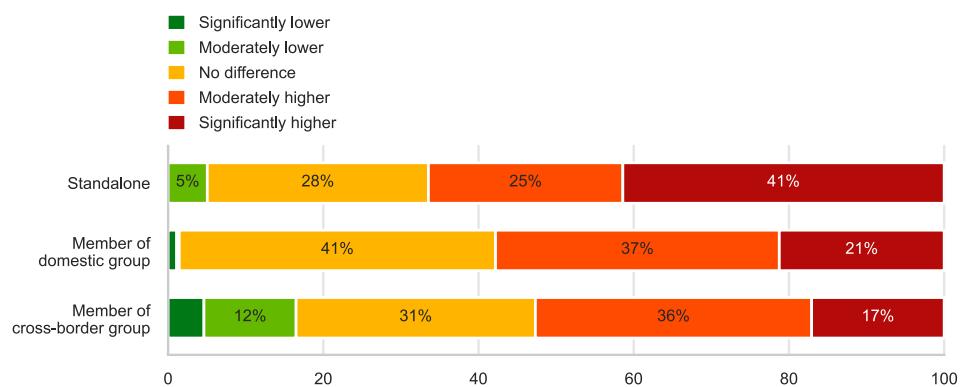


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published 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 A9.7**

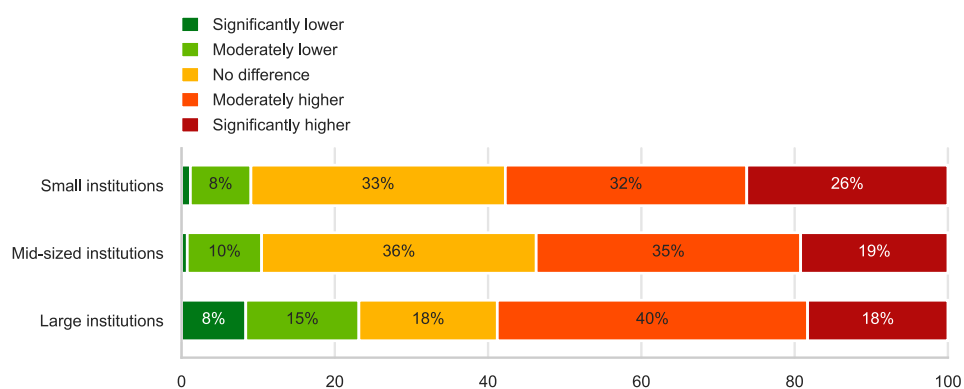
Implementation costs of Scenario 2 compared with Scenario 1 – decomposition by type of respondent



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 A9.8**

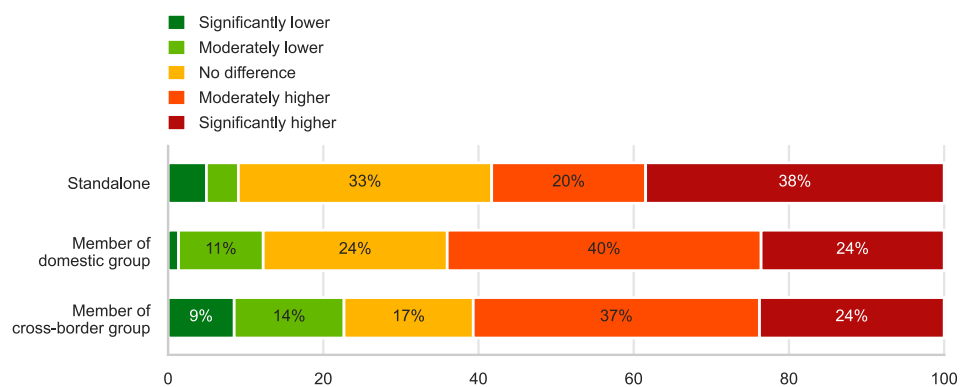
Implementation costs of Scenario 2 compared with Scenario 1 – decomposition by size of respondent



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 A9.9**

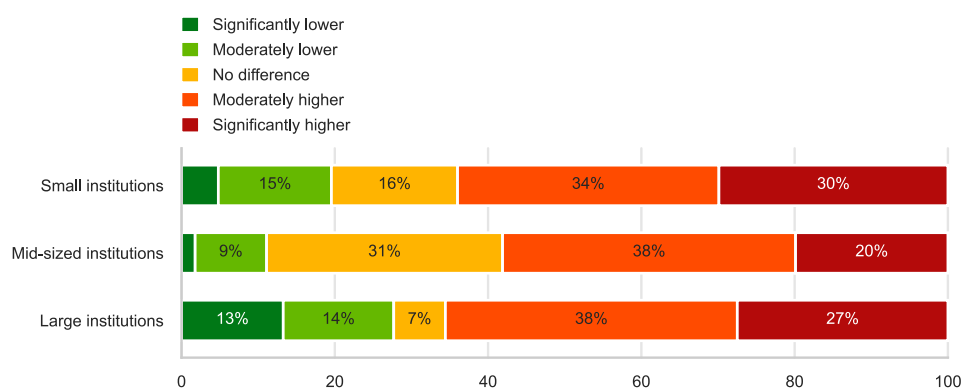
Implementation costs of Scenario 3 compared with Scenario 1 – decomposition by type of respondent



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 A9.10**

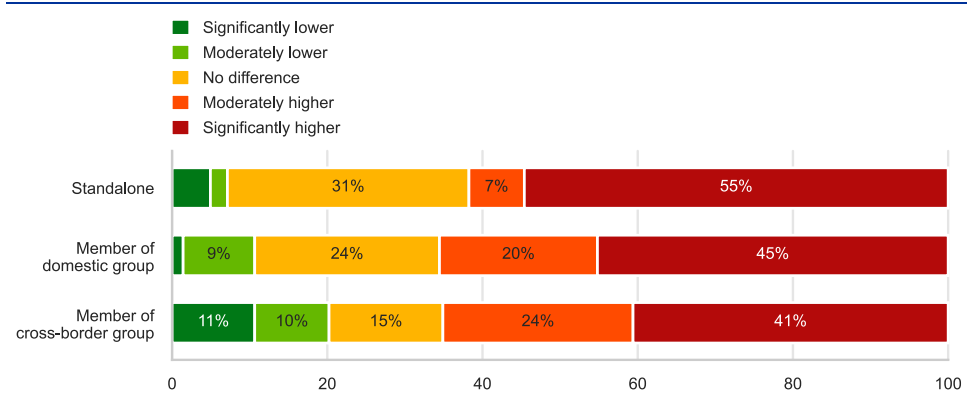
Implementation costs of Scenario 3 compared with Scenario 1 – decomposition by size of respondent



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 A9.11**

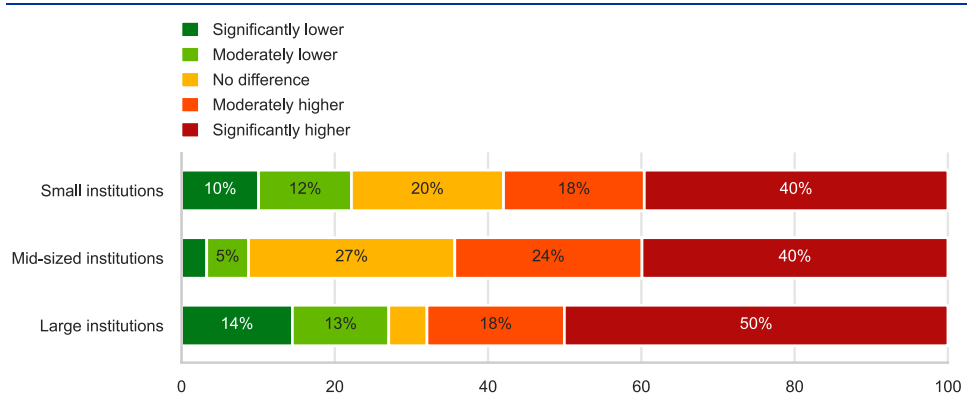
Implementation costs of Scenario 4 compared with Scenario 1 – decomposition by type of respondent



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 A9.12**

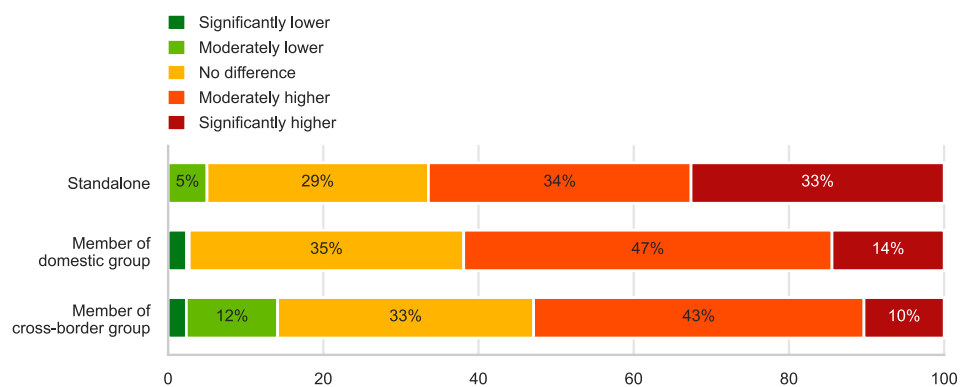
Implementation costs of Scenario 4 compared with Scenario 1 – decomposition by size of respondent



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 A9.13**

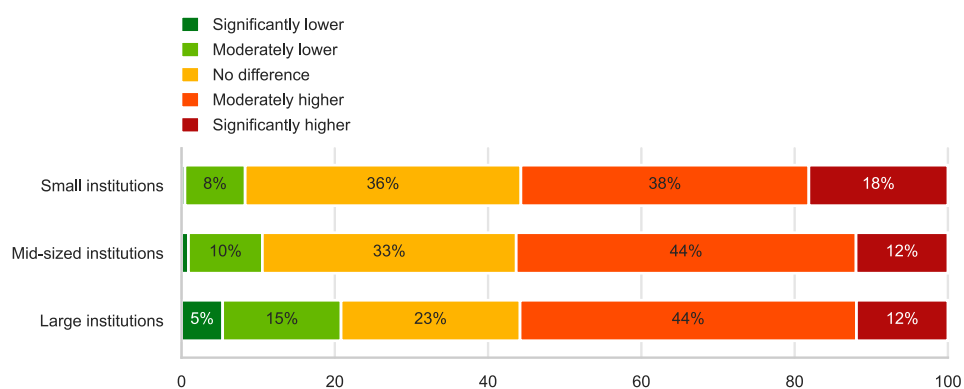
Regular costs of Scenario 2 compared with Scenario 1 – decomposition by type of respondent



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 A9.14**

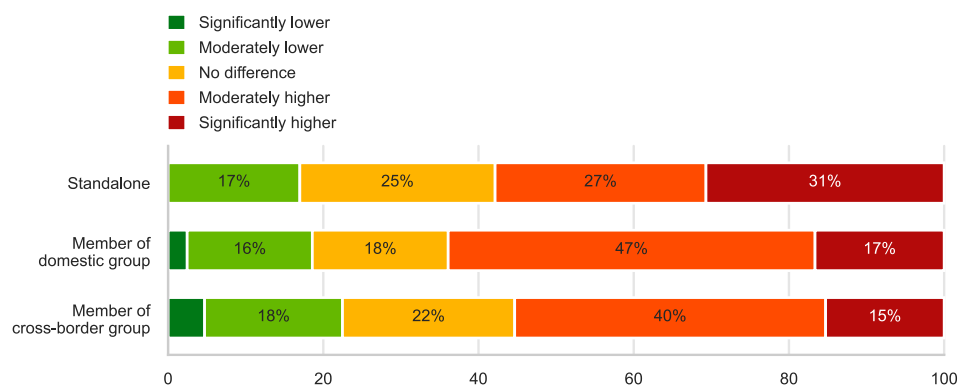
Regular costs of Scenario 2 compared with Scenario 1 – decomposition by size of respondent



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 A9.15**

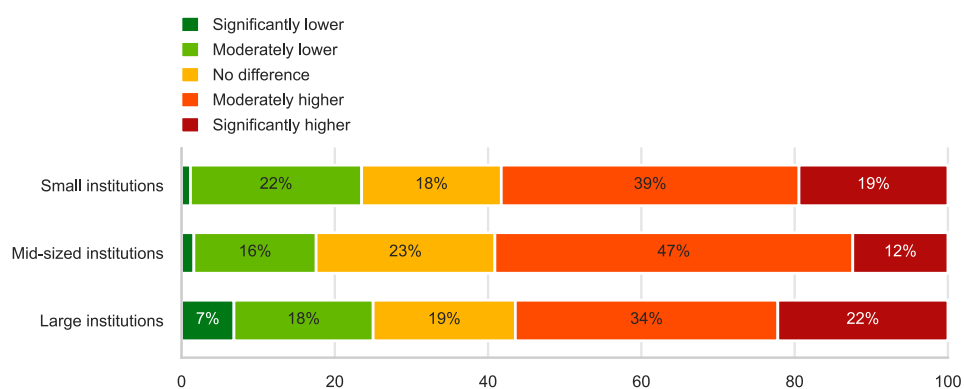
Regular costs of Scenario 3 compared with Scenario 1 – decomposition by type of respondent



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 A9.16**

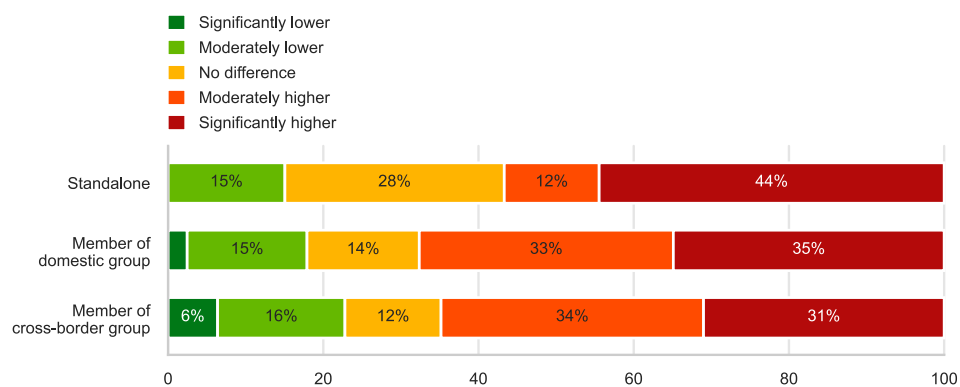
Regular costs of Scenario 3 compared with Scenario 1 – decomposition by size of respondent



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 A9.17**

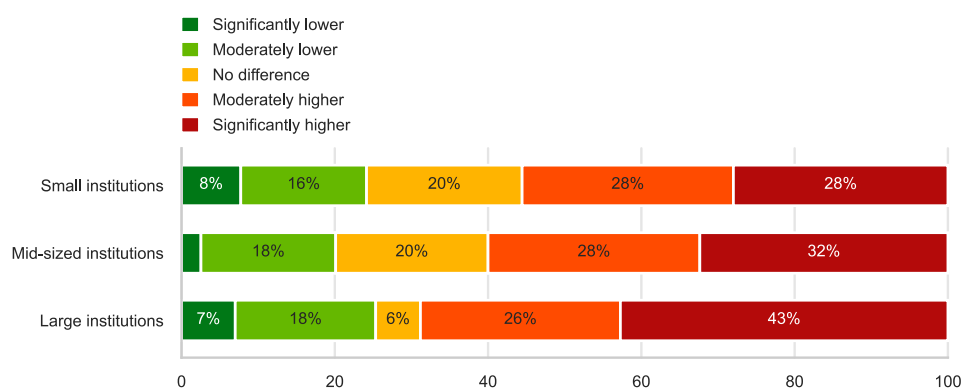
Regular costs of Scenario 4 compared with Scenario 1 – decomposition by type of respondent



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 A9.18**

Regular costs of Scenario 4 compared with Scenario 1 – decomposition by size of respondent

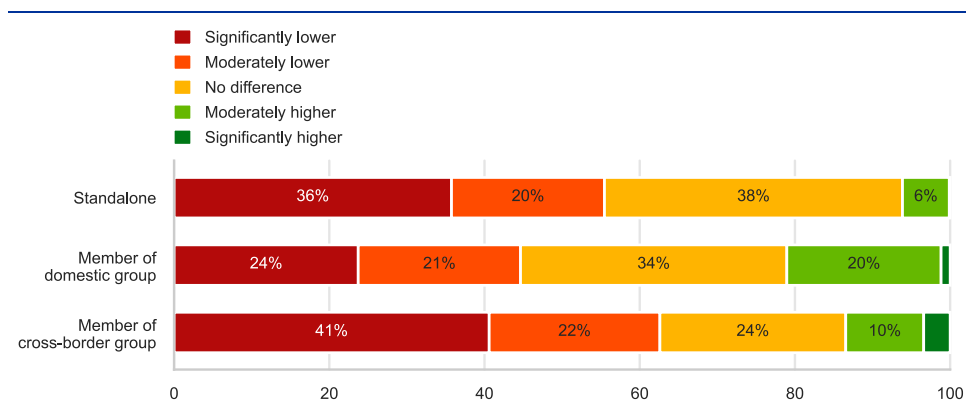


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published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

## A10 Early submission of counterparty reference data

**Chart A10.1**

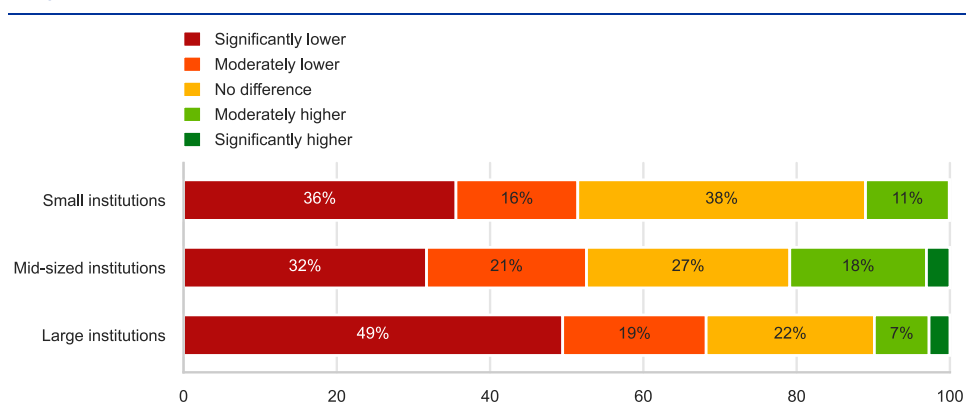
Benefits of Scenario 2 compared with Scenario 1 – decomposition by type of respondent



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 A10.2**

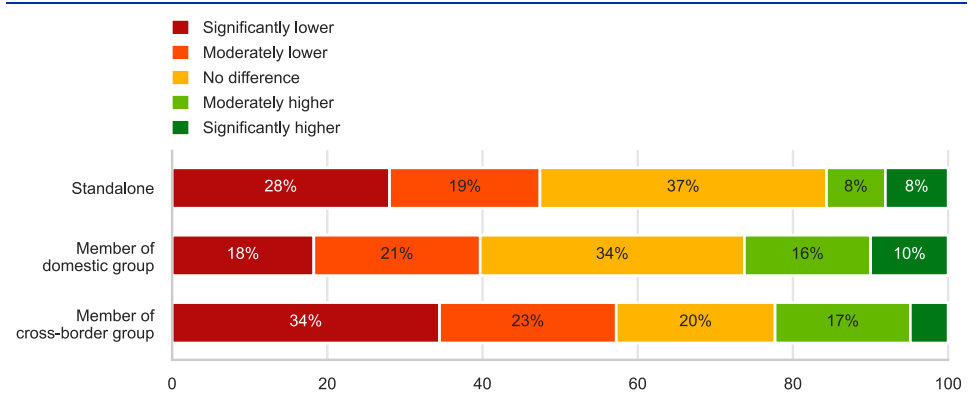
Benefits of Scenario 2 compared with Scenario 1 – decomposition by size of respondent



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 A10.3

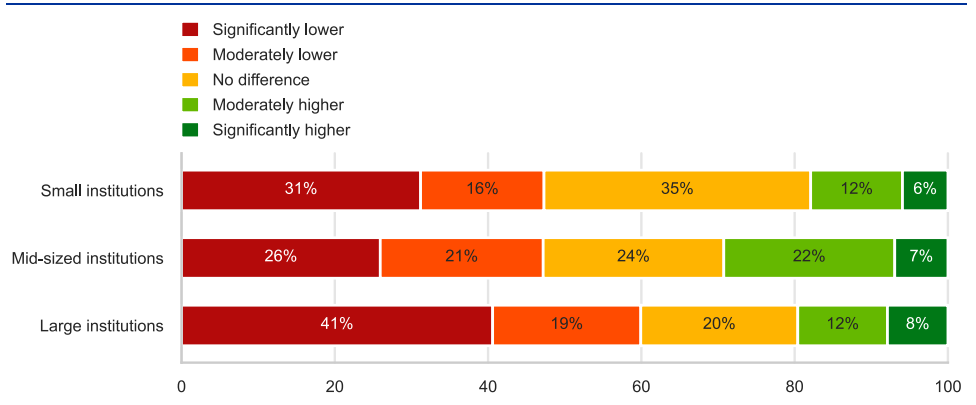
#### Benefits of Scenario 3 compared with Scenario 1 – decomposition by type of respondent



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 A10.4

#### Benefits of Scenario 3 compared with Scenario 1 – decomposition by size of respondent

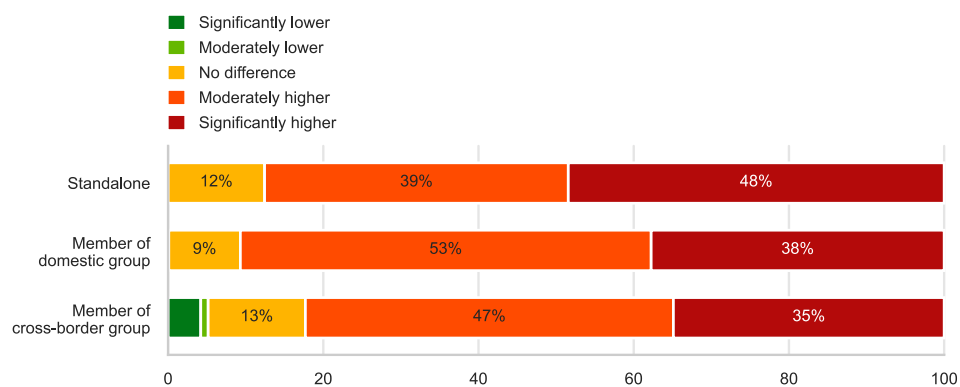


Notes: The percentages are calculated as the simple average of the corresponding frequencies across euro area countries. See Annex B of the report "Complementary cost-benefit assessment of the Integrated Reporting Framework – Extension of the IReF Regulation to cover country-specific requirements" published 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 A10.5

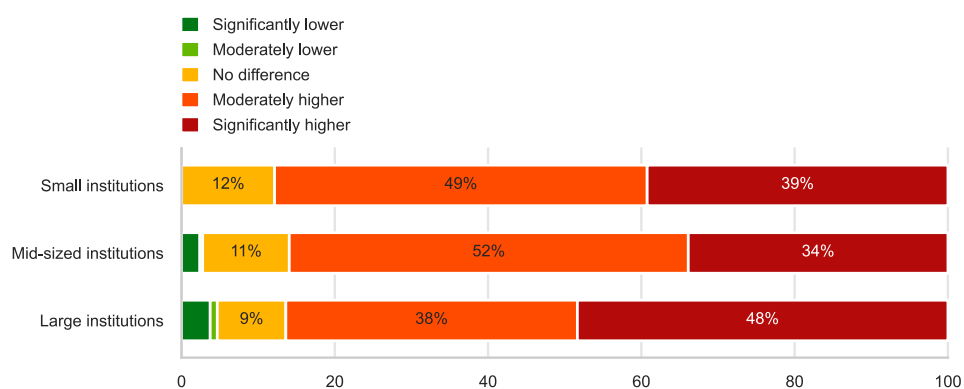
#### Implementation costs of Scenario 2 compared with Scenario 1 – decomposition by type of respondent



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 A10.6

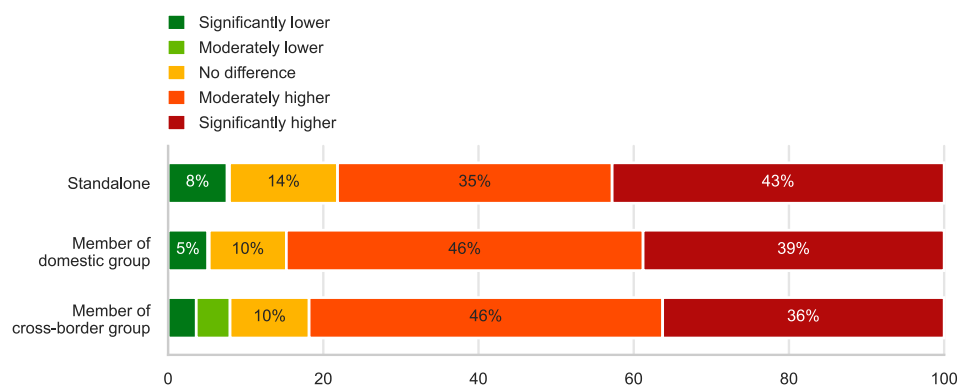
#### Implementation costs of Scenario 2 compared with Scenario 1 – decomposition by size of respondent



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 A10.7**

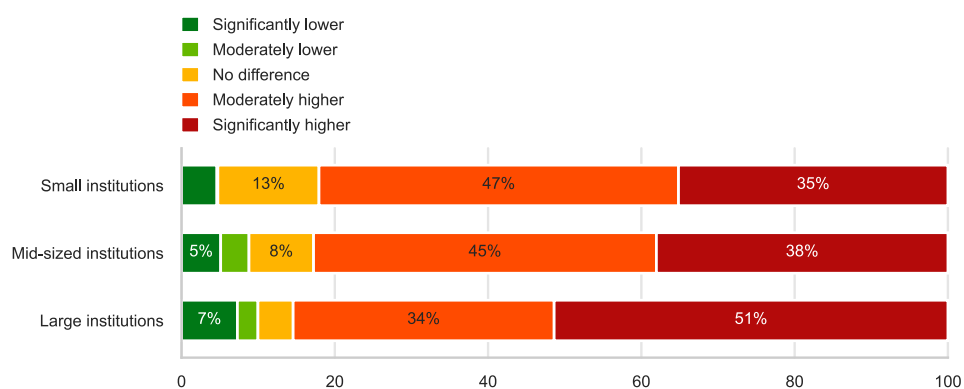
Implementation costs of Scenario 3 compared with Scenario 1 – decomposition by type of respondent



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 A10.8**

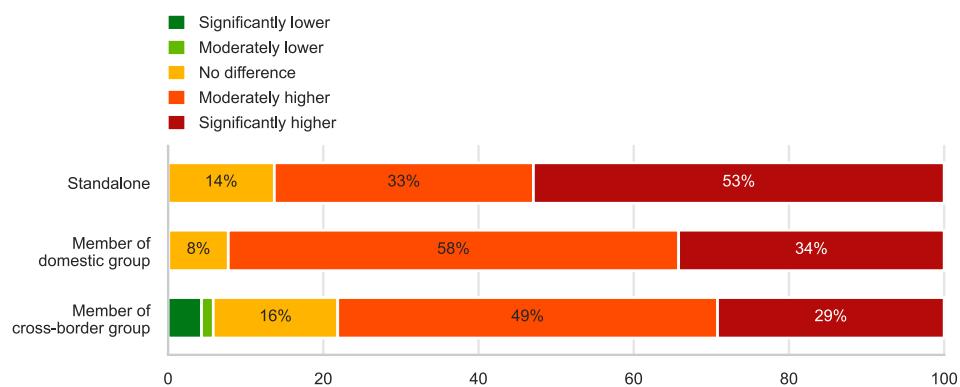
Implementation costs of Scenario 3 compared with Scenario 1 – decomposition by size of respondent



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 A10.9**

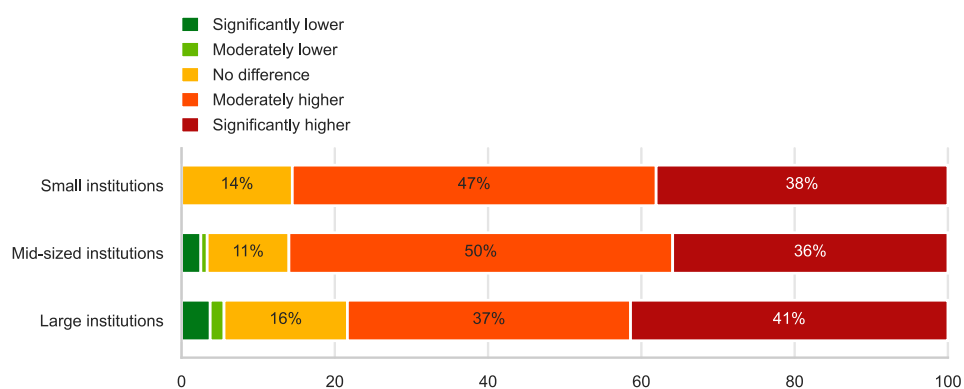
Regular costs of Scenario 2 compared with Scenario 1 – decomposition by type of respondent



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 A10.10**

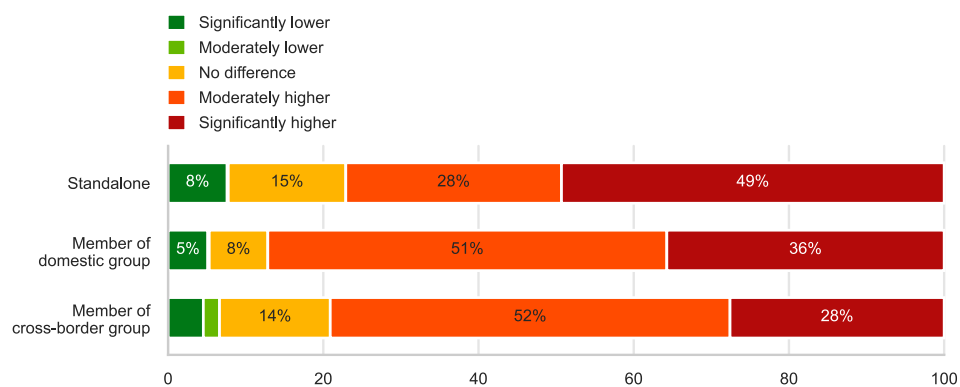
Regular costs of Scenario 2 compared with Scenario 1 – decomposition by size of respondent



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 A10.11**

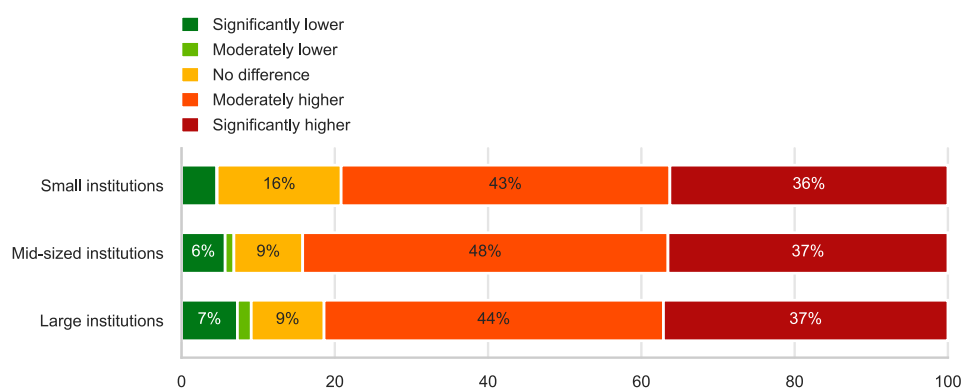
Regular costs of Scenario 3 compared with Scenario 1 – decomposition by type of respondent



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 A10.12**

Regular costs of Scenario 3 compared with Scenario 1 – 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.

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