« Good to know » on Notification of Impracticability

- Notifications in N.01.01 are backward-looking, so the bank is NOT expected to notify in Jan for Q1, but rather to notify all liabilities for which it may have determined impracticability since its last notification (for instance 3 months ago).
- Quarterly is a policy preference, i.e. 4 times per year (banks are thus encouraged not to send more than 4 notifications per year), although the system is configured on a monthly basis.
- Notifications in N.01.02 are forward-looking, and should include an estimate for the next six months and should be sent ideally in Q1 and Q3 (ref date 31/01 and 31/07)
- If a bank wishes to send a notification in Feb for instance, it should have the 28/02 reference date
- On an exceptional basis, if a second notification should be sent for the same XBRL reference date, the cumulative criteria remains (i.e. the notification file should contain the content of all notifications of that period)
- Guidance available on https://www.srb.europa.eu/en/content/notification-impracticability-include-bail-recognition-clauses-contracts-srb-approach-and

