
CP on amending the SyRB Guidelines

09 April 2026, Public Hearing

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01

Background: the SyRB and existing Guidelines

01. The Systemic Risk Buffer in brief

- Macroprudential capital buffer under Article 133 CRD
- Aimed at preventing and mitigating systemic risks
- Can be applied:
 - ✓ to all exposures, or
 - ✓ to sectoral exposures, or
 - ✓ to other subset of exposures

01. Role of the 2020 Guidelines

- EBA/GL/2020/13 published in 2020
- Target audience: competent authorities or, where different, other designated authorities
- Objective: provide a harmonised framework for defining subsets of sectoral exposures
- Based on:
 - ✓ three core dimensions: counterparty, exposure and collateral
 - ✓ optional sub-dimensions
- Support consistency and reciprocity across Member States



02

Why an amendment is needed

02. Why the Guidelines need to be amended

- Recent amendments to Article 133 of the CRD explicitly introduced climate-related risks into the regulatory framework
- Existing framework insufficient to:
 - identify climate-risk-sensitive exposures
 - target risks linked to economic activities or geography
- Need to ensure the SyRB remains usable and effective

02. Policy objectives of the amendments

- Enable effective use of the SyRB for climate-related systemic risks
- Improve clarity and usability of the Guidelines
- Incorporate lessons learned from past applications
- Preserve consistency and proportionality



03

Overview of proposed changes

03. High-level overview of proposed changes

Three main pillars:

- integration of climate risks
- targeted technical clarifications
- strengthened cooperation and transparency

03. Addressing climate transition risks

- Economic activity introduced as a key lens
- Enables targeting of exposures to sectors that are sensitive to transition policies
- Builds on existing sub-dimension in the framework

03. Addressing climate physical risks

- Geographic location becomes central
- Relevant for:
 - counterparties
 - collateral location
- Allows targeting risks from floods, wildfires, sea-level rise, etc.

03. Consistency with the existing framework

- No new dimensions introduced
- Climate risks integrated through existing dimensions and sub-dimensions
- Ensures continuity with the current guidance

03. Lessons learned

- Multiple subsets
 - Clarification that one SyRB measure may cover multiple subsets
 - Reflect existing practice by authorities
- Exposure identification
 - Possibility to identify exposures based on the approach used to calculate credit risk RWAs
 - Aligns SyRB design with supervisory reporting
- Information sharing
 - Stronger expectations for information provided to other authorities
 - Supports assessment for reciprocation

03. What does not change

Governance and justification

- Authorities expected to
 - Identify systemic nature of the risk
 - Justify scope and calibration
 - Ensure proportionality

Interaction with other buffers

- Avoid overlap with
 - O-SII / G-SII buffers
 - Countercyclical capital buffer

03. What does not change

Review and adjustment over time

- SyRB measures should be reviewed regularly
- Adjusted as risks evolve

Transparency in communication

- Clear public communication when setting or changing the SyRB
- Disclosure of
 - targeted exposures
 - rationale and objectives



04

Expected impact and next steps

04. Expected benefits

- More risk-sensitive SyRB measures
- Improved operational clarity
- Better alignment with emerging systemic risks

04. Consultation scope

Feedback invited on:

- benefits and feasibility of proposals
- clarity and proportionality
- unintended consequences

04. Timeline and next steps

- Consultation period until **30 April 2026** via EBA webpage
- Finalisation of Guidelines in Q3-Q4 2026
- Application date (6 months after publication)

Thank you!



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