EBA/ITS/2025/05

16 June 2025

Final Report

Final Draft Implementing Technical Standards

amending Commission Implementing Regulation (EU) 2024/3117 on supervisory reporting under Article 430(7) of Regulation (EU) No 575/2013 concerning operational risk

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1. Executive Summary

The CRR2 contained several different approaches for the computation of regulatory capital on operational risk. Under the CRR3, the approaches were replaced by one single, non-model-based approach called the business indicator component ('BIC') approach. With these changes, the deletion of the former operational risk template and the development of a comprehensive reporting framework for the BIC were deemed necessary.

The final report covers amendments to the operational risk reporting framework to assess compliance with the operational risk own funds requirements and complements the reporting requirements already in place[1] by requesting further details on the calculation of the business indicator components. The publication of the final draft ITS on reporting is coordinated with the publication of other EBA level 2 products on operational risk that give institutions further guidance on the requirements for own funds calculations.

The EBA has always aimed at fostering a regulatory framework that is proportionate and efficient, while also ensuring that the supervisory authorities have access to data on a '*need to have*' basis to fulfil their mandates without introducing significant additional burden. The EBA has prepared these final draft ITS by:

- keeping the alignment between the development of the reporting framework and the development of other Level 2 products on operational risk to ensure a harmonised approach and clarity on supervisory expectations;
- acknowledging that granular data used for the calculation of the business indicator component may take some time to reach the expected quality;
- scrutinising the information requested to ensure only the 'need to have' data points are included in the reporting requirements.

Next steps

After the submission of the final draft ITS to the Commission for adoption, and publication of the final report and IT tools, including binding instructions on our website, the EBA will develop the data point model (DPM), XBRL taxonomy and validation rules based on the final draft ITS. This technical package will be published as a draft in Q3 2025, while the final technical package is expected to be published in Q4 2025. The first reference date for the reporting templates covered by these draft ITS is March 2026.

[1] The EBA updates the supervisory reporting framework | European Banking Authority

2. Background and rationale

1. On 19 June 2024, the Capital Requirements Regulation (CRR3) and the Capital Requirements Directive (CRD VI) were published in the Official Journal of the European Union, to implement the Basel Committee on Banking Supervision (BCBS)'s December 2017 Basel III post-crisis regulatory reforms, while considering the specific aspects of the EU's banking sector. The banking package implements a robust regulatory framework, efficient supervision and enhanced risk control by credit institutions.

2. Following the CRDVI/CRR3, the EBA has been asked to work on the layer of the regulatory products that ensures a technical implementation of the prudential framework, including amendments to the reporting framework. On 14 December the EBA published the 'EBA Roadmap on Strengthening the Prudential Framework'. This roadmap explains the implementation timeline of the EBA mandates under the banking package, clarifying how the EBA will develop the mandates that implement the legislation, and how it expects to finalise the most significant components prior to the application date.

3. The EBA reporting framework, specified in binding technical standards, is uniformly and directly applicable, ensuring maximum harmonisation, a level playing field for institutions and comparability of data. The EBA reporting framework has evolved over the years since its inception, with the first reporting framework published in 2013. Since then, the EBA has reviewed the content of the framework on a regular basis to ensure its continued relevance and has also continued to develop the technical package and version management to facilitate implementation and support for reporting processes.

4. One of the main tasks of the EBA is to contribute, through the adoption of binding technical standards (BTS) and guidelines, to the creation of the European Single Rulebook in banking. The Single Rulebook aims at providing a single set of harmonised prudential rules for financial institutions throughout the EU, helping to create a level playing field and providing high protection to depositors, investors and consumers. Regulation (EU) 2024/3117 referring to the ITS on the supervisory reporting of institutions reflects the CRR part of the Single Rulebook at reporting level, together with the amending draft ITS that are now being published. These draft ITS form part of this Single Rulebook for banking in Europe and become directly applicable in all Member States once adopted by the Commission and published in the Official Journal of the EU.

5. The CRR mandates the EBA, in Article 430(7), to develop implementing technical standards (ITS) specifying uniform reporting requirements. These reporting requirements are included in Commission Implementing Regulation (EU) 2024/3117 laying down ITS with regards to the supervisory reporting of institutions (the EBA ITS on supervisory reporting). These standards cover information on institutions' compliance with prudential requirements as put forward by the CRR and related technical standards, as well as additional information required by

supervisors to perform their supervisory tasks. Hence, the ITS on supervisory reporting need to be updated whenever the underlying legal requirements change, or whenever it is necessary to improve the supervisors' ability to monitor and assess institutions.

6. The EBA has always aimed at fostering a regulatory framework that is proportionate and efficient while ensuring that the supervisory authorities have access to data on a '*need to have*' basis to fulfil their mandates. The EBA's ongoing work to amend existing reporting and introduce new reporting, to ensure that the data remain fit-for-purpose, should ensure that harmonised requirements do not introduce a significant additional burden on reporting entities. Proportionality will continue to be a key consideration in all reporting work.

2.1. New banking regulatory package for operational risk

7. Regulation (EU) 2024/1623 amending Regulation (EU) No 575/2013 (CRR3) introduces into the EU a revised framework for operational risk, according to which all existing approaches for the calculation of the own funds requirements on operational risk are replaced by a single, non-model-based approach, the business indicator component (BIC). The BIC bases the capital requirements on operational risk on the business indicator (BI), a financial statement-based proxy for operational risk, in line with the BCBS standards [OPE 25.1(1)].

8. The reporting requirements for operational risk have been consulted separately from other supervisory reporting topics in a standalone Consultation Paper (EBA/CP/2024/07) published on 20 February 2024, given the need to align the development process of the operational risk reporting framework with other EBA Level 2 products on operational risk2 ('BI-related mandates'), in particular related to:

   i. the mandate to specify the components of the business indicator under Article 314(9)(a) of the CRR and the elements to be excluded from the business indicator under Article 314(9)(b) of the CRR, and on the adjustments to the business indicator under Article 315(3)(a), (b) and (c) of the CRR;

   ii. mapping of the business indicator components to the corresponding supervisory reporting references under Article 314(10) of the CRR.

2.2. Simplification and measures to support institutions in their compliance obligations

9. The EBA has always aimed at fostering a regulatory framework that is proportionate and efficient while ensuring that the supervisory authorities have access to data on a 'need to have' basis to fulfil their mandates. The final report covering amendments to the operational risk

[2] The EBA consults on the new framework for the business indicator for operational risk as part of the implementation of the EU Banking Package | European Banking Authority

reporting framework includes specific provisions that facilitate institutions' compliance, in particular accounting for the following:

i. the alignment between the development of the reporting framework and the development of other Level 2 products on operational risk to ensure a harmonised approach and clarity on supervisory expectations;

ii. allowing enough time to institutions to prepare their systems by taking a two-step approach in developing the reporting requirements;

iii. information on operational risk was scrutinised and reduced to ensure only the 'need to have' data points are included in the reporting requirements;

iv. the final report has been enhanced with additional explanations and reporting examples to clarify and support a uniform understanding of the reporting expectations.

10. Article 430(7), as amended by CRR3, refers to the IT solutions, including templates and instructions, which the EBA is asked to develop for the implementation of the reporting requirements. As part of these IT solutions, the instructions will continue to be referred to in the ITS. The instructions are binding for the reporting institutions to convey the data points/information required under the templates (Annex I of Regulation (EU) 2024/3117) and for efficiency purposes they will be available on the EBA website only.

11. To support institutions in their compliance obligations, the EBA has been developing the EBA mapping tool, showing the relationship between supervisory reporting and banks' disclosure requirements. This tool will be updated to reflect the new reporting requirements introduced by these amending draft ITS on operational risk.

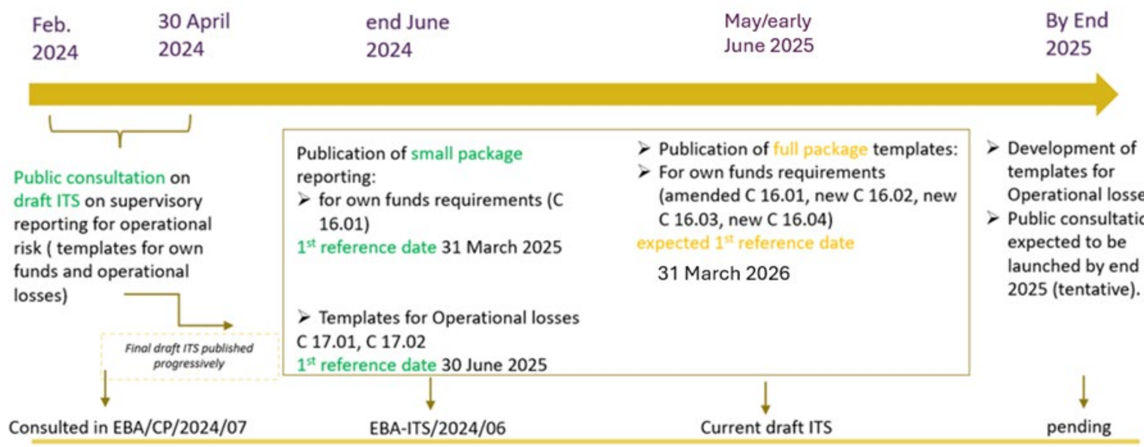
12. In addition, the interactive supervisory reporting signposting tool, helping banks to identify and understand the applicable supervisory reporting requirements, will also be updated to include the additional reporting obligations capturing the operational risk own funds requirements.

13. The EBA's ongoing work to amend existing reporting and introduce new reporting to ensure that the data remains fit-for-purpose should ensure that harmonised requirements do not introduce significant additional burdens on reporting entities.

2.3. Timeline for the development of the operational risk reporting requirements under CRR3

14. Below is a depiction of the key dates for the development of operational risk reporting. In the Accompanying documents of this report, you may find a detailed chart with the full set of templates for operational risk that would need to be reported for each reference date (Section 4.2).

Figure 1. Key dates for the development of the operational risk reporting requirements



15. The finalisation of the ITS on operational risk, together with the analysis of the feedback received during the consultation period, is taking place in two stages:

    ➔ The 'small package' -> already published on 9 July 2024 as part of the **final draft ITS on supervisory reporting**[3] and includes the minimum reporting requirements on operational risk that are applicable to institutions from the date of application of the CRR3. This package is based on a partial review of the feedback received.

    ➔ The 'full package' -> under the scope of this final report. It covers all the data needed by supervisory authorities to analyse institutions' compliance with the calculation of own funds requirements for operational risk and aligns the publication date with that for related policy products (in particular related to: i. the mandate to specify the components of the business indicator under Article 314(9)(a) of the CRR and the elements to be excluded from the business indicator under Article 314(9)(b) of the CRR; and ii. the mapping of the business indicator components with the corresponding supervisory reporting references under Article 314(10) of the CRR and finalising the review of all the feedback received.

16. The proposal for reporting in the scope of operational losses, consulted in February 2024, has been implemented as part of the 'small package'. The remaining impact of CRR3 and CRD VI on operational loss reporting will be incorporated into a second Consultation Paper expected to be published in 2025, accounting for pending policy work development with respect to operational risk losses.

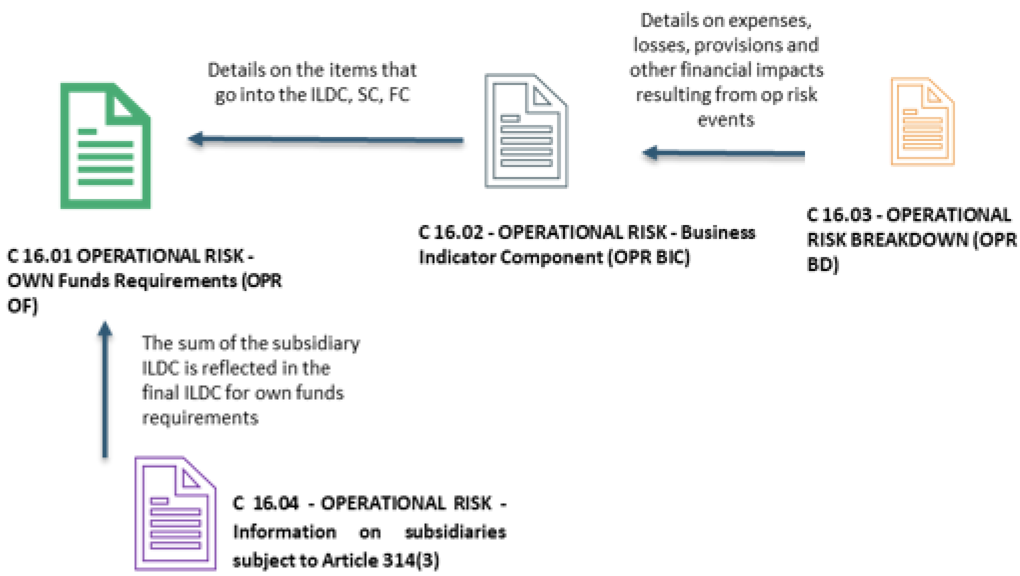
17. An overview of the reporting requirements for operational risk covering only reporting in the scope of own funds requirements calculation is presented below.

[3] The EBA updates the supervisory reporting framework | European Banking Authority

Figure 2. Overview of draft reporting requirements on operational risk for the computation of own funds requirements

Reporting template	Frequency	Scope of institutions
C 16.01[4]	quarterly	All institutions, Ind and Con
New C 16.02	quarterly	All institutions, Ind and Con
New C 16.03	quarterly	All institutions, Ind and Con
New C 16.04	quarterly	EU parent institutions, Con, information on subsidiaries subject to the derogation referred to in Article 314(3)

Figure 3. Relationship between templates



2.4. Main changes implemented based on the feedback received following the public consultation

18. Amendments to instructions and templates consulted, as highlighted in Section 4.3 of this report, are reflected directly in the documents. The more significant changes are also highlighted below:

2.4.1. Reduction in the granularity of information requested with respect to leased assets

[4] Template C 16.01 is currently reported by Institutions and has been slightly amended in these draft ITS to avoid double reporting of information in one row that would otherwise be reported in template C 16.02.

19. Feedback from the consultation has pointed out that, given the lower materiality and significance of expenses other than interest expenses related to operating leased assets, compared with other items used in the calculation of the BI, the level of granularity when reporting these data can be simplified. Consequently, to ensure that institutions report all and only the data that authorities need to fulfil their mandates, combining the need for simplification/reducing the cost of compliance and keeping the reporting framework relevant, the level of granularity of the information requested with respect to operating leased assets has been reduced. The item 'Expenses from operating leased assets other than interest expenses' will include the aggregate value of: (i) Depreciation of operating leased assets (ii) 'Impairment or (-) reversal of impairment of operating leased assets (financial and non-financial assets)' and (iii) 'Expenses from operating leased assets, including other administrative expenses related to operating leased assets'. Instructions have been amended accordingly.

2.4.2. Losses, expenses, provisions and other financial impacts due to operational risk events

20. Instructions and templates have been amended to reflect the fact that losses, expenses, provisions and other financial impacts due to operational risk events would impact the services component only. This led to amendments to template C 16.03 and changes in the instructions to templates C 16.02, for the ILDC (interest, leases and dividend component) part, where it is clarified that expenses related to operational risk events should be excluded from the ILDC calculation and instead reflected in the SC calculation.

2.4.3. Recognition of the difficulties encountered by institutions in ensuring compliance with data quality assurance, particularly during the initial reporting periods

21. The EBA acknowledges that compliance with the new reporting requirements creates some challenges for reporting institutions[5], including:

- **New data needed for past periods:** operational risk reporting does not always provide for a 1:1 mapping with other supervisory reporting, and therefore for past periods it may be necessary to identify other internal bank information, to be able to provide the granularity requested.

- **Retroactive adjustments:** in the case of M&A operations, the acquirer has to retroactively report the BIC as if the acquiree was part of the group for the whole reporting period.

- **Expenses related only to operational loss events** are spread all over the P&L and not included in a unique item, which complicates the reporting process.

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[5] More information can also be found in the feedback table of the RTS relating to the Draft Regulatory Technical Standards on the components of the business indicator under Article 314(9)(a) of the CRR: the topic related to other operating expenses (OOE): granularity of operational risk losses.

22. Recognising these challenges, and at the same time the implementation timeline required in the CRR3, a series of transitional provisions could be considered when assessing the data quality of the reported information. For the following reporting reference dates: March, June and September 2026, the following rows of templates C 16.02 and C 16.03 could be reported by employing business estimates or other proxies:

- **Template C 16.02:** Rows 0040 to 0060, 0080 to 0100, 0130 to 0190, 0230 to 0250, 0270 to 0300, 0320 to 0330, 0350 to 0360, 0390 to 0410 and 0440 to 0480.

- **Template C 16.03:** Rows 0010 to 0070.

23. It should be noted that the EBA's approach of gradually implementing reporting requirements has also helped institutions by providing further time for developing their reporting capabilities.

Figure 4. Reporting reference date and years considered in the BI calculation

	Years considered in the Bicalculation			
Reference date	2023	2024	2025	2026
Mar-26	x	x	x	
Jun-26	x	x	x	
Sep-26	x	x	x	
Dec-26		x	x	x

24. Starting from the December 2026 reference date, the date when the years used in the BI calculations change, the full set of information as depicted in templates C 16.02 and C 16.03 is expected to reach the highest level of quality assurance as requested by the supervisory authorities.

25. This transitional period for the expected quality of the reported data does not apply to the rest of the rows of both templates (C 16.02 and C 16.03) or of C 16.04 (when applicable), which are to be mandatorily reported from the entry into force of these draft ITS, while template C 16.01 is already reported by institutions.

2.5. Overview of reporting in the scope of own funds requirements for operational risk

26. Template C 16.01 captures the information on own funds requirements for operational risk according to the new approach introduced in the CRR3, the business indicator component (based on a BI which is a financial statement-based proxy for operational risk). This template is currently reported by institutions starting with a reporting reference date of March 2025. It is now complemented with the addition of three more templates to be reported by institutions – making up the 'full package' for reporting in the scope of own funds requirements calculation for operational risk.

27. These new templates shall be reported on an individual and consolidated basis in accordance with Section 2 of Chapter 2 of Title II of Part 1 of Regulation (EU) No 575/2013, with the exception of template C 16.04, which contains information about subsidiaries subject to the derogation set out in Article 314(3) and will be submitted at the highest level of consolidation.

2.5.1. Template C 16.02 – OPERATIONAL RISK – Business Indicator Component (OPR BIC)

28. This template provides a detailed breakdown of the sub-components that go into the calculation of the three BI components[6]. The values of the items included in this template related to Year 3 and Year 2 consider adjustments due to mergers, acquisitions and/or disposals of entities or activities. All the values reported are based on exact or approximate references to FINREP reporting, as reflected in the instructions.

29. If an entity applies the derogations stated in Article 314 paragraphs 3 and 4, the institution should exclude figures related to those derogations from all the items reported in C 16.02.

Interest, leases and dividend component

30. The ILDC component of the BI consists of three sub-components: IC, AC and DC. The lease sub-component is embedded in the IC, following the same logic as in the Basel standard.

Services Component (SC)

31. The SC is divided into four sub-components: other operating income, other operating expenses, fee and commission income and fee and commission expenses.

32. Article 314(5) of the CRR requires institutions to include operational risk event expenses and losses within their other operating expenses. However, the financial consequences of such events are reflected in an institution's P&L statement using various accounting breakdowns encompassing not only expenses and losses, but also broader economic impacts extending beyond the direct associations with operational risk events. Consequently, establishing a clear alignment with the various components of an institution's P&L statement becomes a more complex undertaking.

33. Member institutions belonging to a compliant institutional protection scheme according to the specifications in Article 113(7) of the CRR can determine the SC by excluding any income received from or expenses paid to other institutions within the same institutional protection scheme (IPS). Therefore, there are specific rows in the template to capture these amounts that should not contribute to the SC calculation (see also the example in Section 4.2).

Financial Component (FC)

[6] The BI comprises three components: the interest, leases and dividend component (ILDC), the services component (SC) and the financial component (FC), as reported in C 16.01.

34. The FC is calculated as the sum of the trading book component and the non-trading (i.e. banking) book component (Article 314 paragraph 4), each representing the average net profit or loss in the respective trading/banking book.

35. C 16.02 captures by row the sub-items that are to be considered in calculating the FC, divided into the trading and banking books. Unlike the ILDC and SC, for the FC, institutions applying the Prudential Boundary Approach (PBA)[7], will report the values for the sub-items in accordance with the PBA. In this case, institutions should also report the values in accordance with the accounting approach. When institutions apply the PBA, the values based on the PBA are used instead of the accounting ones when calculating the trading/banking book components. If a bank chooses to revert to the accounting approach, it will no longer report the values in accordance with the PBA and instead the accounting values will be considered for the calculation (see Example 2 in Section 4.2).

2.5.2. Template C 16.03 – OPERATIONAL RISK – Operational Risk Breakdown (OPR BD)

36. To acquire thorough and comprehensive insights into the allocation of financial impacts stemming from operational risk events within an institution's P&L statement, this template includes, for each of the last three financial years, a breakdown of the total losses, expenses, provisions and other financial impacts resulting from operational risk events, as recorded in the institution's profit and loss statement.

37. The value reported for the total in C 16.03 shall correspond to the value reported in C 16.02, contributing to the calculation of the SC.

2.5.3. Template C 16.04 – OPERATIONAL RISK – Information about subsidiaries related to the application of derogation referred to in Article 314(3)

38. In accordance with Article 314(3), institutions may for a certain period, and upon prior permission to be evaluated every two years by CAs, calculate a separate ILDC for some of their subsidiaries. By 31 December 2031, the EBA shall report to the Commission on the use and appropriateness of this derogation, having regard to the specific business models concerned and to the adequacy of the related own funds requirements for operational risk.

39. Template C 16.04 captures the information related to the ILDC computed for entities that are subject to the derogation. The sum of the ILDC for all entities would feed into C 16.01 the total ILDC value for entities considered by Article 314(3). An example of the reporting of template C 16.04 is provided in Section 4.2.

[7] The prudential boundary is a concept that clarifies the separation between the trading and the non-trading (i.e. banking) books, and Chapter 3 in Part Three, Title I of CRR3 outlines the rules and procedures to follow in order to proceed with this separation.

2.6. Reporting considerations: FINREP vs COREP Operational Risk reporting alignment

40. The reporting framework for operational risk is part of the COREP reporting package. As per the CRR3 requirements, it has been developed to ensure alignment with the accounting framework. The list of items that are part of the sub-components and components of the BI are either directly linked or a subset of the FINREP reported figures, in line with other Level 2 products[8] that are published together with this final report.

41. Aligning operational risk reporting requirements with FINREP standards promotes a harmonised interpretation and adoption of the BI across the EU. This alignment not only ensures consistency but also reduces implementation, administrative and operational costs for EU institutions, fostering efficiency and streamlined compliance.

42. FINREP templates are developed to account for both IFRS and for national accounting frameworks. When developing the reporting framework for operational risk, all references to FINREP should therefore account for both IFRS and NGAAP reporting and therefore the cells in FINREP to which the information is referring should cover both possibilities of reporting (e.g. held for trading (IFRS) and trading (NGAAP)).

43. While aligning reporting requirements between FINREP and COREP fosters consistency and efficiency, there are nonetheless certain aspects that need to be carefully considered from a reporting perspective, which may lead to discrepancies between the actual reported values under the FINREP and COREP frameworks.

Different requirements on the reporting of FINREP vs COREP values

44. The EBA's draft ITS on mapping align FINREP and COREP operational risk, but only a few data point values may match between the two frameworks. Reported values may differ due to varying other requirements (e.g. values for 'year 2' and 'year 3' are to be reported as adjusted by mergers, acquisitions and disposals in COREP and will not therefore reflect the information in FINREP). References to FINREP values should be understood as business concepts, not the exact reported data.

45. In addition, any thresholds for reporting applicable in FINREP should not apply to the data point needed for COREP operational risk reporting, unless otherwise specified. For example, FINREP template F 21.00 is to be reported if tangible assets subject to operating leases are equal to or higher than 10% of total tangible assets; this threshold should not be accounted for when

[8] *The draft RTS on the components of the business indicator under Article 314(9 (a) of the CRR and the elements to be excluded from the business indicator under Article 314(9)(b) of the CRR, and with the draft ITS on the mapping of the business indicator components with corresponding supervisory reporting references under Article 314(7) of the CRR.*

reporting the values for COREP. A similar problem in reconciling the data may appear if the frequency of reporting or submission dates are different between COREP and FINREP values.

Reporting of limited identical information between FINREP and COREP

46. Templates in COREP related to operational risk contain certain data points that are an exact mapping to FINREP values (as mentioned in paragraph 45). By referencing the same data point in FINREP to be reported in COREP – the operational risk reporting, institutions would need to double report this information (once as part of the FINREP module and once as part of the COREP module). According to the current proposal on reporting, only six data points have been identified that would be expected to be identical to the information reported in FINREP for the same reference date.

47. The definition of the identical data point is the same, as reflected in the instructions and as will be reflected in the technical package. These data points are essential information that is part of the computation of the own funds requirements on institutions. In addition, only consolidated FINREP is harmonised at EEA level and this information would not be available from the reporting of similar FINREP information that may be required on an individual basis by Competent Authorities. Given the above, from a cost and benefit analysis, it was proposed that these data points should also be collected as part of the COREP framework as opposed to leveraging the FINREP data, in order to ensure consistency in the information reflected in the templates and to avoid implementing, for the moment, new processes that would be needed to bring the information together, given the limited scope.

Different scope of consolidation

48. As part of the EEA harmonised reporting framework, FINREP is required to be reported only at consolidated level. Therefore, it may be possible that validation rules defined between FINREP and COREP apply only for the consolidated level. At national level, authorities may collect the FINREP data points at individual level that are also relevant for COREP operational risk at individual level, and in this case national authorities may enhance the scope of validations performed on their side.

3. Draft Implementing Technical Standards amending Commission Implementing Regulation (EU) 2024/3117 on supervisory reporting referred to in Article 430(7) of Regulation (EU) No 575/2013 concerning operational risk

COMMISSION IMPLEMENTING REGULATION (EU) …/...

of XXX

amending Commission Implementing Regulation (EU) 2024/3117 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regards to operational risk supervisory reporting of institutions

(Text with EEA relevance)

THE EUROPEAN COMMISSION,
Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and amending Regulation (EU) No 648/2012[9] and in particular Article 430(7), fifth subparagraph, and Article 430(1) point (a) thereof,

Whereas:

[9] OJ L 176, 27.6.2013, p. 1. ELI: http://data.europa.eu/eli/reg/2013/575/oj.

(1) Regulation (EU) No 575/2013 was amended by Regulation (EU) 2024/1623 of the European Parliament and of the Council[10] to implement the final set of international standards of the Basel Committee on Banking Supervision (Basel III). These developments have led to the revision of the reporting framework by the adoption of Commission Implementing Regulation (EU) 2024/3117 of 29 November 2024[11].

(2) Given the changes to the prudential framework for own funds requirements for operational risk, new reporting templates need to be developed to ensure institutions report according to the new framework in place. A first set of requirements on reporting in the scope of own funds requirements in line with Regulation (EU) No 575/2013 has already been adopted via Commission Implementing Regulation (EU) 2024/3117 and should be complemented with additional reporting requirements.

(3) Regulation (EU) No 575/2013 gives a series of mandates to the EBA to develop regulatory technical standards (RTS) and implementing technical standards (ITS) to further specify the application of the operational risk reporting framework. These delegated and implementing acts impact the structure and content of the reporting framework. Therefore, close coordination in the development process needs to be ensured, with the reporting framework being changed gradually as the associated delegated and implementing acts become available.

(4) In particular, with respect to the computation of own funds requirements, pursuant to Articles 314(9) and 315(3) of Regulation (EU) No 575/2013, the European Banking Authority is to develop draft RTS to specify the components of the business indicator and the elements listed in Article 314(7) referring to items to be excluded from the business indicator, draft ITS to specify the items of the business indicator by mapping those items to the corresponding reporting cells, and draft RTS to specify the adjustments to the business indicator due to merged, acquired or disposed entities or activities. The reporting framework capturing the own funds requirements has been closely coordinated with the development of these technical standards.

(5) The EBA has conducted open public consultations on the draft implementing technical standards on which this Regulation is based, analysed the potential related costs and benefits and requested the advice of the Banking Stakeholder Group established in accordance with Article 37 of Regulation (EU) No 1093/2010[12].

(6) Implementing Regulation (EU) 2024/3117 should therefore be amended accordingly,

HAS ADOPTED THIS REGULATION:

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[10] Regulation (EU) 2024/1623 of the European Parliament and of the Council of 31 May 2024 amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor (OJ L, 19.6.2024, ELI: http://data.europa.eu/eli/reg/2024/1623/oj).

[11] Commission Implementing Regulation (EU) 2024/3117 of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regards to supervisory reporting of institutions and repealing Commission Implementing Regulation (EU) 2021/451 (OJ L, 2024/3117, 27.12.2024, ELI: http://data.europa.eu/eli/reg_impl/2024/3117/oj).

[12] Regulation (EU) No 1093/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Banking Authority), amending Decision No 716/2009/EC and repealing Commission Decision 2009/78/EC (OJ L 331, 15.12.2010, p. 12, ELI: http://data.europa.eu/eli/reg/2010/1093/oj).

Article 1

Implementing Regulation (EU) 2024/3117 is amended as follows:

(1) in Article 5, paragraph 1 is replaced by the following:

‘1. Institutions that report information on own funds and on own funds requirements as required by Article 430(1), point (a), of Regulation (EU) No 575/2013 on an individual basis shall submit that information as specified in Section 1 – “Reporting on own funds and own funds requirements” of Annex I to this Regulation, with the exception of template C 16.04, with a quarterly frequency.’

(2) in Article 7, the following point is added:

‘(c) EU parent institutions shall report the information required in template C 16.04 of Annex I related to information on subsidiaries subject to the derogation provided for in Article 314(3) of Regulation (EU) No 575/2013, on a quarterly basis.’

(3) The text set out in Section 1 – ‘Reporting on own funds and own funds requirements’ of Annex I is replaced by the text set out in the Annex to this Regulation.

Article 2

This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

For the Commission

The President

On behalf of the

President [Position]

4. Accompanying documents

4.1. Draft cost-benefit analysis / impact assessment

49. As per Article 15 of Regulation (EU) No 1093/2010 (EBA Regulation), any draft ITS developed by the EBA shall be accompanied by an impact assessment (IA) which analysis 'the potential related costs and benefits'.

50. This analysis presents the IA of the main policy options included in this Consultation Paper on the draft implementing technical standards amending Commission Implementing Regulation (EU) 2024/3117 on supervisory reporting referred to in Article 430(7) of Regulation (EU) No 575/2013 concerning operational risk ('the draft ITS'). The analysis provides an overview of the identified problem, the proposed options for addressing this problem, as well as the potential impact of these options. The IA is high level and qualitative in nature.

4.1.1. Problem identification and background

51. Article 430(7) of Regulation (EU) No 575/2013 ('the CRR') mandates the EBA to 'develop draft implementing technical standards to specify uniform reporting formats and templates, instructions and methodology on how to use those templates, the frequency and dates of reporting, the definitions and the IT solutions for the reporting (…).'. Under this mandate the EBA has developed several ITS to create these reporting templates and their instructions but also, over time, to adapt these reporting templates and instructions to the related changes in the regulations. These ITS, adopted by the Commission, are now published by the Commission under Commission Implementing Regulation (EU) 2024/3117. Thus, this Regulation is important for institutions and Competent Authorities as it gathers the latest reporting templates and instructions; this Regulation therefore needs to be updated when the underlying related Regulation is modified.

52. The CRR3 implements the Basel III reforms, which will underpin a robust regulatory framework, efficient supervision and enhanced risk control by credit institutions. Some new requirements from the CRR3 are related to operational risk and have an impact on reporting elements that will thus make the current operational risk reporting templates and instructions out of date.

53. Consequently, Commission Implementing Regulation (EU) 2024/3117 needs to be amended to adapt operational risk reporting templates and instructions to CRR3-related requirements.

4.1.2. Policy objectives

54. The draft implementing technical standards amending Commission Implementing Regulation (EU) 2021/451 on supervisory reporting referred to in Article 430(7) of Regulation (EU)

No 575/2013 concerning operational risk aims at adapting the current reporting templates and instructions to the operational risk policy changes.

4.1.3. Options considered, assessment of the options and preferred options

55. Section C presents the main policy options discussed and the decisions made by the EBA during the development of the draft ITS. Advantages and disadvantages, as well as potential costs and benefits from the qualitative perspective of the policy options, and the preferred options resulting from this analysis, are provided.

Operational Risk Breakdown

56. The CRR currently contains several different approaches for the computation of the regulatory capital on operational risk. Under the CRR3, the existing approaches will be replaced by one single, non-model-based approach called the business indicator component ('BIC') approach. With these changes, the deletion of the former operational risk template and its replacement with one template on the operational risk own funds requirements (OPR OF) and one on the operational risk business indicator component (OPR BIC) was deemed necessary. On the OPR BIC template, institutions will be required to report, as one aggregate amount, their total losses, expenses, provisions and other financial impacts resulting from operational risk events. Regarding the need for an addition of one template giving a breakdown of these total losses, expenses, provisions and other financial impacts, as recorded in the institution's profit and loss statement, the EBA considered two policy options.

Option 1a: To add a template with a breakdown of the total losses, expenses, provisions and other financial impacts, as recorded in the institution's profit and loss statement, but only those resulting from operational risk events (OPR BD).

Option 1b: Not to add a template with a breakdown of the total losses, expenses, provisions and other financial impacts.

57. Requesting institutions to provide a breakdown of their total losses, expenses, provisions and other financial impacts would create additional reporting costs for institutions. On the other hand, these costs should not be significant, as the requested information should already be available on the institutions' side. Furthermore, the provision of the above-mentioned breakdown could be done, for a first phase until the end of 2026, by employing business estimates or other proxies. The reporting of that additional information by institutions would also trigger costs for Competent Authorities, as the additional templates would have to be controlled and reviewed in the context of their supervisory duties. In terms of benefits, the reporting of this breakdown would provide much-needed information for the supervisors to be able to monitor one important element of the computation of the risk-weighted assets (i.e. losses, expenses, provisions and other financial impacts resulting from operational risk events) and, ultimately, to enhance the quality of the performance of their supervisory tasks.

58. Based on the above, Option 1a has been chosen as the preferred option and the reporting will contain a template requesting a breakdown of the total losses, expenses, provisions and other

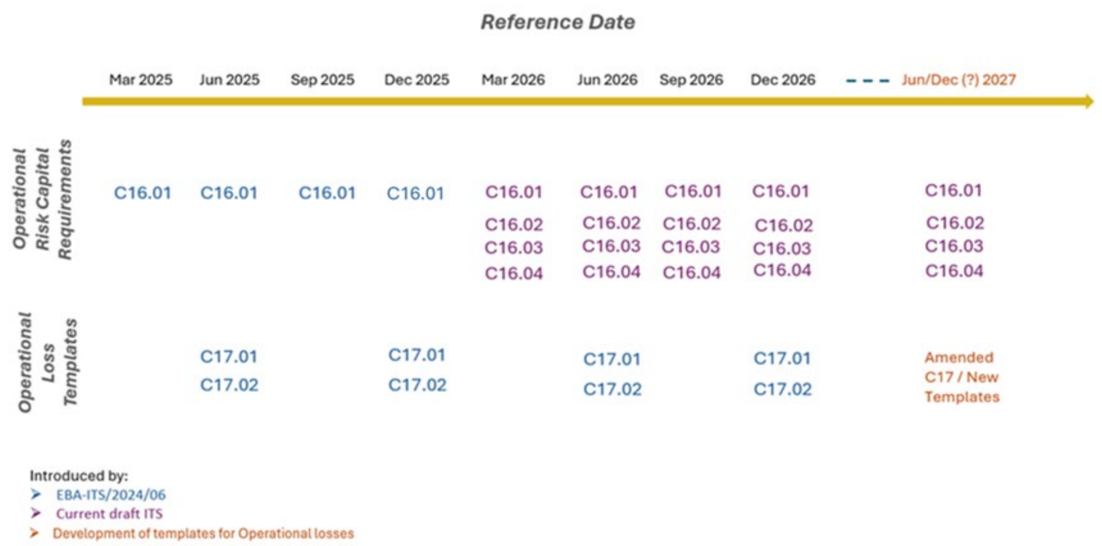
financial impacts, as recorded in the institution's profit and loss statement, but only those resulting from operational risk events (OPR BD).

4.1.4. Conclusion

59. The draft ITS will amend Commission Implementing Regulation (EU) 2024/3117 on supervisory reporting as referred to in Article 430(7) of Regulation (EU) No 575/2013 concerning operational risk, in order to adapt the current reporting templates and instructions with the underlying related changes to Regulation (EU) No 575/2013 brought by the CRR3. For institutions, the draft ITS requirements are expected to trigger costs, given that more information will be requested with new additional templates. However, the majority of these requirements are linked to the CRR3 changes and thus the costs are not all associated with the draft ITS but rather with the underlying related changes brought by the CRR3. Moreover, these requirements are necessary to allow supervisors to perform adequate monitoring of the application of the CRR3 operational risk requirements, and this benefit exceeds the costs for institutions and the additional costs of monitoring that will be incurred by supervisors. Overall, the impact assessment on the draft ITS suggests that the expected benefits are higher than the incurred expected costs.

4.2. Reporting examples

Example 1: Overview of expected reporting templates



Example 2. Reporting of Financial Component

Scenario 1: the institution is not using the PBA approach or has reverted back to using the accounting approach in order to calculate the trading and banking book parts of the FC. This approach takes the average of the net profit or loss applicable to the banking and trading book according to the accounting approach values over the past three financial years (below is a summarised example of figures to be reported).

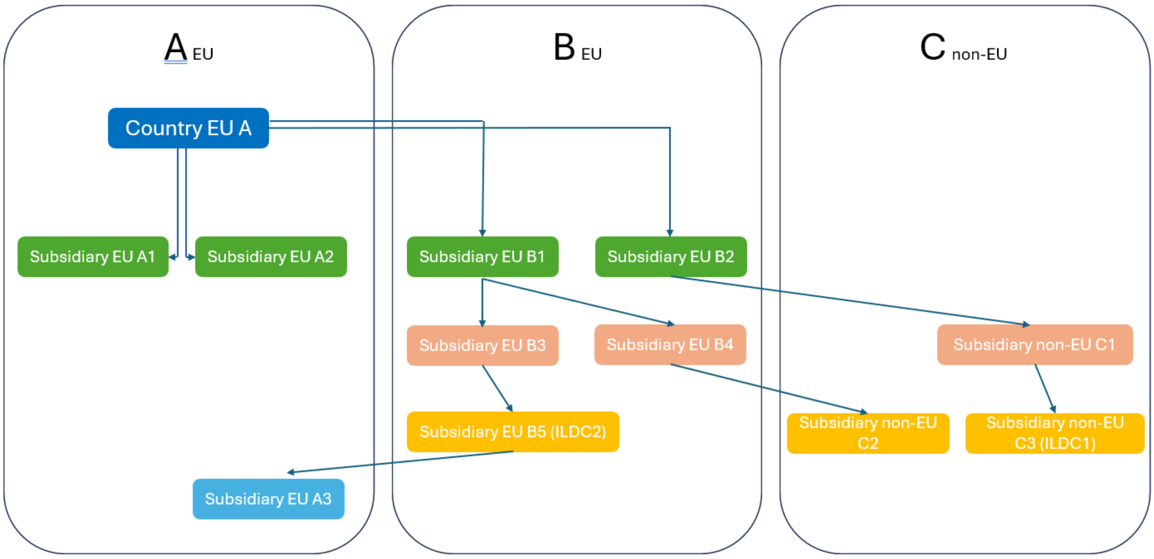
		YEAR 3		YEAR 2		LAST YEAR		
		Value	**Value – Prudential Boundary Approach**	**Value**	**Value – Prudential Boundary Approach**	**Value**	**Value – Prudential Boundary Approach**	**Average value**
		0010	0020	0030	0040	0050	0060	0070
	3. Financial component (FC)							
0370	**Trading book component**							3 700 000
0380	**Net profit or loss applicable to trading book**	4 200 0 00		2 900 000		4 000 000		
0420	**Banking book component**							7 600 000
0430	**Net profit or loss applicable to banking book**	7 500 0 00		6 400 000		8 900 000		

Scenario 2: the institution is using the PBA approach. The institution must still report the values for the sub-items (r0420:r0440 & r0460:r0510) according to the accounting approach for each of the past 3 years, in addition to reporting the values according to the PBA. When calculating the trading book and the banking book components, only the PBA values shall be considered (below is a summarised example of figures to be reported).

		YEAR 3		YEAR 2		LAST YEAR		
		Value	Value – Prudential Boundary Approach	Value	Value – Prudential Boundary Approach	Value	Value – Prudential Boundary Approach	Average value
		0010	0020	0030	0040	0050	0060	0070
	3. Financial component (FC)							
0370	Trading book component							2 800 000
0380	Net profit or loss applicable to trading book	4 200 000	3 400 000	2 900 000	1 700 000	4 000 000	3 300 000	
0420	Banking book component							6 600 000
0430	Net profit or loss applicable to banking book	7 500 000	6 500 000	6 400 000	5 700 000	8 900 000	7 600 000	

Example 3. Reporting of template C 16.04

A parent institution located in the EU has several subsidiaries operating in three different countries. Some of these subsidiaries are, at the same time, parent institutions in their respective countries as shown below. Subsidiary non-EU C3 (ILDC1) and Subsidiary EU B5 (ILDC2) are supervised as part of Subsidiary EU B1 and Subsidiary non-EU C1 sub-consolidated supervision in their respective home countries.



The parent institution of the whole consolidated group considers that, due to the specificities of some local markets, it is more appropriate to ask for an authorisation to apply the derogation provided for in Article 314(3) of CRR3 for two of its subsidiaries, as shown above.

The EU parent institution supervisor has granted the derogation provided for in Article 314(3) by virtue of which the ILDC of both the 'Subsidiary non-EU C3' (ILDC1) and 'Subsidiary EU B5' (ILDC2) will be added to the ILDC of the rest of the consolidated group. Because of this, template C 16.04 should be completed only by the EU parent institution 'Country EU A' according to the following logic:

C 16.04 - OPERATIONAL RISK - Information at subsidiary level related with Article 314(3)

	Legal Entity name	LEI Code	ILDC	IC	AC	DC
Rows	0010	0020	0030	0040	0050	0060
10	Subsidiary non-UE C3	XXXXXXXXX	9,5	10	110	7
20	Subsidiary UE B5	XXXXXXXXX	11,6	8	115	9

The total ILDC (ILDC1+ILDC2) corresponding with those two subsidiaries amounts to 21.1, which must be completed accordingly in template C 16.01 ({C 16.01; r0050; c0010}).

On the other hand, with regards to reporting obligations, all institutions within the EU will have to report both individual and consolidated supervisory reporting templates (FINREP and COREP). With regards to the latter, the following consolidated information related to operational risk should be prepared:

Country EU A:
ILDC (rest of the group) + ILDC1 + ILDC2
Templates C 16.01 to C 16.04

Subsidiary EU B1: Sub-consolidated information should be reported irrespective of its inclusion within the consolidated figures reported by parent institution as above.
ILDC (rest of its subgroup) + ILDC2
Templates C 16.01 to C 16.03

Subsidiary EU B2: Sub-consolidated information should be reported irrespective of its inclusion within the consolidated figures reported by parent institution as above.
ILDC (rest of its subgroup) + ILDC1
Templates C 16.01 to C 16.03

Example 4. Reporting of income and expenses concerning members of the same IPS

Income and expenses related to the service component and arising from transactions with a member of the same IPS must be reported separately if the conditions of Article 314(5) are met. In this case, figures should not be included in the calculation of the SC component and, consequently, will not be part of the calculated figures of column 0070 in template C 16.02.

This requirement applies from the date of first application after the permission was granted by the Competent Authority. Therefore, if income or expenses originated from transactions with the same institution before it became a member of the same IPS, and before receiving permission from the Competent Authority, these figures should continue to be included in other income and expenses from previous periods and thus in the SC.

In the following example, the reporting institution has received income from and paid expenses to institution A over the past several years. In 2026, institution A joins the same IPS as the reporting institution and the reporting institution is granted permission to calculate the services component net of any income received from, or expenses paid to, institution A. Therefore, from 2026 onwards, income from and expenses paid to institution A shall be reported in the dedicated lines reflecting transactions within the IPS. However, for reference date Q4 2026 in this example, income and expenses reflected in columns 0010 (Year 3) and 0030 (Year 2) shall not be retroactively adjusted and not feed into the lines reflecting transactions within the IPS and shall therefore still be reflected in the average of column 0070.

Q4 2025		YEAR-3		YEAR-2		LAST YEAR		
		Accounting Value	Value - Prudential Boundary Approach	Accounting Value	Value - Prudential Boundary Approach	Accounting Value	Value - Prudential Boundary Approach	Average Value
		0010	0020	0030	0040	0050	0060	0070
0220 - 0360	**2. Services component (SC)**							
0220	**Other operating income**							1300
0230	Other operating income from members belonging to the same IPS	0		0		0		
0240	Profit from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations	100		200		300		
0250	Other	1000		1100		1200		
0260	**(Other operating expenses)**							940
0270	(Other operating expenses from members belonging to the same IPS)	0		0		0		
0280	(Total losses, expenses, provisions and other financial impacts due to operational risk events)	10		20		30		
0290	(Losses from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations)	20		20		20		
0300	(Other)	800		900		1000		
0310	**Fee and commission income component**							100
0320	Fee and commission income	90		100		110		
0330	of which: from members belonging to the same IPS	0		0		0		
0340	**(Fee and commission expenses component)**							50
0350	(Fee and commission expenses	40		50		60		
0360	(of which: from members belonging to the same IPS)	0		0		0		

Q4 2026		YEAR-3		YEAR-2		LAST YEAR		
		Accounting Value	Value - Prudential Boundary Approach	Accounting Value	Value - Prudential Boundary Approach	Accounting Value	Value - Prudential Boundary Approach	Average Value
		0010	0020	0030	0040	0050	0060	0070
0220 - 0360	**2. Services component (SC)**							
0220	**Other operating income**							1493,3
0230	Other operating income from members belonging to the same IPS	0		0		20		
0240	Profit from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations	200		0		380		
0250	Other	1100		1200		1300		
0260	**(Other operating expenses)**							1049
0270	(Other operating expenses from members belonging to the same IPS)	0		0		3		
0280	(Total losses, expenses, provisions and other financial impacts due to operational risk events)	20		30		40		
0290	(Losses from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations)	20		20		20		
0300	(Other)	900		1000		1097		
0310	**Fee and commission income component**							110
0320	Fee and commission income	100		110		140		
0330	of which: from members belonging to the same IPS	0		0		20		
0340	**(Fee and commission expenses component)**							60
0350	(Fee and commission expenses)	50		60		90		
0360	(of which: from members belonging to the same IPS)	0		0		20		

4.3. Feedback on the public consultation

60. The EBA publicly consulted on the draft ITS contained in this paper in the period 20 February–30 April 2024. The time period for consultation was shorter than usual (less than 3 months), due to the need to finalise the draft ITS in a timely manner and to leave institutions sufficient time to implement the changes and prepare to report for the first reference date of March 2025.

61. A total of 11 replies13 have been received to the consultation on supervisory reporting on operational risk14.

62. The development of the supervisory reporting requirements for operational risk are closely linked with the development of other Level 2 policy products regarding operational risk, as was explained in the Consultation Paper and now in this final report. The consultation period for the policy products ended on 21 May 2024. In many cases the feedback received on reporting topics also had implications on the policy side and, in addition, similar feedback as received to the Consultation Paper on reporting has also been sent on the consultation for the policy products. The policy and reporting products were therefore developed in close coordination and the publication of the final reports was synchronised.

63. Given the above, the feedback received to the Consultation Paper on operational risk reporting (EBA/CP/2024/07) has been revised as follows:

   - ➢ Feedback already covered in the 'simplified package' -> has not been reflected in this final report, as it is already reflected in EBA – ITS/2024/06.
   - ➢ Feedback presented in the final report on the other Level 2 products:
     - **If it leads to changes in reporting:** the feedback is also presented in this final report and feedback table on the reporting side.
     - **If it does not lead to changes in reporting**: the feedback is not presented in this final report and feedback table on the reporting side.
   - ➢ Other feedback: is reflected in this final report and feedback table.

Summary of the key issues and the EBA's response

[13] Nine replies have been published on the website, while two were confidential.
[14] Implementing Technical Standards on supervisory reporting concerning operational risk | European Banking Authority.

Comments	Summary of responses received	EBA analysis	Amendments to the proposals
Comments topic			
Mergers and acquisitions	In the case of mergers, should we include the effect of this in all reporting lines in C 16.02 or only reflect it in C 16.01?	The effect of mergers, acquisitions and disposals should be included in all reporting lines in template C 16.02, in addition to being reflected in template C 16.01. This is already reflected in the instructions.	No changes made
Template C 16.03 reporting of losses, expenses, provisions and other financial impacts resulting from operational risk events.	There seems to be a discrepancy between Article 314(5) (Article 314(7) in the final text) of CRR3, which lists the elements that should be excluded from the calculation of the business indicator, and some of the items being requested in template C 16.03. -> specifically rows 0020 and 0030.	Article 314(7) of the CRR3 requests not to use some items within the BI, e.g. administrative expenses. However, Article 314(5) of the CRR3 specifically states that expenses and losses due to operational risk events need to be included within the OOE. The RTS clarify that such expenses and losses should be included within the BI, regardless of where they are accounted (e.g. also in items, such as administrative expenses, which in accordance with Article 314(7) of the CRR3 should not be used within the BI).	The specific references of templates C 16.02 and C 16.03 have been adjusted to align with the ITS on mapping
Granularity of information in the templates	The supervisory authority's goal with the use of fixed FINREP items is to narrow the scope of interpretation. However, in some cases, 'thereof' values (for example, regarding data loss) must be reported within a FINREP item, which can only be gathered within the regulatory consolidation scope with considerable effort. The	The EBA acknowledges that the new operational risk reporting could be burdensome for the institutions. See Section 2.4.3.	Final report was amended

	identification of such items can only be carried out using complex, sometimes manual, processes. Therefore, the suggestion is to omit such rows unless absolutely necessary. Even if FINREP reports exist for these dates, the level of detail needed for form C 16.02 is not available. If there are any discrepancies from current FINREP reporting, as most certainly in the case of mergers and acquisitions adjustments, retroactive data gathering will be exceedingly challenging.		
Changes in losses taxonomy	Any change to the reporting framework implies changes in internal management and should be clearly communicated in advance so that they can be adequately implemented. There are expected changes in the operational risk taxonomy in the near future. These should be clearly communicated in advance so that banks have time to adapt.	The reporting templates for the losses from operational risk will be developed in a second stage, as explained in the final report.	The expected timeline for the templates of operational risk losses has also been briefly explained in this final report.
First reporting date	The Consultation Paper does not make any statements about the first reporting dates using the new approach -> detailed reporting for each of the last three financial year-ends. This means that, for the first reporting date (31.3.2025), the figures for the reporting dates YE 2024, YE 2023 and YE 2022 must be retrospectively processed. Even if FINREP reports are available for these reporting dates, the reporting data are not available in the granularity required for the preparation of the reporting form C 16.02. In all cases of deviations from the existing FINREP reporting (adjustments for M&A, need for more granularity), the retroactive data provision is very burdensome.	For detailed information on expectations at the first reporting date after the date of application of the CRR3, please refer to the EBA communication here: https://www.eba.europa.eu/publications-and-media/press-releases/eba-updates-supervisory-reporting-framework	As evidenced by the communication in the link, the steps taken by the EBA with regards to the reporting framework and its interaction with the policy development phase already provide relaxed conditions for the first reporting dates and allow institutions to ease into the new requirements. Thus, this has been reiterated in these ITS.
Handling of nGAAP-FINREP references	The proposal is primarily based on IFRS. The handling of nGAAP-FINREP remains unclear. Many of the cells of the various FINREP templates listed in the consultation for determining the business indicator are not documented or greyed out in the German FINREP implementation for	The mapping proposed is considered to be aligned with NGAAP institutions compatible with both IFRS and BAD. In addition, the instructions reflect both the IFRS references as well as BAD in case there are	The EBA IT solutions were revised to ensure both references to IFRS and BAD, where are provided.

	institutions reporting under nGAAP (German Commercial Law, HGB), for example. For example, in our view, the cells interest income (F 02.00_r0010_c0010) and interest expenses (F 02.00_r0090_c0010) are missing for HGB institutions. Will there be an EBA adjustment here for nGAAP balance sheet providers, or would this have to be defined by the national supervisory authority? Paragraph 1 states: 'Given that the FINREP templates laid down in Annexes III and IV of Commission Implementing Regulation (EU) 2021/451 set out the financial information to be reported in accordance with IFRS and GAAP, items to be included in the calculation of the business indicator components should be mapped with the corresponding cells of those templates'. Question: does this mean that the items to be included in the calculation of the business indicator components of the institution at unconsolidated (subsidiary) level (or for the respective scope where IFRS is not available) might be reported based on the national accounting standard (UGB in Austria)?	discrepancies in FINREP reporting between the two. Yes, institutions should report all amounts based on the accounting framework they use for the reporting of financial information, unless otherwise specified in this Annex. References to reporting requirements reflected in Annex III, IV and V to the EBA IT solutions have been reflected throughout the instructions, due to the close connection between operational risk reporting and institution's financial statement. Where a 1:1 mapping between nGAAP and FINREP is not possible, the institution should use underlying data in accordance with nGAAP to ensure that the reporting reflects the actual calculation of the own funds' requirements.	
Mapping to FINREP	Row 0010. The row refers to 'other expenses' in FINREP (F 45.3 r0040 c0020). However, it is unclear if the figures should be collected from FINREP as a whole (1:1) or if only the figures referring to operational risk in FINREP should be collected? Row 0050. Please clarify where the figures should be collected from. It does not seem to be from FINREP.	As indicated in the ITS on BI items, and in these draft ITS, the mapping can be exact or approximate. To be harmonised as much as possible among institutions in the building of the BI, a mapping with FINREP items has been indicated in these ITS.	It has been clarified in these draft ITS that when applying exact mapping, the FINREP meaning of the item should be used for COREP purposes. When applying approximate mapping (because in such cases FINREP is not specific enough to permit 1:1 mapping), the

			FINREP item indicated in the ITS should be used as reference and adjusted accordingly based on the institution's most appropriate data source (e.g. accounting, managerial).
Template C 16.03	The presentation in Figure 1 on page 7 provides for quarterly reporting with C 16.03 by all institutions. As we understand it, the content of C 16.03 is a list of P&L expense data attributable to operational risks. In our opinion, however, the provision of such a statement is only necessary if an institution is obliged to collect data in accordance with Article 316(f) CRR III. However, this requirement applies only to institutions with a BI of EUR 750 million or higher. Accordingly, we assume that template C 16.03 is only relevant for institutions that are subject to the requirements of Article 316(f) CRR III. The depiction in Figure 1 should therefore be adjusted accordingly.	Template C 16.03 should be reported by all institutions irrespective of their size.	No changes made.
Pillar III	We would suggest avoiding Pillar III templates with data that cannot be recovered from COREP. This requires creating an additional direct interface between OpRisk and Pillar III systems, whereas so far the OpRisk systems only fed the COREP ones.	Please see the final report[15] and the approach taken for Pillar III templates on operational risk.	Mapping between Pillar III disclosures and reporting will be updated.
Tight timeline with first reporting by 31 March 2025	A very significant effort: -> limited time to prepare their IT systems and processes -> reporting as of 31 December2024 will have to be according to the previous standards.	In view of the feedback received from institutions on the tight timeline for implementation of the new reporting frameworks in line with CRR3(EBA-ITS/2024/06), the remittance date for Q1 2025 data has been delayed to 30 June 2025. In addition, the reporting of the rest of the	Final report reflects the process followed.

[15] The EBA updates the Pillar 3 disclosure framework finalising the implementation of the Basel III Pillar 3 framework \| European Banking Authority

	-> operational burden that the preparation of these reporting templates will require, given that in some cases FINREP will not provide the information that is required. We consider that certain exemptions or relief should be provided to institutions.	operational package was delayed, to allow clarity on the reporting information and allow enough time to the institutions to prepare.	
Need more alignment with FRINREP	We would like to have more alignment between operational risk reporting and FINREP. In the current shape, we need to prepare separate reporting processes, each time verifying: - Appropriate classification of lease items; - Appropriate division between banking and trading book; - Appropriate reporting of costs connected with operational risk events; - Calculation of some items from F 21, as there is a threshold that does not allow calculation at the level of sub-consolidated FINREP reporting; One process can be easier to manage, but will force banks to report additional data quarterly instead of yearly.	The EBA has developed implementing technical standards to specify the items of the business indicator by mapping those items to the corresponding reporting cells set out in Commission Implementing Regulation (EU) 2021/451(*), **where appropriate.** EBA took into consideration these aspects. 1:1 mapping is not possible for all components, for different reasons.	No change
Fees and commission income/expense	With specific reference to lines 0350 and 0380 of template C 16.02, the ITS on the mapping to supervisory reporting under Article 314(7) of the CRR include, in the calculation of the BI, items related to F.22 that are not listed in C 16.02 (see Annex 1), which includes F.02 items. Please clarify whether the composition/content is the same and harmonised, referring only to F.02. By comparing the list of items as for draft RTS 'on the components of the BI under Article 314(6) of the CRR', Article 7 with the list of items as for draft ITS 'on the mapping of the BI components to the corresponding	The ITS on the mapping to supervisory reporting under Article 314(10) of the CRR refers to F 22. Not all institutions have to report F 22, therefore an additional mapping to less granular F02 is done. F22.01r0200_c0010 (fee and commission income from loan commitments given) is reflected in the ITS on the mapping to supervisory reporting under Article 314(10) for lines 0320 of template C 16.02.	No change

	supervisory reporting under Article 314(7) of the CRR', we noticed that the RTS list does not include the item 'fee and commission income from loan commitments given' (which is included in the ITS list, mapped to F22.01r0200_c0010 FINREP item). Please clarify whether this item should also be included within the RTS list.		
New numbering of certain articles	Two respondents pointed to the fact that the final CRR3 text which has been adopted by the Plenary of the European Parliament on 24 April 2024 has introduced changes to the numbering of certain articles. As a result, certain articles mentioned in the consultation now have a new numbering.	There is a difference in the numbering of paragraphs in Article 314. Templates, instructions and the final report will make reference to the final CRR3 text and will therefore differ to what was published under consultation.	Templates and instructions have been updated.
Interest-bearing assets – > balances with central banks	Additionally, interest-bearing assets include all the balances with central banks, without distinguishing whether these balances kept at central banks generate any interest for the depositing institution or not. It should be noted that there are balances left at central banks both for regulatory reserve maintenance purposes, and others for operational purposes to carry out payments of their clients. In some cases, these balances, depending on the decision of the central bank in question, may or may not accrue interest for the institution subject to the decision of this central bank. In cases where these balances do not accrue any interest for the entity, there is no difference for this entity between the balance kept in cash immediately available to the institution and these balances. Therefore, we propose that in cases where the balances kept at central banks, as well as demand deposits kept at credit institutions, do not generate any interest for the depositing institution, these should be kept out of scope of the calculation of interest-bearing assets.	The cash balance at central banks and other demand deposits should be included, since they typically generate interest income. Cases where interest is not generated are marginal. 'Cash on hand' is not considered either in the IC or in the AC within the RTS on BI. The balance sheet line which is being considered is 'Cash balances at central banks and other demand deposits', which is related to F.01.01 rows 30 and 40.	Instructions have been updated

Other operating income	With reference to the calculation of the other operating income, neither Article 5 of the RTS nor the ITS included in the annex explicitly exclude from the calculation of the business indicator recoveries of expenses on behalf of customers (stamp duty, substitute tax and other recoveries), although Article 314(5) (d) provides for such exclusion. We urge seeing Article 5 of the ITS amended, because in certain jurisdictions exclusion has a material effect on BIC.	The EBA acknowledges this point.	Templates and instructions have been updated.
IPS	Within the calculation of the service component in C 16.02, there are certain positions, such as row 0300, in which deductions can be made for income/expenses if they can be attributed to members of the same IPS. When a new member joins the IPS, does the data then need to be reported for the year they joined only, and from then on, or is the date retroactively to be adjusted?	Data are not to be adjusted retroactively.	No changes made.