

Comments Matrix

Credit-related forms: BA 200 and BA 210

COMMENTS RECEIVED FROM INDUSTRY VIA THE BANKING ASSOCIATION SOUTH AFRICA

# No.	Regulatory return reference	Industry: Comment	Industry: Further clarity	PA's response
1	BA210 row 734	Clarify, does the updated return only require the total to be submitted, with no detailed breakdown? Will the detailed breakdown be required in any form, including as part of the supervisory process?		The PA is of the view that instead of row 734, Cell 734 is being referenced. In this regard, a breakdown of the exposures or counterparties reflecting on the watch list will need to be submitted to the PA. All specify items are still required to be submitted to the PA via a separate excel sheet as it relates to credit risk.

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2	BA210 is the threshold for reporting large exposures	<p>We note that as part of the BA210 the threshold for reporting large exposures was removed. In the current BA210, footnote 1 of section 12 specifies: Includes credit exposures in respect of which the expected loss exceeds 1% of qualifying capital and reserve funds reported in item 88 of form BA 700, which credit exposure is not yet classified as being in default. Therefore, there is an existing bilateral instruction to report all loans above a specified threshold specified by the SARB PA for exposure and PD rating. We acknowledge that this threshold is too high as loans with an expected loss greater than 1% of qualifying will never be considered during the normal course of business. This is submitted via the supervisory process, rather than the BA returns. However, this threshold has not been updated for inflation and the increase in clients above this threshold results in ever-increasing dilution of the focus on the key risks on the watchlist.</p> <p>Therefore, we propose that one of the following options be considered:</p> <p>1. The removal of the bilateral instruction allowed banks to set their watchlist according to their risk profile. This will then need the additional clarification:</p> <p>a) As there are multiple watchlists in the bank at various reporting levels, the appropriate watchlist would be the one reported to the senior management of the bank, i.e., the Chief Executive Officer or Chief Risk Officer.</p> <p>b) PD ratings from operational issues (i.e., stale, or unrated ratings) should be excluded from the watchlist – unless there are also credit concerns</p>	<p>Recommend that option 1 be used as this will ensure the greatest alignment between internal processes and the BA returns.</p>	<p>The PA assumes that the threshold being referred to is the threshold relating to exposures on the watch list and not large exposures.</p> <p>The PA wishes to thank the commentator for providing options for it to consider the best way to receive a 'watch list' of counterparties that warrant more than normal attention from the bank's senior management, prior to default classification.</p> <p>The purpose of the watch list is to receive the names of the counterparties that the bank has so identified, whether it is based on, for example, negative press releases, deteriorating financials or risk profiles, specific client engagements, impact of macroeconomic events, etc. as part of its ongoing credit risk management.</p> <p>In this regard, the PA has removed the regulatory reporting threshold to ensure that the watchlist reporting to the PA is aligned to the internal reporting and risk profiling of counterparties that receive management attention at the highest level of the organisation. This may mean that some banks may already have internal thresholds in place for internal reporting purposes, which may then be used for regulatory reporting as well.</p>

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		<p>c) Clients originated at a high credit risk – for example in high-risk countries with a high-country ceiling – should be excluded as this risk would have been considered and priced for unless there is further deterioration in the credit risk.</p> <p>2. Specification of an exposure threshold based on Tier 1 capital. In the standardised section of the current BA210 return (section 11), this is specified as 1%. Lowering this to 0,25%, together with a minimum PD of 6,0891% (i.e., SARB prescribed PD band 20) would provide a good view of the key watchlist items. For loans on the standardised approach, the minimum PD can be replaced with clients where most loans (by exposure) are reported as Stage 2 for IFRS 9 reporting.</p> <p>As management committees meet prior to the finalisation of the BA returns we also proposed that the “Tier 1 capital” is based on the previous half-year reporting period to ensure alignment between the management committees and the BA returns.</p> <p>3. Specifying the thresholds on a bilateral basis and reviewing the thresholds at least every 5 years.</p>		
3	Annex A1 Reg 23(23) instructions-STA	Provide context on what is intended by the following addition to item 2: “This item should also include any advance or restructured credit exposures subject to	Clarify	This is aligned to the requirements of Directive 7 of 2015 (D7/2015). Please refer to section 7 of D7/2015.

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		amended terms, conditions or concessions that are not formalised in writing.”		
4	BA 200 Columns 12 and 13	Except for restructured exposures (as defined in footnote 3 under table 2), our understanding of the definition of “Impaired Advance” (column 12) vs “Defaulted Exposure” (column 13) is that the only difference is “Defaulted Exposures” will include defaulted exposures that have a zero specific impairment.	Clarify that our understanding is correct.	Please refer to the definitions of “Impaired Advance” and “Defaulted Exposure” in the Regulations relating to Banks. However, in essence, defaulted exposures will include exposures that meet the definition of default and/or have zero specific impairments raised against them.
5	BA200 Row 40	Clarity is sought regarding which NCA rate is being referred to.	Clarify	The current form has a footnote to the line item unsecured loans <= R30k - “Including loans in respect of which the maximum NCA rate applies.” The revised forms (as published in draft 1) included the footnote in a new line item relating to unsecured loans that receive the maximum NCA rate. However, the line item has subsequently been removed.
6	BA200 Row 131-137 as it related to columns 33-40	Distributing the development portion of an HVCRE portfolio by LTV percentages using the value of the property at origination is not considered a valuable measure of risk for development. The properties are under construction, so the value of properties at origination is likely to be limited to land value if not zero. Any resultant LTV calculated using current On- and Off-balance sheet exposures will overstate the risk.	Recommend to reconsider using the LTV measure in reference to the HVCRE portfolio or to exclude Developments from the measure entirely.	Reference to HVCRE & Land ADC has been removed from the LTV table for reporting purposes for banks on the standardised approach. Reference to Land ADC has been removed from the LTV table for reporting purposes for banks on the IRB approach.

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7	BA210 Section 4	Column 9: definition of the total, being "total of col 2,3 and 7 to 9" is incorrect. Should read: "total of col 1,2, and 6 to 8". If not, the calculation will be a circular reference.	Update Clarify why only part of the prior disclosed exposures/columns is included in this column. Granted, Gross SFTs & Gross derivative columns have been removed, but then this risk is not accounted for in this total? Clarify, is this total column used or evaluated against any thresholds at all?	The definition/calculation of the total column has been corrected. The columns relating to gross SFTs and gross derivatives have been re-inserted.
8	BA210 Section 12: Footnote 1	The removal of the quantifiable threshold for the inclusion of deals in this section will create ambiguity and inconsistent interpretation.	Recommend reconsidering a quantifiable threshold designed to focus the information on material exposures	Noted. Please refer to the PA's response to comment 2 above.
9	Form BA200 Table 4 and Table 20 Standardised Approach	Add modification losses recognised in the impairment line in the income statement as the other leg of the entry sits in advances and is not part of the balance sheet provision movement. It would be impossible to balance the total income statement charge without this line. Input spaces are required for all 3 stages.	Clarify	A line item for modification losses and gains for each stage has been added to the form BA 200 Tables 4 and 20.

# No.	Regulatory return reference	Industry: Comment	Industry: Further clarity	PA's response
10	BA210, Section 4 Standardised Approach	<p>The label for line 93. It should reference "FI's other than D- SIBs and G-SIBs" as there are more than just Banks that can be classified as D-SIB or G-SIB and therefore line 93 needs to refer to FI's and not just Banks.</p> <p>Line 91 - Currently classified only as D-SIB, whereas D3-2022 refers to D-SIB or D-SIFI.</p> <p>Line 93 - Currently classified as "Banks other than D-SIBs and G-SIBs".</p>	<p>Recommend that row 91 be updated to refer to D-SIB or D-SIFI. Considering the recommendation on row 91 above, D-SIFIs have also been disclosed in row 91. Recommend that Row 93 refer to "FI's other than D-SIBs, D-SIFIs and G-SIBs" and therefore not only banks will be disclosed in row 93 but FI's in general. Clarify if the PA intends to disclose only banks in row 93 and then other FIs in row 94.</p>	<p>Line 91 in draft 1 has been updated to include "or D-SIFI".</p> <p>Line 93 in draft 1 should be the reporting line item for all the banks other than those designated as a D-SIB or G-SIB. The PA does not agree with the statement that there are more than just banks that can be classified as a D-SIB and a G-SIB. These only refer to banks that are of some systemic importance (globally or domestically). Therefore, other financial institutions should be reported in the line item "Persons/Institutions other than a bank".</p>
11	BA200 Table 5, Standardised Approach	Form BA200 Table 5 states "Total credit exposure post CCF". We require clarification on whether this should be interpreted as pre-CRM and pre-specific credit impairments.	Clarify	A footnote was added to the table on the form BA 200 and clarity included in the instructions to the form.
12	Form 210 Section 4 Columns 9 and 12 Standardised Approach	Form 210 Section 4 Colum 9 mentions "Gross credit exposure pre-CCF & CRM (Total of col 2,3 and 7 to 9)". We require clarity on the "Total of col 2, 3 and 7 to 9", since the column numbers seem to have changed. Similarly, column 12 "(Total of col 2, 4, 6, 8 and 9 to 11 less col 14)" also does not make sense.	<p>Clarify</p> <p>Clarify Why have columns 1, 3, 5 and 7 have been excluded from this total?</p> <p>Clarify, Column 12 has a conflicting definition of calculation in the form.</p>	The column totals have been corrected for the large exposure tables.

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13	Form BA 210 Section 11 Column 1 Standardised Approach	We require clarity on the meaning of "Gross" here. Should Form BA 210 Section 11 Column 1 reconcile to Section 4 column 9 "Gross credit exposure pre-CCF & CRM"?	Clarify	The gross exposure in the Table "Credit concentration risk - 20 largest exposures" (the bank's top 20 exposures irrespective of meeting the definition of a large exposure) would not be equal to gross exposure in the Table "Credit concentration risk - large exposure to a person" (all the bank's exposures that meet the definition of a large exposure, that is, equal to or greater than 10% of tier 1 capital and reserve funds). However, both columns refer to gross credit exposure which would be the exposure before any CCF, specific credit impairment as well as CRM.
14	Form BA 210 Section 11 Column 4 Standardised Approach	Should Form BA 210 Section 11 Column 4 reconcile to Section 4 column 15 "Adjusted exposure post-CCFs, specific credit impairments and CRM"?	Clarify	See comment 13 above. However, both columns refer to "Adjusted exposure post-CCFs, specific credit impairments and CRM".
15	Form BA 210 Standardised Approach	Why does the BA 210 refer to "Sections" and the BA 200 refers to "Tables"?	Clarify	The PA notes the comment. These are just different naming conventions. However, the PA changed the form BA 210 to refer to tables.
16	Form 200 Table 2 Lines 24 and 41 Standardised Approach	Purchased receivables – corporate Purchased receivables – retail These lines appear in the Standardised Approach table. We seek clarity on whether these exposure categories exist within the Standardised Approach methodology.	Clarify If not, recommend that these lines be removed from the STA table. If yes, clarify the definition of these exposure types as they are only defined under the IRB approach.	The line items referencing purchased receivables for retail and corporate have been removed from the standardised approach form BA 200.

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17	BA210 Section 4 – BCBS246, paragraph 25	Paragraph 25 states: The definition of a large exposure encompasses direct exposures to single counterparties or groups of connected counterparties as well as exposures to credit protection providers, which should also be viewed as counterparties for large exposure purposes. Consequently, exposures arising through the purchase of credit protection (such as credit default swaps and guarantees) should be added to the total of any other direct exposures to the same counterparty.	Clarify in reference to the section in the definition be added to any other direct exposures to the same counterparty, we seek guidance on where in Section 4 should this exposure to the credit protection provider be disclosed? Col 1 as direct exposures to the same counterparty, or under the CRM columns and if so, how does that influence the total column formula considering in this case the intention is to increase the risk to the counterparty and not reduce the risk in case of having received CRM to reduce risk?	The PA has updated the table relating to the reporting of large exposures to include exposures to credit risk mitigation providers.
18	BA210 Section 5, footnote 1A	Sector classification is based on statistics SA data.	Recommend the PA accept the sector classification to be based on a more current, and actively kept-to-date classification, as published by ICB? Bearing in mind, the JSE also uses.	The PA endeavoured to align the sectoral distribution of the forms BA 210 and BA 900. Since the Standard Industrial Classification of all Economic Activities (7 th Edition), used by SARS, is not yet in effect, the PA will revert to the 5 th Edition. Accordingly, the current classification in the form BA 210 will remain in effect. The classification and reporting of exposures in the sector classifications should be aligned to that of the BA 900.

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19	BA210 Section 12: Footnote 1	The removal of the quantifiable threshold for the inclusion of deals in this section will create ambiguity and inconsistent interpretation.	Recommend the inclusion of a threshold	See the PA's response to comment 2 above.
20	Revised BA 200 Standardised approach: General question:	Directive 1 of 2021 under 2.3 states that line items 86, 103 to 106, 201 to 206, 276, 293 to 320 and 325 to 331 (current form BA 200) are not mandatory in the submission of consolidated returns.	Clarify, since additional line items have been added and tables deleted in the standardised sections of the form BA 200.	Directive 1 of 2021 will be updated as soon as the forms are finalised.
21	Revised BA 200 Standardised approach: Table 2:	Column 1, On-balance sheet exposure: "This column shall reflect the relevant aggregate amount in respect of amounts drawn by clients, that is, utilised amounts, which amounts form part of the current exposure of the reporting bank, before the impact of any relevant CRM has been taken into consideration." Currently, in South Africa, specific exposure types are reported based on average balances, specific guidance in this regard will be appreciated.	Clarify	For the items listed in regulation 23(3) of the Regulations, on-balance sheet exposures should be reported based on average daily balances. There were no amendments made to the reporting requirements relating to column 1 of Table 2 of the standardised approach. Banks are welcome to approach the PA bilaterally should further clarity be required.
22	Revised BA 200 Standardised approach: Tables 11 and 13:	The CVA cells have been greyed out, however, in table 13, CVA still seems to be required to be populated. Guidance regarding the population of CVA information in the BA 200 is required.	Clarify	There were no amendments made to the reporting requirements relating to Tables 11 and 13 for the standardised approach. Table 11 relates to counterparty credit risk exposures per specified risk weightings whereas Table 13 relates to standardised CVA risk weighted exposures per rating. Table 13, footnote 2 specifies that "Total Standardised CVA risk weighted exposure may not be equal to the sum of individual requirements calculated due to, amongst others, diversification benefits."
23	Revised BA 200 Standardised approach: Table 18:	1. Under the final Basel III framework, the BIS added the exposure type "Large corporates" (consolidated turnover > €500m), will it not be	Clarify	The PA assumes reference is made to Table 18 on the IRB approach and not standardised approach.1. The PA takes note of the suggestion which may be incorporated in the form BA 200 in the future.

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		prudent for this exposure type to be added as an asset class?		
		2. With the introduction of Commercial real estate as an additional specialised lending asset class, is it correct that the firm size adjustment is still applicable for exposures below the corporate threshold? (This question applies to all wholesale exposures.)		2. There was no additional specialised lending category introduced for commercial real estate (CRE) for banks on the IRB approach. The firm size-adjustment is an adjustment to the correlation parameter applicable to corporate entities of a certain size. If a bank is able to determine the sales figure, then the firm-size adjustment applies, however if a bank cannot determine the sales figure then the corporate formula is applied without an adjustment.
		3. Does the CRE asset class include all loans secured by commercial real estate or only loans advanced specifically to finance commercial real estate? Do we disclose the assets that are treated as CRE in the standardised approach in the commercial real estate line or is there a specific way to identify these exposures?		3. The PA requested further clarity as part of its 2 nd round of informal consultation on the revised form BA 200. In this regard, general CRE that were largely classified in the corporate or SME corporate asset classes. However, the new form BA 200 includes a separate line item for general CRE exposures similar to the proposed Pillar III disclosures.
		4. Is the assumption that HVCRE includes ADC (ADC is a subset of HVCRE) or are they seen as the same exposures across approaches (all HVCRE are ADC, and all ADC are HVCRE)?		4. Regulation 23(11)(c)(i)(E) of the proposed regulations refer. The PA is of the view that it is not necessarily the same thing, but can rather be viewed as a sub-type that should be grouped together with HVCRE for reporting purposes due to the element of uncertainty that may exist.

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		5. If the above assumption is incorrect, can it not be considered to add an additional asset class, thus an asset class for HVCRE and an asset class for ADC?		5. The PA requested further clarity as part of its 2 nd round of consultation on the revised form BA 200. In this regard, the PA, at this stage, will not incorporate an additional asset class for reporting purposes.
		6. QRRE revolvers: Under the proposed regulations, different PD floors apply to QRRE revolvers and QRRE transactors, will it not be prudent to distinguish between these exposure types, thus introducing an additional asset class?		6. The PA takes note of the comment. The PA is aware that the revised framework makes distinction between QRRE revolvers and transactors for banks applying the IRB approach. The forms BA 200 and BA 210 already splits the asset classes between QRRE and 'of which credit cards' and therefore incorporating a further split, will create an additional 4 line items on the IRB approach. The revised standardised approach distinguishes the transactors and revolvers on retail exposures overall, and not specifically to the QRRE asset class. In this regard, the PA, at this stage, will not incorporate an additional asset class for reporting purposes. However, may in the future decide to do so.
24	Revised BA 200 Standardised approach: Table 21:	Where securitisation RWA is calculated based on the standardised approach under the new proposed regulation effective 1 October 2022, should this be reported under the Standardised or IRB section of the BA 200?	Clarify	The PA assumes reference is made to Table 18 on the IRB approach and not the standardised approach. This question covers Table 2 on STA and Table 18 for IRB. RWA calculated on SEC-SA BA500 table 1, line 4, column 2 should be mapped to BA200 Table 2, line 38, column 8; RWA calculated on SEC –IRB BA500 Table 1, line 2, column 2 should be mapped to BA200 table 18, line 204 column 13.

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25	Revised BA 200 Standardised approach: Table 24:	Clarity is required regarding the LTV calculation: should this be based on EAD or gross credit extended? In addition, should the valuation amount be the inception valuation or the current market value?	Clarify	The PA assumes reference is made to Table 24 on the IRB approach and not the standardised approach. For LTV reporting purposes, reporting should be based on gross credit extended. The PA requested further clarity as part of its 2nd round of informal consultation on the revised form BA 210 - In terms of the valuation of the property, reference is made to Regulation 23(6)(c)(v) of the Regulations, where the relevant LTV will be the amount of the loan divided by the value of the property. For reporting purposes, the value of the property will be market related.
26	Revised BA 200 Standardised approach: Table 26/27:	When calculating EAD weighted PD, is it done at an exposure collateral level (subdivided exposures) before aggregation?	Clarify	The PA assumes reference is made to Table 26/27 on the IRB approach and not standardised approach. The PA requires more clarity. The commentor is requested to approach the PA bilaterally.
27	Revised BA 200 Standardised approach: Table 28:	When calculating expected loss (PD x LGD x EAD), is it done at an exposure collateral level (subdivided exposure level, below transaction) and then aggregated?	Clarify	The PA assumes reference is made to Table 28 on the IRB approach and not standardised approach. The PA requires more clarity. The commentor is requested to approach the PA bilaterally.
28	Revised BA 200 Standardised approach: Table 31/33:	Table 31, CVA columns 18, 19 and 20 have been greyed out, however, table 33 for CVA risk is still required. As mentioned under the standardised section applicable to CVA, clear guidance regarding the reporting of CVA risk is required.	Clarify	The PA assumes reference is made to Table 31/33 on the IRB approach and not standardised approach. See response to comment 22 above.
29	Revised BA 210 SA and IRB approach: General question:	Directive 1 of 2021 under 2.3 states that line items 1 to 21, 43 to 117, 215 to 256, 285 to 340 and 438 to 452 are not mandatory in the submission of consolidated returns. Guidance is required in this regard since IRB and standardised sections of the	Clarify	Directive 1 of 2021 will be updated as soon as the forms are finalised. Furthermore, the IRB and standardised sections/tables of the form BA 210 will revert to separate tables.

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		form BA 210 have been combined in the new proposed form BA 210.		
30	Revised BA 210 SA and IRB approach: Section 2, column 5:	When substituting PD (AIRB guaranteed by AIRB) is it still required to show the inflow and outflow?	Clarify	The assumption is correct.
31	Revised BA 210 SA and IRB approach: Section 2, columns 10 – 18:	For Foundation IRB asset classes where both PD and LGD are substituted, is the requirement to complete this section as well, or is this aimed at AIRB to AIRB LGD-only substitution?	Clarify	This is also aimed at F-IRB asset classes where both PD and LGD are substituted. However, the PA will in due course issue further guidance on the correct interpretation and application of regulation 23 sub regulations (11) and (13) of the Regulations as they relate to credit risk mitigation.
32	Revised BA 210 SA and IRB approach: Section 4, column 16	Under the new LEX framework, both gross and adjusted exposure is measured on the standardised approach, guidance is required regarding the risk-weighted exposure to be reported in column 16 for IRB banks.	Clarify	The PA requested further clarity as part of its 2nd round of informal consultation on the revised form BA 210. For banks on the IRB approach for credit risk, the risk weighted exposure will be measured based on the IRB approach.
33	Revised BA 210 SA and IRB approach: Section 4, column 16, 20 - 21:	For consolidated reporting where concentration risk is reported and aggregated across both IRB and standardised approaches, EAD and PD will only apply to the IRB portion of the aggregated exposure.	Recommend that these reporting requirements be revisited as gross and adjusted exposures are calculated on the standardised approach.	The tables on the form BA210 have been de-merged since the first draft of amendments to the form BA 210. This means that the form BA 210 will have tables for completion for the IRB approach and standardised approach, similar to the current forms in effect. Therefore, the PA is of the view that this would not be a problem anymore.

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34	Revised BA 210 SA and IRB approach: Section 5, columns 13 and 14: Section 8, columns 13 and 14: Section 9:	Applicable to consolidated reporting, clear guidance is required specific to the calculation of EAD weighted parameters (PD, LGD) for a combination of IRB and standardised exposures. The assumption is that it will only apply to the subset (IRB) exposures in these columns.	Recommend guidance regarding the calculation of EAD weighted parameters: should these calculations be done at an exposure/collateral level that is for subdivided exposures, before aggregation and then subsequently aggregated?	The tables on the form BA210 have been de-merged since the first draft of amendments to the form BA 210. This means that the form BA 210 will have tables for completion for the IRB approach and standardised approach, similar to the current forms in effect. Therefore, the PA is of the view that this would not be a problem anymore. Otherwise, the commentator may engage the PA bilaterally. Also see comments 26 and 27 above.
35	Revised BA 210 SA and IRB approach: Sections 8 – 11:	Confirmation is required regarding footnote 4.	Clarify does this apply to all exposures or only “unrated” exposures.	Exposures in default should be reported in the appropriate "in default" line item.
36	Revised BA 210 SA and IRB approach: Section 12:	With the removal of the original footnote 1 regarding the threshold and replaced by “Credit exposures that warrant more than normal attention”, further guidance on a threshold will be required. Will this information be provided on supporting schedules or in the proposed BA 210 itself? In addition, the exposure and collateral information required is based on the standardised approach, clarity regarding the risk-weighted exposure column for IRB Banks is required, should this be the IRB or standardised RWE?	Clarify	See response to comment 2 above.
37	Form 200 Table 2 Lines 17 to 19 Standardised Approach	Noted comment number 43 above has been removed, I would like to confirm the application of the standardised approach with respect to IPRRE, IPCRE, Object finance and HVCRE.	1. Clarify that our understanding is correct that under the Standardised Approach, IPRRE is defined and risk-weighted under Regulation 23(6)(c)(xi). 2. Clarify that our understanding is correct that under the Standardised	The PA agrees with the regulatory references as follows: 1. IPRRE is defined and risk-weighted under regulation 23(6)(c)(xi) of the Regulations. Also see CRE20.70. 2. IPCRE is defined and risk-weighted under regulation 23(6)(d)(i) of the Regulations. Also see CRE20.70. 3. Object finance, Project finance and Commodity finance are the only three specialised lending categories under the revised standardised approach and are

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			<p>Approach, IPCRE is defined and risk-weighted under Regulation 23(6)(d)(i).</p> <p>3. Object finance, Project finance and Commodity finance are defined in Regulation 23(8)(a)(vi)(A) under the Standardised approach.</p> <p>4. HVCRE is not defined under the Standardised Approach. Clarify whether the Standardised Approach should infer the definition for HVCRE from the Advanced Approach under Regulation 23(11)(c)(i)(E).</p> <p>5. Clarify under which Regulation should HVCRE be risk-weighted under the Standardised Approach.</p>	<p>defined in regulation 23(8)(a)(vi)(A)(i) to (iii) of the Regulations. Also see CRE20.49.</p> <p>4/5. The category HVCRE for banks on the standardised has been removed from the second draft of the proposed form BA 200.</p>

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38	Form BA200 Table 4 and Table 20	Add modification losses recognised in the impairment line in the income statement as the other leg of the entry sits in advances and not part of the balance sheet provision movement. It would be impossible to balance the total income statement charge without this line. Input space required for all 3 stages.		Please refer to the PA's response to comment 9 above.
39	BA210, Section 4	The label for line 93. It should reference "FI's other than D-SIBs and G-SIBs" as there are more than just Banks that can be classified as D-SIB or G-SIB and therefore line 93 needs to refer to FI's and not just Banks.		Please refer to the PA's response to comment 10 above.
40	Form 200 Table 5 All Columns	Form BA200 Table 5 states "Total credit exposure post CCF". We require clarification on whether this should be interpreted as pre- CRM and pre specific credit impairments?		Please refer to the PA's response to comment 11 above.
41	Form 210 Section 4 Colum 9 and 12	Form 210 Section 4 Colum 9 mentions "Gross credit exposure pre CCF & CRM (Total of col 2,3 and 7 to 9)". We require clarity on the "Total of col 2, 3 and 7 to 9", since the column numbers seem to have changed. Similarly column 12 "(Total of col 2, 4, 6, 8 and 9 to 11 less col 14)" also does not make sense.		Please refer to the PA's response to comments 7 and 11 above.
42	Form BA 210 Section 11 Column 1	We require clarity on the meaning of "Gross" here. Should Form BA 210 Section 11 Column 1 reconcile to Section 4 column 9 "Gross credit exposure pre CCF & CRM"?		Please refer to the PA's response to comment 12 above.
43	Form BA 210 Section 11 Column 4	Should Form BA 210 Section 11 Column 4 reconcile to Section 4 column 15 "Adjusted exposure post CCFs, specific credit impairments and CRM"?		Please refer to the PA's response to comment 13 above.

44	Form BA 210	Why does the BA 210 refer to “Sections” and the BA 200 refers to “Tables”?		Please refer to the PA’ response to comment 14 above.
45	Form 200 Table 2 Lines 17 to 19	Specialised lending - income producing residential real estate (IPRRE) Specialised lending - income producing commercial real estate (IPCRE) Specialised lending - HVCRE and Land ADC These lines appear in the Standardised Approach table. We seek clarity on whether these exposure categories exist within the Standardised Approach methodology. If not, we recommend that these lines be removed from the STA table. If yes, we seek clarity on the definition of these exposure types as they are only defined under the IRB approach.		Please refer to the PA’s response to comment 42 above.
46	Form 200 Table 2 Lines 24 and 41	Purchased receivables – corporate Purchased receivables – retail These lines appear in the Standardised Approach table. We seek clarity on whether these exposure categories exist within the Standardised Approach methodology. If not, we recommend that these lines be removed from the STA table. If yes, we seek clarity on the definition of these exposure types as they are only defined under the IRB approach.		Please refer to the PA’s response to comment 15 above.
47	Consolidated BA200/210	Which tables would we have to complete for Consolidated BA200 and BA210?		Please refer to the PA’s response to comments 20 and 34 above.