EBA/CP/2026/07

10 April 2026

Consultation Paper

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

Table of Contents

1. Responding to this consultation

The EBA invites comments on all proposals put forward in this consultation paper and in particular on the specific questions summarised in the topic specific modules of the consultation paper.

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

Responses to the consultations can be submitted using dedicated surveys in each topic-specific module and in the general part of the consultation paper by 10 July 2026 23:59 CEST.

For FINREP templates and related instructions, that are mainly affected by the implementation of IFRS 18[1] (F 02.00, F 16.01, F 16.02, F 16.03, F 16.04, F 16.04.1, F 16.05, F 16.06, F 16.07, F 45.02, F 45.03, F 20.03) please provide your comments by 10 May 2026 23:59 CEST.

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 (EU) 1725/2018 of the European Parliament and of the Council of 23 October 2018. Further information on data protection can be found under the Legal notice section of the EBA website.

[1] Questions for consultation from Q1 to Q4 included in the module on FINREP.

2. Executive Summary

The EBA supervisory reporting requirements are currently laid down in Commission Implementing Regulation (EU) 2024/3117 and serve as a cornerstone for supervisors' ability to monitor institutions' compliance with prudential rules and to assess financial soundness. After 15 years of harmonisation and given the focus of the policymakers across the EU on the simplification and streamlining of the regulatory framework and the breadth of recent regulatory, accounting and supervisory developments, a comprehensive review of the ITS on supervisory reporting was considered warranted.

The revisions envisaged respond to the experience and maturity gained in the use of supervisory reporting in recent years and co-legislators' calls for avoiding unnecessary compliance costs due to supervisory reporting. This is consistent with EBA's long-standing commitment to a reporting framework that is proportionate, efficient and fit for purpose, including the recommendations of the EBA's 2021 study on the cost of compliance with supervisory reporting[2] and the 2025 Report on the efficiency of the regulatory and supervisory framework[3].

The EBA objectives in this regard are fully aligned with the European Commission's 2024 work programme and data strategy on long-term competitiveness call for a reduction in reporting costs through streamlined requirements, greater re-use of data and improved data sharing among authorities. In the EBA view, the simplification measures introduced in this consultation paper combined with other ongoing and planned initiatives in the area of supervisory reporting deliver the expected degree of cost savings, but this need to be confirmed through the industry response to the consultation.

In parallel, the adoption of IFRS 18 on presentation and disclosure in financial statements requires corresponding adjustments to FINREP reporting. Further drivers include the integration of environmental, social and governance (ESG) risks into prudential supervision, the review of certain reporting requirements on liquidity, asset encumbrance or FINREP to enhance them building on the lessons learnt from supervisory experience, and the forthcoming application of the revised market risk framework under the Fundamental Review of the Trading Book (FRTB).

The consultation paper therefore combines regulatory-driven amendments and enhancements with a broad set of simplification measures informed by supervisory experience and extensive stakeholder input, including engagement with competent authorities, other public users of supervisory data and industry feedback. The proposed simplification measures focus on reducing data points and templates, adjusting reporting frequency and scope, enhancing proportionality for small and non-complex institutions (SNCIs), expanding the use of a 'core plus supplement' approach, integrating parallel data collections at the EBA level, such as stress testing and

[2] EBA/REP/2021/15
[3] EBA/REP/2025/26

supervisory benchmarking, improving alignment of definitions and qualitative elements and harmonising and integrating into the EBA reporting framework reporting requirements now requested at national/jurisdictional level.

To facilitate stakeholder engagement, the consultation paper is structured in a modular format comprising nine topic-specific modules, each supported by its own background and rationale, reporting templates, instructions, impact assessment and consultation questions. These modules are brought together under a common overarching rationale and complemented by general questions on reporting costs and horizontal amendments to the ITS legal text. The modules cover liquidity and asset encumbrance, FINREP, operational risk losses, integration of EU-wide stress testing data, market risk and FRTB, COREP own funds, ESG reporting, alignment with Pillar 3 disclosures for SNCIs, and a set of other targeted amendments.

This consultation paper is also an opportunity to reflect on reporting change management. The EBA would like to introduce a more structured and advanced information regarding upcoming reporting changes, develop a more structured dialogue with the stakeholders as well as a two-step approach to impact assessment with the aim of better understanding cost implications of the proposed changes. In the same vein, the EBA is envisaging an implementation calendar which would provide as much as possible implementation time to the industry to implement changes, integrating ad hoc collections into the regular reporting and providing transitional arrangements for the requirements coming into the force before the first reporting reference data under the revised ITS.

The EBA also notes that considering the implementation timeline of September 2027, the timeline of the revisions will already provides a greater degree of stability, as no major changes in the reporting requirements will have been introduced by the Authority for almost two years.

Next steps

The EBA plans to finalise the revised ITS following the public consultation and submit the final report to the European Commission for adoption by the end of 2026. First reporting under the revised framework is expected for the reference date of 30 September 2027, accompanied by a comprehensive reporting technical package. Specific transitional arrangements are foreseen to address reporting obligations that apply earlier, notably IFRS 18 and operational risk loss reporting. The revised process will also separate the publication of instructions from the legal text of the ITS, with instructions made available through EBA IT tools to facilitate operational implementation.

The EBA will also continue its work on seeking improvements to the change management framework, where the proposal will be further refined based on the industry feedback to this consultation. While resolution reporting is not currently covered by this consultation paper, it remains part of the holistic effort to reduce the reporting cost, in particular, by introducing measures aimed at improving the predictability and stability of reporting obligations.

3. Background and rationale

1. Regulation (EU) No 575/2013 (Capital Requirements Regulation, CRR) mandates the EBA, in Article 430(7), to develop implementing technical standards (ITS) to specify the uniform reporting requirements. These reporting requirements are included in the Commission Implementing Regulation (EU) 2024/3117 (Implementing Technical Standards on supervisory reporting - ITS on supervisory reporting'). They cover information on institutions' compliance with prudential requirements as put forward by the CRR and related technical standards, as well as additional financial information required by supervisors to perform their supervisory tasks. Hence, the ITS on supervisory reporting needs to be updated whenever the underlying legal requirements change, or it is necessary to improve the supervisors' ability to monitor and assess institutions.

2. In April 2024, the International Accounting Standards Board (IASB) issued 'IFRS 18 - Presentation and Disclosure in Financial Statements', which necessitates the revision of the reporting requirements for financial information (FINREP) in order to align it with the IFRS 18 standards.

3. Equally, the integration of environmental, social and governance (ESG) risks into prudential supervision constitutes a key regulatory priority within the Union's sustainable finance strategy. CRR introduces new reporting and extends the scope of the disclosure requirements to ensure that competent authorities are equipped with harmonised data to assess institutions' exposures to environmental and climate-related risks and their risk mitigation strategies.

4. The application of the revised framework for the treatment of market risks – the Fundamental Review of the Trading Book (FRTB), including the revised rules on the boundary between the trading and non-trading (banking) books and structural foreign exchange positions from 2027 necessitate the revision of the approach to market risk reporting.

5. The changes in the underlying CRR, CRD and IFRS requirements have called for the revision of the ITS on supervisory reporting to ensure that the competent authorities have all necessary information to carry out supervisory activities and be able to assess compliance of the institutions with those new regulatory requirements.

3.1. Simplification of reporting requirements

6. In addition to the regulatory drivers, the revision to the ITS on supervisory reporting are triggered by the need to simplify the reporting requirements. The EBA has been always committed to fostering a supervisory reporting framework that is fit-for-purpose, proportionate and efficient. As part of this drive and following the mandate in Article 430 (8) of CRR, in 2021 the EBA published a Report on a study on the cost of compliance with supervisory reporting

requirements[4], which set out recommendation for increasing effectiveness and efficiency of the EBA supervisory reporting framework and reducing reporting costs, in particular for small and non-complex institutions (SNCIs). The recommendations, in particular, call for the revisions of the reporting requirements and streamlining, where necessary, to reflect most necessary information from the supervisory perspective, introduction of greater proportionality through the use of 'core + supplement' approach to designing the requirements.

7. The EBA work on simplification and efficiency is fully aligned with the European Commission work. Specifically, the EU Commission's data strategy on long-term competitiveness sets out the goal of reducing costs associated with reporting requirements, without undermining the policy and reporting objectives, through regular reviews, a re-use of reported data and easier data sharing between authorities.

8. The EU Commission's recent initiatives for further simplification of regulatory requirements are also reflected in the EBA own work on the simplification of regulatory and supervisory frameworks, in accordance with the 2025 Report on EBA Report on the efficiency of the regulatory and supervisory framework[5]. This report calls, amongst other initiatives, for the review and reduction of reporting requirements across all modules of the EBA reporting framework and of additional requirements set by competent and resolution authorities

9. The revisions proposed in this consultation paper cover various reporting topics, and put together simplification proposals, regulatory driven amendments and enhancements based on supervisory experience. Simplification proposals, focus on (1) reduction of data points and templates, (2) reduced frequency and scope adjustments, (3) introducing greater proportionality for SNCIs, (4) wider use of 'core + supplement' approach, (5) integration and streamlining of separate data collections such as EU-wide stress testing (included as a module of this consultation paper) and supervisory benchmarking (covered as a separate consultation paper) and (6) qualitative effects, e.g. through better alignment of definitions.

10. The simplification proposals set out in the consultation paper have been developed based on the input from the competent authorities, where relevant considering the views also of other users of the supervisory reporting data from macroprudential, statistical or resolution functions, and also reflecting the input from the industry that the EBA has received through the ECB-led engagement with the industry as part of the ECB simplification project during 2025.

11. An important element of the simplification efforts will be the integration of the data on the starting point needed to run the EU-wide stress test, including climate stress testing, into a regular reporting framework, which will coexist with a significantly streamlined version of the

[4] EBA/REP/2021/15 (see https://www.eba.europa.eu/sites/default/files/document_library/Publications/Reports/2021/1013948/Study%20of%20the%20cost%20of%20compliance%20with%20supervisory%20reporting%20requirement.pdf)

[5] EBA/REP/2025/26 (see https://www.eba.europa.eu/sites/default/files/2025-10/b8e0ef8e-2d49-43fc-b917-dbca3423588c/Report%20on%20the%20efficiency%20of%20the%20regulatory%20and%20supervisory%20framework.pdf)

stress test ad hoc templates, focused on projections. This will represent a significant step towards greater integration and cross-usage of the supervisory reporting data and will contribute to the stability and predictability of this data request and related cost reduction. As part of this integration, the conjunction of the data requested in the supervisory reporting framework and in the new ad hoc stress test templates will be significantly streamlined compared to past data collection.

3.2. Structure of the consultation paper

12. Given the comprehensive nature of the consultation paper and the number of the diverse topics covered and to facilitate the consultation process, the consultation paper is of modular design. To this end, the consultation paper is structured in 9 topic-specific ‘mini consultation papers’ with own background rationale, reporting templates and instructions supported by own impact assessments and questions for the consultation.

13. These modules are brought together under one common ‘umbrella’ background and rationale supported by the general questions regarding impacts of the proposals on the institutions reporting costs that would facilitate the impact assessment of the proposal and common changes to the legal text of the ITS.

14. The EBA seeks stakeholders’ feedback to the following modules:

   a. Liquidity and asset encumbrance;

   b. Financial reporting (FINREP);

   c. Operational risk losses;

   d. Integration of EU-wide stress testing data needs;

   e. Boundary, thresholds, market risk, Counterparty credit risk (CCR), Credit valuation adjustment (CVA) risk and prudent valuation;

   f. COREP own funds: transitional arrangements, adjustments to templates and simplification of settlement reporting;

   g. ESG reporting;

   h. Alignment with Pillar 3 disclosures for SNCIs;

   i. Other changes (IRRBB, large exposures – shadow banking exposures, resubmission/explanations, leverage ratio other ITS amendments).

3.3. Integrated reporting and collaboration with stakeholders

15. The Joint Bank Reporting Committee[6] is an EU-level advisory committee created to simplify, harmonise, and improve bank reporting across Europe. It helps to develop common definitions and standards for the data that banks are required to report for statistical, supervisory and resolution purposes. EBA co-chairs the JBRC, contributes to its work and is committed to follow the JBRC advice to enhance integration of reporting, build an integrated glossary of harmonised definitions and a common data dictionary.

16. One of the main priorities of the JBRC is semantic integration. Authorities and industry[7] are working together[8] to ensure that concepts and definitions are harmonized and aligned across the three different areas of reporting, contributing to defining a common data dictionary and an iintegrated glossary. The concepts and definitions from the EBA consultation paper are subject to the JBRC work plan for 2026. The EBA is reaching out to the JBRC to provide the necessary details and support for discussing content of this consultation paper and how to achieve efficient design of reporting to ensure semantic integration of final reporting requirements. EBA is committed to reflecting the recommendations of the JBRC in the finalisation of the final report.

17. The JBRC issued in January 2026 advice on ESG definitions[9]. The EBA has incorporated this advice into the proposals for ESG reporting presented in this consultation paper.

18. On a similar note, the EBA's Advisory Committee on Proportionality (ACP) provides, since its creation in 2020, recommendations to the Authority on how to foster proportionality in its activities and missions. The EBA is implementing in this consultation recommendations from the ACP by introducing enhanced proportionality for small and non-complex institutions and medium institutions on various areas. Examples within this consultation paper include reduced frequencies or exemptions in area of liquidity and use of 'core + supplement' approach in FINREP as well as review of least used templates.

19. As part of the improving change management framework (see below), the EBA is also looking at better and more structured engagement with the stakeholders when developing or reviewing reporting requirements. Starting from this public consultation, in addition to the usual public hearing, the EBA will organise a more focused workshop to present and discuss the proposed changes. Going forward, such workshops on the reporting requirements will be organized with regular occurrence.

[6] Joint Bank Reporting Committee (JBRC) | European Banking Authority
[7] via the Reporting Contact Group (RCG), one of the permanent structures of the JBRC
[8] Expert Group on Semantic integration
[9] The Joint Bank Reporting Committee publishes its 2026 Work Programme and recommendations to enhance semantic integration on ESG definitions | European Banking Authority

3.4. Implementation and application

20. The first reporting based on the revised ITS on supervisory reporting is expected for the reference date of 30 September 2027.

21. To facilitate the implementation, the EBA intends to finalise the proposal following the public consultation, issue the final report with the proposed revised ITS on supervisory reporting and submit it to the EU Commission for adoption by the end of 2026.

22. The publication of the final report will be accompanied by the package consisting of EBA Data Point Model database (DPM 2.0), XBRL-csv taxonomy and validation rules. The publication of the final report and technical package could mark the start of the implementation period for the industry.

23. This timeline, however, poses specific challenges for a number of the reporting obligations starting to apply before September 2027, most notably the implementation of IFRS 18 and operational loss reporting. For these reasons, the EBA is introducing specific transitional arrangements that are explained in the relevant modules of the consultation paper.

24. Pursuant to Article 430 paragraph 7, subparagraph 1 as amended by the CRR3, the instructions included in the final report will not be part of ITS published in the official journal, as they shall be published on the EBA website as part of the ITS-related IT tools. This change in the process aims at easier operationalisation of the ITS. The instructions will be available in all languages and shall remain directly applicable in all Member States as part of the ITS once the ITS is adopted by the European Commission and published in the Official Journal of the EU.

3.5. Stable and predictable - improvements to reporting change management

25. An important element for the simplification of the reporting framework often raised by the authorities and the industry as having a potential to introduce significant cost savings, is improvements to the change management practices. This is also addressed as a recommendation in the 2025 Report on EBA Report on the efficiency of the regulatory and supervisory framework[10]. The recommendation calls to prepare a proposal with actions to strengthen ex ante impact assessments, increasing predictability of the reporting changes and deepening engagement with the stakeholders. Furthermore, the EBA is asked to look into reducing frequency of changes and increase predictability and stability of the EBA reporting framework. The implementation of the recommendation should focus first on the prudential reporting followed by the resolution reporting.

[10] EBA/REP/2025/26

26. From the practical perspective, the implementation of this recommendation can be split into two:

    a. improvements to the communication practices on the side of the EBA and to the impact assessment, and

    b. better batching of the upcoming reporting releases, increasing predictability, stability of the requirements and giving the industry more time for the implementation.

27. Both of these angles strongly echo the recommendation of the 2021 Study of the cost of compliance report and the EBA has acted on them by providing more forward-looking information to the stakeholders regarding planned changes and aiming at maintaining one reporting release per year. Also, the communication of the changes has also improved with the consultation papers on reporting being supplemented by additional explanations, reasoning and examples.

28. However, better change-management and greater stability and predictability of the requirements are still raised by the industry as a source of concern for the overall reporting costs and more actions can be considered also based on the industry feedback to this consultation papers.

29. To facilitate this, the EBA considers the following good practices for future reporting requirements and changes starting from this consultation paper already:

    a. be more transparent and provide relevant calendars in advance;

    b. further enhance how rationale and explanations of the requirements are presented in the consultation papers and final reports, all supported by more practical examples

    c. introduce a more structured approach to consultation papers with targeted standard questions regarding availability of the request, input for cost-benefit assessment, simplification needs, use cases;

    d. when developing new or revised reporting requirements run a fitness check of existing reporting and accompany proposals with a rigorous impact assessment covering assessment of reporting burden and cost-benefit assessment;

    e. organise workshop with publication on the EBA website more explanatory materials regarding existing and upcoming reporting requirements and technical package and specifications, possibly in more accessible form.

30. These improvements to the communication practices and impact assessment are already reflected in the current consultation paper. To this end, the modular design of the consultation paper allows a more focused feedback from relevant industry experts, all changes to the requirements (both simplifications and additions) are explained and reasoned, which provides the stakeholders with a possibility to provide more structured feedback. The consultation

paper features a revised two two-step approach to impact assessment, where the qualitative assessment provided before the consultation will be further refined in the final report considering both responses to the consultation and information regarding the cost implications of the proposed changes that the EBA seeks to collect from the respondents to this consultation – this would also allow the EBA to better assess how the proposed simplification measures contribute to the reporting costs reduction target.

31. As for the communication elements, already following the recommendations of the 2021 Study of the cost of compliance, the EBA has invested in updating its website to provide more information regarding the applicable reporting requirements, including the signposting and mapping tools and time traveler tools:

- Reporting frameworks
- Reporting time traveler
- Signposting tool
- Mapping tool

32. Through the consultation paper the EBA is also seeking feedback on these tools and will consider improvements based on the feedback received and available resources.

33. The second part of the change management process is heavily linked to the timing aspects and, in particular, regulatory timeline, where the reporting calendar is dependent on the calendar of the application of the underlying regulatory requirements.

34. In this area, the EBA has considered not introducing new requirements for a period of time and grouping the introduction of requirements into larger batches. Whilst such pause is difficult to implement and maintain given the regulatory changes and those calendars, the current simplification project allowed the EBA to achieve such pause. In particular, the timeline of the current revisions introduced in this consultation paper already provide a degree of stability and as no major changes in the reporting requirements have been introduced by the EBA for almost two years considering the implementation timeline of September 2027.

35. Furthermore, the EBA considers establishing less frequent change cycles and provide more stability on reporting modules to avoid 'continuous change', for instance by grouping the introduction of requirements into no more than two batches every year. In practice this cycle can be based around fixed reference dates with up to two a year, meaning that the reporting requirements whenever they are introduced apply with predefined reference dates. This, however, may create a risk of disconnect between the regulatory and reporting calendars.

36. This is a particular point requiring further discussion between the supervisors and the industry – the link between the frequency and timing of the changes of the reporting requirements and the timelines and frequency of changes of the underlying regulatory requirements. The calendars are often dictated by the calendars of the underlying Level 1 requirements, which renders the best intentions of stability and batching of the reporting requirements difficult to achieve and manage without jeopardising the supervisory responsibilities of the competent

authorities. The risks of having situations when the regulatory requirements apply but cannot be immediately supervised due to missing reporting is a strong supervisory concern. An alternative solution that could mitigate these supervisory concerns could be an earlier start of the reporting, where the industry would start reporting e.g. six months before the regulatory requirements start to apply. The industry feedback is also sought on these considerations.

4. Draft implementing technical standards

COMMISSION IMPLEMENTING REGULATION (EU) …/...

of XXX

amending the implementing technical standards laid down in Commission Implementing Regulation (EU) 2024/3117 with regard to the update and simplification of supervisory reporting of institutions in various areas (including aggregate exposure to shadow banking entities, exposure to ESG risk, transitional arrangements, IP losses, liquidity coverage ratio, additional liquidity monitoring metrics, asset encumbrance, leverage ratio, operational risk losses, consistency with disclosures and stress testing related requirements), and amending Commission Implementing Regulation (EU) 2025/379 in relation to credit risk benchmarking

(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[11] and in particular Article 430(7), the fifth subparagraph thereof, Article 430(9) the third subparagraph thereof,

Having regard 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/EC ([1]), and in particular Article 78(8), fourth subparagraph thereof,

Whereas:

(1) The European Commission's data strategy on long-term competitiveness sets out the goal of reducing reporting costs for institutions, considering also the recommendations of the EBA Report on the cost of compliance with supervisory reporting (EBA/REP/2021/15). Thus, reporting requirements should be amended to reduce the reporting of data that are considered dispensable or where there are overlaps with other similar reporting requirement, and to instead focus on data that is essential for supervisory purposes. Besides reducing the number of reporting templates and data points, in order to ensure a simplification and a reduction of the reporting burden it is necessary in some cases to reduce the reporting frequencies, in particular for SNCIs, and introduce a wider use of proportionality.

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

(2) Regulation (EU) No 575/2013 was amended by Regulation (EU) 2024/1623 of the European Parliament and of the Council[12] to implement the final set of international standards developed by the Basel Committee on Banking Supervision (Basel). As a result, the reporting framework as set out in Commission Implementing Regulation (EU) No 2024/3117[13], which already includes some of these changes, should be amended to reflect those changes yet to be implemented.

(3) On 1 January 2027, the alternative approaches for calculating the own funds requirements for market risk will become applicable in the EU for the calculation of both unfloored and floored risk-weighted exposure amounts. Against this background, it is necessary to revise and expand the set of information to be reported by institutions, in order to provide supervisors with a basis for assessing both the magnitude and the nature of the market risks and the compliance with the own funds requirements. Furthermore, reporting should also be harmonised also where institutions received permission to exempt structural foreign exchange positions from the calculation of their own founds requirements.

(4) A new template in the large exposures section should provide for the reporting of information in accordance with the amendments to Article 394(2) of Regulation (EU) No 575/2013, which require institutions to report their aggregate exposure to shadow banking entities.

(5) A new template should be provided for the reporting of information on the impact of certain transitional arrangements on own funds requirements to allow that sufficient data is collected by the European Banking Authority (EBA) for fulfilling the mandates related to these transitional arrangements in Regulation (EU) No 575/2013.

(6) Information on capital ratios and capital levels should be updated to provide information on fully loaded capital ratios, i.e. ratios calculated on the assumption that all prudential transitional arrangements and phase-in provisions have expired, and that the final definitions of capital, risk weighted exposure amounts and regulatory requirements are fully and permanently applicable.

(7) Memorandum items of capital adequacy templates should be updated to provide information on the fully loaded adjustment related to the output floor.

(8) The own funds template should be updated to provide detailed information on prior permissions to reduce own fund and to provide more specific information on non eligible profits but intended to be recognised as retained earnings at a later stage, i.e. of the amount of profits which are neither retained earnings yet nor profits according to Art. 26 (2) of Regulation (EU) No 575/2013.

[12] 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, 2024/1623, 19.6.2024, ELI: http://data.europa.eu/eli/reg/2024/1623/oj).

[13] 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 regard 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*).

(9) In April 2024, the International Accounting Standards Board (IASB) published the International Financial Reporting Standard (IFRS) 18 'Presentation and Disclosure in Financial Statements' ('IFRS 18'). This standard introduces a new structure of the Statement of profit and loss. IFRS 18 is implemented into Union law by Commission Regulation (EU) 2026/338. Amendments to Implementing Regulation (EU) 2024/3117 are required to reflect the implementation of IFRS 18 into Union law.

(10) Further amendments to Implementing Regulation (EU) 2024/3117 are required to ensure competent authorities' ability to effectively monitor and assess the institutions' risk profile and to obtain a view on the risks posed to the financial sector. In particular, the collection of more granular information on collateral is needed to close identified data gaps in assessing and monitoring the quality of collateral. Furthermore, the increase of the reporting frequency of template F 41.01 from annual to quarterly and the inclusion of the information on the hedging derivatives is required to monitor institutions' unrealised gains and losses on financial instruments at cost or amortised cost and the related hedge of interest rate risk. Finally, the additional information on the institutions' exposures towards non-bank financial intermediaries (NBFI), the level of activities in crypto-assets, overlays and 'Public Guarantee Scheme' should allow monitoring emerging risks arising from: the increasing interconnectedness between institutions and other financial corporations; the activities in crypto markets; and other novel risks like energy supply, supply chains in general, environmental risks, inflation and geopolitical risks.

(11) The introduction of a new granular operational risk taxonomy based on Commission Delegated Regulation (EU) 2026/XXX [RTS on operational risk taxonomy] requires amending Implementing Regulation (EU) 2024/3117 to allow for reporting of operational risk losses within the scope of Article 319 of Regulation (EU) 575/2013. Given the extra granularity and level of detail of the new operational risk taxonomy and considering the benefits of granular reporting, the operational risk loss reporting should be revised to allow for the transition from aggregate to a granular reporting so as to increase the efficiency and simplify the reporting process for institutions, as it would not result in any loss of any necessary information for supervisors.

(12) The EU-wide stress testing reporting is integrated in Implementing Regulation (EU) 2024/3117 to enhance efficiency while preserving analytical robustness, comparability, benchmarking capabilities and the bottom-up and top-down approaches. Within the overarching principle of reducing the reporting requirements, the stress test exercise is revised by streamlining templates, aligning methodological definitions with reporting definitions and strengthening synergies with supervisory reporting through the integration of selected stress test starting-point data, in particular for credit risk, into that Regulation. This integration should reduce reliance on ad-hoc data collections, lower reconciliation and quality-assurance costs, and guided by the principles of proportionality and stability, allow institutions to focus stress test submissions primarily on projections, thereby delivering a meaningful reduction in overall reporting and compliance burden without loss of information necessary for supervisory analysis.

(13) Implementing Regulation (EU) 2024/3117 should be amended to allow for voluntary reporting by small and non-complex institutions and by institutions other than large or small and non-complex intuitions institutions or for the institutions not meeting

reporting-related thresholds , for the information reported in accordance with Articles 5 to 21c. This is necessary because in those cases where proportionality measures are introduced to waive certain types of institutions from reporting certain templates, not reporting the information can become more costly than reporting it, and the institutions should have the possibility to report this information even if they are not required to for the sake of efficiency and cost reduction. .

(14) A new provision should be introduced in Implementing Regulation (EU) 2024/3117 to include the reporting of ESG risk exposures in accordance with Article 430(h) of Regulation (EU) No 575/2013, as introduced by Regulation (EU) 2024/1623.

(15) Based on market developments and supervisory experience, including evidence from national ad-hoc data collections, the Additional liquidity monitoring metrics (ALMM) and asset encumbrance (AE) reporting should be updated to ensure the necessary information is captured in a harmonised and simplified manner, reducing reliance on recurring ad-hoc collections, supporting transparency and comparability, and to sufficiently capture institutions' funding and collateral mobilisation capabilities. Furthermore, given that the asset encumbrance situation of institutions affects the overall liquidity situation of institutions, the AE templates should be revised to align with other liquidity reporting.

(16) Implementing Regulation (EU) 2024/3117 should be amended to allow the collection of information needed from small and non-complex institutions in order for EBA to comply with the mandate in Article 434(4) of Regulation (EU) No 575/2013, which requires the EBA to publish on its website the disclosures of such institutions on the basis of their reporting to competent authorities.

(17) This Regulation is based on the draft implementing technical standards submitted by the EBA to the Commission.

(18) 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[14].

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

HAS ADOPTED THIS REGULATION:

Article 1

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

[14] 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, 15.12.2020, p. 12, ELI: http://data.europa.eu/eli/reg/2010/1093/oj).

(1) Article 5 is amended as follows:

(a) paragraphs 2 and 3 are replaced by the following:

‘2. Institutions shall submit the information specified in templates C 09.01 and C 09.02 aggregated at a total level; additionally, institutions shall submit the information on the geographical distribution of exposures by country, where non-domestic original exposures in all non-domestic countries in all exposure classes, as reported in accordance with template C 04.00, row 0850, are equal to or higher than 10 % of total domestic and non-domestic original exposures as reported in accordance with template C 04.00, row 0860. Exposures shall be deemed to be domestic where they are exposures to counterparties located in the Member State where the institution is established.

3. Institutions shall submit the information on the composition of the trading book as specified in template C 90.05, where they are not eligible to apply the treatment set out in Article 94(2) of Regulation (EU) No 575/2013.’

(b) The following paragraphs 5 and 6 are added:

‘5. Institutions shall submit the information on profits and losses arising from market risk as specified in template C 99.00, where they meet both of the following conditions:

(a) they are not eligible to apply the treatment set out in Article 94(2) of Regulation (EU) No 575/2013;

(b) they are not allowed to calculate the own funds requirements for market risk by using the simplified standardised approach in accordance with Article 325a(1) of Regulation (EU) No 575/2013.

6. By way of derogation from paragraph 1, only large institutions with total assets above 30 bn EUR shall submit the information required in column 0255 and in rows 0021 and 0022 of template C 32.02 and in column 0010 (rows 0170 to 0220), 0040 (rows 0020 to 0110 and 0170 to 0220) and 0045 of template C 25.01 in that Section 1 – ‘Reporting on own funds and own funds requirements’ of Annex I to this Regulation with a quarterly frequency ’.

(2) In Article 6, paragraph 4 is replaced by the following:

‘4. Institutions that report information on operational risk losses as referred to in Article 316(1) of Regulation (EU) 575/2013, shall submit information on all operational risk losses as referred to in Articles 317 and 318 of that Regulation, where such losses exceed the thresholds set out in Article 319 of that Regulation, by reporting the complete set of information specified in template C 17.01,

’

(3) Article 8 is amended as follows:

(a) The following paragraphs 3 and 4 are added:

3. Large institutions with total assets above 30 billion EUR shall submit the information specified in Annex I template C 09.05 with an annual frequency. This information shall be submitted at the highest level of consolidation in the Union. In the case of large institutions that are neither parent undertakings nor subsidiaries of an EU parent institution nor included in the consolidation of an EU parent institutions pursuant to Article 18 of Regulation (EU) 575/2013, the highest level of consolidation refers to individual basis.

4. Institutions shall submit information required in paragraph 3 aggregated at a total level. Additionally, institutions shall submit the information on the geographical distribution of exposures by country where the institution exceeds the threshold set out in Article 5(2). Where the institutions' do not exceed the threshold set out in Article 5(2), the domestic exposures shall be reported separately from all non-domestic exposures. All non-domestic exposures shall be aggregated into the geographical area 'Other countries'.

(4) Articles 9 and 10 are repealed.

(5) Article 11 is replaced by the following:

'Article 11

Reporting on financial information on a consolidated basis for institutions subject to Regulation (EC) No 1606/2002 of the European Parliament and of the Council

Institutions that submit financial information on a consolidated basis in accordance with Article 430(3) or (4) of Regulation (EU) No 575/2013 shall submit the information set out in Section 2 – 'Reporting on Financial information according to IFRS' of Annex I to this Regulation as follows:

(a) the information specified in Annex I, Section 2, templates F 01.01 to F 09.02, F 12.01 to F 13.01.2, F 14.00, F 16.01, F 16.02, F 16.03 rows 0010 to 0095, F 16.04 to F 16.07, F 16.08 column 0010, F 18.00 to F 19.00 with a quarterly frequency;

(b) the information specified in Annex I, Section 2, templates F 10.00 to F 11.04 with a quarterly frequency where the institution is not a small and non-complex institution;

(c) the information specified in Annex I, Section 2, templates F 10.00 to F 11.04 with a quarterly frequency where the institution is a small and non-complex institution and at least one of the following conditions is met:

(i) the total value of the institution's derivative positions calculated in accordance with Article 273a (3) of Regulation (EU) No 575/2013 and for the purpose of the Article 4(145)(e) of that Regulation exceed 1%;

(ii) the total notional amount of the institution's derivative positions is higher than EUR 2billion;

(d) the information specified in Annex I, Section 2, template F 16.03 rows 0096 and

0097, and template F 16.08 columns 0020 to 0060, with a quarterly frequency where the institution is a large institution with total assets above 30 billion EUR. This information shall be submitted at the highest level of consolidation in the Union;

(e) the information specified in Annex I, Section 2, template F 13.03.1 with a semi-annual frequency;

(f) the information specified in Annex I, Section 2, templates F 20.01 to F 20.06 with a quarterly frequency where the institution exceeds the threshold set out in Article 5(2) of this Regulation;

(g) the information specified in Annex I, Section 2, templates F 22.01 and F 22.02 with a quarterly frequency where net fee and commission income is equal to or higher than 10 % of the sum of net fee and commission income and net interest income as reported in accordance with Annex I, Section 2, template F 02.00. For the purpose of this calculation, 'net fee and commission income' shall be the absolute value of the difference between 'fee and commission income' and 'fee and commission expense' and 'net interest' shall be the absolute value of the difference between 'interest income' and 'interest expenses';

(h) the information specified in Annex I, Section 2, templates F 23.02 to 26.00 with a quarterly frequency where both of the following conditions are met:

(i) the institution is other than a small and non-complex institution;

(ii) the ratio between the institution's gross carrying amount of loans and advances that fall under Article 47a(3) of Regulation (EU) No 575/2013 and the total gross carrying amount of loans and advances that fall under Article 47a(1) of that Regulation is equal to or higher than 5 %. This ratio shall not include loans and advances classified as held for sale, cash balances at central banks, and other demand deposits in either the denominator or the numerator;

(i) the information specified in Annex I, Section 2, templates F 27.01 to F 27.03 with a quarterly frequency where the institution is other than a small and non-complex institution and the total amount of the institution's financial assets towards the counterparty of 'Other financial corporations' as reported in Annex I, Section 2, templates F 04.01 to F 04.04.1 is equal to or higher than 5% of the institution's total amount of financial assets as reported in Annex I, Section 2, templates F 04.01 to F 04.04.1;

(j) the information specified in Annex I, Section 2, templates F 17.01 to F17.03, F 37.00 and F 38.00 with a semi- annual frequency where the institution is other than a small and non-complex institution;

(k) the information specified in Annex I, Section 2, templates F 15.00, F 30.01, F 31.01, F 40.01, F 44.03, F 44.04 columns 0010 to 0050, F 45.02, F 45.03, F 46.00, F 48.00 with an annual frequency where the institution is other than a small and non-complex institution;

(l) the information specified in Annex I, Section 2, template F 44.04 columns 0060 to 0100 with an annual frequency where the institution is a large institution with total assets above 30 billion EUR. This information shall be submitted at the highest level of consolidation in the Union;

(m) the information specified in Annex I, Section 2, template F 41.01 with a quarterly frequency where the institution is other than a small and non-complex institution;

(n) the information specified in Annex I, Section 2, template F 42.00, columns 0010 and 0020, with an annual frequency where the institution is other than a small and non-complex institution;

(o) the information specified in Annex I, Section 2, template F 42.00, column 0030 with an annual frequency, where both of the following conditions are met:

(i) the institution is not a small and non-complex institution;
(ii) tangible assets subject to operating leases are equal to or higher than 10% of the total tangible assets as reported in accordance with Annex I, Section 2, template F 01.01;

(p) the information specified in Annex I, Section 2, template F 49.01, with annual frequency where the institution is a large institution with total assets above 30 billion EUR. Additionally, where the institution exceeds the threshold laid down in Article 5(2) of this Regulation, the geographical breakdown shall also be reported. The information shall be submitted at the highest level of consolidation in the Union;

(q) the information specified in Annex I, Section 2, template F 49.02, with quarterly frequency where the institution is other than a small and non-complex institution. Additionally, where the institution exceeds the threshold laid down in Article 5(2) of this Regulation, the geographical breakdown shall also be reported. Th information shall be submitted at the highest level of consolidation.

(r) the information specified in Annex I, Section 2, template F 50.00 at the highest level of consolidation in the Union, with annual frequency, where the institution is a large institution with total assets above 30 billion EUR.

(6) Article 12 is replaced by the following:

‘Article 12
Reporting on financial information on a consolidated basis for institutions applying national accounting frameworks

Where a competent authority has extended the reporting requirements on financial information to institutions established in a Member State in accordance with Article 430(6) of Regulation (EU) No 575/2013, institutions shall submit the financial information on a consolidated basis set out in Annex I, Section 3 – ‘Reporting on Financial information according to GAAP’ as follows:

(a) the information specified in Annex I, Section 3, templates F 01.01 to F 09.02, F 12.00 to 13.01.2, F 14.00, F 16.01, F 16.02, F 16.03 rows 0010 to 0015 and rows 0100 to 0180 , F 16.04 to F 16.07, F 16.08 column 0010, F 18.00 to F 19.00 with a quarterly frequency;

(b) the information specified in Annex I, Section 3, templates F 10.00 to F 11.04, with a quarterly frequency where the institution is not a small and non-complex institution;

(c) the information specified in Annex I, Section 3, templates F 10.00 to F 11.04 with a quarterly frequency where the institution is a small and non-complex institution and at least one of the following conditions is met:

(i) the total value of an institution's derivative positions calculated in accordance with Article 273a (3) of Regulation (EU) No 575/2013 and for the purpose of Article 4 (145)(e) of that Regulation exceed 1%;
(ii) the total notional amount of an institution's derivative positions is higher than EUR 2billion;

(d) the information specified in Annex I, Section 3, template F 16.03 rows 0096 and 0097, and template F 16.08 columns 0020 to 0060 at the highest level of consolidation in the Union, with a quarterly frequency where the institution is a large institution with total assets above 30 billion EUR;

(e) the information specified in Annex I, Section 3, template F 13.03.1 with a semi-annual frequency;

(f) the information specified in Annex I, Section 3, templates F 20.01 to F 20.06 with a quarterly frequency where the institution exceeds the threshold laid down in Article 5(2) of this Regulation;

(g) the information specified in Annex I, Section 3, templates F 22.01 and F 22.02 with a quarterly frequency where net fee and commission income is equal to or higher than 10 % of the sum of the net fee and commission income and net interest income as reported in accordance with Annex I, Section 3, template F 02.00. For the purpose of this calculation, 'net fee and commission income' shall be the absolute value of the difference between 'fee and commission income' and 'fee and commission expense' and 'net interest' shall be the absolute value of the difference between 'interest income' and 'interest expenses';

(h) the information specified in Annex I, Section 3, templates F 23.02 to 26.00 with a quarterly frequency where both of the following conditions are met:

(i) the institution is other than a small and non-complex institution;
(ii) the ratio between the institution's gross carrying amount of loans and advances that fall under Article 47a(3) of Regulation (EU) No 575/2013 and the total gross carrying amount of loans and advances that fall under Article 47a(1) of that Regulation is equal to or higher than 5 %. The ratio shall not include loans and advances classified as held for sale, cash balances at central banks, and other demand deposits in either the denominator or the numerator;

(i) the information specified in Annex I, Section 3, templates F 27.01 to F 27.03 with a quarterly frequency where the institution is other than a small and non-complex institution and the total amount of the institution's financial assets towards the counterparty of 'Other financial corporations' as reported in Annex I, Section 3, templates F 04.01 to F 04.04.1 and F 04.06 to F 04.10 is equal to or higher than 5% of the institution's total amount of financial assets as reported in Annex I, Section 3, templates F 04.01 to F 04.04.1 and F04.06 to F 04.10;.

(j) the information specified in Annex I, Section 3, templates F 17.01 to F 17.03, F

37.00 and F 38.00 with a semi-annual frequency where the institution is other than a small and non-complex institution;

(k) the information specified in Annex I, Section 3, templates F 15.00, F 30.01, F 31.01, F 40.01, F 44.03, F 44.04 columns 0010 to 0050, F 45.02, F 45.03, F 46.00, F 48.00 with an annual frequency where the institution is other than a small and non-complex institution;

(l) the information specified in Annex I, Section 3, template F 44.04 columns 0060 to 0100 with an annual frequency at the highest level of consolidation in the Union, where the institution is a large institution with total assets above 30 billion EUR;

(m) the information specified in Annex I, Section 3, template F 41.01 with a quarterly frequency where the institution is other than a small and non-complex institution;

(n) the information specified in Annex I, Section 3, template F 42.00, columns 0010 and 0020, with an annual frequency where the institution is other than a small and non-complex institution;

(o) the information specified in Annex I, Section 3, template F42.00, column 0030 with an annual frequency, where both of the following conditions are met:

(i) the institution is not a small and non-complex institution, and

(ii) the institution's tangible assets subject to operating leases are equal to or higher than 10% of the total tangible assets as reported in accordance with Annex I, Section 3, template F 01.01;

(p) the information specified in Annex I, Section 2, template F 49.01, with annual frequency where the institution is a large institution with total assets above 30 billion EUR. Additionally, where the institution exceeds the threshold laid down in Article 5(2) of this Regulation, the geographical breakdown shall also be reported. The information shall be submitted at the highest level of consolidation;

(q) the information specified in Annex I, Section 2, template F 49.02, with quarterly frequency where the institution is other than a small and non-complex institution. Additionally, where the institution exceeds the threshold laid down in Article 5(2) of this Regulation, the geographical breakdown shall also be reported. The information shall be submitted at the highest level of consolidation;

(r) the information specified in Annex I, Section 3, template F 50.00, with annual frequency at the highest level of consolidation in the Union, where the institution is a large institution with total assets above 30 billion EUR'.

(7) Article 15, paragraph 1 is replaced by the following:

'Institutions that report their leverage ratio as referred to in Article 430(1)(a), of Regulation (EU) No 575/2013 on both an individual and a consolidated basis shall submit that information as specified in Annex I, Section 6 – 'Reporting on the leverage' with a quarterly frequency, except for template C 44.00 which shall be reported with an annual frequency.

By way of derogation from the first sentence, only large institutions shall submit template C 48.00 on information on leverage ratio volatility.'

(8) Article 16, paragraph 1 is replaced by the following:

'Institutions that report their liquidity coverage as referred to in Article 412 of Regulation (EU) No 575/2013 and as required by Article 430(1)(d) of that Regulation on both an individual and a consolidated basis, shall submit that information as specified in Annex I, Section 10 - 'Reporting on the liquidity', templates C 72.00, C 73.00, C 74.00 and C 76.00 with a monthly frequency.'

(9) In Article 16, paragraph 1a is added:

'1a. Large institutions and institutions that are neither large institutions nor small and non-complex institutions that report their liquidity coverage as referred to in Article 412 of Regulation (EU) No 575/2013 and as required by Article 430(1)(d) of that Regulation on both an individual and a consolidated basis, shall submit that information as specified in Annex I, Section 10 - 'Reporting on the liquidity', template C 75.01 with a quarterly frequency'

(10) In Article 18, point a is replaced by the following:

'(a) large institutions shall submit the information specified in Annex I, Section 9, templates C 66.01, C 66.02, C 67.01, C 68.00, C 69.00 and C 71.00 with a monthly frequency;'

(11) In Article 18, point b is replaced by the following:

'small and non-complex institutions shall submit the information specified in Annex I, Section 9, template C 66.01 and C 67.00 with a quarterly frequency;'

(12) In Article 18, point c is replaced by the following:

'institutions that are neither large institutions, nor small and non-complex institutions, shall submit the information specified in Annex I, Section 9, templates C 66.01, C 67.00, C 68.00 and C 71.00 with a monthly frequency.'

(13) Article 19 is replaced by the following:

'Article 19
Reporting on asset encumbrance on both an individual and a consolidated basis

Institutions that report on the level of asset encumbrance as referred to in Article 430(1) (g), of Regulation (EU) No 575/2013 on both individual and consolidated basis shall submit the information specified in Annex I, Section 8 – 'Reporting on asset encumbrance' as follows:

a) the information specified in templates F 32.11 and F 32.12 with a quarterly frequency;

(b) large institutions and institutions that are neither large institutions nor small and non-complex institutions, the information specified in template F 32.04 and F 35.00 with a quarterly frequency;

(c) institutions that are neither large institutions nor small and non-complex institutions and have an asset encumbrance level, specified as (Carrying amount of encumbered assets and fair value of collateral)/(Total assets and collateral), equal to or above 15 %, the information specified in template F 33.00 with a quarterly frequency;

(d) large institutions the information specified in templates F 33.00 with a quarterly frequency and templates F 36.11 and F 36.12 with a semi-annual frequency.’

(14) The following Articles are added after Article 21:

‘Article 21a

Voluntary reporting

1. Small and non-complex institutions may report on a voluntary basis the information required for institutions other than small and non-complex institutions pursuant to this Regulation, including reporting with the same frequency as institutions other than small and non-complex institutions.

2. Institutions other than large institutions and other than small and non-complex institutions may report on a voluntary basis the information required for large institutions pursuant to this Regulation, including reporting with the same frequency as large institutions.

3. Where reporting in accordance with paragraphs (1) and (2), institutions shall report the complete set of information referred to in Articles 5 to 10, or in any of the Articles 11 to 21, 21b and 21c.

4. Large institutions that do not meet the threshold set out in Article 316(1) of Regulation (EU) 575/2013 may report on a voluntary basis the complete set of information specified in template C 17.01 required from them institutions meeting that threshold’

Article 21b

[Placeholder for the reporting of information on credit risk benchmarking]

Article 21c

Reporting on exposures to ESG risk on individual and consolidated basis

1. Large institutions that report information on their ESG risk exposures as referred to in Article 430(1)(h), of Regulation (EU) No 575/2013, shall submit at the highest level of consolidation in the Union, the information specified in Annex I, Section 13 – ‘Reporting on ESG Risk exposures’, templates D 01.02, D 02.00, D 04.00 and D 05.00 with a semi-annual frequency and templates D 03.00, D 10.00 and D 11.00 with an annual frequency**.**
2. By way of derogation from paragraph 1, those Large institutions with total assets above 30 bn EUR that report information on their ESG risk exposures as referred to in Article 430(1)(h), of Regulation (EU) No 575/2013, shall submit at the highest level of consolidation in the Union, the information specified in Annex I, Section 13 – ‘Reporting on ESG Risk exposures’, templates D 01.00, D 02.00, D 04.00 and D 05.00 with a semi-annual frequency and templates D 03.00, D 10.00 and D 11.00 with an annual frequency**.**

3. Other listed institutions that report information on their ESG risk exposures as referred to in Article 430(1)(h), of Regulation (EU) No 575/2013, shall submit at the highest level of consolidation in the Union, the information specified in Annex I, Section 13 - 'Reporting on ESG Risk exposures', templates D 01.02, D 02.00, D 04.00, D 05.01, D 10.00 and D 11.00 with an annual frequency'. .
4. By way of derogation from paragraph 1, large subsidiaries that report information on their ESG risk exposures as referred to in Article 430(1)(h), of Regulation (EU) No 575/2013, shall submit that information as specified in Annex I, Section 13 - 'Reporting on ESG Risk exposures', templates D 01.02, D 02.00, D 04.00, D 05.01, D 10.00 and D 11.00 with a annual frequency', on an individual basis or, where applicable in accordance with this Regulation and Directive 2013/36/EU, on a sub-consolidated basis.
5. Small and non-complex institutions and Other non-listed institutions that report information on their ESG risk exposures pursuant to Article 430(1)(h), of Regulation (EU) No 575/2013, shall submit, at the highest level of consolidation in the Union, the information specified in Annex I, Section 13 - 'Reporting on ESG Risk exposures', template D 01.01 with an annual frequency.
6. For the purpose of this Article, in the case of institutions that are neither parent undertakings nor subsidiaries of an EU parent institution nor included in the consolidation of an EU parent institutions pursuant to Article 18 of Regulation (EU) 575/2013, the highest level of consolidation refers to individual basis.

Article 21d

Reporting of information to P3DH implementation for SNCIs

1. Small and non-complex institutions that are listed and are not part of a group within the Union required to disclose information under Article 433b (c) of Regulation (EU) No 575/2013, shall submit the information specified in Annex I, Section 14, templates CR1, CQ1, CQ3 and CQ7 with an annual frequency.
2. Small and non-complex institutions that are listed and are required to disclose information under Article 433b (g) of Regulation (EU) No 575/2013, shall submit the information specified in Annex I, Section 14, templates REM1, REM2, REM3 and REM4 with an annual frequency.
3. [PLACEHOLDER – Qualitative information]'

(15) Annex I is amended as follows:

Explanatory text for consultation purposes

The specific provisions for replacing the parts of Annex I to Regulation (EU) 2024/3117 will be added after consultation.

Article 2- One-off reporting of historical operational risk losses

For the first reference date following the date of application of this Regulation, institutions referred to in Article 6(4) of Regulation (EU) 2024/3117 or small and non-complex institutions, institutions other than large institutions and large institutions that do not meet the threshold set out in Article 316(1) of Regulation (EU) 575/2013 that opt for the voluntary reporting in accordance with Article 21a of Regulation (EU) 2024/3117 shall report aggregate information on operational risk losses pursuant to Article 318(1) of Regulation (EU) 575/2013 by providing the information specified in Annex I, Section .... , template C 17.02.

Article 3

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 28 September 2027.

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]

Draft Annexes to Implementing Regulation (EU) 202X/XXX

Please see separate files (annexes to the different modules of the consultation paper)

5. Accompanying documents

5.1. 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'.

In order to prepare the impact assessment and also considering the industry feedback regarding the need to improve the impact assessment practices in relation to the supervisory reporting topics, within this consultation process the EBA is taking a revised approach to the impact assessment. Thus, individual topic-specific modules forming the parts of this consultation paper include largely qualitative impacts assessment that will be revised (subject to the quality and number of answers received from the consultation) in the final report based on the information and feedback provided by the stakeholders in the consultation process.

To facilitate the preparation of that revised impacts assessment to be included in the final report, in addition to the traditional approach to collecting stakeholders' feedback through the responses to the consultation questions, the EBA seeks voluntary input regarding the impacts of the proposals on the institutions' reporting costs. This information on the reporting costs will be essential for the EBA to assess the impacts of the proposed changes to the supervisory reporting, and also to get an information needed to understand the contribution of the proposed simplification measures to the reporting cost reduction target set by the EBA.

To this end the respondents to the consultation are requested to provide the reporting cost-related information specified in the templates below by including their (1) current reporting costs, and (2) impacts of the changes form the proposals set forth in the consultation paper. Conscious that the responses to the consultation paper may be provided by individual institutions, or the industry associations, the EBA proposes different approach to facilitate the collection of data on reporting costs for both types of respondents.

Instructions

Respondents to the consultation are invited to provide information in the following tables:

Table 1 that aims to provide information about the respondent.

If the respondent is an institution, it should fill Tables 1.1, 2 and 4.

If the respondent refers to multiple institutions (e.g. an association), it should fill Tables 1.2 , 3 and 4 (and not Table 2 at this aggregate level), and their voluntary institutions members' can provide separate files at institution level (i.e. Tables 1.1, 2 and 4). In this case, several files could be sent by the respondent to the EBA.

Table 2 aims to provide data on reporting-related costs at institution level and Table 3 on reporting-related costs at multiple institutions level (with data provided by respondent that represent these institutions).

All figures are to be provided on 'best efforts' basis.

Table 4 may be used, among other things, to specify any caveats related to the figures (such as accuracy ranges if applicable). This table consists of an open-ended free-text response box.

Table 1. Respondent information

Table 1.1 - Information (one institution)

Institution information	
Institution Name	
Institution LEI	
Institution category (Large, Medium or SNCI)	

Table 1.2 - Multiple institutions (Associations, authority ...)

Respondent information	
Respondent Name	
Institutions category ((Large, Medium, SNCI or mix))[1]	
Number of institutions[1]	
Average Total Assets in the past 3 years in EUR (2023-2025)[1]	

[1]If possible, please provide this information related to institutions represented / supervised

Table 2. Costs of reporting (2023-2025) and impact of changes - template for single institution

Column	A	B	C	D	E	F
		Current costs			Impact of changes proposed in the Consultation Paper[6]	
Row		Total Costs	Implementation costs	Running costs	Implementation costs	Running costs
1	**Costs[1] (in EUR) dedicated to all data reports[2]**					
2	**Weight of costs dedicated to 'EBA related' reports[3] (% of row 1)[4]**					
3	*of which AE[5]*					
4	*of which ALMM*					
5	*of which FINREP*					
5.1	*Of which stress test related changes[7]*					
6	*of which LCR*					
7	*of which Large Exposure*					
8	*of which Leverage*					
9	*of which COREP Own Funds*					
9.1	*Of which stress test related changes[7]*					
10	*of which FRTB (template C 90.00 being accounted in COREP OF row)*					
11	*of which ESG templates[8]*					
12	**Weight of costs dedicated to reports to other authorities (% of row 1)**					

On best effort basis, please provide in the cells one figure or percentage. As a secondary option, please provide ranges.

[1]Please report costs in positive value. Please provide a representative yearly average of the costs/weights in the past 3 years (2023-2025).
[2]"all data reports" are the 'EBA related' reports listed in https://www.eba.europa.eu/risk-and-data-analysis/reporting-frameworks/reporting-framework-42 AND regular EBA data collection (stress test exercise, Transparency, QIS, ESG) AND reports (e.g. Anti money laundering reporting, national statistical reporting …) to other authorities (e.g. national authorities, other European authorities …).

[3]Reports 'EBA related' listed in https://www.eba.europa.eu/risk-and-data-analysis/reporting-frameworks/reporting-framework-42 AND regular EBA data collection (stress test exercise, Transparency, QIS, ESG).

[4]For columns B, C and D, sum of row 2 and row 12 should equal to 100%.
[5]Note not concerning rows 5.1 and 9.1 – see note 7 below. For columns B, all the rows 3 to 10 are weights of the costs dedicated to 'EBA related' reports (row 2). So (as all reports are not listed), sum of rows 3 to 10 does not equal 100%.
[6]Please provide information per modules (e.g. in row 3 the estimation of increase/decrease of costs related to AE).
- Provide yearly percentages of increase/decrease of the current averaged yearly total costs related to the concerned module (assuming that implementation costs impact will be related to only one year and running costs to every subsequent years).
- For running costs, provide negative percentage if the impact is estimated to be a decrease and positive percentages if the impact is estimated to be an increase.
See also specificities for rows 5.1, 9.1 and 11 in notes 7 and 8.
[7]Please provide data as an of which of row 5 (for row 5.1) or row 9 (for row 9.1). Please provide here the impact of stress test data migration on the FINREP or COREP OF costs. The costs impact on the current stress test templates (the data collection ones) should not be included in this table but, on best effort basis, could be provided in table 4.
[8]The costs impact for the current ESG templates (the data collection ones) should not be included in this table but, on best effort basis, could be provided in table 4. As there is currently no ESG templates of the supervisory reporting, columns B is not applicable and therefore we kindly ask, for this specific row 11, to report the impact (columns E and F) as percentages of increase/decrease of the current yearly total costs related to the EBA related reports (i.e. of row 2, column B).

Illustrative example of how to fill table 2 (in the example, the full table is not filled as the illustration is only done for some cells - figures are purely random - should the respondent provide ranges, the logic of this example still applies)

		Current costs			Impact of changes proposed in the Consultation Paper	
Row		Total Costs	Implementation costs	Running costs	Implementation costs	Running costs
1	**Costs (in EUR) dedicated to all data reports**[1]	20,000	12,000	8,000		
2	**Weight of costs dedicated to 'EBA related' reports (% of row 1)**[2]	50%	48%	53%		
3	*of which AE*[3]	20%			2%	-1%
4	*of which ALMM*					
5	*of which FINREP*	25%			2%	-4%
5.1	*Of which stress test related changes*				30%	-25%
6	*of which LCR*					
7	*of which Large Exposure*					
8	*of which Leverage*					
9	*of which COREP Own Funds*					
9.1	*Of which stress test related changes*					
10	*of which FRTB (template C 90.00 being accounted in COREP OF row)*					
11	*of which ESG templates*					
12	**Weight of costs dedicated to reports to other authorities (% of row 1)**	50%	52%	47%		

[1]Total costs of all data reports is 20,000 EUR, of which 12,000 EUR related to implementation costs and 8,000 EUR to running costs.

[2] - ’EBA related‘ reports total costs represent 50% of total costs of "all data reports". ‘EBA related‘ reports implementation costs represent 48% of implementation costs of "all data reports". ‘EBA related‘ reports running costs represent 53% of running costs of "all data reports". We have the equivalence: 12,000*48%+8,000*53% = 20,000*50%.
- Reports to other authorities total costs represent 50% of total costs of "all data reports". Other authorities reports' implementation costs represent 52% of implementation costs of "all data reports". Other authorities reports' running costs represent 47% of running costs of "all data reports". We have the equivalence: 12,000*52%+8,000*47% = 20,000*50%.
[3]Total costs related to AE reporting, represent 20% of total costs of ‘EBA related‘ reports. In order to be implemented, the changes proposed in the CP will cost 2% of the total costs related to AE reporting (i.e. 2%*20%*50%*20,000). Thanks to the changes proposed in the CP, the running costs decrease will represent 1% of the total costs related to AE reporting (i.e. 1%*20%*50%*20,000). In other terms (example made with other parameters unchanged), the first year of implementation (“n” – implementation and running costs impacts) AE reporting costs would account for 20,000*50%*20%*(1+2%-1%)=2,020, in “n+1” (only running costs impact) for 20,000*50%*20%*(1-1%)=1,980 and in “n+2” (and subsequent years) for 1,980 as well. Rows 4 to 11 work similarly (except rows 5.1 and 9.1 for which the data provided should be percentages of, respectively, rows 5 and 9 ones : for instance in row 5.1 (i) the 30% means that 30% of the 2% FINREP implementation costs impact are related to stress test data migrations into FINREP and (ii) the -25% means that running costs for stress test data migrated into FINREP will trigger an increase of total costs for FINREP – column B – by 25% of 4%).

Table 3. Costs of reporting (2023-2025) and impact of changes - template for associations (or other) representing multiple institutions

Column	*A*	*B*	*C*	*D*	*E*	*F*
		Current costs			**Impact of changes proposed in the Consultation Paper[6]**	
Row		**Total Costs**	**Implementation costs**	**Running costs**	**Implementation costs**	**Running costs**
1	**Weights related to costs[1] dedicated to all data reports[2]**					

2	**Weight of costs dedicated to 'EBA related' reports[3] (% of costs related to reports of row 1)[4]**					
3	*of which AE[5]*					
4	*of which ALMM*					
5	*of which FINREP*					
5.1	*Of which stress test related changes[7]*					
6	*of which LCR*					
7	*of which Large Exposure*					
8	*of which Leverage*					
9	*of which COREP Own Funds*					
9.1	*Of which stress test related changes[7]*					
10	*of which FRTB (template C 90.00 being accounted in COREP OF row)*					
11	*of which ESG templates[8]*					
12	**Weight of costs dedicated to reports to other authorities (% of costs related to reports of row 1)**					

On best effort basis, please provide in the cells one figure or percentage. As a secondary option, please provide ranges.

[1]Please provide a representative yearly average of the weights of implementation and running costs (sum of column C and D should equal 100%) in the past 3 years (2023-2025).

[2]"all data reports" are the ’EBA related‘ reports listed in https://www.eba.europa.eu/risk-and-data-analysis/reporting-frameworks/reporting-framework-42 AND regular EBA data collection (stress test exercise, Transparency, QIS, ESG) AND reports (e.g. Anti money laundering reporting, national statistical reporting …) to other authorities (e.g. national authorities, other European authorities …).

[3]Reports 'EBA related' listed in https://www.eba.europa.eu/risk-and-data-analysis/reporting-frameworks/reporting-framework-42 AND regular EBA data collection (stress test exercise, Transparency, QIS, ESG).

[4]For columns B, C and D, sum of row 2 and row 12 should equal to 100%.

[5] Note not concerning rows 5.1 and 9.1 – see note 7 below. For columns B, all the rows 3 to 10 are weights of the costs dedicated to 'EBA related' reports (row 2). So (as all reports are not listed), sum of rows 3 to 10 does not equal 100%.

[6]Please provide information per modules (e.g. in row 3 the estimation of increase/decrease of costs related to AE).

- Provide yearly percentages of increase/decrease of the current averaged yearly total costs related to the concerned module (assuming that implementation costs impact will be related to only one year and running costs to every subsequent years).
- For running costs, provide negative percentage if the impact is estimated to be a decrease and positive percentages if the impact is estimated to be an increase.

See also specificities for rows 5.1, 9.1 and 11 in notes 7 and 8.

[7]Please provide data as an of which of row 5 (for row 5.1) or row 9 (for row 9.1). Please provide here the impact of stress test data migration on the FINREP or COREP OF costs. The costs impact on the stress test templates (the data collection ones) should not be included in this table but, on best effort basis, could be provided in table 4.

[8]The costs impact for the current ESG templates (the data collection ones) should not be included in this table but, on best effort basis, could be provided in table 4. As there is currently no ESG templates of the supervisory reporting, columns B is not applicable and therefore we kindly ask, for this specific row 11, to report the impact (columns E and F) as percentages of increase/decrease of the current yearly total costs related to the EBA related reports (i.e. of row 2, column B).

Illustrative example of how to fill table 3 (in the example, the full table is not filled as the illustration is only done for some cells - figures are purely random - should the respondent provide ranges, the logic of this example still applies)

		Current costs			Impact of changes proposed in the Consultation Paper	
Row		Total Costs	Implementation costs	Running costs	Implementation costs	Running costs
1	Weights related to costs dedicated to all data reports [1]		65%	35%		

2	**Weight of costs dedicated to 'EBA related' reports (% of costs related to reports of row 1)[2]**	40%	50%	21%		
3	*of which AE[3]*	15%			2%	-5%
4	*of which ALMM*					
5	*of which FINREP*					
5.1	*Of which stress test related changes*					
6	*of which LCR*					
7	*of which Large Exposure*					
8	*of which Leverage*					
9	*of which COREP Own Funds*					
9.1	*Of which stress test related changes*					
10	*of which FRTB (template C 90.00 being accounted in COREP OF row)*					
11	*of which ESG templates*					
12	**Weight of costs dedicated to reports to other authorities (% of costs related to reports of row 1)**	60%	50%	79%		

[1]65% of total costs of all data reports are related to implementation costs and 35% to running costs.

[2] - ’EBA related’ reports total costs represent 40% of total costs of "all data reports". ’EBA related’ reports implementation costs represent 50% of implementation costs of "all data reports". ’EBA related’ reports running costs represent 21% of running costs of "all data reports". We have the (rounded) equivalence: 65%*50%+35%*21% = 40%.
- Reports to other authorities total costs represent 60% of total costs of "all data reports". Other authorities reports' implementation costs represent 50% of implementation costs of "all data reports". Other authorities reports' running costs represent 79% of running costs of "all data reports". We have the (rounded) equivalence: 65%*50%+35%*79% = 60%.

[3]Total costs related to AE reporting, represent 15% of total costs of 'EBA related' reports. In order to be implemented, the changes (related to AE) proposed in the CP will cost 2% of the total costs related to AE reporting. Thanks to the changes (related to AE) proposed in the CP, the running costs decrease will represent 5% of the total costs related to AE reporting. In other terms (example made with other parameters unchanged), the first year of implementation ("n" – implementation and running costs impact)) AE reporting costs would account for 40%*15%*(1+2%-5%) of all data reports costs, in "n+1" (only running costs impact) for 40%*15%*(1-5%) and in "n+2" (and subsequent years) for 40%*15%*(1-5%) as well. Rows 4 to 11 works similarly (except rows 5.1 and 9.1 – see note 3 of table 2 illustration).

Table 4. Other remarks

Please provide here any remarks that you deem important regarding the former tables filled.

Please also make any other remark you deem important regarding the costs of reporting (for instance, remarks on: (i) has one particular EBA template – even the ones not concerned by changes in this consultation paper - or even one row in a specific template disproportionate costs? Or disproportionate costs vs the foreseen benefits? (ii) Are there particular significant information about reporting costs that would not be revealed by former tables (iii) What changes – proposed or not in this consultation - would deliver the most cost reduction? (iv) what is the degree of impact of different costs drivers? etc.).

5.2. Overview of questions for consultation

Question 1. What are respondents' views on the proposed changes to the text of the ITS?

Question 2. What are the respondents' views on the practicability and usability of the communication tools regarding the reporting requirements provided on the EBA website (time traveller, signposting tool, reporting frameworks overview)?

Question 3. What improvements could be made in the respondents' view to the EBA website in relation to the provision of information regarding the reporting requirements?

Question 4. What are the respondents' views on how change management process can be improved considering the limitations imposed by the calendars for the implementation of the underlying regulatory calendars? Following a regulatory change supervisors need updated data either by regular reporting or by ad hoc reporting, when timelines do not allow adequate time to implement, how should data gaps and outdated regular reporting be managed?

Question 5. What are the respondents' views on introducing fixed calendar to the application of new reporting requirements/changes? What would be the preferred fixed first reference date(s) given different application dates of regulatory changes and monthly/quarterly/semi-annual/annual reporting?

Question 6. Should the fixed calendar to the application of new reporting requirements/changes be introduced, what are the respondents' views on commencing the reporting earlier than envisaged by the fixed calendar to meet the implementation of the underlying regulatory requirements (e.g. up to six months earlier)?

Question 7. How could it be possible to quantify the impacts on reporting costs of measures to improve predictability and stability?

Question 8. Which share of the burden reduction is driven by changes in the reporting frequency and by the reduction of data points?