

EBA/CP/2026/08

10 Apr 2026

Consultation Paper

Draft Implementing Technical Standards amending Commission Implementing Regulation (EU) 2024/3117 regarding Credit Risk and IFRS 9 Benchmarking¹ reporting

¹ Article 78 of Directive 2013/36/EU (CRD)

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1. Responding to this consultation

The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions summarised in Section 5.3.

Comments are most helpful if they:

- respond to the question stated;
- indicate the specific point to which a comment relates;
- contain a clear rationale;
- provide evidence to support the views expressed/ rationale proposed; and
- describe any alternative regulatory choices the EBA should consider.

Submission of responses

To submit your comments, click on the 'send your comments' button on the consultation page by 10 July 2026. Please note that comments submitted after this deadline or submitted via other means may not be processed.

Publication of responses

Please clearly indicate in the consultation form if you wish your comments to be disclosed or to be treated as confidential. A confidential response may be requested from us in accordance with the EBA's rules on public access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response is reviewable by the EBA's Board of Appeal and the European Ombudsman.

Data protection

The protection of individuals with regard to the processing of personal data by the EBA is based on Regulation (EC) N° 45/2001 of the European Parliament and of the Council of 18 December 2000 as implemented by the EBA in its implementing rules adopted by its Management Board. Further information on data protection can be found under the Legal notice section of the EBA website.

2. Executive Summary

With a view of increasing efficiency of the supervisory processes and reducing administrative and reporting cost in line with the EBA objectives for increasing the efficiency of regulatory and supervisory framework², this consultation paper proposes amendments to the Commission Implementing Regulation (EU) 2024/3117 laying down ITS with regard to supervisory reporting of institutions (EBA ITS on Supervisory Reporting). The proposal introducing the templates regarding the Credit Risk (CR) and IFRS 9 of the Benchmarking exercise as required by Article 78 of Directive 2013/36/EU (CRD).

Article 78 of CRD requires competent authorities to conduct a regular assessment of the quality of internal approaches used for the calculation of own funds requirements and used for accounting purposes. To assist competent authorities in this assessment, the EBA calculates and distributes benchmark values to CAs that allow a comparison of individual institutions' risk parameters. These benchmark values are based on data submitted by institutions at least annually.

The EBA supervisory benchmarking serves three major objectives, the first one being the supervisory assessment of the quality of internal approaches. It also provides a tool to explain and monitor Risk Weighted Exposure Amounts (RWEA) variability both over time and across institutions and portfolios, as well as to indicate related implications for prudential ratios and policy discussions. Lastly, the benchmarking results also provide institutions with valuable information on their risk assessment compared to other institutions' assessment on comparable portfolios.

In addition to the updates of the reporting requirements that are necessary to align with the requirements of Article 78 of CRD, the consultation paper introduces significant simplification and streamlining of the reporting requirements that is driven by the EBA reporting simplification agenda. This consultation paper is part of a wider package of measures aimed at the implementation of the EBA recommendations as regards improving the efficiency and effectiveness of the EU regulatory and supervisory frameworks. Focusing on the simplification and increasing efficiency of the reporting requirements, under the new framework for the benchmarking data collection, in this consultation paper the EBA puts forward proposals for material reduction of the number of templates and the number of portfolios and for the integration of the benchmarking data collection into the ITS on Supervisory Reporting. This is with a view to stabilising the templates (avoiding the annual revision that characterised the current framework in the last years) but also for ensuring a better alignment with COREP.

Up to 2026, with reference date 31 December 2025, the Benchmarking templates for CR and IFRS 9 were included in a separate ITS³. Starting from 2027, in order to increase the efficiency of the

² See EBA Report on the efficiency of the regulatory and supervisory framework (EBA/REP/2025/26)

³ Commission Implementing Regulation (EU) 2016/2070 with regard to the benchmarking of internal models (ITS on benchmarking)

overall reporting process the EBA proposes to simplify and integrate those templates into the ITS on supervisory reporting. In addition to this integration, the following changes are suggested:

- For CR, significant changes are proposed. The main reason for this revision relates to the changes introduced to the EBA ITS on Supervisory Reporting as a result of the amendments made to the Capital Requirements Regulation, CRR 3 (Regulation (EU) No 575/2013) and Capital Requirements Directive, CRD VI (Directive 2013/36/EU). The changes are also meant to reduce the reporting burden for institutions, reducing the number of data points to be reported. The proposed changes are also meant to reflect the experiences gathered throughout the years the data has been in use.
- It is envisaged to limit the reporting requirement to the highest level of consolidation at the EU level for banking groups and on an individual basis for institutions that are not part of a group. However, this aspect will be further analysed from a legal point of view and could be revised during the consultation. For example, the existence of large subsidiaries may require extending the reporting level to sub-consolidation at Member State level.
- A specific template has been introduced to gather information regarding realised loss rates. The model level is introduced. The list of borrowers of the Low Default Portfolios has been updated and complemented.
- For IFRS 9, since the templates share the portfolio definitions with the CR, it is proposed to merge the IFRS 9 templates with the CR templates using separate sub templates.

These changes and simplifications coupled with the integration of the reporting requirements into the regular reporting under the ITS on supervisory benchmarking should lead to a significant reduction of the reporting costs for the institutions in line with the EBA objectives for the overall reductions of the reporting costs by 25%.

Next steps

After a consultation period of 3 months the EBA will finalise the draft amendments to the ITS on Supervisory Reporting and submit the amending final draft text to the EU Commission.

The EBA will also develop the data-point model (DPM), XBRL taxonomy and validation rules based on the final draft amending ITS. The first reporting is aimed for the 2027 exercise (December 2026 reference date).

However, anticipating possible delays in the timeline, it is possible that alternative, fall back solutions will have to be taken into consideration. For example, it will be possible to postpone the reference date or the reporting date for the first year of reporting. It will be also possible to revert to the 2026 ITS on benchmarking reporting also for December 2026 data.

3. Background and rationale

3.1 Migration to the ITS on supervisory reporting

1. The EBA reporting framework (as reflected in the Commission Implementing Regulation (EU) 2024/3117⁴ - ITS on Supervisory Reporting) is uniformly and directly applicable to institutions, ensuring a level playing field in the area of reporting and facilitating data comparability. The EBA reporting framework has evolved over the years, ever since the first reporting framework was published in 2013. The EBA has periodically reviewed the content of the reporting requirements to ensure its continued relevance and alignment with the underlying regulation. In addition, the EBA has developed and maintained the technical package and the version management system to facilitate the implementation and supporting of the reporting processes.
2. The Single Rulebook aims to provide a single set of harmonised prudential rules for financial institutions throughout the EU, helping to create a level playing field for all institutions in scope and providing high protection to depositors, investors and consumers. These draft Implementing Technical Standards (ITS) reflect the Single Rulebook provisions at the reporting level and are an integral part of it for financial institutions in Europe. These standards become directly applicable in all Member States once adopted by the European Commission and published in the Official Journal of the EU.
3. Since the inception of the Benchmarking exercise, it was based on a specific data collection. The ITS on benchmarking, which provides a description of the templates and of the benchmarking portfolios, was annually published. The templates for credit risk benchmarking have been crafted to offer additional granular details concerning the exposure classes reported in the Supervisory Reporting templates. The aim has been twofold: firstly, to ensure the reusability of the definitions of the CRR and secondly, to align the analyses with those feasible through the use of COREP data.
4. Nevertheless, with the 2026 revision of the Benchmarking ITS, a notable change was implemented. A mapping was established between the exposure classes utilised in Commission Implementing Regulation (EU) 2021/451 up until December 2024 and the new exposure classes that were introduced with Commission Implementing Regulation (EU) 2024/3117 from March 2025 with Commission Implementing Regulation (EU) 2024/3117 onwards. This innovative approach, while beneficial in some respects, resulted in a temporary misalignment between the benchmarking portfolios and the officially reported exposure classes.
5. It is important to emphasise that this misalignment is regarded as a transitional phase. The primary objective of this interim solution was to minimise the alterations required in the benchmarking templates and to defer any significant changes during a transitional period. This strategic postponement was aimed at providing sufficient time for a smoother transition and ensuring that

⁴ Commission Implementing Regulation (EU) 2024/3117 of 17 December 2020 laying down implementing technical standards for the application of Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to supervisory reporting of institutions and repealing Implementing Regulation (EU) No 680/2014.

all stakeholders had ample opportunity to adapt to the new exposure classifications without experiencing abrupt disruptions.

6. In summary, the modifications introduced for ITS 2026 were intended to balance the immediate need for enhanced granularity and the long-term goal of maintaining coherence with the ITS on Supervisory Reporting. This transitional intervention serves as a testament to the ongoing evolution and refinement of the benchmarking processes to better serve the needs of the financial sector.

3.2 Simplification and proportionality

7. Starting from the 2027 Benchmarking exercise, it is foreseen to bring the CR and IFRS 9 templates under the ITS on Supervisory Reporting. This integration should lead to the overall increase of the efficiency of the reporting process and will foster coherence between the Benchmarking and the credit risk templates of the ITS on supervisory reporting that were used as reference to define the Benchmarking templates but also to simplify the normative framework. Also, the opportunity was taken to revise and simplify the Benchmarking templates leveraging on the experience gathered in the last years of usage of such information. The changes were motivated by the double purposes to extend the analysis and to reduce the cost of supervisory reporting.
8. Regarding the EBA's credit risk benchmarking data collection, the reason for the new changes is the need to adapt the portfolio definitions to the new definition of exposure classes reported in the credit risk templates of the ITS on supervisory reporting templates as a consequence of the amendments made to the Capital Requirements Regulation, CRR III (Regulation (EU) No 575/2013), and the need to update the list of counterparties of the low default portfolios. In this context, this revision of the CR templates also provided an opportunity to introduce a series of changes based on the experience gained using the collected data over the years. In particular, the proposals to introduce a split by model, as well as a specific template aimed at collecting data on the observed loss rate, derives from this experience. In addition, effort has been made to reduce the cost of data collection by materially reducing the number of portfolios for which data is collected. Also, the list of counterparties of the Low Default Portfolios has been updated.
9. Also, the instructions of IFRS 9 templates were modified to reflect the new asset classes of the ITS on Supervisory Reporting but also with the aim of simplifying the existing templates. In particular, the number of templates was reduced. Article 78 of Directive 2013/36/EU (CRD) specifies that all institutions permitted to use internal approaches under Part Three, Title II, Chapter 3, of Regulation (EU) No 575/2013 (IRB institutions) and that adopted the IFRS 9 shall report the results of the calculations of the approaches used for determining the amount of expected credit losses for their exposures or positions that are included in the benchmark portfolios. Such data must be submitted with the IFRS 9 templates. It is also required to extend such reporting to relevant institutions that apply the Standardised approach under Part Three, Title II, Chapter 2, of that Regulation (SA institutions) that adopted the IFRS 9.

10. It is proposed to define as relevant SA, those SA institutions falling in the definition of Large institutions according to Article 4 (1) (146) of the Regulation (EU) 575/13 (CRR) and provided that they are subject to IFRS 9 requirements⁵.
11. These changes and simplifications introduced in this consultation paper together with the integration of the reporting requirements into the regular reporting under the ITS on supervisory benchmarking should bring overall efficiency gains through a reduction of the reporting costs for the institutions and bring additional valued though better cross usage of data on the supervisory side. The proposals are the major continuing factor to the reduction of the reporting costs for the institutions in line with the EBA objectives for the overall reduction of the reporting costs by 25%.

3.3 New Benchmarking CR and IFRS9 package

12. As part of the migration of templates from a specific ITS for benchmarking to the ITS on Supervisory Reporting, some changes to the templates have been made. First of all, the list of individual counterparties relating to the Low Default portfolios has been reviewed and updated. This list is shown in the template C. 100. Moreover, it is suggested to refer also to the list of Large Exposures reported at the same reference date by the reporting institution in Template C.27.00 (Large Exposures: Identification of the counterparty) so to enlarge the sample of low default counterparties but also to introduce an element that will automatically update in the future. The eventual additional borrowers stemming from the C.27.00 Template will be classified in the portfolios on the ground of the sector reported in column 050 (Sector of the counterparty) of the Template C. 27.
13. The list of combinations of risk drivers defining the benchmarking portfolio has been substituted by a set of rules indicating how to combine such factors. The template C.102 and C.103 have been merged and in this new template, some columns were deleted and others added and for other ones the description was revised. A mapping between the institutions' internal rating scale and a common master scale is introduced. It is proposed to integrate the split by IRB models into the portfolio level and with this replacing the former mapping Table C 105.2. A new template has been introduced with the aim of collecting data on realized loss rates.
14. As regards the IFRS 9, it is proposed to delete all the 8 templates and to extend the CR templates so to include some IFRS 9 information.

⁵ The updated list of largest credit institutions or banking groups is available here: <https://www.eba.europa.eu/risk-and-data-analysis/data/registers-and-other-list-institutions/other-list-institutions>

3.4 Proposed templates

3.2.1 C 100 - List of Low Default Portfolio counterparties

15. This template provides the list of European obligors (firms, banks and central governments) that are expected to have relationships with institutions. If an institution that takes part in the CR Benchmarking has exposure with some of the subjects in the list, it is required to provide the information indicated in the templates C 101.01 and C 101.02. It is also required to compare this list with the list of Large Exposures identified by the reporting institutions and included in the Template C 27 at the same reference date and to report also all the Large Exposures that are not already included in the Annex.

3.2.2 C 101 - Details on Low Default Portfolio counterparties: internal models and IFRS 9

16. Template C 101.01. This template collects IRB information about the exposures and the prudential parameter at nominal level for the obligors indicated in the template C 100 and additional obligors added based on the comparison with template C 27.00

17. Template C 101.02. This template collects IFRS 9 information about the exposures and the prudential parameter at nominal level for the obligors indicated in the template C 100 and additional obligors added based on the comparison with template C 27.00 This template is meant to collect some of the IFRS 9 information that were collected with the templates C.111-C.114.

3.2.3 C 102 - Details on exposures in Low Default and High Default Portfolios: Internal models and IFRS 9

18. Template C 102.01. This template combines the previous templates C 102.00 and C 103.00. This template collects information in part similar to what is reported in the templates C 08.01 and C 09.02 but with a higher level of granularity.

19. Template C 102.02. This template is meant to collect some of the IFRS 9 information that were collected with the templates C.115-C.118.

3.2.4 C 104 - Loss rates template

20. This is a new template, and it is meant to collect information about the actual loss rate of defaults for which the recovery process was completed.

3.2.5 C 105.1 - Definition of internal models

21. The purpose of the template is to gather further quantitative and qualitative information about the IRB models.

4. Draft implementing technical standards

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 regard to supervisory reporting of institutions and repealing Implementing Regulation (EU) No 2021/451 for the reporting referred to in Article 78(2) of Directive 2013/36/EU of the European Parliament and of the Council

(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 648/2012⁶ and in particular the last subparagraph of Article 470(7) thereof, and to Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC⁷, and in particular Article 78(8), third subparagraph thereof,

Whereas:

- (1) For the purposes of the supervisory benchmarking exercise with regard to credit risk and IFRS 9 pursuant to Article 78(8) of Directive 2013/36/EU, it is necessary to ensure that the related templates allow the monitoring of the range of risk-weighted exposure amounts for the exposures or transactions in the benchmark portfolio resulting from the approaches of those institutions covered by the exercise and to assess the quality of those approaches. This was previously achieved via setting out separate templates for the reporting by institutions covered by this benchmarking in Commission Implementing Regulation (EU) 2016/2070⁸. Nevertheless, this objective of benchmarking reporting

⁶ OJ L 176, 27.6.2013, p. 1.

⁷ OJ L 176, 27.6.2013, p. 338, ELI: <http://data.europa.eu/eli/dir/2013/36/oj>.

⁸ [Commission Implementing Regulation \(EU\) 2016/2070 of 14 September 2016 laying down implementing technical standards for templates, definitions and IT-solutions to be used by institutions when reporting to the European Banking Authority and to competent authorities in accordance with Article 78\(2\) of Directive 2013/36/EU of the European](#)

can also be achieved by introducing specific templates as a separate module in the framework of the Commission Implementing Regulation (EU) 2024/3117, in order to require the reporting of additional granular details concerning the exposure classes covered therein. This would ensure the reusability of the definitions outlined in that framework and alignment of the information collected with the Benchmarking templates with the information contained in other templates of the Supervisory Reporting framework. Similarly, for the IFRS 9 templates, which share some definitions with the related credit risk templates. Given that such an approach is expected to enhance the coherence between the benchmarking and other templates, it can also simplify and rationalise institutions' reporting burden. Therefore, it is appropriate that the reporting of the information required for the benchmarking exercise relating to credit risk and IFRS 9 is done via the reporting of the templates set out in Implementing Regulation (EU) 2024/3117. For the same reasons, it is necessary to repeal the relevant templates from Implementing Regulation (EU) 2016/2070.

- (2) Further, based on the supervisory experience gained from the supervisory benchmarking exercise, it is necessary to introduce, for the purposes of reporting of all the asset classes a split per model, as well as to include a specific template on the observed loss rate data in order to improve comparisons between LGD estimates by taking into account the actual observed risk.
- (3) Furthermore, in order to simplify and reduce the cost and reporting burden to institutions, it is necessary to eliminate some columns from the IFRS and to materially reduce the number of benchmarking portfolios for which data is collected.
- (4) Implementing Regulation (EU) 2024/3117 and Implementing Regulation (EU) 2016/2070 should therefore be amended accordingly.

HAS ADOPTED THIS REGULATION:

Article XYZ

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

In Article 3, paragraph (1)(d) is amended as follows:

d) annual reporting, 31 December of each year: reporting requirements according to Article 21b: 11 April

The following Article **21b** is inserted:

‘For the purpose of reporting the information needed to conduct the benchmarking exercise on credit risk internal models and IFRS 9 models in accordance with Article 78 of Directive 2013/36/EU, the following institutions shall submit the following information to the competent authorities:

(a) institutions permitted to use internal approaches under Part Three, Title II, Chapter 3, of Regulation (EU) No 575/2013 shall submit the information specified in templates

[Parliament and of the Council \(Text with EEA relevance \), OJ L 328, 2.12.2016, p. 1, ELI: \[http://data.europa.eu/eli/reg_impl/2016/2070/oj\]\(http://data.europa.eu/eli/reg_impl/2016/2070/oj\)](#)

C 101.01, C 102.01, C 104 to C 105.01 of Annex I and in templates C 101.02 and C 102.02 of Annex I if they adopted the IFRS 9.

(b) institutions that apply the standardised approach under Part Three, Title II, Chapter 2, of Regulation (EU) No 575/2013 that adopted the IFRS 9 principles and that are classified as Large Institutions according to Article 4 (1) (146) of the Regulation (EU) 575/13 (CRR) shall submit, the IFRS 9 information specified in the templates in C.101.02 and C.102.02 of Annex I.

(c) Institutions shall report the information on a consolidated basis for banking groups and on an individual basis for institutions that are not part of a group.

Article 5

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

It shall apply from December 2026.

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]

5. Accompanying documents

5.1 Draft cost-benefit analysis / impact assessment

As per Article 15 of Regulation (EU) No 1093/2010 (EBA Regulation), any implementing technical standards 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 involved in this Consultation Paper on the Draft Implementing Technical Standards amending the ITS with regard to supervisory reporting of institutions according to Regulation (EU) No 575/2013 regarding the introduction of the credit risk and IFRS 9 benchmarking templates. The IA is high level and qualitative in nature and it refers to the anticipated cost for both the involved NCAs and the reporting institutions. With regard to the proportionality assessment specifically, the scope of application of the ITS does not justify a data collection for the conduct of a quantitative impact assessment on reporting compliance costs, mainly because the affected institutions either report this information for other items of reporting requirements or they do it for internal purposes. Instead, the EBA conducted a qualitative assessment, derived from policy expert views, to evaluate whether the benchmarking reporting implies an appropriate, and proportionate, cost of reporting.

5.2 Draft cost-benefit analysis for changes related to credit benchmarking

Article 78 of Directive 2013/36/EU (CRD IV/CRD VI) requires competent authorities to conduct a regular assessment of the quality of internal model approaches, used for the calculation of risk-weighted exposure amounts or own funds requirements, and requires the EBA to produce a report to assist them in this assessment. The report of the EBA relies on data submitted by institutions in accordance with EU Regulation 2016/2070, which specifies the benchmarking portfolios, templates, definitions and IT solutions to be used by the institutions as part of the annual benchmarking reporting, when using internal model approaches for market and credit risk.

The current text amending ITS on Supervisory Reporting aims to substitute the previous ITS (EU) 2016/2070 for the Benchmarking data collection with the purpose of improving the exercises and adapting to the relevant policy changes which will be applicable by end-2026 and thus relevant for the 2027 exercise.

5.2.1 Credit risk

Regarding the EBA’s credit risk benchmarking data collection, the reason for the new changes is the need to adapt the portfolio definitions to the new definition of exposure classes introduced in the templates of the ITS on Supervisory Reporting as a consequence of the amendments made to the Capital Requirements Regulation, CRR 3 (Regulation (EU) No 575/2013), and the need to update the

list of counterparties of the low default portfolios. In this context, this revision of the CR templates also provided an opportunity to introduce a series of changes based on the experience gained using the collected data over the years. In particular, the proposals to introduce a split by model, as well as a specific template aimed at collecting data on the observed loss rate, derives from this experience. In addition, some effort has also been made to try to reduce the cost of data collection: this has led to eliminating some columns and reducing the number of portfolios for which data is collected.

5.2.1.1 Problem identification: alignment with new COREP and other issues

Since the beginning of the benchmarking exercise, the benchmarking templates for credit risk have been designed to provide additional details with respect to the CRR-exposure classes represented in the Supervisory Reporting templates. **This has the dual purpose of being able to re-use the definitions used in the Supervisory Reporting templates and to allow the analyses to be aligned with those that can be extracted from those templates.** Despite this, for the Benchmarking 2026 ITS a mapping has been introduced between the exposure classes adopted in the ITS on Supervisory Reporting until December 2024 and the new exposure classes introduced starting from 2025. This approach has led to the misalignment of the portfolios defined in the benchmarking ITS with the exposure classes reported according to the ITS on Supervisory Reporting; however, this has been seen as a transitional intervention aimed at minimizing changes in the benchmarking templates and postponing more fundamental changes to the benchmarking templates by one year.

The current list of obligors for low default portfolios has not been updated for years, which has led to the reduction of the data quality of the current list. In turn, this has led to a reduction of the number of cross-comparisons that it is possible to analyze using the list of common obligors.

Currently, **portfolios are defined by listing all the relevant combinations**, which has been viewed as a rigid approach which increases the cost of updating the portfolio definitions. Also, a mapping between the institutions' internal rating scale and a **common master scale** is proposed to reduce the possible number of reported rating grades.

The table below provides an overview of the portfolios that have been defined.

B. Policy objectives

The main objective of the implementation of the current draft benchmarking templates is to align the portfolios with the new exposure classes introduced with the CRR3, to update the list of obligors for low-exposure portfolios and to revise the portfolio definitions.

C. Baseline scenario

It would be theoretically possible to maintain the current setting (ITS on Benchmarking 2026) for further years. However, full alignment with Regulation (EU) 2024/3117 is also considered necessary to avoid maintaining the old classifications solely for the annual benchmarking exercise, which would therefore be considered an unnecessary cost.

D. Options considered

When developing the draft templates, the EBA considered the following options:

Option 1: do nothing

This option implies that credit institutions continue to report data for the benchmarking exercise using the current templates and portfolio definitions.

For the part of the exercise related to credit risk, continuing to apply the previous set of templates and benchmarking portfolios would imply the use of classifications that are no longer used for any purpose other than benchmarking reporting. Furthermore, the analyses produced would be difficult to integrate with those that can be done using COREP reporting data.

Moreover, with reference to the list of obligors classified in the low default portfolios, there has been a reduction of the borrowers in the borrowers actually reported by the participating institutions over the past years. As a consequence, the analysis produced related to the low-default portfolios has become less relevant over time.

Option 2: revision of the portfolios relating to the benchmarking exercises

Under this option, the portfolio definition is adapted to the exposure class definition adopted in “2.5 Annex II – Part II – credit risk IRB” which is based on the amended Regulation (EU) No 575/2013 (CRR3). Also, a more flexible portfolio definition based on a set of rules is introduced, rather than providing the full list of relevant combinations. A common master scale is also introduced, in contrast to the current approach where institutions are allowed to report their own internal master scale.

It is proposed to revise the list of borrowers, so as to update and correct the current list. Additionally, it is proposed to introduce a dynamic element so that reporting institutions are asked to refer to the Large Exposure obligors reported in C.27.00 at the same reference date. This is done

under the constraint that a client that is already listed in Template C 100, shall be reported only once and using the code in column 010 of the Template C 100.00.

E. Cost-Benefit Analysis

The principle of proportionality applies to all aspects of the impact assessment, including methodology, depth of analysis, level of detail and necessity of quantitative analysis. Being consistent with this principle, the EBA staff follow the principle of proportionality when conducting the cost-benefit analyses.

Without the alignment of the benchmarking portfolios with the CRR definitions (which are also used in the ITS on Supervisory Reporting), it would be necessary for institutions to maintain the old classification only for the benchmarking exercise, which would constitute an additional cost. Moreover, it would be difficult to complement the benchmarking results with COREP analysis, as the two systems would be based on different classifications.

Introducing a rule-based approach for defining portfolios is seen as less costly to be implemented and maintained. In this context, the number of portfolios was substantially reduced.

The common list of obligors provided in the benchmarking exercise is meant to enable comparisons of risk measures obtained by different institutions for the same obligor. For this comparison to be meaningful, it is necessary to obtain data on the same obligor from a minimum number of institutions. Over time, the number of obligors for which this comparison is possible has been reduced. The likely cause of this decrease is the reduction of the quality of the data reported in the list. For this reason, it is proposed to update the list, and to ensure that data quality does not stagnate over time, it is also proposed to make a reference to the list of large exposures, which is updated directly by institutions.

F. Preferred option

The EBA considers that, although these benefits are not directly observable and are spread over time, they are not negligible, and they are considered more important than the costs enumerated above. For this reason, the preferred option is Option 2.

5.2.1.2 Problem identification: introduction of the model level

The past experience using the benchmarking credit data proves that it is difficult to exploit data in the template C. 105.02 (model detailed data) and this prevents more detailed analysis of single models which is necessary to investigate the reasons for significant divergences among institutions as required by Article 78(4) CRD VI.

The intention has thus been to conduct more detailed analysis at model level.

B. Policy objectives

To enable analysis at the model level and to increase the level of detail at the model level.

C. Baseline scenario

It would be possible to maintain the current setting (ITS on Benchmarking 2026) for further years but this would prevent any detailed analysis at the model level.

D. Options considered

When developing the draft ITS, the EBA considered the following options:

Option 1: Increase details provided in template C. 105.02

Option 2: Incorporate a split by model in templates C. 102.01

E. Cost-Benefit Analysis

It is clear that option 2 increases the number of datapoints collected. Option 1, on the other hand, would increase the complexity of template C.105.02 and require double reporting of some variables. To reduce this cost, the split by model is only required for selected portfolios.

F. Preferred option

The preferred option is option 2. The stance taken by the EBA is that increasing the datapoints collected in templates C. 102.01/ C. 102.02 is associated with non-negligible benefits over time.

5.2.1.3 Problem identification: loss rate template

With the data currently available it is possible to conduct an actual versus estimated comparison for the PD, by considering the default rate. This comparison is not possible for LGD, because the loss rate data collected is not comparable with the LGD since it does not reflect the economic loss (Article 4(55) and 5(2) CRR).

B. Policy objectives

To enable actual versus estimated comparisons for the LGD as well.

C. Baseline scenario

In the baseline scenario, the current information collected on the loss rate is coherent with the one year-horizon of the data collection, but this implies that information is not being collected for all recoveries. To be able to collect actual loss-rate, it is necessary to change the time horizon, which requires the introduction of a new template.

D. Options considered

When developing the draft ITS, the EBA considered the following options:

Option 1: do nothing

It is possible not to introduce the new loss-rate template. This would prevent actual versus estimated comparisons on the LGD from a modelling perspective.

Option 2: Introduce a specialized template for collecting data on loss rates.

For the new template C 104.00, it is asked to consider all recovery procedures that closed during the year and to report the observed loss rate.

E. Cost-Benefit Analysis

The introduction of a novel template is associated with increased costs. However, the new information collected is seen as necessary in order to study whether the variability of LGD across institutions can be justified in terms of actual risk.

F. Preferred option

The preferred option is option 2. The stance taken by the EBA is that the costs that are associated with the introduction of a new template will be outweighed by the non-negligible benefits over time.

5.2.1.4 Problem identification: migration to the ITS on supervisory reporting

The data collection linked to the credit risk benchmarking exercise has existed for many years and is intended to be replicated in the years to come. Furthermore, this data collection is linked to a specific regulatory requirement (Art. 78 CRD). As such, the data collection cannot be considered as neither temporary nor voluntary and it can be expected that it will continue for a long time to come. Based on this, it is proposed that the data collection will be included among the regulatory data collections like the ITS on Supervisory Reporting.

B. Policy objectives

The benchmarking credit risk data collection is designed to collect some additional breakdowns in comparison with the information that can be obtained from IRB templates of the ITS on Supervisory Reporting. As such, it is necessary that the benchmarking data collection remain coherent with the COREP definitions.

C. Baseline scenario

The baseline scenario consists in maintaining a separate ITS for CR and IFRS 9 benchmarking

D. Options considered

When developing the draft ITS, the EBA considered the following options:

Option 1: do nothing

Option 2: migrate the CR and IFRS 9 templates of the ITS (EU) 2016/2070 with regard to the benchmarking of internal models into the ITS on Supervisory Reporting

E. Cost-Benefit Analysis

The advantages of bringing benchmarking templates on CR and IFRS 9 into the ITS on Supervisory Reporting framework are attributable to the greater simplicity of maintaining coherence between Benchmarking and Supervisory Reporting and the possibility of defining a common framework for reporting obligations.

The disadvantages are linked to the increase in complexity of the ITS on supervisory reporting, and to the impossibility of also bringing templates for market risk benchmarking for which ITS on benchmarking would continue to exist.

F. Preferred option

The preferred option is option 2.

5.2.2 IFRS 9

The IFRS 9 Benchmarking templates referred to the models used for accounting purposes under the IFRS 9 principle were developed starting from the CR Benchmarking referred to internal approach under Part Three, Title II, Chapter 3, of Regulation (EU) No 575/2013.

5.2.2.1 Scope of the exercise

Starting from the year 2025, the Article 78 of Directive 2013/36/EU (CRD) was extended to include in the benchmarking exercise also the models used for accounting purposes under the IFRS 9 principle. Institutions asked to report the IFRS 9 templates are also the relevant institutions using the standard approach for credit risk (SA institutions).

B. Policy objectives

Given that also SA institutions can apply the IFRS 9 principles and as such they develop and employ internal models for accounting purposes, the Article 78 of Directive 2013/36/EU (CRD) extends also to SA institutions the requirement to report the IFRS 9 benchmarking templates. However, with the aim of limiting the cost of reporting, the Article 78 introduces the term of relevant SA institutions so that only a subset of SA institutions is asked to report the IFRS 9 templates.

C. Baseline scenario

The baseline scenario consists in limiting the reporting of the IFRS 9 templates only to IRB validated institutions that adopted the IFRS 9.

D. Options considered

When developing the benchmarking amendments of the ITS on Supervisory Reporting, the EBA considered the following options:

Option 1: extend to all the SA institutions subject to IFRS 9 principles the requirement to report the IFRS 9 templates

Option 2: provide an operational definition of relevant institutions

E. Cost-Benefit Analysis

Table 1 below shows that at the end of the year 2024, there were 108 IRB institutions and more than 2,600 SA institutions at the highest level of consolidation in the EU. The IRB institutions represented about 74% of the total assets. Not all the SA institutions adopted the IFRS 9 principles. There were 226 SA institutions (of which 30 subsidiaries of EU institutions) classified as subject to IFRS 9 principles.

By limiting the reporting of the IFRS 9 benchmarking templates to IRB institutions, a significant amount of institutions adopting internal models for accounting purposes would be excluded. On the other hand, extending to all the SA institutions adopting the IFRS 9, the reporting requirement would increase materially the number of institutions reporting the benchmarking templates.

Table 1: Number of Institutions reporting COREP figures, December 2024 – Highest level of consolidation at the EU

	irb			
	no		yes	
	N	%TA	N	%TA
ALL	2,637	25.7%	108	74.3%
CON	396	13.5%	88	73.0%
IND	2,241	12.2%	20	1.3%

Source: Supervisory Reporting

It is proposed to define as relevant SA, those institutions classified as Large institutions according to Article 4 (1) of the Regulation (EU) 575/13 (CRR), and they are subject to IFRS 9.

The following analysis is based on the list of Large institutions that is published on the EBA web site⁹. Along with these criteria, it is expected to obtain an enlargement of the sample of about 50 units.

⁹ <https://www.eba.europa.eu/risk-and-data-analysis/data/registers-and-other-list-institutions/other-list-institutions>. This list is based on the criteria established by Article 2(3) of the EBA Decision concerning supervisory reporting by competent authorities to the EBA (EBA/DC/2020/334). The two terms, “large” as per CRR and “largest” as per EBA Decision differ and may not result in the same sample of banks. We used that definition based on the EBA decision because it is implemented in the EBA data base.

Table 2: Number of SA Largest Institutions at March 2025 – Highest level of consolidation at the EU

Ctry	Nr
AT	3
BE	2
BG	.
CY	3
CZ	.
DE	4
DK	.
EE	1
ES	4
FI	1
FR	6
GR	3
HR	.
HU	.
IE	3
IT	4
LT	2
LU	.
LV	1
MT	2
NL	2
PL	2
PT	1
RO	2
SE	1
SI	2
SK	.
All	49

Source: COREP

F. Preferred option

The preferred option is option 2.

5.2.2.2 Portfolio definition for SA banks

B. Policy objectives

It was identified the need to carefully design the way in which SA institutions are onboarded in the existing templates. Notably, SA exposure classes are different from the IRB exposure classes, which will result in a complexity for SA institutions to fill in Supervisory Benchmarking based on IRB exposure classes.

C. Baseline scenario

The baseline scenario consists in asking the SA institutions to report using the same portfolios defined for IRB institutions.

D. Options considered

When developing the draft amending ITS, the EBA considered the following options:

Option 1: define new exposure classes to be used for SA and IRB institutions

Option 2: SA banks shall be required to report their SA exposures under SA exposure classes

Option 3: Both SA institutions and IRB institutions shall be required to report their exposures under SA exposure classes

E. Cost-Benefit Analysis

The main advantages of options 1 and 3 is that SA and IRB institutions would report the same portfolios, this in turn would simplify the comparisons. However, under these options some institutions would be forced to adopt a new exposure class classification only for benchmarking purposes, which would increase the reporting costs. With option 2, institutions would be asked to use the same exposure class definitions already used to calculate their risk-weighted exposures amounts.

F. Preferred option

The preferred option is option 2.

5.2.2.3 Merging of the templates

B. Policy objectives

IFRS 9 templates enable to collect information both at borrower level for Low Default Portfolios and at portfolio level for High Default Portfolios. The list of borrowers and the definition of the portfolios are in common with the CR templates. With the aim of reducing the cost of reporting it is proposed to merge the IFRS 9 templates with the CR templates.

C. Baseline scenario

The baseline scenario consists in leaving the reporting of the IFRS 9 based on the 8 templates used in the last two exercises.

D. Options considered

When developing the draft ITS, the EBA considered the following options:

Option 1: delete the IFRS 9 templates and rely on existing sources of information like FINREP and Anacredit

Option 2: extend the CR templates so to include part of the information collected with the IFRS 9 templates

E. Cost-Benefit Analysis

Although option 1 would be the most cost-effective, the loss of information would be significant.

Under option 2, some columns are added to both the borrower level template C.101 and to the portfolio level template C.102 while the 8 IFRS 9 templates are cancelled.

This option represents a compromise: on the one hand, it allows the elimination of 8 templates, on the other, it allows the recovery of some of the information from those templates.

F. Preferred option

The preferred option is option 2.

5.3 Overview of questions for consultation

Questions:

General 1: Are the instructions and templates clear to the respondents? If not, what should be clarified?

General 2: Do the respondents identify any discrepancies between these templates and instructions and the calculation of the requirements set out in the underlying regulation?

General 3: Do the respondents agree that the amended ITS on Supervisory Reporting allows to fulfil the requirements and purpose of the Article 78 of the CRD?

General 4: what is the information (please refer to single columns) that you see as particularly costly to be provided? Please provide detailed information about the implementation and running costs of the proposed changes, also compared to the current total costs.

General 5: what is the reporting level for banking groups that you deem more appropriate?

CR 1: Do you foresee any issues with supplementing the sample of counterparties listed in C 100.00 by the Large Exposures counterparties reported in the Template C 27.00 at the same reference date in order to expand the sample of low default counterparties for the reporting for template C 101.01/.02?

CR 2: Do you identify any errors in the list of counterparties in C 100.00? If so, please report it to us.

CR 3: Do you foresee any issues with the transfer of the portfolio/model split from the former template C 105.02 to the template C 101.01 and the new template C 102.01? Do you agree with the EBA's assessment that the portfolio/model split in the new template C 102.01 is the preferred option compared to designing a separate template increasing the reporting details of the former templates C 105.01 and C 105.02?

CR 4: Do you think it is possible to provide the details of the impacts of the RWEA add-ons and MoCs (columns 0203, 0204, 0205 of Template C 102.01) at the required segmentation level?

CR 5: Do you agree with the proposed simplification in the reporting for column 0202 (RWEA Standardised) of the template C 102.01? Do you deem the segmentation level for which the information is requested sufficient to highlight the key differences between the IRB approach and the Standardised Approach?

CR 6: The split by collateral type (column 0061 of new template C 102.01) differs from the split used in the current Benchmarking portfolios. Do you foresee any issues or disadvantages with the new definition and instructions as compared to the ones currently in use?

CR 7: Do you see material obstacles in providing the information required by the column 0302 of the template C 102.01 (Long-run average realized loss rate of assigned facility grades)?

CR 8: Do you see material obstacles in providing the information required by the new loss rate template (C 104.00)? Would alternative measures of loss rates be more appropriate?

CR 9.1: The split by facility type (column 0062 of template C 102.01) is designed to collect information on the functioning of the CCF models. The classification into buckets (facility types) of off-balance-sheet items is based on Annex I of Regulation (EU) No 575/2013. Do you think there exist other classifications (for example product types) of off-balance-sheet items that would be more useful for representing the CCF models?

CR 9.2: Template C 101.01 and C 102.01 propose two alternatives to collect the information on the CCF, either by one column (column 0110 in C 101.01 and column 0120 in C 102.01) or by two separate columns (columns 0111/0112 in C 101.01 and columns 0121/0122 in C 102.01). Which of these reporting alternatives do you prefer?

CR 10> Do you support the use and the proposed granularity of the common master scale to limit the number of reported rating grades? What alternative would you propose.

IFRS9 1: Do you agree with the proposed definition of SA institutions as relevant for the benchmarking reporting?

IFRS9 2: Do you agree with the proposal to refer to SA exposure classes in defining the portfolios for SA institutions?