
Consultation Paper on draft ITS on Resolution planning reporting

Public Hearing | 12 September 2024

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2 Main changes to reporting obligations

1. Welcome and introduction: purpose of the review

Harmonise reporting

- Avoid parallel data collections (SRB, RAs)
- Promote efficient and harmonised practice
- Remove overlapping data points (with MREL/TLAC, FinRep)

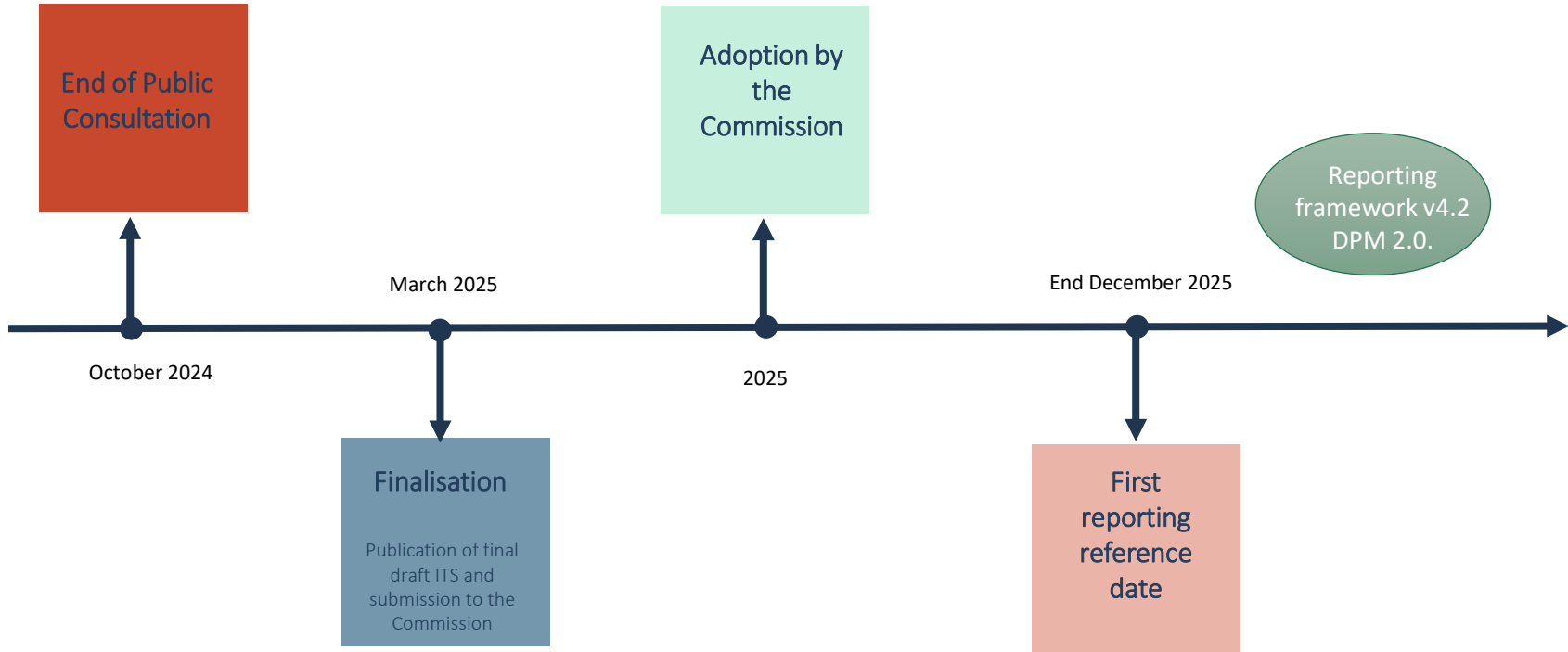
Improve usability of ITS data

- Fix issues
- Reflect the latest developments in resolution planning, crisis preparedness and policies

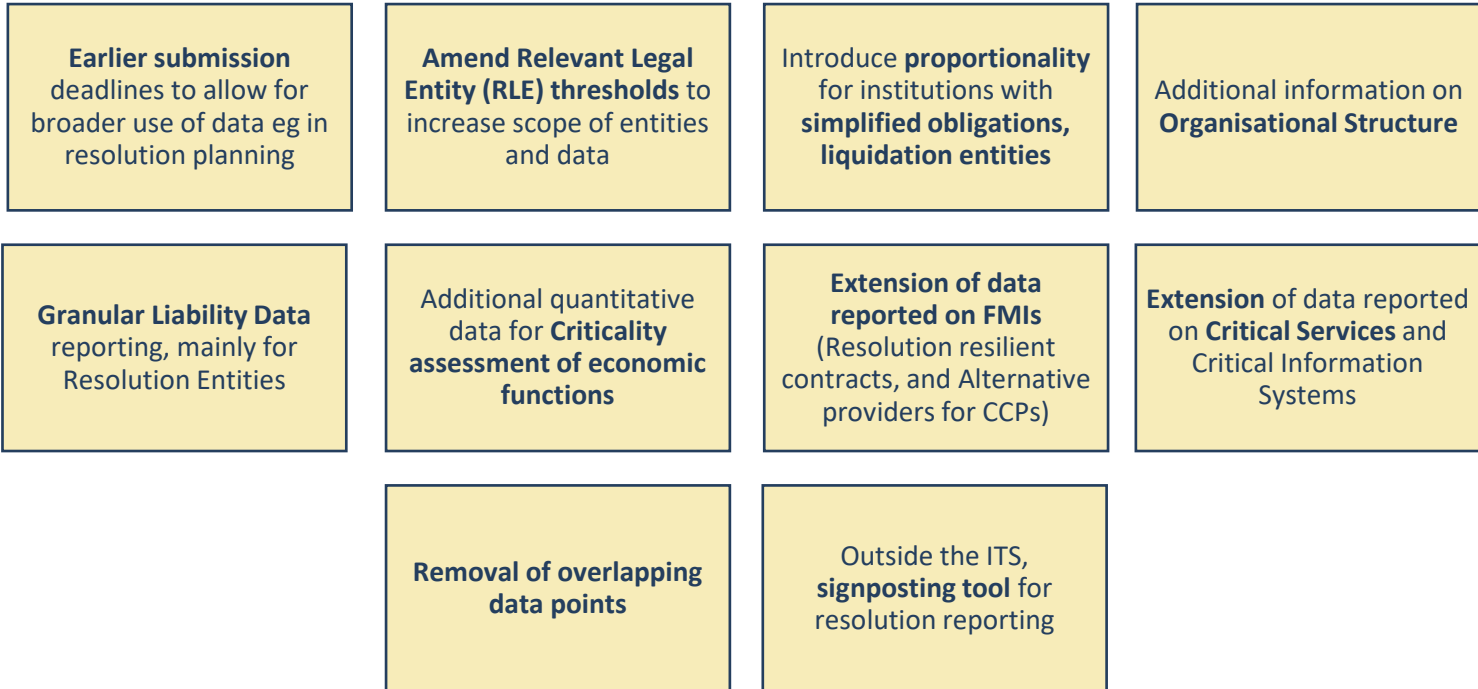
Introduce more proportionality

- Implementation of a modular core plus supplement approach (see slide 7) to reporting that reduces the scope of reporting obligations for certain categories of reporting entities based on their size and complexity

1. Welcome and introduction: Timeline



2. Main changes to reporting obligations: Scope of the review



2. Main changes to reporting obligations: Reporting scope application

Template	Template Description	Short Name	Institutions and Groups under Simplified Obligations	Institutions that are not part of a Group		Groups						
				Resolution Entity	Liquidation entity not subject to Simplified Obligations	Liquidation Group not subject to Simplified Obligations		Union Parent Undertaking or Resolution Entity		RLEs that are institutions		Other RLEs
						(Sub-) Consolidated	Individual	(Sub-) Consolidated	Individual	(Sub-) Consolidated	Individual	
Organisational Structure												
Z0101	Legal Entities	ORG 1			*			*				
Z0102	Ownership Structure	ORG 2	*	*	*			*				
Aggregate Liability Data												
Z0200	Liability Structure	LIAB 1	*	*	*	*		*	*	*	*	*
Z0301	Own Funds Requirement	LIAB 2	*					*	*	*	*	*
Z0302	Own Funds Requirement - Investment Firms	LIAB 3	*					*	*	*	*	*
Z0400	Intragroup Financial Interconnections	LIAB 4			*			*				
Z0501	Major Liability Counterparties	LIAB 5	*	*		*		*			*	*
Z0502	Major Off Balance Sheet Counterparties	LIAB 6	*	*		*		*			*	*
Z0600	Deposit Insurance	LIAB 7	*	*		*		*			*	*
Critical Functions												
Z0701	Criticality assessment of economic functions	FUNC 1	*	*	*	*		*	*		*	*
Z0702	Mapping of economic functions by legal entity	FUNC 2						*				
Z0703	Mapping of core business lines to material legal entities	FUNC 3						*				
Z0704	Mapping of critical economic functions to core business lines	FUNC 4	*	*	*	*		*	*		*	*
Relevant Services												
Z0801	Relevant Services	SERV 1	*					*				
Z0802	Relevant Services – mapping to assets	SERV 2	*					*				
Z0803	Relevant Services – mapping to roles	SERV 3	*					*				
Z0804	Relevant Services – mapping to critical functions	SERV 4	*					*				
Z0805	Relevant Services – mapping to core business lines	SERV 5	*					*				
Financial Market Infrastructures												
Z0901	FMI Services – Providers and Users	FMI 1	*	*	*			*	*		*	*
Z0902	FMI Services – Mapping to Economic Functions	FMI 2	*					*				
Z0903	FMI Services – Key Metrics	FMI 3	*					*				
Z0904	FMI Services – CCPs – Alternate provider	FMI 4	*					*				
Granular Liability Data												
Z1001	Intragroup Liabilities, excluding Derivatives	G-LIAB 1							*		*	
Z1002	Securities (Including CET1, AT1 & Tier 2 Instruments; Excluding intragroup)	G-LIAB 2	*					*				
Z1003	All Deposits (excluding intragroup)	G-LIAB 3	*					*				
Z1004	Other financial Liabilities (not included in other tabs, excluding intragroup)	G-LIAB 4	*					*				
Z1005	Derivatives	G-LIAB 5	*					*				
Z1006	Secured Finance, excluding intragroup	G-LIAB 6	*					*				
Z1007	Other Non-Financial (not included in other tabs, excluding intragroup)	G-LIAB 7	*					*				

2. Main changes to reporting obligations: Updated ITS (legal act)

Changes to definition of Relevant Legal Entity:

- provides critical functions; or
- represents or provides more than **2%** of any of the following:
 - i. the total risk exposure amount of the resolution group, referred to in Article 92(3) of Regulation (EU) No 575/2013 **of the European Parliament and of the Council**;
 - ii. **the** total exposure measure of the resolution group, referred to in Article 429(4) of Regulation (EU) No 575/2013;
 - iii. the operating income of the group on a consolidated basis.
- **has total assets exceeding EUR 5bn**
- **is important for the financial stability of at least one of the Member States in which they have their registered offices or operate (Delegated Regulation 2016/1075)**

Introduction of « Liquidation Entity »

- an entity earmarked for liquidation in accordance with the group's resolution plan, which would then be liquidated under the applicable insolvency law, as defined in Article 2(1) point (83aa) of Directive 2014/59/EU.
- **Change to reporting deadline to March 31.**

Main changes to Reporting Obligations: detailed changes

Organisational Structure

- Review of existing organisational report to facilitate identification of resolution group structured and focus on key financial indicators for resolution planning.
- New reporting on shareholders of the group's entities with more than 2% of shareholdings introduced to facilitate analysis of contagion.

Aggregate Liability Data

- Removal of data request for COREP and FINREP data points covered in the ITS, where they have already been declared by the reporting entity for the same reference date and reporting scope, in order to reduce the reporting burden on banks.
- Introduction of dedicated data points of Own Funds in Investment Firms to facilitate reporting by these entities.
- Introduction of the Carrying Amount in addition to Outstanding Amount to support ongoing work on MREL policy development.
- Reporting of intragroup financial interconnections to also cover liabilities excluded from bail-in, enabling RAs to perform a more complete assessment of interconnections.

Critical Functions

- Harmonisation of reporting by expanding the scope of reporting on Impact and Substitutability analyses to cover data points reported by banks under the SRB remit over the past years to assess the criticality of banks' functions.
- Introduction of Regional reporting of critical functions, where applicable for a given jurisdiction.
- Introduction of a "Comments" field to facilitate communication from banks on the reasoning behind their criticality assessment.
- Introduction of reporting of the banks' onboarding capacity, limited for now to Deposits and Payments functions, as strongly supported by Resolution Authorities.
- Introduction of the notion of recurrent accounts.

Main changes to Reporting Obligations: detailed changes

Relevant Services

- Restructuring of existing data request to better assess the operational continuity in resolution and separability, and also an assessment by the bank of the resolution resilience of service contracts.
- Introduction mapping to assets and roles.
- Note that to the extent that there is an overlap between changes to these reports and data requested as part of the resolvability assessment (e.g. Service Catalogue), the aim would be to remove any such overlap from the resolvability assessment.

Critical Information Systems

- This reporting obligation has been removed and is integrated to the reporting on Relevant Services above.

Financial Market Infrastructures

- Introduction of limited additional qualitative and quantitative data fields, in particular reporting on the resolution resilience of certain FMI contracts;
- Removal of fields not strictly necessary for FMIR exploitation.
- Introduction of declaration of potential alternate CCP providers.

Granular Liability Data

- New reporting obligation of liability data at a granular level (securities, deposits, derivatives, financial and non-financial liabilities and secured finance).
- Aimed at increasing the transparency and standardisation of reporting across Member States (this data has been requested from and reported by entities under the SRB remit for more than 7 years).
- Support will be provided to reporting entities to explain the link between this granular data and the aggregate data also covered in this ITS.
- This reporting obligation is essentially limited to Resolution entities at the Individual level in an effort to reduce the reporting burden on banks.

Q&As





Thank you!



Floor 24-27, Tour Europlaza
20 Avenue André Prothin
92400 Courbevoie, France

Tel: +33 1 86 52 70 00
E-mail: info@eba.europa.eu

<https://eba.europa.eu/>