EBA/CP/202607 Module 4

10 April 2026

Consultation Paper

Revisions to the ITS on supervisory reporting (Commission Implementing Regulation (EU) 2024/3117)

Module on Stress testing

1. Background and rationale

1. The EU-wide stress test is a core supervisory tool that supports both micro-prudential supervision—most notably the assessment of banks' capital adequacy and the setting of Pillar 2 guidance—and market transparency by providing a consistent and comparable view of banks' resilience under adverse scenarios. Over time, the exercise has evolved into a comprehensive and detailed framework, which necessarily entails a significant operational effort for both banks and supervisory authorities.

2. So far, the EU-wide stress test has relied on the data collected through the ad hoc data collections using stand-alone ad hoc templates, combining inputs, calculations and outputs under stress-test-specific definitions. While this approach has ensured a high degree of control and flexibility, it has also required considerable manual work by banks, reconciliation with FINREP and COREP, and extensive quality assurance processes. Experience from recent rounds of EU-wide stress testing exercises suggests that the growing size and granularity of the templates absorb substantial resources, while additional refinements in granularity do not always translate into proportionate gains in analytical insight.

3. Against this background, and in line with the EBA objectives for increasing efficiency of the supervisory and regulatory frameworks, the EBA seeks to simplify the EU-wide stress test while preserving its analytical robustness, comparability and hybrid structure, combining bottom-up and top-down modelling approaches. A key element of this strategy is to strengthen synergies with supervisory reporting by integrating selected stress test data needs—most notably credit risk starting points, including some data for independent supervisory analysis —into regular reporting (FINREP, COREP and ESG reporting) and aligning further definitions, thereby reducing reliance on ad-hoc data collections in future exercises for starting points.

4. The simplification proposed should also reduce the burden of the stress test exercise as templates are streamlined through reduced and more targeted breakdowns, clearer and more stable methodological definitions, and closer alignment with accounting and supervisory reporting standards instead of stress test specific concepts.

5. Once implemented, this integration would allow institutions to rely to the extent possible on supervisory reporting data for stress test starting points in the relevant risk areas and to focus stress test submissions primarily on projections, reducing duplication and simplifying quality assurance over time. The impact assessment indicates that, taken together, these measures could lead to an overall reduction in stress test data requirements of around 55% compared to the 2025 exercise, alongside lower reconciliation costs and a greater scope for automated and consistent quality checks based on regularly validated supervisory data. The approach is guided by the principles of proportionality and stability: reporting requirements will scale with the

materiality, size and complexity of institutions, and changes to data requirements will be introduced with a medium- to long-term perspective to enhance predictability and operational efficiency. Overall, the integration of stress testing data needs into supervisory reporting is expected to deliver meaningful efficiency gains, support high-quality analysis, and provide a stronger and more sustainable data foundation for both bottom-up assessments and the development of supervisory analytical tools and challenger models.

6. The integration of stress testing into a regular reporting will cover data on the starting points, as data on projections is less suited for the regular reporting and will therefore remain for all risks in the ad-hoc stress test templates, outside of supervisory reporting. Projections data are based on scenarios tailored to each exercise. This proposal would apply for the 2029 stress test and onwards (as FINREP/COREP amendments are planned to have as first reference as of September 2027). Still for the 2027 stress test, the stress test templates will mimic the FINREP/COREP/ESG reporting proposals included in the amended ITS on supervisory reporting. This way, institutions will already benefit from the simplification of the stress test templates for the 2027 exercise, and it help them to prepare the implementation of the FINREP/COREP/ESG reporting changes.

7. The EBA suggests approaching the integration of the stress testing data templates in a comprehensive manner covering the data needs for bottom-up, centralised analytical and benchmarking tools and climate stress tests, where practically feasible and reasonable considering the role of the regular supervisory reporting as opposed to the targeted data collection.

Credit risk (including information for climate stress test)

8. Credit risk data needs for the calculation of losses can be split into those needed for the EU-wide stress test (bottom-up), for analytical supervisory tools and desktop analysis, and climate stress test data[1]. Further, credit risk exposure amounts (REA) are also included for the quantification of the scenario impact on the CET1 ratio.

9. The data needs for stress testing purposes and integration of those needs to the regular reporting necessitate amendments of FINREP, COREP and the inclusion of certain sectorial information in ESG reporting under template D 01.00. This template also includes data requirements on transition risk needed for the purpose of climate stress testing. The proposed approach aims to ensure consistency in the reporting of all sectoral information collected for stress testing purposes, to streamline data submissions, and to avoid duplication.

[1] To fulfil its mandate under Article 23 of its Founding Regulation and in line with the strategic steering provided by the Board of Supervisors (BoS) in 2024, the EBA intends to integrate a short-term climate risk component into the 2027 EU-wide stress test. This integration will take the form of a dedicated module covering both physical and transition risks.

10. At the same time, forward-looking sectoral projections required specifically for the EU-wide stress test and for climate stress testing purposes would continue to be collected through ad hoc templates in the years in which the stress test is conducted.

Integration and amendments to FINREP

11. FINREP is best placed to integrate the starting point data required to compute credit risk losses. FINREP covers the reporting of impairments calculations and already includes some stress test relevant information. Some additions in terms of variables and geographical granularity would be needed. To support stress testing, specific information is requested on gross carrying amounts, impairments (with and without overlays) and some credit risk parameters, with geographical breakdown.

12. Furthermore, information is requested to support centralised analytical tools based on FINREP. Some additional details would be required, which would allow for a broader sample and higher frequency to enhance calibration of challenger models. For those data that are common with the data for supporting stress test exercises (exposures, impairments), redundancies will be removed, depending on the final proportionality chosen.

13. In particular, the following templates are proposed to be added to FINREP:

    a) Template F 49.01. To support effective quality assurance of stress test projections, the template contains fields to report information for credit risk parameters for on-balance sheet amortised cost exposures broken-down by residence of the counterparty. The template also includes information on the amount of off-balance sheet exposures.

    b) Template F 49.02. The template contains fields to report carrying amounts, broken down by IFRS9 stage where relevant, impairments, and collateral information for amortised cost on-balance sheet and off-balance sheet exposures broken-down by residence of the counterparty. This information is added to compute stress test losses and allow adequate quality assurance. The template also includes fields for transfers of exposures across IFRS9 stages, information that can support supervisory analytical work. The latter information is already requested to some extent in FINREP, but the template adds the geographical dimension.

14. The data requirements specified above rely less on ad-hoc stress test data requests and definitions thus, reduce the efforts for both banks and supervisors to quality assuring and benchmark stress test starting point data and projections.

Integration and amendments to COREP

15. The calculation of credit risk exposure amounts (CR REA) will draw from existing COREP information, plus some limited information. The starting points for CR REA under standardised approach (SA) and for the computation of the REA necessary for the calculation of the output floor are already included in COREP templates (C 09.01 and C 10.00). For IRB exposures, template C 09.02 already includes some useful information on geographical breakdown but

there are some identified data gaps to meet the EU-wide stress test methodological requirements.

16. To address these data gaps identified in C 09.02 in a proportionate and operationally efficient manner, a new dedicated template C 09.05 has been introduced. This new template is built with the same structure as C 09.02 and introduces additional columns to capture the split between defaulted and non-defaulted exposures. It also requests more granular exposures for corporates. Like C 09.02, C 09.05 would only be reported by institutions with exposures under IRB approach. Combining datapoints from C 09.02 and the new C 09.05 templates, all necessary starting points for the computation of IRB credit risk exposure amounts in the EU-wide stress test would be covered.

17. Rather than expanding the scope of C 09.02—which would have imposed additional burden on all reporting institutions—the additional data required exclusively for stress test purposes will be captured in a standalone template. This narrow-scope approach ensures that only a limited number of institutions, which are typically those that can participate in supervisory stress tests, will be required to report the template.

18. The data requirements specified above are essential to collect CR REA of IRB exposures for the purpose of the EU-wide stress test. These additional requirements would bridge the identified data gaps in the previous version of the COREP C 09 templates to ensure that all necessary starting points according to the EU-wide stress test methodology are available in the supervisory reporting. In turn, all these datapoints will no longer be collected via the ad-hoc stress test templates which will then only focus on the projections. The regular collection of these additional datapoints will also support the development of challenger models and enable additional risk analyses by supervisors.

Integration and amendments to ESG reporting

19. The EU-wide stress test also covers information on non-financial corporate sectors at NACE level 1 and some aggregated information on NACE level 2. This information has been useful to understand sectoral developments. To achieve synergies, information on sectors which is relevant for credit risk and information relevant for climate stress test (transition risk) is added in template D 01.00 in ESG reporting, which is already incorporating data requirements for general ESG risk assessment. This will allow to avoid overlaps and include all relevant information in one place. Finally, it will also facilitate the integration of climate risk into the EU-wide stress test by collecting information on risk parameters and exposures across IFRS9 stages, in a consistent manner.

20. With regard to transition risk data used for climate stress testing, two exposure classes are particularly relevant. First, household exposures secured by real estate may be vulnerable to transition-related developments, and exposures to non-financial corporates are directly affected by sector-specific transition dynamics.

21. In the residential real estate segment, transition risk primarily stems from the tightening of energy-efficiency standards, rising energy costs, and the potential need for significant renovation investments to meet evolving regulatory or market expectations. These developments may affect both borrowers' repayment capacity and the value of the underlying collateral. Collecting data by energy performance bucket therefore provides a relevant and proportionate proxy for assessing transition-related vulnerabilities in household mortgage portfolios. As a result, template D 01.00 will include additional information on household exposures to real estate broken down by energy performance buckets.

22. Concerning non-financial corporates, sector-level data are essential for climate transition risk stress testing, as the financial impact of the transition to a low-carbon economy differs markedly across economic activities. Key transition drivers—such as carbon pricing, regulatory measures, technological developments and demand shifts—affect sectors through distinct transmission channels. Collecting sufficiently granular sectoral data allows exposures to be differentiated according to their transition risk profile and prevents risk concentrations in transition-sensitive activities from being obscured through aggregation.

23. Therefore, information at NACE 2 level for sectors that highly contribute to climate change (A, B, C, D, E, F, G, H, M) are requested in template D 01.00, building on the ESG Pillar 3 disclosure template on transition risk. Information on other sectors is also requested as they are also relevant for stress test purposes to understand sectoral developments.

24. Concerning the information to be reported in columns, they are aligned with the new FINREP templates 49.01 and 49.02, covering carrying amounts, broken down by IFRS9 stage where relevant, impairments, collateral information and risk parameters, for amortised cost on-balance sheet exposures (see also paragraph 12). This allows analysis of sectoral risks in the stress test and a granular link with the scenario narrative, increasing thus the synergies between the different data collections.

Materiality

25. Only reporting institutions with more than 10% of non-domestic exposures would be subject to the reporting of the geographical dimension with a detailed breakdown by country. However, the breakdown by country was also narrowed down to the countries with more than 1% of the total exposures, in order to avoid reporting of less material countries (exposures in these less material countries would be aggregated into an "other countries" residual category). Reporting institutions below the abovementioned 10% non-domestic exposure threshold would be requested to report a simplified geographical breakdown with only the totals and the split between domestic and non-domestic exposures. The formulation of the templates therefore supports the integration of stress test relevant information into the ITS framework while maintaining proportionality and minimising undue burden on smaller or less complex institutions.

26. In accordance with Section 1.d of the Instructions on ESG risks exposures reporting and the information related to the EU-wide Stress Test, institutions should report sectoral exposures to Non-Financial Corporations (NFCs) at NACE Level 1 and Level 2 in a given material country only where the exposure is material, i.e. equal to or greater than 0.5% of the institution's total exposures to NFCs. Institutions should only report the total gross carrying amount for exposures below this threshold . This approach is intended to enhance proportionality in the reporting requirements by focusing on sectoral exposures that are significant. The same materiality threshold should apply to the reporting of aggregated sectoral exposures for "other countries", as well as for domestic and non-domestic exposures. Accordingly, only NACE Level 1 and Level 2 exposures equal to or greater than 0.5% of total exposures to NFCs should be reported in these categories.

Market risk

27. The data needs for the market risk component of stress testing cannot be fully satisfied by the current regular reporting, and thereof some additional market risk data need to be included in FINREP and COREP, in particular in relation to Additional Value Adjustments (AVA) and Credit Value Adjustments (CVA).

28. The proposal presented in this consultation paper foresees adding a few data points to template C 32.02, to incorporate information needed for stress-testing purposes. These new data points present the starting point for applying stress scenarios to the reserves (AVAs and fair value adjustments). As a longstanding and stable element of the stress testing, they can be collected via the regular reporting in a more efficient manner than via ad-hoc stress test data collection. The new data points comprise:

    a) Two rows, inserted below row 0020, to retrieve AVA and fair value adjustments of banking book positions designated at Fair Value through Other Comprehensive Income (FVOCI) and at Fair Value through Profit or Loss (FVPL);

    b) A new column for 'other adjustments', after column 0250, is proposed to be added to capture residual fair value adjustments that do not enter the AVA calculation.

29. In addition, the integration of stress testing data needs also affects CVA and template C 25.01. Thus, the proposals put forward in this Consultation paper envisage opening the cells in the column referring to incurred CVA (c0040) to retrieve information on CVA exemptions and incurred CVA by type of counterparty. Furthermore, an additional column is added to gather the fair value of CVA hedges. This information will allow supervisors to perform quality assurance with regard to institutions' projections of CVA in the stress test.

30. Furthermore, additional information in template F 16.03 for stress-testing purposes, relating to client revenues from items held with a trading intent, is also requested. These revenues are not currently captured in supervisory reporting. They represent a relatively stable source of income, particularly for banks acting as market makers, and may in some cases offset market

risk losses under stress. Client revenues are defined as the portion of Net Trading Income arising from bid/ask spread mark-ups on client-driven trading, from prime services, and from fees related to corporate debt underwriting or issuance of items held with a trading intent. They will be reported as an "of which" item under gains and losses on financial assets and liabilities held for trading (c0920), which requires the addition of a dedicated row in template F 16.03.

31. Finally, a new template, F 50.00, is introduced to capture additional information for stress-testing purposes on risk sensitivities, thereby enhancing the quality assurance of banks' projections.

32. As regards the row structure of template F 50.00, the template covers instruments classified as held for trading, as well as instruments not held for trading but measured at fair value (i.e. FVTPL and FVOCI). Instruments held for trading are reported as a single aggregated category (net of hedging effects). Instruments not held for trading are further disaggregated by hedge type: fair value hedges, cash flow hedges and economic hedges. With respect to the column structure, fair value and notional amount are reported in columns c0010 and c0020, respectively. From column c0030 onwards, the template collects risk sensitivities (Delta, Gamma and Vega), broken down by the following risk factors:

- Interest rate: Euro area, United States and other geographies, each by 1-year, 5-year and 10-year maturities
- Foreign exchange (FX): EUR/GBP, EUR/USD, EUR/JPY and other currency pairs;
- Equity: European Union, United States, other advanced economies and other emerging market economies;
- Funds;
- Commodities: Brent crude oil, natural gas, agricultural products and metals;
- Credit spreads;
- Sovereign: Euro area, United States and other;
- Corporate: CQS 1–2, CQS 3 and CQS 4–6.

33. Sensitivities are defined as raw (unweighted) sensitivities, meaning they are not risk-weighted as in FRTB reporting. They are expressed as the euro change in fair value resulting from a predefined movement (in basis points or percentage points, depending on the risk factor type) of the relevant risk factor.

34. The data requirements on sensitivities are essential for stress testing, as they allow the assessment of the instantaneous P&L impact of market risk shocks on banks' portfolios measured at fair value. Raw sensitivities are usually generated by banks risk management

systems. By multiplying the raw sensitivities by the shocks defined under a given scenario, the instantaneous gain or loss under the adverse scenario can be obtained.

35. It is important to note that, for stress testing purposes, raw sensitivities will still be collected at a more granular level through an ad-hoc template. The sensitivities reported in Template F.50 are less granular and will be used to validate and challenge those submitted at a more detailed level in the stress test.

Operational risk

36. Most of the data needed for the operational risk component is already included in FINREP/COREP. An additional proposal is included in this Consultation paper (in another section) to introduce in COREP loss-by-loss reporting of operational risk losses above 20,000 EUR. This is included in the new revised template C 17.01 and would allow centralisation of both reporting historical and projecting scenario losses or to have additional information to benchmark projections provided by institutions as part of the stress test.

37. However, due to the timeline of the implementation of the revised operational risk loss reporting, an ad-hoc collection will still be necessary in the 2027 EU-wide stress test.

Administrative expenses

38. The EU-wide stress test methodology requires banks to report their starting point administrative expenses broken down by type of expenses (as already reporting in FINREP F 16.08 and F 44.04 templates), but also with a geographical breakdown across the five most significant countries where total administrative expenses are located. Such breakdown by geography allows for more precise projections in relation with the macroeconomic scenario, and especially the inflation component. It is proposed to incorporate this geographical dimension into existing FINREP templates F 16.08 and F 44.04 by adding five additional columns to report the expenses located in the identified top 5 countries. To maintain proportionality and minimising undue burden, only a limited number of institutions would be subject to the reporting of these additional columns. Also, as long as 95% of total administrative expenses would already be covered by less than five countries, institutions would not be requested to report the remaining columns.

39. The data requirements specified above are essential to ensure relevant stress test starting points for administrative expenses are collected via supervisory reporting. This data will be used by supervisors to avoid ad-hoc reporting via the stress test templates, while the existence of this regular data collection will enable the development of centralised tools and risk analyses.

Reporting population and frequences

40. The sample of the 2025 EU-wide stress test included 64 banks (51 from the euro area). In addition, the ECB-SSM carries out in parallel a stress test (it is based on the same approach as

the EBA stress test) for the ECB-SSM banks not included in the EBA sample (45 ECB-SSM banks). Therefore, the total sample included 109 banks in 2025.

41. The EBA sample is determined based on size. The sample covers broadly 75% of the banking sector at the higher level of consolidation in the euro area, each non-euro area EU Member State and Norway. Banks should have a minimum of EUR 30 bn total assets. Furthermore, competent authorities could, at their discretion, request to include additional institutions in their jurisdiction. The sample changes in every stress test as banks' total assets may change overtime (the sample is relative).

42. The sample for supervisory reporting and ESG reporting is based on the CRR criteria. As of December 2025. 409 institutions report FINREP, including 180 Large institutions, 75 SNCIs and 154 Medium-sized institutions. 2723 institutions report COREP, 477 of which are banking groups. In terms of size, 149 are Large institutions (126 banking groups), 2041 are SNCIs (160 banking groups) and 533 are Medium-sized (191 banking groups). 124 institutions currently report ESG based on Pillar 3 information, all of them Large institutions.

43. The proposal on the sample and the frequencies is the following:

    - Credit risk – Template F49.01 applicable to the FINREP sample of large banks with total assets above 30 billion EUR at the highest level of consolidation in the Union. This template would have annual frequency.

    - Credit risk – Template F 49.02 covers information that is an extension in FINREP with additions on flows and breakdown by countries. This would be requested to the FINREP sample excluding Small and Non-Complex Institutions, with a quarterly frequency. The sample is larger and at a higher frequency (quarterly) as this information should be more readily available than the credit risk parameter data required for the quality assurance of the bottom-up stress test needs. In addition, the draft CP seeks stakeholders' views on the collections of historical information through an ad-hoc data collection.

    - Credit risk information for climate stress test and sectoral information –Template D 01.00 in ESG supervisory reporting. The information on credit risk parameters would mirror the sample and frequency of F49.01, i.e. large banks with total assets above 30 billion EUR reporting to FINREP at the highest level of consolidation in the Union with annual frequency.

    - Credit risk REA – COREP template C 09.05 (for IRB banks) will be requested to large banks with total assets above 30 billion EUR at the highest level of consolidation in the Union. The template would be requested on an annual basis contrary to C 09.01 and C 09.02 which are reported quarterly.

    - Administrative expenses – Templates F 16.08 and F 44.04 includes five additional columns to capture the breakdown of the expenses across the top 5 countries where

total expenses are located. This information would be requested for large banks with total assets above 30 billion EUR at the highest level of consolidation in the Union. Also, banks that would already cover 95% or more of their total expenses with less than 5 countries would not have to report data for all of them. In terms of frequency, F 16.08 is reported quarterly, while F 44.04 is reported annually.

- Market risk: Template F 50.00 covering aggregated risk sensitivities on items designated at fair value (including related hedges). This data should be reported on an annual basis. In addition, template F16.03 includes two additional rows to capture client revenues. Regarding COREP, targeted amendments have been made to templates C 25.01 and C 32.02, to incorporate stress test data requirements related to CVA and AVA reserves. The information in these templates will be reported on a quarterly basis. The data for market risk should be reported by large institutions with total assets above 30 billion EUR at the highest level of consolidation in the Union.

- The stress test is used by competent authorities as a SREP tool, therefore, Competent Authorities would be able to make use of their supervisory powers under Article 104 of CRD to extend these reporting requirements to other institutions, as part of their supervisory review and evaluation process.

2. Accompanying documents

2.1. Draft cost-benefit analysis / impact assessment

As per Article 15 of Regulation (EU) No 1093/2010 (EBA Regulation), any draft implementing technical standards (ITS) developed by the EBA shall be accompanied by an Impact Assessment (IA), which analyses 'the potential related costs and benefits'.

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

A. Problem identification and background

Experience from recent rounds of EU-wide stress testing exercises suggests that the growing size and granularity of the stress tests templates absorb substantial resources, while additional refinements in granularity do not always translate into proportionate gains in analytical insight. Against this background, and in line with the EBA objectives for increasing efficiency of the

supervisory and regulatory frameworks, the EBA sought to simplify the EU-wide stress test templates via synergies with - or/and changes in - the supervisory reporting. Consequently, based on Article 430(7) of the Regulation (EU) No 575/2013 ('the CRR') which mandates the EBA to *'develop draft implementing technical standards to specify the uniform reporting formats and templates, the instructions and methodology on how to use those templates, the frequency and dates of reporting, the definitions and the IT solutions for the reporting (…).',* the Commission Implementing Regulation (EU) 2024/3117 on supervisory reporting shall be updated to reflect the changes triggered by the modifications in the supervisory reporting and related instructions.

B. Policy objectives

The draft ITS amending Commission Implementing Regulation (EU) 2024/3117 on supervisory reporting under Article 430 (7) of Regulation (EU) No 575/2013 concerning stress test elements aims at specifying supervisory reporting formats and definitions related to the changes triggered by modifications in the stress test templates.

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

Stress test data points into regular supervisory reporting

In the context of the ongoing simplification of the EU-wide stress test, the EBA assessed whether some stress test related data should remain within the stress test data request or be migrated to regular supervisory reporting. Against this background, the EBA considered two options.

Option 1a: Integrating some stress test data point requests from stress test data collection to regular supervisory reporting.

Option 1b: Keeping stress test data requests in the stress test data collection.

Keeping stress test data request in the stress test data collection would preserve the current stand-alone architecture and avoid immediate changes to banks' reporting systems. The existing stress test ad hoc data collection Excel-based templates have ensured a high degree of control and flexibility. As such maintaining this approach would minimise short-term adaptation needs for institutions and supervisory authorities and ensure continuity in established validation procedures. However, this approach has also required considerable manual work by institutions, reconciliation with supervisory reporting, and extensive quality assurance processes.

On the other hand, migrating some stress test data request from the stress test data collection to regular supervisory reporting would strengthen synergies with this reporting and reduce duplication over time. Concretely, the simplification proposed should reduce the burden of the stress test exercise by: (i) streamlining templates through reduced and more targeted breakdowns, (ii) applying clearer and more stable methodological definitions that remain consistent across cycles; and (iii) aligning more closely with accounting and supervisory reporting standards, enabling banks to rely on regularly validated supervisory data for some stress test information and to

concentrate stress test submissions primarily on projections. This approach facilitates automated and consistent quality checks and lowers reconciliation costs with regular supervisory reporting as the overall template size and granularity are rationalised.

Based on the above, **Option 1a has been chosen** and the draft ITS will propose to integrate some stress test data points request from stress test data collection to regular supervisory reporting.

D. Conclusion

The development of the draft ITS amending Commission Implementing Regulation (EU) 2024/3117 on supervisory reporting under Article 430 (7) of Regulation (EU) No 575/2013 concerning stress test elements is intended to specify the updated supervisory reporting formats and definitions related to the changes triggered by the modifications in the stress test templates. The expected benefits - mainly the decrease of datapoints in the stress test data collection - are expected to outweigh the costs.

2.2. Overview of the questions for consultation

Question 1. Do the respondents agree with the integration of stress testing data needs into regular reporting?

Question 2. Do the respondents agree with the proposed approach to the scope of reporting of the stress testing data?

Question 3. Do the respondents agree with the frequency of reporting of the stress test data?

Question 4. Do the respondents see any impediment in providing the credit risk parameters? Please elaborate.

Question 5. Do the respondents identify any difficulty in providing the notion of nominal amount after the application of the accounting CCF? Please elaborate.

Question 6. Do the respondents identify any difficulty in reporting the adjusted opening balance? Please elaborate.

Question 7. Do the respondents identify any difficulty in potentially providing the information on F 49.02 historically (i.e. since 2018 when IFRS 9 entered into application)?

Question 8. Do respondents have any comments on the proposed introduction of the new COREP C 09.05 template?

Question 9. Do respondents see as an efficient reduction of reporting cost the implementation of a materiality threshold on the geographical dimension in C09.05 (i.e. no data would be requested

for countries representing less than 1% of total exposures), compared to reporting all countries irrespective of materiality? If not, please explain.

Question 10. What are respondents' views on the proposed approach to applying the 0.5% materiality threshold to sectoral exposures? Please provide reasons and, where relevant, suggest alternative approaches.

Question 11. Do respondents have any comments on the proposed introduction of the limited geographical breakdown in F 16.08 and F 44.04?

Question 12. Do the respondents identify any difficulty in reporting client revenues on items not held with a trading intent as defined in template F 16.03? Do you generate client revenues also on items not held with a trading intent?