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Consultation Paper on changes to ITS on supervisory reporting: General part

Fields marked with * are mandatory.

Introduction

The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions detailed below.
Comments are most helpful if they:

- respond to the question stated; indicate the specific point to which a comment relates;
- are supported by a clear rationale;
- provide evidence to support the views expressed/ rationale proposed; and
- provide alternative regulatory options for consideration by the EBA.

Important note to users:
All the fields marked (*) are mandatory. In case a question is not relevant for you, please answer with "Non-Applicable" or "NA". Please note that the maximum length of the answers to any single question is technically limited by the tool to 5000 characters.
All contributions received will be published following the close of the consultation, unless you request otherwise by ticking the relevant box in the form below. Please note that a request to access a confidential response may be submitted 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.

Personal data protection:
The protection of individuals with regard to the processing of personal data by the EBA is based on Regulation (EU) 2018/1725. Further information on the processing of the personal data is available in the Data Protection Notice.

Should you encounter issues with submitting your responses, please contact us by email at *eba.consultation@eba.europa.eu* no later than 48 hours before the deadline of the consultation period.

Please provide your responses by **10 July 2026 23:59 CEST**. Late responses will not be considered

Many thanks for your cooperation and support!

Who is responding

* Name of the organisation

German Banking Industry Committee

* Contact name

Christoph Friedrich

* Contact email

c.friedrich@bvr.de

* Disclose comments

- [x] Yes
- [ ] No

1. Questions for consultation

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

We welcome the simplification initiatives regarding the supervisory reporting framework. However, we consider the proposed ITS amendments, generally, as a significant challenge. The overarching objective of simplifying the supervisory reporting framework is not fully achieved. On the contrary, the label "simplification package" is somewhat misleading. While the replacement of existing requirements with new ones may streamline certain aspects, it does not appear to result in a tangible reduction of the overall burden. In this context, we do not expect a significant decrease in associated costs, nor a noticeable alleviation of operational efforts in day-to-day reporting processes.
The overall marginal reduction of the total number of data points (other than stress testing) does not effectively apply to less significant institutions (LSIs), as many of the data points considered for reduction (see stress testing) were never subject to reporting requirements for LSIs. For LSIs and nGAAP-institutions treated as LSI for stress test purposes the integration of stress test means not a simplification but an additional burden, as they were not a subject to the EU wide stress test. While the number of templates has slightly decreased, the approximately 30 templates that are subject to change should not be underestimated in terms of implementation effort. Each change must be examined and considered in design and data management.

Implementation period:
Given that the final EBA draft is supposed to be delivered by the end of this year, the first reporting by 30 September 2027 for most of the modules appears extremely ambitious. A period of just six to nine months is clearly insufficient, particularly for banks using external reporting software providers and those with central IT service providers. It poses significant operational challenges that are unlikely to be manageable within the given

timeframe. Hence, we suggest extending the implementation period until at least September 2028.
Furthermore, we are also concerned about the introduction of various thresholds and classifications, e. g. in FINREP- and ESG-modules. We particularly regard the integration of stress testing, the alignment of asset encumbrance with liquidity risk reporting and ESG reporting (particularly the changes going beyond CRR disclosure) with a degree of special challenge. The integration of stress testing requirements into supervisory reporting contributes to “report data only once” and is conceptually welcome. However, this is not merely a reporting adjustment, but rather a paradigm shift that accordingly requires substantial implementation time. The “simplification package” shifts burdens from ad hoc exercises into recurring business-as-usual reporting obligations, but increasing the frequency, cutting the submission deadline and without materially reducing the overall operational effort required from institutions.

Establish materiality concept and ease resubmissions:
Materiality and proportionality should be established as core principles of supervisory reporting. A robust legal basis for effective materiality thresholds in the ITS for supervisory reporting would reduce unnecessary resubmissions, data storage and compliance costs. Articles 3(4) and 3(5) of the ITS on supervisory reporting should therefore refer explicitly to “material” deviations between audited and unaudited figures, as well as other corrections, enabling the EBA, in coordination with the ECB, to define appropriate thresholds. Validation and resubmission processes should also be aligned and standardised across supervisory and statistical reporting. In this context, Article 3 of Commission Implementing Regulation (EU) 2023/894 for insurance and reinsurance undertakings already provides a useful precedent by explicitly applying a materiality concept to resubmissions. In order to establish a fully harmonized resubmission framework, we suggest to also amend Commission Implementing Regulation (EU) 2025/2303 (ITS on resolution planning reporting) – therein Article 6 (3) and (6) - and coordination with the SRB.
Simplification should primarily focus on eliminating divergent national and SSM-specific additional requirements. Integration into the ITS must not result in higher reporting frequencies or additional Asset Encumbrance requirements at solo or sub-consolidated level. In particular, reporting on Asset Encumbrance for LSIs should be removed in light of the new liquidity-based approach.

* **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)?

The tools provide helpful assistance. We welcome the introduction of the signposting tool.

However, the usability could be improved: Instead of an Excel sheet, a BI-Solution where the results can be downloaded and adjusted for the reference date (i.e. a time traveller option) would enhance the usability. Additionally, the Excel sheet showing grey cells with texts are rather misleading and confusing. With regard to the validation rules, for example, we would appreciate it if a how-to-read guide or syntax explanations were always included directly.

To the extent possible, such tools could also be made available at the consultation stage for the respective DPMs, without prejudging the outcome of the consultation.

* **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?

The coordination and publication process for the ITS on supervisory reporting between the EBA and the EU (publication in the Official Journal of the EU) needs to be better managed, and the provision of the relevant documents to institutions in their respective languages needs to be reconsidered.

We note that the current setup no longer includes the ZIP file containing all relevant reporting templates as Excel files.
In the past, the availability of a comprehensive ZIP file has proven to be highly valuable for institutions. It provided a transparent, structured, and user-friendly overview of all reporting templates, significantly facilitating both implementation and ongoing reporting processes. However, we suggest that, instead of providing a single package containing all languages, separate packages be provided for each individual language. The entire removal of this feature represents, in our view, a step backwards in terms of usability and efficiency.
Against this background, we strongly advocate for the reintroduction of a comparable solution. Specifically, we propose the provision of a structured ZIP folder for each language, containing all relevant reporting templates in Excel format. Such an approach would ensure continued accessibility, transparency, and ease of use for reporting institutions, while at the same time supporting the overarching objective of simplifying supervisory reporting.

Repeatedly searching for information after website changes (keyword: broken links) wastes valuable time. To maintain a consolidated overview, it's necessary to regularly refer back to previous framework releases.
The EBA website should be the single source for the overview of all validation rules (EBA, EGDQ und NCA) and also be released in no more than two batches every year.

* **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?

The transition to Data Point Model (DPM) 4.2 presented significant challenges for European supervisors and, consequently, for all stakeholders involved, including financial institutions.
DPM 4.2 affected all supervisory reporting and entails an extensive overhaul, with more than 60,000 individual changes to reporting structures. In addition, the technical reporting format was completely changed from XBRL to XBRL-CSV. Short-notice amendments and inconsistent reporting requirements have made the first implementation in Q1 2026 particularly challenging.
During the first quarter of 2026, supervisory authorities issued numerous refinements and corrections, most recently on 6 March, 17 March and 31 March (approximately 4,000 changes). Further corrections relating to the implementation of NACE codes for large exposure and large loan reporting were communicated by the Bundesbank throughout April 2026, most recently on 13 April.

We therefore suggest the following changes:
- Reference test datasets should be published so that software providers can validate their reporting solutions against expected results.
- The implementation should follow a phased approach, introducing individual reporting requirements first and cross-reporting validation rules only at a later stage. This would reduce complexity for both institutions and supervisors and ultimately improve data quality.
- A pilot phase involving a small number of institutions should be established. The initial rollout could be limited to selected institutions in order to gather practical experience and obtain additional feedback before wider implementation.
- A continuous test-reporting environment should be made available, not only for institutions and not only during specific testing periods, but also for software providers. This would create greater opportunities to test and validate implementations, for example in the context of RESOL1 reporting.

From a banking perspective, it remains for this recurring issue that a period of at least one year lead time must

generally be planned for the implementation of finalized regulatory changes into regular reporting. The reason is that in the first place the standard software provider for regulatory reporting needs to accommodate such changes within one of their four annually main releases. Subsequently, concepts and data provisions regarding both source data in the own systems and the new target data of the reporting software must be adjusted, tested, and approved for going live. Therefore, it would still be desirable to firmly establish this one-year timeframe as a fundamental lead time. For the rare data that is required more urgently as a one-time exception, ad hoc reporting would be preferable, but it should be as close as possible linked to an existing reporting module or, even better, to a template or a small number of templates, with clear specification of the additional information that needs to be provided on an ad hoc basis.
In addition, we recommend introducing a clearly defined "frozen zone" of four weeks before the first reporting reference date. During this period, no further changes to the technical requirements should be introduced, including changes presented as minor corrections. Any remaining issues should instead be addressed in a subsequent release or through appropriate supervisory guidance.
Furthermore, for the first submission under new or substantially amended reporting requirements, an extended submission window would be highly welcome. From our perspective, an additional period of six weeks would be appropriate to allow institutions and software providers to address implementation issues, perform final quality checks and ensure reliable reporting.
For medium-sized and large institutions, ad-hoc announcements are critical, as the institutions have had to constantly maintain resources for this purpose. We consider the current resubmission rules to be sufficient, however, the resubmission thresholds is extremely too low (see also Q1). As mentioned in Q1, a meaningful materiality principle and/or thresholds – both for supervisory and statistical reporting – would reduce resubmission and data storage costs and efforts.
As for the data storage costs: We see a potential for the improvement of the change management process. An early evaluation of the (European and national) supervisory data needs resulting in banks' obligation to store data for the case of potential resubmissions or possible data requests should be established. This includes data storage needs for a long period of time and/or in parallel for different reporting models with respect to any fundamental changes (e. g. DPM 1.0/2.0 change or transition to the future integrated reporting system). As an example in the context of statistical reporting, please refer to AnaCredit, where banks store granular data at the individual customer level beginning with 2018 as there is no time limit for the supervisory data requests.

* **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?

A fixed calendar is essential for capacity planning. The preferred fixed first reference date is the end of September.
A fixed calender would be a helpful contribution for the planning and implementation. Even more important would be a reliable calendar beforehand, indicating when a new requirement becomes final and binding.

* **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)?

New reporting requirements or significant changes to existing ones should only be published once a year.
Reporting requirements should also generally include a review clause (e.g. every five years).
Previous reports are heavily dependent on external software providers.

As outlined in question 4, there are mandatory tasks for the implementation of new reporting requirements, including dependencies on the software provider, upstream systems, IT, and other often equally high-priority requirements. Therefore, we consider the option of an early start of reporting to be impractical, as the mentioned obstacles cannot be removed.

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

Number of mandatory correction notifications, number of audit days per year, number of hotfixes for the reporting software.

The costs can be quantified more precisely once an ITS with its final changes is available and the software provider demonstrates which changes this will lead to in their software based on the new ITS.

With regard to the requested collection of implementation costs: The proposed structure of the data collection would entail a considerable additional burden. The level of detail deviates significantly from that used in the EBA's Cost-of-Compliance study, and allocating costs to individual reporting requirements is in practice very difficult to achieve. Furthermore, our experience shows that the effort required for such data collection has not yielded commensurate benefits for institutions in the past, as it has, from our perspective, not resulted in proposals leading to meaningful relief for institutions.
We therefore suggest, as an alternative, collecting a qualitative assessment of the proposed changes (e.g. by using size categories such as XS, S, M, L, XL).

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

The reduction in reporting frequencies has less effect for the established reporting.

A lower reporting frequency relieves operational activities to some extent, and the reduction of single/several data points in a template also contributes, but to a lesser degree since it requires significant initial implementation effort and costs. Greater relief is achieved through a reduction of entire templates, a stable set of validation rules applied to a lesser extent than today, a limit of two amendment batches or only one release per year, and requiring resubmissions only in cases of relative materiality or much higher thresholds than currently foreseen.

2. Data for the assessment of impacts on reporting costs

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. Information on respondent

Table 1.1 - Information (one institution responding)

	Value
Institution's name	
Institution's LEI	
Institution's CRR category (Large/Medium or SNCI)	

Table 1.2 - Information (multiple institutions, association, authorities responding)

	Value
Repondent's name	German Banking Industry Committee
Institutions category (Large, Medium, SNCI or mix)(1)	mix
Number of institutions (1)	1050
Average Total Assets in the past 3 years , in EUR (2023-2025)(1)	not essential for this estimate / feedback from IT providers

Notes:

(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

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

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

Notes:

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).

Please refer also to example to to filling this table provided in the pdf version of the consultation paper.

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

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

	A	B	C	D	E	F
		Current costs			**Impact of changes proposed in the Consultation Paper** (6)	
		Total costs	**Implementation costs**	**Running costs**	**Implementation costs**	**Running costs**
1	**Weights related to costs** (1) **dedicated to all data reports** (2)	XXXXXXXXXXXX	70 %	30 %	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	
2	**Weight of costs dedicated to 'EBA related' reports** (3) (**% of costs related to reports of row 1)**(4)	60 %	%	%	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	
3	*of which AE (5)*	12 %	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXX		8 %	37 %
4	*of which ALMM*	12 %	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXX		14 %	-23 %
5	*of which FINREP*	15 %	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXX		8 %	35 %
5.1	*of which stress test related changes (7)*	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX			%	%
6	*of which LCR*	15 %	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXX		0 %	0 %
7	*of which Large Exposure*	12 %	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXX		3 %	5 %
8	*of which Leverage*	5 %	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXX		1 %	-20 %
9	*of which COREP Own Funds*	24 %	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXX		9 %	25 %
9.1	*of which stress test related changes (7)*	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX			%	%
10	*of which FRTB (template C 90.00 being accounted in COREP OF row)*	5 %	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXX		3 %	20 %
11	*of which ESG templates (8)*	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX			100 %	100 %
12	**Weight of costs dedicated to reports to other authorities (% of costs related to reports of row 1)**	40 %	%	%	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	

Notes:

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

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(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).

Please refer also to example to to filling this table provided in the pdf version of the consultation paper.

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.).

The cost estimates presented have primarily been prepared by two centralised IT service providers which mainly support medium and small and non complex institutions. Due to the limited timeframe available, it was not feasible to comprehensively incorporate input from individual institutions. As a result, additional cost components—particularly the anticipated increase in personnel expenses within banks, as well as training and capacity-building costs—are not reflected in the current estimates.
For a more comprehensive assessment of the overall cost implications, reference is made to the final report of the Cost of Compliance Study from 2021, which provides further insights into the broader cost drivers and impacts on institutions.
In particular, the breakdown between implementation costs and running costs at the level of individual institutions would likely indicate a significantly stronger increase in recurring expenses. This is especially relevant for institutions relying on central IT service providers, where implementation costs are largely absorbed at the service provider level, while institutions themselves face comparatively higher ongoing operational costs.

Contact

Contact Form

Contribution ID: 36b31fa2-e378-4628-b2f1-a7e7a54d01e4

Date: 10/07/2026 15:34:47

Consultation Paper on changes to ITS on supervisory reporting: Module on liquidity and asset encumbrance

Fields marked with * are mandatory.

Introduction

The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions detailed below.
Comments are most helpful if they:

- respond to the question stated; indicate the specific point to which a comment relates;
- are supported by a clear rationale;
- provide evidence to support the views expressed/ rationale proposed; and
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Please provide your responses by **10 July 2026 close of business**. Late responses will not be considered

Many thanks for your cooperation and support!

Who is responding

* Name of the organisation

German Banking Industry Committee

* Contact name

Christoph Friedrich

* Contact email

c.friedrich@bvr.de

* Disclose comments

- (•) Yes
- ( ) No

Questions for consultation

General questions

* **Question 1.** Are the templates and instructions clear to the institutions and in line with the regulation?

The proposals are mainly clear. However, the instructions leave open whether the new liquidity and/or asset encumbrance templates may in future also be required on a sub-monthly basis at national level. For ECB-supervised institutions, obligations to submit the SSM Liquidity Template and the Joint Liquidity Template (SSM /SRB) already exist. Sub-monthly (AMM)/sub-quarterly (AE) reporting under these frameworks would generate significant operational burden — and the consultation does not clarify how the new templates relate to this existing requirement.

This ambiguity is particularly problematic because the asset encumbrance templates contain IFRS values that are by definition not producible at higher frequency. The same applies to balance sheet values more broadly. The instructions should therefore explicitly state that higher-frequency reporting may only draw on stock or market values, not on accounting or IFRS values.

* **Question 2.** Do institutions see any double reporting of information?

Yes. For NGAAP institutions, the data reported in the CBC in template C 66.01 and in the new templates F 32.11/F 32.12 will be almost identical, as valuation model assessments are not applied. We recommend assessing whether the template can be streamlined for SIs and considering proportionality fully dispensing with templates F32.11 and F32.12 for LSIs. Please also refer to our comments under Question 21.

* **Question 3.** Do institutions see any possible need for streamlining of the definitions, where? Where do you see room for further semantic integration of concepts within the ITS and with other reporting frameworks?

Yes, we do have further comments.

Regarding the reporting of the Asset Encumbrance (please see also our suggestions under question 21), the consultation paper explains in chapter 3.1 the aligning of the AE overview of assets and collateral with the ALMM (ML) overview (option 5a). It remains unclear if this will also affect the assignment of other non-tradable assets in template AE COL (F 32.12), row 130 column 180. This is because the definition of EBA Q&A 2013_675 was not included in the overview of the revised Q&As in chapter 3.3 and the alignment explained above may also affect the kinds of collateral received that should be reported by the institutes in template AE COL (F 32.12, r130 c180). With respect to the year of publication (2014) the definition in Q&A 2013_675 should also be reviewed by EBA during this consultation.

Specific questions by template

C 75.01 LCR – collateral swaps

* **Question 4.** Are the changes proposed for simplification in the LCR reporting, cost reducing to the institutions?

No.
The calculation of template C 75 remains necessary for the calculation of the LCR. Consequently, excluding C 75 only from monthly reporting, while still requiring it on a quarterly basis, would create additional operational and process related burden. From a process perspective, it would therefore be simpler and more efficient to continue reporting this template on a monthly basis.

C 66.01

* **Question 5.** Are the instructions related to Deposits collected via online third-party platforms clear? please specify how they can be improved?

The instructions regarding deposits received through third-party online platforms are not entirely clear. Please provide further details on the procedure for identification and segregation.

The enhancement of the maturity ladder with daily time buckets and new rows for online platform deposits and intragroup FX swaps will not only necessitate technology upgrades, but also the collection of new data from clients.

C 66.02 – behaviour info

* **Question 6.** Do you have any comments regarding the way to reflect New Business in this template?

No comments.

* **Question 7.** Do you have any comments or proposals regarding the second and N-round effects and the way to reflect them in the template?

No comments.

* **Question 8.** Are the examples in section 3.4 relevant for you? Based on them, do you plan to model and report transactions individually, or will you adopt a balance sheet approach instead?

No comments.

Question 9. Do you see an alternative way to represent the second-round and subsequent effects?

No comments.

* **Question 10.** What is your view on the adequacy of a monthly frequency for this template to capture possible ad-hoc decisions. Do you model all your cash flows systematically, without considering any ad-hoc decisions? If the latter, please specify the frequency (e.g., ad hoc decisions are made weekly).

No comments.

* **Question 11.** With this consultation paper, the EBA is also seeking views from the institutions on their ability to provide this data to meet the supervisor’s expectations and to gather additional views on the costs and benefits of having this information defined in a harmonised way at EEA level. Please provide your comments.

No comments.

C 68 concentration by product type

* **Question 12.** Do you have any comments on the instructions for the rows on the breakdown by size of deposit? Are the instructions and the additional guidance provided in Directive 2014/49 EU sufficiently clear?

The instructions are clear. However, in our view, concentration risks are adequately covered by template C 67.00 (or C 67.01) already.

* **Question 13.** Do you have any comments regarding the rows on Economic Area Central Bank, Eurosystem Central Bank and Non-European Economic Area funding? Is It possible to properly distinguish between Central Bank funding received with the underlying instructions for these rows?

No comments.

* **Question 14.** Are the instructions for row 0080 and 0090 on savings accounts clear with respect to the notice period?

A distinction between notice periods for withdrawal of up to 30 days and those of more than 30 days is not necessary for Germany, since according to German legal regulations in § 21 para. 4 no. 4 RechKredV only those deposits qualify as savings deposits which have a notice period for withdrawal of at least 3 months. This means, that additional rows would be introduced, leading to implementation efforts, although these rows would consistently remain non-applicable and therefore unpopulated for German institutions.

* **Question 15.** Do you prefer the deletion of the column 0030 “amount not covered by a Deposit Guarantee Scheme in accordance with Directive 2014/49/EU or an equivalent deposit guarantee scheme in a third country” over keeping the column. The C 68.00 currently asks banks to provide evidence for “Amount covered by a Deposit Guarantee Scheme in accordance with Directive 2014/49/EU” and “Amount not covered by a Deposit Guarantee Scheme in accordance with Directive 2014/49/EU”. As the latter column can be retrieved by difference between the former and the total carrying amount, would it be a burden reduction to the institution if this would be deleted?

No, this does not constitute a reduction in reporting burden, as this data field has been populated fully automatically for many years. In general, any change to regulatory requirements entails effort (in this case only minor changes to technical implementation, training materials and internal guidance). From this perspective, especially far reaching changes, such as those proposed under templates F 32.11 and F 32.12, should be avoided.

C.67 (concentration of funding by counterparty)

* **Question 16.** SNCI institutions are invited to provide feedback on (i) the costs associated with implementing the amendments to this template, (ii) the costs if the data would be requested instead outside of supervisory reporting by supervisors when needed, (iii) any challenges linked to its production, and (iv) alternative sources from which the underlying information could be reliably retrieved

ad iii)
Draft of instructions chapter 1.2 No 8 in column 0050 is missing abbreviations for several products (including: UWF, CBM, deposits, etc.).

* **Question 17.** Would it be a significant increase in the reporting burden if the same template C 67.01 would be asked to all type of institutions? or it would be preferable from a practical perspective to have the same template reported by all institutions?
This would mean to ask all institutions to report the top 30 counterparties, with monthly frequency for Large and medium sized institutions and quarterly for SNCIs.

Yes, this would result in a significant increase in the reporting burden.

This is due not only to the extension of the counterparty scope, but also to the overall increase in the volume of data that would need to be collected, validated and plausibilised.

In particular, the removal of the current 1% threshold in the CP would already lead to a substantial expansion of the data to be assessed, as all of the top 10 counterparties would then have to be reported regardless of materiality. Moreover, requiring all institutions to report the top 30 counterparties would be disproportionate from a practical perspective. Even the largest exposure among the current top 10 counterparties is typically still far removed from the smallest exposure within a hypothetical top 30 list for systemically important institutions. Extending the requirement to 30 counterparties would therefore add considerable complexity and workload while providing limited additional supervisory value.

Against this background, applying the same template C 67.01 to all types of institutions would significantly increase reporting costs and operational burden, particularly without a commensurate benefit.

* **Question 18.** Do you find any overlap or ambiguity in the counterparty sectors and/or product types defined in the C.67 template?

We have the following observations regarding the product types in column 0050 of template C.67:
The new product differentiation no longer distinguishes between financial customers and wholesale corporate customers. This does not reflect the economic reality and leads to unnecessary implementation effort and costs. We recommend to retain the previous differentiation between UWF (financial customers) and UWNF (large corporate customers). By contrast, excluding retail customer deposits from OFP seems conceptually justified.

The new formulation ("...product types to be considered are...") lacks clarity, as the technical implementation requires a complete and explicit enumeration of all product types subject to reporting. We therefore propose to retain the existing wording.

* **Question 19.** Do you consider the way deposits raised through deposit platforms should be reported consistent with the definition provided throughout template C.67?

Yes.

Asset Encumbrance

* **Question 20.** Is the mapping between the CBC and the AE information (provided in the annex with the templates) clear? Please explain.

The mapping is understandable; however, at this stage it already becomes evident that there is a significant degree of data redundancy within the AE reporting framework.

While the mapping towards CBC is clear, the relation between AE reporting and AE disclosure requires further consideration. As of now, we have no knowledge of any adjustments to the annual disclosure of unencumbered /encumbered assets and collaterals. At least the AE disclosure is not changed according to the current final EBA report amending the ITS on disclosure.

By the calculation of medians, the year-end AE disclosure tables EU AE1 and EU AE2 necessitate the tables F32.01 and F32.02 for all four quarters of the disclosed year. Given the currently unchanged requirements for AE-disclosure and the proposed endorsement of the currently consulted changes to AE reporting for September 30th, 2027, compliance both with reporting on AE and the YE-2027 AE-disclosure implies a burdening and costly coexistence of F32.01/F32.02 and F32.11/F32.12.

In our opinion such an adverse phase of coexistence while maintaining the disclosure of medians can only be eliminated by the implementation of changes to AE reporting with the end of any first quarter as the first reference date, e.g. Q1/2029 or at least Q1/2028. Moreover, to ensure the established strong linkage between the quarterly AE reporting and the annual disclosure of AE we would expect AE disclosure templates to be aligned with AE reporting templates soon, starting with the year of amended reporting.

Regarding AE-disclosure requirements for LSIs, please refer to our response to Question 21.

Questions related to Cost of compliance

* **Question 21.** Cost of compliance with the reporting requirements: Is or are there any element(s) of this proposal for new and amended reporting requirements that you expect to trigger a particularly high, or in your view disproportionate, effort or cost of compliance? If yes, please:
- specify which element(s) of the proposal trigger(s) that particularly high cost of compliance,
- explain the nature/source of the cost (i.e. explain what makes it costly to comply with this element of the proposal) and specify whether the cost arises as part of the implementation, or as part of the on-going compliance with the reporting requirements,
- offer suggestions on alternative ways to achieve the same/a similar result with lower cost of compliance for you.

1. Excessive costs would result from the complete redesign of the F32.11 and F32.12 templates, encompassing not only substantial one off implementation efforts but also significant ongoing costs related to staff training, governance adjustments and permanently altered reporting processes. These costs are disproportionate and particularly difficult to justify given that template based reporting is expected to be phased out in the foreseeable future with the introduction of IReF and IRS.

2. Double reporting would arise from the introduction of templates F 32.11 and F 32.12, as 85% of the information requested is already available through existing reporting frameworks (See the separate Excel-file “GBIC_alternative_sources_Asset_Encumbrance”) for a complete mapping of the requested data to existing templates):

2a) First, market values are already comprehensively reported via the Counterbalancing Capacity (CBC) in template C 66. The extensive mapping between Asset Encumbrance (AE) reporting and the CBC, included in the AE template annexes, demonstrates a high level of redundancy between these frameworks. Even encumbered assets are already captured in template C 66, as columns 030 to 220 contain the market value of collateral expected to become unencumbered in the future, which taken together represents the volume currently encumbered.

2b) Second, carrying amounts of encumbered and unencumbered assets are already reported in template C 80. Carrying amounts requested in templates F 32.11 are already available for both encumbered and unencumbered securities through existing C 80 reporting, making a separate collection of these values unnecessary.

2c) Third, the split between own assets and collateral received can be approximated using existing templates. While templates F 32.11 and F 32.12 distinguish between own securities and collateral received, this distinction can be reasonably derived from the difference between template C 80 and the CBC, as template C 80 does not include received collateral. Moreover, from a practical perspective, received collateral plays only a very limited role in the refinancing activities of LSIs, further reducing the relevance of this distinction for proportional supervision.

The only three remaining information gaps are of limited supervisory relevance for LSIs and should not be reported for proportionality reasons:

a) Assets issued by other entities of the group:

LSIs generally do not refinance themselves through own issuances in capital markets, and even less so within group structures. Moreover, even if such issuances were to occur, these assets would typically not be retained on the institution's own balance sheet.

b) Assets pre positioned in the pool for monetary policy operations:

Extremely short term refinancing needs are already adequately addressed through the LCR liquidity buffer, making additional reporting of pre positioned assets unnecessary from an LSI perspective.

c) Assets eligible for cover pools:

Where such information is considered indispensable for supervisory purposes, the reporting within template C 66, in the context of the counterbalancing capacity, could be considered, thereby avoiding the need for new F32.11 and F32.12 templates.

Costs and redundancy clearly argue against the introduction of new F32.11 and F32.12 templates for LSIs, as the resulting reporting burden would be disproportionate and inconsistent with the goal of reducing reporting costs for institutions.

Additionally, we want to point out that column 200 "unrealized gains and losses" represents a totally new requirement for LSI since the referenced FINREP template is only to be reported by significant institutions. At the same time, for LSIs this information appears to be largely redundant, as it can already be reasonably approximated using existing reporting, namely as the difference between the carrying amounts reported in the NSFR and the market values reported in the CBC.

In conclusion, we propose that the Asset Encumbrance reporting required under the CRR should for SNCIs be derived completely from existing reporting information (i.e. ALMM or NSFR / see separately provided Excel sheet). For other LSIs, only the existing reporting templates F32.04 and, where applicable, F33 and F35 should be retained. For SIs, we recommend streamlining templates F32.11 and F32.12. This approach avoids double reporting and contributes to the overall objective of this consultation paper, namely simplification.

Simplification due to reduction of national reporting

Question 22. Please indicate any parallel national data collection that could be discontinued due to overlaps in the type of information requested.

For ECB-supervised institutions, the SSM Liquidity Template and the Joint Liquidity Template (SSM/SRB) already capture liquidity and encumbrance data. If the new EBA templates were to be submitted at sub-monthly frequency, this would not reduce reporting burden but significantly increase it — contrary to the simplification objective.

Any overlap assessment must therefore account for the frequency dimension, not only the data content. Discontinuing national collections is only meaningful where the EBA templates match both the data scope and the reporting frequency of existing requirements. Where higher-frequency national collections exist and the new templates cannot support that frequency due to their reliance on IFRS or balance sheet values, discontinuation is not feasible without a substantive change to the template design.

Contact

Contact Form

Contribution ID: cbaaa792-c6c6-49cb-8d07-05d176f5da93
Date: 10/07/2026 15:17:57

Consultation Paper on changes to ITS on supervisory reporting: Module on FINREP

Fields marked with * are mandatory.

Introduction

The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions detailed below.
Comments are most helpful if they:

- respond to the question stated; indicate the specific point to which a comment relates;
- are supported by a clear rationale;
- provide evidence to support the views expressed/ rationale proposed; and
- provide alternative regulatory options for consideration by the EBA.

Important note to users:
All the fields marked (*) are mandatory. In case a question is not relevant for you, please answer with "Non-Applicable" or "NA". Please note that the maximum length of the answers to any single question is technically limited by the tool to 5000 characters.
All contributions received will be published following the close of the consultation, unless you request otherwise by ticking the relevant box in the form below. Please note that a request to access a confidential response may be submitted 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.

Personal data protection:
The protection of individuals with regard to the processing of personal data by the EBA is based on Regulation (EU) 2018/1725. Further information on the processing of the personal data is available in the Data Protection Notice.

Should you encounter issues with submitting your responses, please contact us by email at *eba.consultation@eba.europa.eu* no later than 48 hours before the deadline of the consultation period.

Please provide your responses by **10 July 2026 23:59 CEST**. Late responses will not be considered

Many thanks for your cooperation and support!

Who is responding

* Name of the organisation

German Banking Industry Committee

* Contact name

Christoph Friedrich

* Contact email

c.friedrich@bvr.de

* Disclose comments

- (x) Yes
- ( ) No

Questions for consultation

Collateral additional information

* **Question 5.** Is the definition of 'Maximum amount of the collateral that can be considered' clear? Which challenges regarding the practical application of this definition do you envisage?

The definition is generally clear and understandable. Yet, we have some comments on the instructions. Furthermore, this value is not readily available at all times.

1. Cap on the carrying amount of the exposure and treatment of over-collateralisation
The requirements for the maximum amount of the collateral that can be considered are, in principle, clear. In practice, however, questions arise, particularly in the case of:
• Over-collateralised exposures, e.g., structured finance, syndications, or collateral pools, where collateral covers multiple exposures.
• Portfolios with changing utilisation (revolving facilities, rolling collateral pools).

This results in high complexity in the exposure-specific allocation of collateral when one piece of collateral secures multiple exposures or even multiple group companies.
The FINREP definition (cap at the carrying amount) leads to a divergent presentation between risk management (economic collateral position) and FINREP (capped collateral amount per individual exposure).

2. Reporting of different valuation methods and valuer types

The new requirements include, regarding template F 48.00, the type of valuation (Full visit, Drive-by, Desktop /AVM) and the type of valuer (internal/external), as well as, regarding templates F 37.00 and F 48.00, a breakdown by the type of use of the collateral items.

This requires the new, granular flagging of the latest valuation for each collateral item within all relevant collateral systems, differentiated by its type of use (method + valuer). It must be ensured that the Maximum amount reflects the definition of the collateral value according to FINREP. As this does not correspond to the economic collateral position (see point 3), a new identifier must also be stored in the collateral systems for this purpose.

A complete re-evaluation of the entire collateral portfolio is necessary for the new data fields. In addition to the system-side implementation of a technical solution, this will also involve a high degree of manual effort. We therefore request that the new requirements are dropped or at least a sufficiently long preparation period be granted.

In conclusion, the new requirements clearly do not represent a simplification and require an enormous additional effort. This applies to the functional and technical preparation up to the first-time reporting, but also unequivocally to the ongoing future reporting.

* **Question 6.** Are the instructions and the new templates F 37 and F 48 sufficiently clear? If not, what changes would you suggest facilitating the reporting by institutions and at the same time improving the supervisors' understanding of the levels of collateral liquidity and its recoverability?

Overall, the templates are largely straightforward, and the introduction of a waiver for SNCIs is welcomed. However, these two new templates constitute additional reporting requirements and therefore increase the reporting burden. This, in turn, leads to implementation costs—particularly in light of the very short implementation timeline—as well as additional staff training efforts, especially due to the more granular data requirements. Furthermore, highly granular loan-by-loan data is already comprehensively captured under AnaCredit, Overlaps with existing statistical frameworks should be avoided.

Given the focus on non-performing loans, a 5% NPL ratio threshold should be introduced. This would ensure a risk-based and materiality-based reporting and avoid unnecessary reporting burden.

From our point of view, the instructions and the new templates F 37 and F 48 are not sufficiently clear for a practical implementation and raise fundamental technical problems. For the reporting of percentages in the FINREP group report, a very complex, purely manual, and cost-intensive new process would have to be implemented. Reporting of percentages within the FINREP framework should be generally avoided and the underlying absolute amounts should be requested instead.

* **Question 7.** Do respondents agree with the reporting proposed in the examples on template F 37 provided in Section 3.2 of the consultation paper?

A clear cascade model specifying which collateral types are given priority would facilitate technical implementation. The examples are, for the simple, standard scenarios they depict, coherent and understandable.

However, these examples do not cover the significantly more complex cases that frequently occur in practice at a complex institution.

The already existing complexity in similar templates (e.g., F 13 and F 18) will be further increased by the breakdown required in F 37 by the type of use of the immovable property serving as collateral.

Other financial corporations

* **Question 8.** Do respondents agree with the proposed breakdown by subsector of ‘Other financial corporations’? To which extent is it compatible with your internal classification?

We are highly concerned about the newly proposed requirement, as the scope of disclosures for “other financial corporations” is being significantly expanded. This will cause substantial additional effort for data provision and system adjustments, which should be carefully weighed against the expected supervisory benefit The usage of existing CRR definitions is welcomed, but we do not fully agree with the proposed breakdown in its current form.

We would consider further clarification of the technical requirements or the provision of an example to be helpful. We see challenges in determining and delineating the relevant counterparty sectors. The NACE Code classification is a well established scheme for identification of sectors and sub-sectors in the market and for supervisory practices as well. Therefore, we encourage to align any breakdown of “other financial corporations” with the NACE code classification. The reporting should not be more granular than the four-digit NACE Code level.

In Germany the current customer sector classification is strongly based on the system of the Deutsche Bundesbank. Historically, this system uses more aggregated categories. A multitude of the granular counterparty breakdowns now required by the EBA currently fall into a single collective category such as "Other financial corporations". A one-to-one relationship does not exist.
The new breakdown of counterparty categories for "Other financial corporations" represents a completely new requirement for counterparty classification. The underlying master data to uniquely assign a customer to one of the new, granular categories is missing.

To ensure conformity, a review of the entire dataset must be conducted. The implementation requires an enrichment of master data, which in turn necessitates additional IT and personnel expenditure.

If required, a significantly extended implementation period is needed to carry out the necessary data analyses and system adaptations. Against this background, a first-time application as of 30 September 2027 is highly critical and not feasible. A postponement to at least September 2028 is needed.

* **Question 9**. Is the definition of ‘private credit activities’ sufficiently clear? Which challenges regarding the practical application of this definition do you envisage?

The definition is conceptually understandable, but not sufficiently clear for a consistent application.
A more detailed explanation of the term "private credit activities", especially with examples, would be helpful.
At its core, the issue seems to be about identifying counterparties that engage in bank-like lending without holding a banking license themselves (part of the so-called "shadow banking system"). The definition targets the main economic activity of the counterparty. However, the ambiguity lies in the operational implementation.

Generally, to comply, institutions would have to implement exhaustive client-onboarding questionnaires and dynamic data-tagging processes for all corporate counterparties to detect if they engage in private lending, which is highly inefficient and costly. Nevertheless, we foresee practical challenges regarding the definition of private credit and its distinction from closely related concepts such as shadow banking and unregulated FSEs.

While these categories are closely linked, they require separate identification and consistent classification.
In addition, the ECB is expected to introduce its own definition of private market-related entities, which may not be fully aligned with the EBA framework, further increasing complexity.

In detail, the following significant difficulties have been identified:

- Identification of the counterparty:

There is no public, standardised register or a unique classification code (such as a NACE code) for "private credit activities". Therefore, the identification must be done manually on a best-effort basis, using information from various sources: the company's name, annual reports, website, the fund's investment strategy, etc. This is an extremely complex, resource-intensive, and error-prone process, especially for a large, international client base.

- Demarcation and thresholds:

The definition requires that the counterparty be "primarily involved". A quantitative threshold (e.g., >50% of total assets or turnover) is missing.
Large, diversified asset managers may launch private credit funds alongside their equity and bond funds. It is unclear whether, in such a case, the entire management company should be classified as a "private credit actor", or only the specific credit fund against which an exposure exists.

- Data availability and system implementation:

The introduction of "private credit activity" would be very challenging and associated with high manual effort, as the business models of counterparties can also change.
We strongly recommend that EBA provides a list of Legal Entity Identifiers (LEIs) for all entities that, in its view, fall under "private credit activities". This would significantly reduce the implementation burden for institutions and ensure a level playing field, as it would avoid divergent approaches across banks in identifying and classifying such entities.
The EBA should also specify whether the classification should be made at the level of the specific fund or the parent management company.

4. Grant an adequate implementation period: Due to the high effort for data research, process, and system adaptations, a sufficiently long preparation period is essential.

* **Question 10.** Which challenges regarding the inclusion of the information on 'debt securities issued' broken-down by subsector of 'Other financial corporations' do you envisage?

In the case of debt securities issued, only those liabilities for which the counterparty is known, can be allocated; bearer securities cannot be allocated. The issuer has, generally, no systematic knowledge of who the end-investors of the securities traded on the market are. Therefore, the requirement to break down the holdings of debt securities issued by the new subsectors of Other financial corporations (OFCs) represents a fundamental and, as it currently stands, unsolvable challenge.

Crypto-assets

* **Question 11.** Are the instructions and the new template F 38 sufficiently clear? If not, what changes would you suggest facilitating the reporting by institutions and at the same allowing supervisors to properly monitor the related emerging risks for institutions?

We note that the proposed reporting requirements on crypto-assets are predominantly designed and defined with reference to IFRS-based accounting concepts. While this approach may be appropriate for IFRS-reporting institutions, it does not sufficiently take into account institutions applying national accounting frameworks.

In particular, the current design of the new templates – including the classification and allocation of crypto-assets to specific accounting portfolios – is closely linked to IFRS definitions and standards. At the same time, these reporting requirements are also intended to be applied by institutions that report solely under national GAAP. This creates a conceptual inconsistency and raises significant implementation challenges.

We therefore consider it necessary to ensure that the requirements are clearly defined and operational for all institutions within the scope of application, including references for nGAAP institutions.

* **Question 12**. Do respondents agree that the asset-referenced token as defined in the MICA Regulation, Article 3, point 1, (6) could meet the definition of an intangible asset? If not, please provide the rationale backing your view.

We do not agree that MiCAR asset-referenced tokens (ARTs) could meet the definition of an intangible asset under IAS 38.
The accounting analysis should start from the rights and obligations attached to the ART. Under MiCAR, ARTs have an issuer and holders have a permanent right of redemption against the issuer (Article 39 MiCAR). Where this right gives the holder a right to receive cash/funds or another financial asset, the ART meets the definition of a financial asset under IAS 32.11 and is accounted for under IFRS 9. IAS 38 is residual in this respect and excludes financial assets as defined in IAS 32 from its scope. Therefore, such ARTs should not be reported or treated as intangible assets.
This is also consistent with the IFRS IC June 2019 agenda decision on holdings of cryptocurrencies. That decision concerned crypto-assets that are not issued by another party and do not give rise to a contract between the holder and another party. MiCAR ARTs differ from such unbacked crypto-assets due to their issuer and redemption-right structure.

We would like to further add, that e-money tokens (EMTs) also meet the definition of a financial instrument according to IAS 32.11. Moreover, EMTs may qualify as a cash equivalent under IAS 7. EMTs reference one official currency and MiCAR provides for a claim against the issuer, issuance at par value and redemption at any time and at par value in funds. These features are close to the IAS 7 concept of a known amount of cash with insignificant value risk. Nevertheless, entities must assess the facts and circumstances, including purpose of holding, currency, redemption restrictions, settlement timing, issuer credit and liquidity risk. If the IAS 7 criteria are not met, EMTs remain financial assets under IFRS 9 but should not be presented as cash equivalents.

Other changes

* **Question 13.** In the instructions to Loan commitments, financial guarantees and other commitments (F 9), do you agree with the proposed splitting for “Undrawn amount of unconditionally cancellable commitments” and “Undrawn amount of commitments” in paragraphs 115(i) and 113(b) of the instructions (IT solutions- Annex V to the ITS on reporting) or do you think they should be grouped together? Please provide the rationale backing your answer.

While we do not see any fundamental issues with the proposed splitting, its added value is not evident, and the necessary adjustments to data provision are expected to result in additional implementation costs.

* **Question 14**. In the instructions to template F 40.01 with regard to the ‘Equity of investee’, ‘Total assets of the Investee’ and ‘Profit or (loss) of the Investee’, do respondents agree to require the latest available amounts of those items instead of the amounts in the last financial statements approved by the investee’s board of directors or similar authorised body? Is the proposed change consistent with your internal practices for consolidation purposes where the last investee’s financial statements are not available?

While the use of the most recent available data appears reasonable, it should not result in the de facto circumvention or undermining of applicable national accounting frameworks.

* **Question 15.** Which benefits and challenges regarding the compilation and reporting of the information of template F 41.01 on a more frequent basis do you envisage? In addition, are the instructions on the fair value calculation in IT solutions (Annex V. Part 2, paragraphs 298, 298a) clear and in line with your accounting practices?

No comments.

* **Question 16.** Which benefits and challenges regarding the proposed change of the definition of ‘small and medium-sized enterprises’ by referring to CRR Article 5 do you envisage?

We strongly welcome the alignment of the definition of ‘small and medium-sized enterprises’ with the CRR III definition, which is also applied in COREP. This paves the way to significant simplifications and a reduced operational burden for institutions. However, we note that the wording of the definition in Annex V, Part 1, paragraph 5(i) is not fully aligned with Article 5(9) of the CRR. The definition in Annex V additionally refers to “micro enterprises”.

These do not constitute a separate category under the CRR or within FINREP reporting (in contrast, for example, to the EBA Guidelines on loan origination and monitoring (EBA/GL/2020/06)) and are generally already covered by the term small and medium-sized enterprises. For reasons of clarity, we therefore advocate removing the term “micro” from the definition in Annex V, Part 1, paragraph 5(i).
According to current plans, the amendment would take effect as of the reporting date of 30 September 2027. However, to ease the procedural burden on institutions, the adjustment should be implemented as soon as possible.

In addition, we would like to point out that, for a fully harmonised definition of SMEs for prudential purposes, further alignment would also be required in Commission Delegated Regulation (EU) 2015/61, Article 3(6) (Definitions), as well as in the aforementioned EBA Guidelines on loan origination and monitoring (EBA/GL/2020/06, point 14) and in the context of resolution reporting (MREL/TLAC). The current reference in the EBA/ITS/2025/04 (Annex for IT solutions) to FINREP on the one hand and to the Commission Recommendation of 6 May 2003 on the other hand would no longer be consistent following the harmonization of the FINREP/COREP definition with Article 5(9) of the CRR. In addition, the definition contained in Article 2(1) point 107 of the BRRD should also be revised and adjusted to harmonize the SME definition across the supervisory and resolution regimes, so that in the future only a single, uniform definition applies to all reporting areas.

As the harmonisation should also extend to banking statistical reporting, an amendment to ECB Regulation (EU) 2016/867 on the collection of granular credit and credit risk data (ECB/2016/13) would likewise be necessary. We kindly ask the EBA to advocate for such an adjustment vis-à-vis the ECB.

*

Question 17. In the instructions to template F 01.01, is the proposed reporting of the compulsory reserves in line with your accounting practices? If not, please describe your current reporting and the rationale behind it. uestion

No. Under national accounting requirements (nGAAP) as well as under IFRS, the “minimum reserve” (compulsatory reserves) held at the Deutsche Bundesbank is reported under cash reserves. Hence, compulsatory reserves are reported in row 0030 “cash balances at central banks” because those reserves are “readily available at all times”.

The entire balance held at the central bank can be freely disposed of on a daily basis, as long as it is ensured that the average requirement over the period is met. The balances therefore clearly meet the criterion of being 'receivable on demand' and can also be used for liquidity management.

For this reason, we recommend maintaining the current approach and continuing to report compulsory reserves under "Cash balances at central banks".

* **Question 18.** In Finrep the definition of ‘subordinated debt’ refers to the definition included in Table of Part 2 of Annex II to the ECB BSI Regulation. In the CRR 3, the new article 128 provides for a definition of ‘subordinated debt exposures’. Do respondents believe that the definition of ‘subordinated debt’ in Finrep should be changed and aligned with the definition of CRR 3 Article 128? Which benefits and challenges in this alignment do you envisage?

Harmonization in general, is welcomed. This adjustment also aligns with a more risk-oriented approach in FinRep reporting and facilitates consistency between FinRep and other COREP reporting formats. However, this approach could result in FinRep no longer being consistent with nGAAP accounting in this regard, as the contractual ranking is relevant in accounting.

* **Question 19.** Do respondents have any further comments on the structure and content of the proposed templates?

We have significant concerns that the current draft for the FinRep module extends far beyond the original objectives. The proposal contains not only substantial expansions of existing templates but also introduces entirely new templates with extensive and highly granular reporting requirements. Based on an initial assessment, the new and more detailed requirements outweigh the benefits of the elimination or reduction of reporting components.

Given that no alignment has been carried out with the current FINREP framework regarding the respective reporting scopes (full, simplified, over-simplified, data point reporting), and that no forward-looking assessment of the new templates is available, any evaluation remains inherently limited. In general, new templates inevitably entail additional implementation costs and require staff training. We assume, there would be a significant extension of requirements for banks using currently over-simplified and data point reporting. Moreover, as stated in the public hearing the ECB regulation should be aligned with the EBA proposals. This would take time. To ensure legal certainty, to allow sufficient time for implementation and to avoid the overburden for smaller banks, there should be at least a 12-month period between the final publication of requirements by both the EBA and the ECB and the first reference date, in particular if the reporting proportionality regime is going to change from the current categories to the new ones.
While the inclusion of a “materiality” threshold for the past due breakdown in Template 18 is a welcome simplification, the mandate to provide a granular breakdown of loans subject to “Public Guarantee Schemes”

(PGS) offers very limited ongoing supervisory value. To implement this requirement, it would be necessary to introduce a new flag in the IT systems and to evaluate the existing portfolio, which would involve significant procedural effort. Considering the supervisors' stated goal of providing relief and simplifying procedures, we suggest applying this evaluation only to new business originated from the date the new templates come into force (30 September 2027). Alternatively, and ideally, we would suggest waiving the introduction of this flag altogether after weighing the expected benefits against the implementation effort.

The coloured markings in FinRep Template 20.1 in draft Annex IV indicate that rows 0020 Cash on hand and 0040 Other demand deposits are to be deleted in this template, while row 0030 Cash balances with central banks will remain as well the total position in line 0010 Cash, cash balances at central banks and other demand deposits. If implemented in this way, Table 20.1 would no longer be consistent with the core template, and no other relevant template would make such a change. Please explain the background to this adjustment or change.

Finally, Template 49 requires granular breakdowns of stage transfers and off-balance sheet commitments. This information is already systematically captured in Template 12.02 (stage transfers), Template 12.01 (impairment allowances), Template 18.00 (performing and non-performing exposures), and Template 9.01.1 (off-balance sheet commitments). Maintaining both sets of templates forces institutions to perform complex cross-template reconciliations

* **Question 20.** Do respondents find the proposed instructions clear? Are there specific parts where definitions or instructions should be clarified?

Annex V, Part 2, paragraph 89 clarifies the definition of “specialised lending” and aligns it with Article 147(8) CRR. Accordingly, “specialised lending” comprises the four sub-categories project finance, object finance, commodity finance, and income-producing real estate (IPRE).

Article 147(8) CRR is located within the framework of provisions for institutions using internal models (IRB approach). For institutions applying the standardised approach (KSA), the question therefore arises as to whether—solely for FINREP purposes—the process for identifying “project finance loans” must in fact be extended to include an assessment of “specialised lending” in connection with (IPRE) real estate financing. This would entail additional procedural burdens without a sufficiently clear prudential benefit.
We therefore propose that institutions applying the standardised approach be exempted from this additional, complex assessment and that “income-producing real estate (IPRE)” be excluded from the definition of “specialised lending” for these institutions.

Simplification

* **Question 21.** Do respondents believe that the proportionality introduced for small and non-complex institutions to report the templates F 10 and F 11 on derivatives can effectively reduce the reporting costs for these institutions? If not, please provide the rationale backing your view.

The proposed changes include implementing a new threshold for determining whether an SNCI must quarterly report those templates. Given the fact that the classification as an SNCI already presupposes compliance with the relevant threshold, adding another threshold that must be monitored and calculated doesn’t result in an overall reduction in reporting costs. Hence, we suggest that the status SNCI should be sufficient for waiving the templates F 10 and F 11.

In addition, the proposed approach to “proportionality” is to a large extent already reflected in the existing ECB framework, particularly through the data point model applicable to LSIs with total assets of €3 billion or less. In that regard, the proposed deletion of the templates F 11.3 and F 11.03.1 will not reduce any burden for LSI or SNCI since those templates are already out of scope of reporting, provided that the DPM remains in place, see Q19.

* **Question 22.** Do respondents believe that the simplification proposal of the template F 22.01 ‘Fee and commission income and expenses by activity’ by deleting or bundling some details under the activities of ‘Securities’, ‘Corporate finance’, ‘Custody’, ‘Payment services’ and ‘Customer resources distributed but not managed’ can effectively reduce the institution’s reporting cost? If not, please provide the rationale backing your view.

Regarding LSI:
No. For less significant institutions (including SNCIs), this will not lead to a reduction in costs or operational burden, as template 22.01 is required to be submitted only by Significant Institutions.

For SI:
We welcome the reduction of the data to be reported for templates F 22.01 and F 22.02, as well as the corresponding structural alignment of both tables. Although the effort to generate the data is not reduced significantly, the reduction is nevertheless noticeable.

* **Question 23.** Do respondents believe that the introduction of the additional layer of proportionality for templates F 20 where foreign exposures less than 1% are aggregated in z-axis ‘Other countries’ can effectively reduce the institution’s reporting cost? If not, please provide the rationale backing your view.

No.
On the contrary, this would lead to additional burden. First of all, the balances would have to be collected group-wide for all individual countries, as is currently the case, so that a threshold test can take place to determine whether or not they are above the 1% threshold. Both the review of the threshold value and the subsequent merging of different countries into "Other countries" represent additional work steps that have not yet been required. Raising this threshold to 10% would align with standard materiality principles. Alternatively, allowing institutions to report all countries directly without mandatory threshold-based clubbing would eliminate the need for complex, run-time data aggregation logic.

For less significant institutions (including SNCIs), this will not lead to a reduction in costs or operational burden, as templates 20.01 to 20.03 are required to be submitted only by Significant Institutions. As for the templates F 20.4 – 20.06, only a marginal number of LSIs with more than 3 billion assets will see some relief.

* **Question 24.** Could respondents describe and quantify the reporting costs associated with providing the information of template F 31.02 ‘Related parties: expenses and income generated by transactions with’? Do respondents believe that the deletion of this template can effectively reduce the institution’s reporting cost?

Regarding LSIs, the deletion of this template does not effectively reduce reporting costs since as of now, template F 31.02 is only to be reported by large institutions.

The deletion of this template can only effectively reduce reporting costs for large institutions or significant institutions (SI), respectively.

The preparation of Template F 31.02 is one of the very complex processes in FINREP reporting. The effort stems from the fundamental challenge of identifying and collecting the underlying data. The maintenance of the large and dynamic group of natural persons relevant under IAS 24 (members of the management board, members of the supervisory board, their close family members, and entities controlled or significantly influenced by these persons) is a highly sensitive, manual process that requires close cooperation between Compliance, Human Resources, and Legal departments and must be continuously updated.

In contrast to F 31.01, which only requests balances as of the reporting date, F 31.02 requires the capture of all income and expense transactions over the entire reporting period. For this purpose, every single income and expense entry in the systems must be checked to see if the counterparty is on the list of "Related Parties". This process is very complex, error-prone, and resource-intensive. The costs are disproportionately high compared to the low additional informational value.

We therefore strongly welcome the proposed deletion of Template F 31.02. This represents a very effective measure to reduce the complexity and costs of FINREP reporting without compromising the transparency of the main risk positions.

* **Question 25.** Could respondents describe and quantify the reporting costs associated with providing the information of template F 40.02 ‘Group structure: ‘instrument-by-instrument’? Do respondents believe that the deletion of this template can effectively reduce the institution’s reporting cost?

Regarding LSIs, the deletion of this template does not effectively reduce reporting costs since as of now, template F 31.02 is only to be reported by large institutions.

The deletion of this template effectively reduces reporting costs for large institutions or significant institutions (SI), respectively. We support this deletion as it leads to a material and immediate cost reduction.

* **Question 26.** Cost of compliance with the reporting requirements: Is or are there any element(s) of this proposal for new and amended reporting requirements that you expect to trigger a particularly high, or in your view disproportionate, effort or cost of compliance? If yes, please:

- specify which element(s) of the proposal trigger(s) that particularly high cost of compliance,
- explain the nature/source of the cost (i.e. explain what makes it costly to comply with this particular element of the proposal) and specify whether the cost arises as part of the implementation, or as part of the on-going compliance with the reporting requirements,
- offer suggestions on alternative ways to achieve the same/a similar result with lower cost of compliance for you.

Certain specific requirements (particularly regarding collateral and fair value breakdowns) can be resource-intensive to implement. See also answer to question 27.

The requirement in template 27.01 to identify counterparties that are "primarily involved in private credit activities" is operationally challenging and yields negligible supervisory value. The definition contained in the Annex as well as the general use of the term is generally very broad and not very specific. Classifying the main business activities of companies, especially within other financial corporations, in a consistent and continuous manner poses enormous conceptual and technical challenges for the reporting institutions. Due to the broad definition, we assume that there will be very different conversions in terms of content among FinRep users, so that only a very limited comparability of the data is given. Furthermore, demanding a sub-sector breakdown for the “Debt Securities Issued” line is conceptually illogical. The reporting institution is the issuer of the debt. Requesting a sub-sector breakdown of the issuer is redundant and concetually flawed, as the reporting entity’s own sector is already statistically defined.

As for the integration of stress test data, we refer to Q27 and module 4.

Question 27. Do respondents have any further comments on the proposed simplification measures?

We generally welcome the EBA’s objective of enhancing proportionality within the FINREP reporting framework. However, proportionality is already ensured under the current supervisory framework (see Regulation (EU) 2015/534 (ECB/2015/13) and its subsequent amendments). The system established by the ECB differentiates between four reporting scopes, primarily based on the size and complexity of institutions, and has become a well-established and widely understood practice.In this context, it is currently difficult to assess how the EBA’s proposed measures — especially the “core and supplement approach”, under which small and non-complex institutions would only be required to submit “core templates” — can be effectively aligned with the existing ECB framework. A lack of consistency between these two approaches would create significant uncertainty and operational challenges. Moreover, many of the simplification measures proposed in the consultation paper already appear to be largely reflected in the current framework. In particular, the ECB’s differentiation between data point reporters, (over-)simplified reporters, and full FINREP reporters already ensures a proportionate application of reporting requirements. For example, templates F 15, F 17.1–F 17.3, F 30, and F 41.1 to F 46 - proposed to be waived for SNCI – are already not part of the reporting scope for data point or over-simplified reporters. Several of these templates are only required from significant institutions (SIs) under the full FINREP framework and are not applicable to less significant institutions (LSIs).
Against this background, we are concerned that the proposed measures would not result in any substantial simplification for smaller institutions. On the contrary, should the EBA proposals replace the current ECB framework entirely, institutions with a balance sheet total of less than EUR 3 billion could face a significant increase in reporting requirements – see for example EBA suggestions for “core” templates F 03.00 to F 04.10: These template are currently not to be submitted by LSIs with equal to or less than EUR 3 billion assets. Yet, EBA suggests those templates need to be submitted by all institutions. These potential enhanced reporting requirements will be associated with considerable additional costs and would ultimately contradict the objective of enhanced proportionality.
In light of the above, we strongly encourage the EBA to closely coordinate with the ECB before finalising its proposals and to work towards a consistent and aligned solution that avoids any increase in reporting burdens for smaller institutions and nGAAP-institutions. In general, the reduction in the number of data points in the FINREP module is not material. For less significant institutions (LSIs) and nGAAP-institutions treated as LSI for stress testing purposes the integration of stress test data is not a simplification but exclusively an additional burden as they are not a subject to the EU wide stress test. It should be ensured that the new templates for the EU-wide stress test are to be completed only by the institutions participating in that stress test. LSI incl. SNCIs and nGAAP-institutions treated as LSI for stress testing purposes which are not participating in the EU-wide stress test should not be required to complete these templates (e. g. F 49.01, 49.02, F 50.0) or data points (e.g. in F 16.3F and F 16.8), as they would otherwise be indirectly obliged to contribute to the EU-wide stress test. For SIs under ECB supervision this integration means increasing the reporting frequency, significantly cutting the submission deadline and material workload/costs at least in the short and middle term.
In addition, given the large number of proposed amendments — excluding those related to IFRS 18 and possibly the amendment to the definition of SME for FINREP — the envisaged implementation timeline appears highly ambitious. Implementing these changes by 30 September 2027 would be particularly challenging. Different steps are to be completed by banks and software providers: conceptual and technical analysis, identification and filling data gaps, etc. Prior to go-live, appropriate testing of the IT-infrastructure must be

carried out. For this testing, at least one quarter is required (provided the implementation can be completed in a single test cycle, which is unlikely given the scope of the ITS changes). Any identified errors require corrections, provided in the next software release (3 months later at the earliest).We therefore strongly encourage postponing the first reporting reference date to September 2028, thereby ensuring at least 12 months between the final publication and the initial reporting date.Finally, we propose the use of unchanged numbering of instructions for simplifying the implementation of changes in instructions: New items should get alternative number using alphanumeric suffixes (e.g. 113a, 113b) without altering the existing sequence.

Contact

Contact Form

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Consultation Paper on changes to ITS on supervisory reporting: Module on operational risk losses

Fields marked with * are mandatory.

Introduction

The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions detailed below.
Comments are most helpful if they:

- respond to the question stated; indicate the specific point to which a comment relates;
- are supported by a clear rationale;
- provide evidence to support the views expressed/ rationale proposed; and
- provide alternative regulatory options for consideration by the EBA.

Important note to users:
All the fields marked (*) are mandatory. In case a question is not relevant for you, please answer with "Non-Applicable" or "NA". Please note that the maximum length of the answers to any single question is technically limited by the tool to 5000 characters.
All contributions received will be published following the close of the consultation, unless you request otherwise by ticking the relevant box in the form below. Please note that a request to access a confidential response may be submitted 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.

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Should you encounter issues with submitting your responses, please contact us by email at *eba.consultation@eba.europa.eu* no later than 48 hours before the deadline of the consultation period.

Please provide your responses by **10 July 2026 23:59 CEST**. Late responses will not be considered

Many thanks for your cooperation and support!

Who is responding

* Name of the organisation

German Banking Industry Committee

* Contact name

Christoph Friedrich

* Contact email

c.friedrich@bvr.de

* Disclose comments

- (x) Yes
- ( ) No

Questions for consultation

* **Question 1.** Do the respondents agree with the proposed switch to granular operational loss reporting considering the granularity of the new operational risk taxonomy?

We support in principle the supervisory objective of increasing transparency and comparability of operational risk losses through a more granular taxonomy. In particular we welcome that the existing proportionality arrangements and reporting thresholds under Article 316 CRR will remain unchanged.

A simplification of supervisory reporting is in principle to be welcomed. However, the present draft does not take this consideration into account in the area of operational risk. Moreover, it is partly inconsistent with the most recent version of the EBA RTS 2025/03 on the operational risk taxonomy (see below). We object to requirements going beyond, or deviating from, the OR loss data recording framework set out in the RTS on operational risk taxonomy.

While reporting at the level of individual loss events might in principle reflect institutions’ internal data structures, the proposed design in its current form and granularity does not achieve a proportionate and efficient reporting framework.
The control and management of individual events are inherent responsibilities of the institutions; for this purpose, granular individual data are collected and maintained internally. However, processing these data for supervisory purposes would be burdensome and would lead to high implementation costs. For supervisory purposes, we consider aggregated, quality-assured loss information at an appropriate level of detail to be sufficient to assess risk developments, key operational risk drivers, and concentrations.

The required classification using a large number of Level 2 categories and mandatory attributes introduces significant implementation complexity. This requires substantial enhancements to data models, taxonomy mapping, controls and governance processes, particularly where internal loss data systems are not aligned with the proposed taxonomy.

Furthermore, we request a critical review of the additional new fields, in particular “Event ID”, “Record Type”, “Event Status”, “Primary Event”, “Loss Adjustments”, “Pending Losses”, and “ICT Risk – related to Cyber” (see response to Question 3). Overall, the concept of data submission appears to be incomplete and insufficiently developed. The further explanations under Q3 illustrate this. In addition, numerous outstanding issues create a risk of misunderstandings regarding the approach to data exchange based on the current draft.

In our view, the new fields serve almost exclusively data management purposes, much of which could largely be derived automatically. Decentralising and manually capturing such information does not appear appropriate—also in light of potential data entry errors—either from a time or a substantive perspective. Against this background, we kindly request a revision of the draft accordingly.

* **Question 2.** Do the respondents agree that the move to the granular reporting of operational risk losses will help reducing reporting costs and increase efficiency of the reporting framework?

Based on the current draft, the benefits of granular reporting compared to the existing reporting framework are not sufficiently apparent, while at the same time incurring additional implementation costs. This conceptual redesign does not allow for building on the results of the existing reporting framework. Moreover, the draft introduces additional new data points whose usefulness from the institutions’ perspective is not evident (see Q3).

These would need to be integrated into existing data architectures and require methodological adjustments, resulting in high implementation costs and therefore not constituting any real relief. An increase in costs arises, inter alia, from the following aspects:

a) The additional requirements/data points at individual data record level—beyond the taxonomy—for granular reporting (e.g. with regard to fields such as “Primary Event” or “Record Type”), “Event Status” or “Pending Losses lead to increased effort.

b) The differentiation of loss events into “update” and “correction” is technically complex to implement, ambiguous in practice and should be replaced by a single ‘Update’ record type (see Q3).

c) Further supervisory reporting requirements for operational risk loss data (e.g. for disclosure purposes) will still require aggregated reporting of loss data sets. As a result, a (potential) synergy effect in terms of reducing reporting effort and costs is not achieved.

In addition, the proposed requirements for the transition to granular reporting deviate from current specifications on data preparation for other supervisory submissions. For the purpose of reducing the effort involved in reporting, harmonisation should be ensured. This is illustrated, for example, in PART II: TEMPLATE RELATED INSTRUCTIONS 4.2.3.1 General Remarks No. 157:
(1) “Only loss events with a gross loss amount of EUR 20,000 or more shall be reported…” By comparison, the disclosure threshold is based on the net loss amount.
(2) “In cases where a negative adjustment causes the cumulative gross loss amount to fall below the threshold of EUR 20,000, the loss event should nevertheless continue to be reported…”
This requirement should also be harmonised, for example, with the disclosure framework.

*** Question 3.** Do the respondents agree that the proposed granular reporting template is clear and fit for purpose of the underlying regulation?

The template appears to need improvement (see also Q1, Q2, and Q4):
- Event ID (and Primary Event)
The Event ID is intended to be a unique key that allows events to be consistently identified and assigned. In our view, the current proposal for C 17.01 does not meet this requirement. If correctly understood, several "primary events" may need to be reported for a single "Event ID". Instead, a sequential number could be added to the Event ID, making the reporting of primary events unnecessary. In addition, multiple data records would have to be submitted in the reporting period in the case of adjustments and deletions of a loss event. We prefer an aggregated view of the event, as a breakdown into individual components would entail significant effort for institutions. See also Q4.
The EBA should clarify whether the Event ID identifies the operational risk event only, or whether it is also intended to govern the grouping of related records across legal entities, business areas and classifications.

- Record Type
The values "Insertion" and "Deletion" in the Record Type field can be derived through an automated comparison of two data sets across reporting periods. Since deleted records are removed from the current dataset of a loss event collection, the question arises as to the benefit of an additional resource-intensive submission for supervisory purposes. We do not consider the marking as "erroneously" to be appropriate.
For the differentiation between new events and loss adjustments (as per comments on column 0020), we believe that the record types "Insertion", "Update", and "Deletion" are sufficient. The record type "Correction" does not provide any additional informational value. Distinguishing adjustments to existing loss events between "Update" and "Correction" would require all adjustments within a database to be categorised accordingly. Consequently, a loss event would have to be updated and flagged twice if both types apply. This seems disproportionate(see also Q4).
Where a single previously reported event undergoes both a factual change in amount, which would individually qualify as an "Update", and the rectification of an erroneously reported data field, such as Event Type, which would individually qualify as a "Correction", it is unclear which Record Type should prevail.

Event Status: The distinction between "still ongoing" and "concluded" in the "Event Status" field is not viable. This applies particularly to complex cases that extend over long periods, where the conclusion cannot be determined with certainty (e. g. legal cases). Therefore, this field has only limited utility and should be removed. For further issues, see Q4.

Loss Adjustments: Loss Adjustments can be identified automatically through a period comparison between the current dataset and prior-period data. The benefit of this field is not apparent and it should be removed.

Positive/negative signs for values (i.e. Gross Loss, Loss Adjustments):The draft contains contradictory statements in this regard. In our view, positive and negative values depend on the underlying data management concept and the method of data submission. The reporting treatment of reductions in previously recognised gross losses is also unclear (instructions states that loss figures should always be reported with a positive sign).

Pending Losses: We believe that this field does not provide added value and cannot be populated consistently. It was removed from the RTS on OpRisk Taxonomy and should be removed here as well. If the field is retained, elaboration is needed on its interaction with provisions, reserves, suspense accounts and partial settlements. Art. 318(2)(d) CRR refers to pending losses stemming from operational risk events with a definitive financial impact which are temporarily booked in transitory or suspense accounts and are not yet reflected in the profit and loss accounts. It is thus unclear whether provisions or reserves for operational risk events, where the final loss amount has not yet been determined or fully realised, should be classified as Pending Losses.

Date of Accounting: We consider the allocation of a loss to a quarter to be sufficient and in line with current internal procedures of many institutions. It is unclear how losses should be reported if events/bookings occur over multiple accounting periods. The proposal should clarify what exactly is meant by “accounted for the first time”. This is particularly relevant where a reserve is decided after year-end but booked with an accounting date in the previous year and entered into the loss database only in the following year.

ICT Risk – related to Cyber: The information on whether an operational risk loss event is related to a significant ICT-related incident, and whether it has already been reported under Art. 19 DORA, is currently not collected. Furthermore, DORA reporting differs in substance from operational risk loss data reporting.

* **Question 4.** Do the respondents agree that the instructions for the regular reporting template C 17.01 are clear and fit for purpose?

No, under Questions 1 to 3 we have already highlighted several issues with the proposed template. Additional points that require improvement are outlined below:

• Data point “Event ID” and the requirement regarding related individual loss data records:
“The assignment of progressive numbers shall be coordinated at the Group level. For example, if the internal group identifier "x" reported by one entity to the parent company refers to the same event whose losses are reported with internal group identifier "y" by a second entity, the parent company shall be responsible for assigning progressive reference number "z" to both the records before reporting.”
This requirement is technically complex and costly to implement. In standard loss data systems, a sequential number is typically assigned automatically to each newly recorded loss event, which corresponds to the Event ID. We therefore propose introducing an additional data point containing a sequential group identifier for related records. A unique group identifier would allow all related records to be clearly identified.

• Column 0020 Record Type (see also Q3):
It is not clear which Record Type (Update or Correction) should be selected if both apply. Example: compared to the previous submission, the loss amount has increased. During the adjustment, an incorrectly selected loss event category was also identified and corrected. Should this be reported as an “Update” or a “Correction”?
It remains unclear which types of changes to reported data points trigger an update and which trigger a correction. For simplification, merging both Record Types would be more transparent and practical. All adjustments should be reported using Record Type = Update. This should include corrections of previously reported data fields. If the EBA nevertheless retains both categories, a clear hierarchy is needed for cases where both apply in the same reporting period.

• Change in timing:
Which data points are referred to by “changes in timing” as examples for Updates? In practice, it is entirely possible that a reported closed loss event (Event Status = CL) is adjusted ex post in terms of amount (e.g. due to outstanding legal costs or subsequent insurance recoveries). In addition, internal workflows may result in a loss event being marked as closed and subsequently requiring changes (e.g. when loss data are used in internal models – such as for monthly closing – and the process follows a four-eyes principle in operational risk controlling, leading to a loss event being set to closed).
Should such cases be treated as a correction and/or an update?
In the case of a correction and the requirement to report only one row per loss event (cf. paragraph 154), only column 0120 – Gross Loss would change compared to the previous submission, even though the gross loss itself was not incorrectly reported, but rather the Event Status. From this perspective as well, a deletion of this requirement would be appropriate.

• Further questions:

- lifecycle treatment of loss events. In particular how Event Status interacts with Pending Losses in cases of partial settlements, residual provisions, ongoing legal fees or additional losses identified after an event was reported as Closed. - The instructions should also specify objective criteria for assigning Primary Event = Y, for example by reference to the record with the highest gross loss amount per Event ID, legal entity and business area.

- Interaction between Event ID, Primary Event and Level 1 / Level 2 classifications Must all records sharing the same Event ID carry the same Event Type, does the Primary Event determines the classification at consolidated level, and how events involving multiple Event Types within the same legal entity and business area should be reported.

- Column 0040 Primary Event:

It remains unclear at what level of granularity so-called aggregated loss events should be reported. Is our understanding correct that individual losses belonging to a grouped loss event must each be reported in a separate row, using the overarching aggregated loss event identifier?
Is it left to institutions' discretion to determine the logic according to which Primary Event = Y is assigned?
Aggregated loss events and their related individual losses typically share the same loss event category.
According to which decision logic should the value "Y" be assigned?
We also question whether all related loss events that are grouped into a single record in aggregated reporting must be reported at individual record level in this granular report, or whether there are scenarios in which such groupings may also be reported in aggregated form.

- Column 0050:

This instructions for column (0050) appear contradictory, as events that have not been reported previously can also be subject to adjustments (e.g. if a reporting threshold is exceeded in a subsequent year).

* **Question 5.** Do the respondents agree that, in case that the Loss adjustments refer to a loss event that was not previously reported, as accounted for the first time in previous financial years, such loss event should be reported regardless of when the original loss event has been accounted for the first time (column 0050)?

In principle, we agree, as this approach is consistent with the existing practice; however, we consider column 0050 to be redundant.

Furthermore, for past events, institutions should be explicitly permitted to rely on best-effort reconstruction approaches. Where complete historical event attributes are no longer available, this should include the use of documented proxy classifications as well as appropriate data quality annotations to ensure transparency regarding the underlying limitations.

This should not require a full retrospective reconstruction of all reporting fields for historical events. Institutions should be allowed to rely on the data available in their loss databases at the time and, where necessary, on documented best-effort assumptions or proxy classifications.

* **Question 6.** Do the respondents agree with the proposed approach to one-off reporting of 10-year operational loss history for the starting point?

In principle, we agree; however, we would like to raise the following concerns:
The proposed one-off reporting is very extensive and deviates significantly from the existing reporting framework. Its implementation is expected to entail considerable additional costs, including substantial "sunk costs." In our view, the added value of this one-off reporting is questionable, and it should therefore be

reconsidered or potentially omitted.

In this context, it is worth assessing whether the reporting format used for disclosure purposes (OR1 template) would be sufficient. Such an approach would considerably ease the burden on institutions, as this format is already established and implemented.

If the disclosure format were deemed insufficient, it would be essential to ensure that the derivation of the 10-year historical data is fully aligned with existing methodologies. This alignment should be explicitly clarified within the regulatory text to provide legal certainty and to avoid additional implementation costs.

* **Question 7.** Do the respondents agree that the one-off reporting template is clear and fit for purpose of the underlying regulation?

In principle, the template is understandable. However, we would like to raise the following point regarding the threshold:
The two new templates apply different threshold criteria (based on gross loss amounts for C17.01 and net loss amounts for C17.02). This should be aligned.

It remains unclear how to treat new loss events and loss adjustments (number and gross loss amount) that were recorded in previous periods but are reported for the first time in the current period due to delayed entry into the loss event database. In particular, it is unclear to which year such loss events should be attributed (year of booking or year of reporting).

For reasons of consistency, the year of first reporting should be considered the relevant reference point.
The interaction between the accounting date, the notion of “accounted for the first time” and the allocation of loss amounts to reporting periods need some clarification on how subsequent changes in loss amounts (e.g. adjustments, recoveries or reallocations) are to be reflected across reporting periods, especially in cases where recognition and reporting occur in different periods.

* **Question 8.** Do the respondents agree that the instructions for the one-off reporting template are clear and fit for purpose?

The requirements are generally clear; however, there is a need for several clarifications:

- Direct loss recovery:
With regard to the definition of “direct loss recovery” (i.e. all loss mitigation measures except insurance) in the current draft, the previously applied distinction between direct (i.e. without prior premium/contribution payments) and indirect loss mitigation (i.e. involving prior premium/contribution payments, for example also within guarantee schemes) is altered. We kindly request that this definition be aligned with the existing approach, in particular as current loss event data collections are based on this established distinction.

- Different requirements (gross/net):
The EBA itself acknowledges that the information reported per column and event category (Level 1) should, in principle, be derived from the data provided in template C17.01. However, in order to accelerate the build-up of a historical time series, the aggregated reporting template C17.02 is required as a one-off submission with the reporting reference date of 31 December 2027. It will not form part of the regular (semi-annual) reporting for operational risk loss events. In this context, the existing templates C17.01 and C17.02 are intended to be replaced by a new template C17.01.
However, this approach is not feasible, as for the (one-off) template C17.02, a threshold of EUR 20,000 based

on net loss amount applies, in accordance with Article 318 CRR, whereas the instructions for C17.01 explicitly define a threshold of EUR 20,000 based on gross loss amount for reporting relevance. As a result, in general, more loss events would be included in C17.01 than in the first column of C17.02.

- Pending losses:
We are of the view that the field “pending losses” (row 150) does not provide additional value and would not be filled in a consistent manner. This field was originally included in the RTS on the operational risk taxonomy but was subsequently removed during the consultation process.
If retained, we are uncertain how pending losses interact with provisions, reserves, suspense accounts, partial settlements and Event Status. In particular (i.e. partially resolved events with a residual provision).
If the format applied in template OR1 is deemed insufficient, it is essential that the derivation of the 10-year historical data for the new template C17.02 is fully aligned with existing approaches. This alignment should be explicitly clarified in the regulatory text.

* **Question 9.** Do the respondents agree with the proposed approach to the transitional arrangements for reporting operational risk losses in 2026 and 2027 until the application of the revised ITS on supervisory reporting?

In principle, we would recommend refraining from the introduction of the one-off reporting requirement.

According to paragraph 17 of the consultation paper (EBA/CP/2026/07, Module 3), it is not sufficiently clear which templates (new reduced or existing reduced) are to be reported as of 30 June 2027 (and potentially already as of 31 December 2026). It is only clear that the new templates are to be reported in full as of 31 December 2027.

For the purpose of ensuring legal certainty, planning reliability and a sufficiently long implementation timeline, it would be beneficial for institutions to continue using the existing templates C17.01 and C17.02 up to and including the reporting reference date of 30 June 2027.
In this context, it remains unclear to what extent this approach is covered by option 2c.

Contact

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Contribution ID: 4a73034e-2e4b-4f49-b0ac-a4608ba7f6e6
Date: 10/07/2026 15:54:46

Consultation Paper on changes to ITS on supervisory reporting: Module on stress testing

Fields marked with * are mandatory.

Introduction

The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions detailed below.
Comments are most helpful if they:

- respond to the question stated; indicate the specific point to which a comment relates;
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Many thanks for your cooperation and support!

Who is responding

* Name of the organisation

German Banking Industry Committee

* Contact name

Christoph Friedrich

* Contact email

c.friedrich@bvr.de

* Disclose comments

- (selected) Yes
- No

Questions for consultation

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

We recognise that integrating specific data points from the EU-wide stress tests into regular reporting does, at base, have the potential to improve data quality and the process of EU-wide stress testing (in the ADC phase) over the long term. However, the integration of stress test data into regular reporting should be based on the premise that it can demonstrably reduce ad hoc queries and data reconciliations for stress tests and improve consistency across the various reporting requirements.

However, we do not believe that this measure will result in an appreciable reduction of the burden on institutions. We do not understand the assumption that the number of data fields to be filled out in the templates will be reduced by 55 percent. In many cases, data are no longer required only every two years (as part of the regular EU-wide stress tests), but now at least once a year, sometimes even within a year (depending on the classification of the bank). It is not clear to us that transmitting data more often provides any added value in the context of stress tests. If, in light of the need for up-to-date data for stress testing purposes, an increase in reporting frequency becomes necessary, we recommend refraining from integrating this into regular reporting and limiting it to ad hoc queries.
In addition, new requirements are constantly being added to the EU-wide stress test; CRR III data was added to the EU-wide stress test 2025, and the EU-wide stress test 2027 will include a climate risk stress test. We also do not think that including fewer data necessarily means fewer burdens or costs, particularly not if the data in question is highly complex. This is particularly true for automated data delivery.

Quite apart from that, the requirement to integrate the stress test data into reporting is new and, as currently written, will result in higher burdens and costs, at least over the short term. Institutions will likely have to make fundamental adjustments to their data collections and systems. This will affect different departments within the bank, in particular financial reporting, supervisory reporting (COREP, FINREP, ESG), risk management, pillar 1, pillar 2. This presents major challenges, particularly in terms of the requirement to fundamentally change the underlying credit risk data from COREP to FINREP. Not to mention the additional burden on institutions during the EU-wide stress test 2027, as the draft shows that climate risks are also going to be taken into account as part of credit risk. We welcome the fact that the EBA has released the new templates for consultation in good time. However, ensuring that the necessary adjustments to the new reporting structures are complete in time for the stress test in 2027 will be disproportionately challenging and costly for many institutions. In addition, experience shows that the data quality checks performed by supervisors are highly demanding.

In order to ensure that institutions, the EBA and the ECB have an adequate amount of time to prepare for this new form of data collection, thus ensuring that the transition is as smooth as possible, we urgently request that the underlying credit risk data for the stress test 2027 use the established method (e.g. COREP). Due to the high degree of complexity in the upstream implementation project, which will involve internal and external development partners, we firmly believe that it is in everyone's best interests for the new process to go into effect at the earliest for the 2029 stress test.

In addition, the transition can only take place if reporting data is stable, which means avoiding major changes due to a constant stream of new regulatory requirements or changing definitions, as has unfortunately been the case in the past.

There should be a guarantee that the new templates for the EU wide stress test are only to be filled out by the institutions taking part in the stress test. SNCI's and institutions subject to national supervision that are not taking part should not have to fill out the templates; anything else would represent an indirect requirement to take part in the EU wide stress test.

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

No. There are simply too many unanswered questions at this time, particularly questions of method. While the risk variables (e.g. risk provisions, RWA) are fundamentally based on regulatory definitions (e.g. FINREP /COREP), they often require specific methodical deductions, additional assumptions or increased granularity, which are not directly available in the form required within the reporting system and must therefore be converted.

In addition, while there are now drafts for the relevant reporting system templates, ad-hoc stress test templates and stress test methods, there are still uncertainties in regard to the final designs. Not only that, paragraph 10 of the stress test module indicates that there will be additional ad-hoc data collection for the EU wide stress test itself as well as the climate stress test, which represents another unknown cost driver.
In terms of the market price risk, we question the introduction of new sensitivities reporting (Template F.50). Paragraph 35 of the module states that this template will not replace sensitivity reporting within the stress test, but rather that the stress test will include a more granular ad-hoc template. This represents twice the work for the institutions, and thus in our view directly and obviously contradicts the stated objectives of simplification and relief.

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

No, not in regard to the fact that some reporting will now be required on a quarterly basis. This will significantly increase the amount of effort required for some banks. In addition, it is important to take into account that the switch from EU wide stress tests every two years to annual data collection represents a considerable increase in reporting frequency. Annual data collection should be the maximum frequency required (e.g. for credit risk templates F 49.01 and F 49.02).

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

Yes, not least because many of the credit risk parameters required for F 49.01 are only partially available in the IFRS 9 calculation engines; they are not directly available in FINREP with the necessary level of detail and methodological consistency.

To specify, there is need for further clarification as to how the risk indicators and parameters required by the stress test can be consistently converted for FINREP. As a general rule, IFRS9 based accounting follows different objectives and uses different types of aggregation than supervisory risk reporting, leading to discrepant definitions, calculations and granularity. We are concerned that there will be no way to convert indicators and parameters for use in FINREP without additional interpretation and transformation. We are particularly concerned about the parameters TR1-2 and TR2-1, as these are not necessarily required for classification in accordance with IFRS9, meaning that many institutions do not have access to them, requiring that they be derived specifically for the EU-wide stress test in accordance with the specifications.

Furthermore, as FINREP reporting uses its own rules and aggregation requirements, we are additionally concerned that the switch will limit the ability to verify and analyse indicators and parameters, in particular in regard to their derivation from underlying risk models. For example, variables such as the gross carrying amount or risk provision values are aggregated in regulatory reporting. As such, any direct verification of stage migration or risk provision development on the individual item or transaction level within the stress test will only be possible to a limited degree, and will require additional harmonisation efforts.

In addition, it is important to take into account that derivation of the starting point parameter in previous EU wide stress tests was done using clear methodical requirements (see also EBA Methodological Note 2025, Section 2.4.1). Reporting on specific parameters, in particular TR1-2, TR2-1, and even TR3-1 and TR3-2, necessarily requires assumptions and modelling. For integrated reporting, it is important that consistent requirements remain in place, ensuring that all institutions use the same derivations and assumptions. It is currently unclear, in regard to integration into FINREP, how to continue to guarantee consistent methodical requirements. There is a risk of institutions applying differing assumptions, as well as mapping and derivation approaches, which will have a significant negative impact on the comparability and informative value of reported credit risk parameters.

It will also be important to take into account that parameters that are key to the stress test, such as transition dynamics (e.g. stage migration), exposure developments, scenario assumptions or cashflow projections, are not available in this form or in comparable granularity in FINREP reporting, especially not on the individual transaction level. These amounts will have to be derived from risk models or larger data warehouses, requiring additional interpretation and coordination processes.

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

Yes, difficulties are expected. As mentioned above, many risk parameters, such as the CCF, are not reported in FINREP, and, in particular, not at the required level of granularity.
This would therefore pose significant difficulties for the banks.

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

While the definition of the adjusted opening balance in passages 405 to 409 in Annex 2 of Module 2 (39. CREDIT RISK STRESS TEST INFORMATION [Template F 49.01 – 49.02]) is described adequately, this reporting variable is not a standard indicator, but rather requires a retroactive reconstruction of the engagement and the stage transition during the reporting period. This will create significant operative and technical burdens and should be supported with clear examples and proportional application.

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

need to be converted from IFRS. Secondly, there is no single data source that contains all the data required for F 49.02. In particular, not all data are available for the entire time period in question. There is clarification on the required data fields in the stress test for nGAAP institutions (EBA Methodological Note, Annex VI: Requirements for banks applying nGAAP), it would make sense to include an equivalent clarification for FINREP.

Due to (historic) changes in the institutions' data infrastructures and databases, and due to changes to supervisory regimes, we do not believe that it is possible to provide historic data with the same structure. In our view, this would involve significant burdens at great cost for institutions, for no clear added value. Alternatively, supervisors could use the old EBA stress test data/templates.

It is also important to take into account that template F 49.02 is, to a large extent, based on already existing FINREP templates (in particular 4.4.1, 18 and 12.02 for SIs), meaning that it does not, fundamentally, contain any completely new data requirements. For LSIs, however, the main burden arises from the fact that stage transitions, not previously taken into account, will have to be reported on for the first time. Even in the event that individual transfers, primarily in conjunction with stage 2 for nGAAP institutions, may no longer be required, the burdens for implementation are still very high. They arise from technical integration, data preparation and the increased granularity of the requirements, and will vary strongly between institutions.

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

The ad hoc stress test templates published by the EBA as a draft on June 11 2026 indicate that they have been closely aligned with the templates from consultation EBA/CP/2026/07 - particularly with regard to the separation of CSA (credit standard approach) and IRBA (internal ratings based approach).

One challenge that arises, however, is that the new FINREP focus in CR_SCEN (F.49) complicates both transfer and consistent accounting for new defaults and impairments. This is, however, more of a challenge for the projections than for the reporting templates.

* **Question 9.** Do respondents see as an efficient reduction of reporting cost the implementation of a materiality threshold on the geographical dimension in C09.05 (i.e. no data would be requested for countries representing less than 1% of total exposures), compared to reporting all countries irrespective of materiality? If not, please explain.

In principle, a materiality threshold on the geographical dimension would be an appropriate relief measure, as the data for countries with particularly small shares of the total exposure do not contribute any significant added value for the stress test. However, determining the materiality threshold could be even more burdensome for institutions than simply filling out the full template. In addition, the threshold would always have to be tested during production. The template then has to be filled out based on the results of said test. The burden could in fact in some circumstances be lower if an institution did not carry out the test and simply filled out the template in full. As such, materiality thresholds should be optional.

Reducing complexity would be the best way to grant relief, but there is no sign of that here.

We find it concerning that the rules may become more rigorous compared to the EU-wide stress test 2025. According to the ITS draft, paragraph 25, reporting institutions for which more than 10% of exposures are non-domestic must report the geographical dimension with a detailed breakdown by country. In comparison, the EU-wide stress test 2025 (Annex IX) included a proportionality rule for smaller banks, according to which only 75% of exposures and/or only the 3 countries with the largest exposures needed to be reported.
In light of the (current) stress test template “CSV_CR_SCEN”, which, in addition to current reporting date data, also requests data for the year t-1, it is important to ensure that there is no disadvantage for institutions in the event that t-1 exposures in accordance with ITS were not reported due to being below the materiality threshold, even though the countries in question would in fact be in scope based on t0.

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

According to the ITS draft, paragraph 26, institutions are only required to report NACE sectors with a total exposure equal or greater to at least 0.5%. The requirements for filling out template CSV_CR_SECTOR in accordance with Methodological Note on the ECB stress test 2025, paragraph 109, in contrast, stated that NACE sectors only need to be reported up to the point at which 80% of exposures are represented, and only sectors with a percentage of exposures totalling at least 2%.

We do not believe that there is any additional information to be gained by including NACE sectors with only minor exposures. Due to inadequate data available in smaller NACE sectors, we can assume that many banks will have to resort to the use of standard parameters. We suggest continuing to use the process used so far for the EU wide stress test.

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

We believe that the proposed limited geographical breakdown of administrative expenses is, fundamentally, appropriate. The ‘Top 5’ approach and the 95 % coverage seem proportional. However, this requires a clear and unified definition of identification methods, in particular for determining the 5 most significant countries (e.g. rolling or fixed, reporting date, from a group perspective).

Institutions will also be faced with operative challenges in terms of unique, verifiable geographical classification of expenses, as these are not usually directly available and must be derived from cost points or breakdowns. In light of this, there will need to be an appropriate implementation phase, as such adjustments typically cause significant IT and controlling burdens.

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

Due to heterogeneous processes for individual institutions, we are unable to make a generally applicable statement on this matter

Contact

Contact Form

Contribution ID: 4ff8c86e-70e9-4b27-a5b4-1cb755aca214
Date: 10/07/2026 15:59:31

Consultation Paper on changes to ITS on supervisory reporting: Module on Market risk and FRTB

Fields marked with * are mandatory.

Introduction

The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions detailed below.
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Many thanks for your cooperation and support!

Who is responding

* Name of the organisation

German Banking Industry Committee

* Contact name

Christoph Friedrich

* Contact email

c.friedrich@bvr.de

* Disclose comments

- (•) Yes
- ( ) No

Questions for consultation

* **Question 1. Alignment with the regulatory framework (BOU, MKR, PRUVAL, CCR, CVA)**

Did you identify any issues of the representation of the regulatory framework in the reporting framework, as regards the reporting on the boundary and thresholds, market risks, Prudent Valuation, CCR or CVA risk?

If you have suggestions on how to address these issues, please share them.

Did you identify any issues of the representation of the regulatory framework in the reporting framework, as regards the reporting on the boundary and thresholds, market risks, Prudent Valuation, CCR or CVA risk?

If you have suggestions on how to address these issues, please share them.

Suggestions:

Specific details as to how column 0255 in form C32.02 should be completed are not clear; the same applies to the cell note, which refers to an integration of stress test data. In any case, the removal of this column, as a means of simplification, would be very appreciated.

While we appreciate that templates C32.03 and C32.04 will be deleted, we believe there is room for further simplification:

C32.01:

Template C32.01 is mostly composed of information already embedded in, for example, FINREP templates and

therefore an unnecessary duplication of information.
We would suggest deleting C32.01 in its entirety or removing any information already supplied in other templates.

C32.02:
Column 0120 Upside Uncertainty:
The calculation of upside uncertainty as presented in the instruction is not foreseen by RTS 2016/101 Art. 8(2); the regulatory requirement refers to “achieve a level of certainty in the prudent value”. Upside uncertainty is the opposite of a prudent value and therefore not required according to RTS 2016/101. It is only calculated for purposes of COREP reporting. Upside uncertainty is rarely used in risk-related processes or steering of the banks and is therefore wholly obsolete. It does not bring any added value. Requiring an upside uncertainty calculation adds another layer of complexity and requires additional costly iteration of processes with no added value.
We would suggest deleting column 0120 Upside Uncertainty to simplify and focus calculation requirements on the prudent side and to avoid costly processes with no added value.

Rows 0090 to 0130:
Analogue to newly introduced requirements to present AVAs on book-level (Row 0020, 0021, 0022; see below) we have issues with the break-down to asset classes mentioned in rows 0090 to 0130, as this could be performed through AVA-specific or trade-specific population. Furthermore, the added value of the break-down to asset classes is questionable, as AVAs are calculated on an aggregated basis.

We suggest deleting the rows in question to further simplify the template and focus on the main objective of presenting calculated AVAs. At a minimum, we suggest avoiding additional distribution of AVAs from top-aggregation-level to trade-specific levels through the option to use an AVA-specific population for rows 0090 to 0130.

*** Question 2. Clarity of the reporting requirement (BOU, MKR, PRUVAL, CCR, CVA)**

Is it clear, which entities are subject to which reporting obligation?

Are the amended templates and instructions clear?

If you identify an issue, please also make suggestions on how to address that issue.

Instructions regarding Row 0020 and additional Rows 0021, 0022 in C32.02 are not clear. AVAs are calculated at Bank-level with, among other things, individual valuation exposures (e.g. sensitivities) consolidated irrespective of the trade type, fair value category, book type, etc. It is currently not clear from the instructions how AVAs should be redistributed from the consolidated level to individual book-level. Various approaches have differing shortcomings:

1. An AVA calculation at individual book-levels would potentially lead to differing and misleading AVA presentations as, for example, trading book position exposures might negate exposures in non-trading book positions, therefore leading to a lower AVA on consolidated level (i.e. Row 0010) than by the sum of individual books (i.e. sum of Row 0020, 0021, 0022).

2. A distribution by trade-level valuation exposures compared to the sum of valuation exposures might be misleading due to different signs of exposures leading to potentially confusing (even negative) book-level AVA presentations. Furthermore, the allocation logic would need to be implemented technically and would most likely be computationally challenging due to a vast amount of data created by the trade-level allocation mechanism.

3. A distribution of absolute trade-level valuation exposures compared to the sum of absolute valuation exposures might be the most fitting allocation logic but would, analogue to 2, imply the necessity of technical

implementation of this additional (due to trade-level) computationally challenging allocation logic.

In summary, an additional presentation of AVAs on a book-level seems to be an extension of the reporting requirement with additional processes that must be implemented; it is not a simplification. Furthermore, it is not clear how AVAs should be redistributed from the top-level aggregation to book-levels at which the aggregation is not done within the calculation itself.
We therefore suggest deleting rows 0020, 0021 and 0022.

Finally, we would like to request a clarification as to whether our understanding of the following instructions is correct:

• According to section 209b of the guidelines regarding Module 5 Annex 2, the template C 24.02 is to be submitted empty if the option for structural FX positions is not applied, is that correct?

• With regard to the template C32.02, the new column 0255 referencing IFRS 13.9 and IFRS 13.88, as well as the new rows 0021 and 0022 with their IFRS terminology, are not relevant for nGAAP users, is that correct?

* **Question 3. Simplification measures**

To which extent will the simplification measures proposed entail a reduction of the cost of compliance with the reporting requirements for you?
If you can, please provide quantitative estimate (by individual measure or for all the measures presented in this section).

Due to additional book-level allocation (rows 0021 and 0022), the proposed simplifications for Prudent Valuation would result in an additional process to be implemented and not reduce any costs.

Graying out items 0020/0050 in CVA Template C25.1 does not seem appropriate, since column 0050 is intended to report only derivatives (within CIUs). Therefore, graying out the row “of which derivatives” contradicts the logic of the rest of the reporting form. Adjustments to existing data-filling logic may result in unnecessary effort.

Alternative proposal for simplification: Eliminate the entire CVA reporting form C25.1 for SNCI, since SNCI has only immaterial capital requirements arising from the CVA portfolio due to its limited derivatives business, and therefore the effort required to complete the form in detail is not justified.

We welcome the fact that Form C90.5 does not need to be completed by banks with a “small trading book” as defined in Article 94 of the CRR. Provided that these banks hold FX and commodity exposures relevant to market price risk in their trading book, we assume that a corresponding disclosure in C90 is sufficient. A corresponding clarification in the documentation would be appreciated.

* **Question 4.** Cost of compliance with the reporting requirements: Is or are there any element(s) of this proposal for new and amended reporting requirements that you expect to trigger a particularly high, or in your view disproportionate, effort or cost of compliance? If yes, please:

- specify which element(s) of the proposal trigger(s) that particularly high cost of compliance,
- explain the nature/source of the cost (i.e. explain what makes it costly to comply with this particular element of the proposal) and specify whether the cost arises as part of the implementation, or as part of the on-going compliance with the reporting requirements,

- offer suggestions on alternative ways to achieve the same/a similar result with lower cost of compliance for you.

The CRR CVA exemptions are not considered in the calculation of the incurred CVA.

Furthermore, reporting the incurred CVA in column 0040 will require substantive efforts. It would add substantial reporting costs to report all the memorandum items in rows 0040 to 0120. We suggest continuing the current approach of reporting only one figure of the incurred CVA in row 0010.

For further comments, see above (in particular responses concerning rows 0021 and 0022).

Contact

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Contribution ID: 15bef891-32d7-4fc3-b7ca-cab5ae19c8d8
Date: 10/07/2026 16:06:29

Consultation Paper on changes to ITS on supervisory reporting: Module on COREP Own Funds

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Introduction

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Who is responding

* Name of the organisation

German Banking Industry Committee

* Contact name

Christoph Friedrich

* Contact email

c.friedrich@bvr.de

* Disclose comments

- (x) Yes
- ( ) No

Questions for consultation

* **Question 1.** Are the instructions and templates clear to the respondents?

The templates and instructions provided are generally understandable. However, due to the complexity of the content and the large number of cross-references (in particular between the concerned templates and the underlying CRR requirements), we see a need for clarification in certain areas. Additional clarifications and examples on issues of delineation and special cases would be helpful in order to ensure a correct preparation and a consistent application by banks.

In particular with regard to rows 0290 to 0330 in template C 07.00 (Memorandum Items), we request clarification on the correct original exposure class for a defaulted corporate exposure that would be classified under the exposure class "secured by mortgages on immovable property" if it were not in default. Should such an exposure be reported under "exposures secured by mortgages on immovable property" or under "exposures to corporates"?

We suggest extending the Memorandum Items to also cover the exposure class "secured by mortgages on immovable property".

In template C 08.07, it is unclear – in the context of the Pillar 3 disclosure requirements and the DPM – whether row 0070 should include the entire specialised lending portfolio (including exposures under the supervisory slotting criteria) or only the slotting portfolio itself. In the DPM for C 08.07, the risk weight method is explicitly specified as “Specialised lending slotting criteria”. By contrast, in the EBA mapping for Pillar 3 disclosure, row 5.2.2 (row 0070 in the DPM) of EU CR6-A (K 26.01) is derived as the difference between row 0070 and row

0060 in C 08.07. This calculation appears to imply that row 0070 includes more than just the slotting portfolio, which seems inconsistent with the DPM definition. Could you please clarify whether, for C 08.07 row 0070, institutions should report:

- only specialised lending exposures subject to the slotting criteria, or
- the entire specialised lending portfolio, including but not limited to slotting exposures?

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

For this question we would like to refer to our detailed comments below.

Simplification

* **Question 3.** Do you agree with the deletion of template C 11.00 on settlement/delivery risk?

We welcome the proposed removal of reporting template C 11, as it contributes to the overall objective of reducing unnecessary reporting requirements. However, this measure does not provide any noticeable relief for small and non-complex institutions, as the associated reporting burden for these institutions is already limited and the overall costs remain largely unchanged.

* **Question 4.** Do you have any views on the possibility of adding an additional materiality threshold to the geographical breakdown requested in templates C 09.01 and C 09.02, similar to the additional threshold added in FINREP for geographical breakdown? Please explain.

In principle, a materiality threshold in the geographical dimension does not provide significant relief in terms of the actual data population, on the contrary, an additional verification step is needed for the quarterly reporting. And in case the threshold is exceeded, one must be able to complete these extensive templates within the short submission deadline, meaning the bank always has to be prepared. From this, it can be concluded that the threshold should be defined comfortably, and, for example, in the case of more than one exceedance, the forms would only need to be completed from two or three reporting dates later ongoing (see ITS Article 4 – entry and exit criteria).

Question 5. Do you have any other suggestions on simplification regarding the templates covered by this CP?

Yes, we have proposals of both a general and a more specific nature.

Generally, even the removal or mere editorial (label) modification of rows or columns generates effort. Compared to this, new rows and columns are even greater drivers of workload. Therefore, it would be desirable to achieve a reduction at the template level (instead of row/column level) and to address the understandable objective of integrated reporting through IReF. A prominent example of a well-intentioned but very labor-intensive advancement of reporting integration is template C 09.05.

A further, somewhat more specific question concerns all the new items related to the transitional arrangements. In the explanations regarding Module 6, it is pointed out that only those transitional arrangements which the EBA is required to monitor under the mandates of the CRR3 have been included. According to our reading, the scope reflected in the expanded templates is larger. For example, in our view, Articles 465(4), 495 and 495a do not require reporting for a future date. Likewise, with other articles such as Article 495c, we question whether a quantitative and specific measurement through templates, differentiating between application with and without transitional arrangements, is strictly necessary. To make a long story short: With regard to the measurement of transitional arrangements, we advocate for a review to determine the strictly necessary minimum scope.

More specific proposals can be found below under the further questions.

* **Question 6.** Cost of compliance with the reporting requirements: Is or are there any element(s) of this proposal for new and amended reporting requirements that you expect to trigger a particularly high, or in your view disproportionate, effort or cost of compliance? If yes, please:
- specify which element(s) of the proposal trigger(s) that particularly high cost of compliance,
- explain the nature/source of the cost (i.e. explain what makes it costly to comply with this particular element of the proposal) and specify whether the cost arises as part of the implementation, or as part of the on-going compliance with the reporting requirements,
- offer suggestions on alternative ways to achieve the same/a similar result with lower cost of compliance for you.

The proposed amendments to the own funds reporting framework will, in our view, inevitably lead to additional costs for reporting institutions. Rather than delivering a genuine simplification and associated cost reduction, the changes appear to follow an approach where existing templates are largely maintained, while only individual rows are removed. At the same time, however, new rows are introduced across several templates, including additional memorandum items. Furthermore, entirely new reporting requirements are envisaged, such as the introduction of new templates (e.g. template C 05.03).

As a consequence, institutions are required to adapt their data collection processes, IT systems, and validation frameworks not only to reflect the removal of certain data points, but also to accommodate newly introduced reporting elements. This limits, if not fully offsets, any potential efficiency gains resulting from the deletion of individual rows.

Overall, the cumulative effect of these changes is not a reduction in reporting burden, but rather an increase in operational complexity and implementation effort, ultimately resulting in higher costs for institutions, especially smaller institutions.

Impact of certain transitional arrangements (C 05.03, C 03.00)

* **Question 7.** Is the design for the reporting on the impact of certain transitional provisions clear enough? If you identify any issues, please specify the related instructions.

7.1 General Remarks – Opposition to Template C 05.03
We have fundamental concerns regarding the proposed introduction of template C 05.03 on transitional arrangements under CRR3. In our view, the proposal is not aligned with the stated objective of simplification and would impose a significant additional reporting burden without a clearly demonstrated supervisory need.

7.2 Additional Reporting Burden and Complexity
Template C 05.03 requires the reporting of RWEA both with and without transitional arrangements, on a floored and unfloored basis. This effectively entails parallel RWA calculations under different regulatory approaches, leading to substantial one-off implementation costs (e.g. system changes, process adjustments, validation) and increased ongoing reporting effort.

Although C 05.03 is replacing the former templates C 05.01. and C 05.02, it is considerably more complex and does not constitute a simplification. In addition, there are clear overlaps with existing templates (including C 02.00, C 04.00, C 06.02, C 07.00, C 08.01, C 10.01 and C 13.01). The memorandum items further increase complexity and appear not to reconcile fully with aggregate figures.
If the competent authorities intend to discontinue the transitional template CA5.1, we consider it consistent to also delete position 097 ("Deferred Tax Assets subject to a risk weight of 0%") from template CA4. This row exclusively captures DTAs arising from temporary differences which, pursuant to transitional provisions (in particular Article 472(5) CRR), were not deducted from CET1 but instead assigned a 0% risk weight. With the expiry of the relevant transitional arrangements, the material scope of this position has effectively disappeared; its informational value is therefore very limited, while it continues to generate reporting effort. In line with the "need to have" principle and the envisaged removal of CA5.1, we believe that deleting CA4, row 097 would be both appropriate and consistent.

7.3 Lack of Alignment with the Simplification Objective
The consultation is explicitly based on a "need to have" principle. In our view, template C 05.03 does not meet this standard. While we acknowledge that the EBA selected a more limited option, the remaining requirements continue to be complex and disproportionate.

7.4 Assessment of the Justification
The EBA justifies the introduction of C 05.03 by referring to monitoring needs under CRR3. We would, however, challenge this justification, at least in part.
A review of Part Ten CRR3 suggests that only limited granular data is required, with several mandates focusing on qualitative or aggregated information rather than detailed template-based reporting. We therefore request greater transparency on how the proposed data points map to specific legal obligations.
Moreover, as acknowledged by the EBA, relevant information on transitional arrangements is already available in existing templates. It is therefore questionable whether a new template is necessary, or whether targeted amendments to the existing framework would be sufficient.

7.5 Clarification and Implementation
We request clarification on how institutions should report in cases where transitional arrangements are not applied (e.g. nil vs. blank reporting).

Should the EBA nevertheless proceed with the introduction of C 05.03, a significantly extended implementation timeline is required, alongside a limitation of the reporting obligation to institutions that actually apply the respective transitional arrangements.

* **Question 8.** Is the design for the reporting of the fully loaded capital ratios in template C 03.00 and of the fully loaded adjustment for the output floor in template C 04.00 clear enough? If you have any suggestions, please explain.

8.1 General Remarks – Opposition to the Proposed Additions in C 03.00 and C 04.00
We also wish to raise fundamental concerns regarding the proposed additions to templates C 03.00 and C 04.00. The introduction of three new memorandum rows in C 03.00 reporting capital ratios (CET1, T1, Total Capital Ratio) without application of all transitional provisions – i.e. on a fully loaded basis – as well as the new row 0895 in C 04.00 reporting the fully loaded floor adjustment without any CRR transitional provisions, gives rise to significant reservations both in terms of proportionality and clarity.

8.2 Significant Additional Reporting Burden
The calculation of fully loaded capital ratios requires a complete recalculation of both capital and RWA figures under full implementation of the CRR3 end-state provisions. This presupposes that institutions are able to

calculate all relevant positions under full application of CRR3 without any transitional relief – a requirement that in practice binds substantial system and methodological capacity. The associated one-off implementation costs and the permanently increased ongoing reporting burden are, in our view, disproportionate to the supervisory benefit derived from these additional data points.
Furthermore , the additional reporting burden in the field of market risk would contradict current efforts to reduce the processual costs of the FRTB implementation through the respective Delegated Act by the Commission and accompanying supervisory/regulatory action.

8.3 Limited Supervisory Added Value
The supervisory added value of reporting fully loaded capital ratios on a formalised, quarterly basis is, in our view, limited. Competent authorities already have, through existing reporting obligations, the SREP process and ongoing supervisory dialogue, a comprehensive picture of the capital position of institutions – including a qualitative understanding of the impact of transitional arrangements. Fully loaded capital ratios carry no direct regulatory binding effect and are not envisaged as a mandatory management metric under the existing regulatory framework.

8.4. New vs old “fully loaded” Definition
With the proposed changes, a new fully loaded definition is effectively introduced which also takes into account the new transitional arrangements in Article 495 CRR (“fully phased in”). We are unclear as to what continued justification there is for the old fully phased in definition, in which only the output floor transitional provisions in Article 465 CRR were considered “fully phased in” (but not those of Article 495)?
In the spirit of simplification, we therefore advocate deleting rows 0330-0350 from Template C03.00 and working with a single, clearly defined fully loaded concept.

8.5 Lack of Clarity – Definition of "All Transitional Provisions"
With regard to the clarity of the design, we note that the instructions do not yet provide a precise definition of which transitional provisions are covered by the term "all transitional provisions" for the purposes of calculating the fully loaded ratios. We request the EBA to provide an exhaustive list of the transitional arrangements to be eliminated in the calculation of fully loaded ratios, together with clear guidance on any interactions between individual provisions.

8.6 Inconsistency with Existing Rows in C 03.00
We further note that rows 0330–0350 in template C 03.00 already capture capital ratios without application of the output floor transitional arrangements. The proposed addition of fully loaded ratios excluding all transitional provisions creates a further layer of calculation that may give rise to ambiguities and interpretative uncertainties regarding the delineation from the existing rows. We suggest that the EBA critically reconsider the necessity of this additional level of differentiation and, if appropriate, work towards a clearer consolidation of the various capital ratio presentations within C 03.00.

8.7 Implementation Timeline
Should the EBA decide to proceed with the proposed additions to C 03.00 and C 04.00, we strongly request a significantly extended implementation timeline and comprehensive calculation examples in the reporting instructions, in order to ensure consistent and comparable reporting across institutions.

Other changes to reporting templates and instructions

Credit risk Standardised Approach (C 07.00)

* **Question 9.** Is the design for the reporting of the new row for notifications under Article 111(8)(c) CRR3 clear enough? If you identify any issues, please explain.

The off-balance sheet subcategories listed in Annex I are very comprehensive; therefore, it can be assumed that the new category with similar risks in row 0085 is unlikely to show material amounts. In light of this, and considering our shared efforts to simplify, we advocate for the removal of this row. In other words, this additional requirement is likely to result in disproportionate effort and cost.

* **Question 10.** Is the design for the reporting of the new column for the FX-mismatch under Article 123a CRR3 clear enough? If you identify any issues, please explain.

No comments.

* **Question 11.** Is it warranted to provide more clarification on the treatment of liens in instructions for the purpose of the calculation of the ETV ratio referred to in Article 124(6) of Regulation (EU) No 575/2013, and in accordance, the determination of the exposure amount to which treatment referred to in Article 124(1) of Regulation (EU) No 575/2013 is applied? If yes, please provide further details.

No comments.

Own funds (C 01.00)

* **Question 12.** Is the design for the new rows for the reporting of prior permissions to reduce own funds clear enough? If you identify any issues, please explain.

No comments.

* **Question 13.** Is the design for the new rows for the reporting of not eligible profits but intended to be recognised as retained earnings, i.e. the amount of profits which are neither retained earnings according to Art. 4 (1) nr. 123 CRR nor profits according to Art. 26 (2) CRR clear enough? Are the current instructions regarding the reporting of the concepts 'retained earnings', 'previous year's retained earnings' clear enough? Have you experienced difficulties with regard to the mapping of the various reporting periods? If you identify any issues, please specify the related instructions.

Yes, overall, clear enough.

For the terms "retained earnings" and "previous year's retained earnings" some further clarifications (particularly regarding the distinction between profit or loss for the year, amounts already transferred to reserves and non eligible profit components) would be helpful, in particular an explicit description of the distinction between the profit or loss for the year, amounts already transferred to retained earnings and the non eligible part of the previous year's profit and furthermore a clearer linkage to FINREP, including a consistent reconciliation example.

Regarding the treatment of different reporting periods, we continue to see the main effort in the operational handling of situations where the resolution on the appropriation of profits (e.g. for the previous year) is taken only after the reporting dates for Q1 or Q2. The new rows do address this issue in principle; however, we would welcome additional illustrative examples (for both quarterly and year end reporting dates, including for financial years that do not coincide with the calendar year).

Further, we ask for clarification why row 0141 and row 0142 have the same label “previous years retained earnings”.

Additional column in template C 10.00 IRB exposures subject to output floor

* **Question 14.** Do you have any comments on the changes proposed to implement a new column in template C 10.00 IRB exposures subject to output floor? Do you think that following this addition, it would be possible to simplify any of the information in template C 8.1 on IRB approach? If so, please explain.

We consider the new column to be, in essence, an additional perspective on already available RWA information. In our view, this creates additional reporting effort without any clear reduction in other RWA template information being envisaged. The content of template C 10.00 is based solely on calculation methods under the CR SA, which differ substantially from the IRB approach. The breakdown in template C 10.00 refers exclusively to the rules of the CR SA. Moreover, there are fundamental differences between the two approaches with respect to collateral allocation mechanisms and collateral eligibility requirements. Reconciling these two calculation methods would therefore impose an immense reporting burden on institutions.

This is particularly evident in the case of real estate collateral, where it is not possible to allocate IRB amounts to the breakdown required under the CR SA with its distinct components (secured, unsecured, other).
We also do not consider that this addition would allow any substantial simplification or reduction of the content of C 08.01. C 08.01, with its detailed presentation of IRB parameters, serves a distinct supervisory purpose which is not substituted by the new column in C 10.00.

We therefore suggest that, in the further process, a critical assessment be made as to whether the introduction of the new column in C 10.00 is in fact necessary.

Contact

Contact Form

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Date: 10/07/2026 16:26:39

Consultation Paper on changes to ITS on supervisory reporting: Module on ESG reporting

Fields marked with * are mandatory.

Introduction

The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions detailed below.
Comments are most helpful if they:

- respond to the question stated; indicate the specific point to which a comment relates;
- are supported by a clear rationale;
- provide evidence to support the views expressed/ rationale proposed; and
- provide alternative regulatory options for consideration by the EBA.

Important note to users:
All the fields marked (*) are mandatory. In case a question is not relevant for you, please answer with "Non-Applicable" or "NA". Please note that the maximum length of the answers to any single question is technically limited by the tool to 5000 characters.
All contributions received will be published following the close of the consultation, unless you request otherwise by ticking the relevant box in the form below. Please note that a request to access a confidential response may be submitted 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.

Personal data protection:
The protection of individuals with regard to the processing of personal data by the EBA is based on Regulation (EU) 2018/1725. Further information on the processing of the personal data is available in the Data Protection Notice.

Should you encounter issues with submitting your responses, please contact us by email at *eba.consultation@eba.europa.eu* no later than 48 hours before the deadline of the consultation period.

Please provide your responses by **10 July 2026 close of business**. Late responses will not be considered

Many thanks for your cooperation and support!

Who is responding

* Name of the organisation

German Banking Industry Committee

* Contact name

Christoph Friedrich

* Contact email

c.friedrich@bvr.de

* Disclose comments

- (x) Yes
- ( ) No

Questions for consultation

Proportionality and scope of institutions

* **Question 1.** Do you have any comments on the comprehensive approach proposed for large institutions?

We generally welcome and support the EBA's objective to simplify the supervisory reporting framework and reduce the reporting burden. Leveraging existing ESG disclosure templates from the Pillar 3 framework as a foundation for Module 7 is, in our view, a sound and efficient approach.

However, we are concerned that the current draft extends far beyond these objectives and the established Pillar 3 scope. It introduces substantial extensions as well as entirely new templates with highly granular requirements, thereby increasing complexity and operational burden.
Supervisory reporting should remain closely aligned with Pillar 3 disclosures to avoid duplication and inefficiencies. In addition, the proposed implementation timeline for Module 7 appears overly ambitious. Given that the final regulation is expected only by end-2026, the period until end-2027 is insufficient for the necessary IT developments and process adjustments.

This applies in particular to Template D 11.00. Relevant data points, where available, are often fragmented across systems or only exist as derived figures. Their integration into supervisory reporting would require major adjustments to data architecture, interfaces and processes.

We therefore advocate limiting the scope of the ESG module to the existing Pillar 3 ESG disclosures under

Commission Implementing Regulation (EU) 2022/2453 and the established climate risk templates from the Short-Term Exercise (STE). This would ensure relevant information while keeping the reporting burden manageable.

As STE climate risk data is expected to be integrated into ESG reporting, the STE should be discontinued to avoid duplication.

In addition, data on credit parameters include elements that have so far only been available within stress testing data environments (e.g. forward-looking probability of exposures) and have not yet been integrated into supervisory reporting. Integrating such data into regular supervisory reporting implies that data originally required only at a later stage for stress testing purposes would now need to be available significantly earlier, in line with the regular submission deadlines for supervisory reporting. A submission aligned with FINREP within six weeks after the reference date is not feasible in the short to medium term. We therefore advocate for a later, separate submission deadline for stress testing-related data. Moreover, the framework should better reflect proportionality. In particular, accounting standards (IFRS vs. nGAAP) and supervisory approaches (KSA, AIRB, FIRB) should be considered more explicitly. The ITS should clarify how institutions not applying AIRB are expected to populate PD, LGD and TR columns. It remains unclear how KSA and FIRB institutions should proceed. For example, KSA institutions could be limited to Template D01.02, while LGD requirements could be waived for FIRB portfolios.
Pillar 3 disclosures and ESG data collections have so far been closely aligned. A divergence would create significant additional effort. To ensure consistency and efficiency, both frameworks should remain aligned and follow a clear “need-to-have” principle.

Finally, frequent changes to reporting requirements increase complexity and hinder the establishment of stable data management processes. Implementation efforts are substantial, and short timelines do not allow adequate planning of resources and costs. The proposed timeline until Q4 2027 is therefore insufficient. It would also be helpful if new drafts clearly indicated added and removed data fields.

* **Question 2.** Do you have any comments on the simplified approach proposed to Other listed institutions and large subsidiaries?

We would like to emphasise that the other listed institutions were not obliged to make the ESG disclosures. All the ESG reporting and disclosure requirements would be completely new for these banks. They would not only have to install the reporting lines but also to develop and introduce new data collection processes for the reporting and disclosure. Therefore, there is the need of granting sufficient time for the implementation.

* **Question 3.** Do you agree that large subsidiaries should report ESG risk exposures using the simplified reporting approach, in line with the proportionality principles applied to other institutions and similarly as in the Pillar 3 framework?

We would like to raise concerns regarding the operational proportionality of applying Template D 05.01 (simplified) at the large subsidiary level.

In many banking groups, the main operating institution represents the core business activities and risk profile, while other entities within the group perimeter may consist of holding or financial entities with comparatively limited balance sheets and risk exposures.

Preparing Template D 05.01 (simplified) at subsidiary level would require reporting based on a different geographical (z axis) dimension, namely a NUTS 2 breakdown, compared with the reporting applied at consolidated level.

In this context, we see a risk of duplicative and disproportionate reporting effort, without a commensurate supervisory benefit, especially where the subsidiary effectively represents the group's core operating activities and risk profile.

We therefore kindly seek confirmation as to whether, in such circumstances, the application of Template D 05.00 at the large subsidiary level, aligned with the consolidated reporting approach, would be considered appropriate. Explicit clarification in the ITS regarding expectations for large subsidiaries that effectively mirror the group's risk profile would support proportionality and consistency in reporting.

* **Question 4.** Do you have any views on the reduced and essential set of information applicable to SNCI and Other non-listed institutions?

It is positive that SNCIs and non-listed institutions are subject to a significantly reduced reporting scope. A broader scope would otherwise risk overburdening these institutions.

However, the initial collection of ESG data remains particularly challenging for SNCIs, and the proposed implementation timeline for Module 7 appears highly ambitious. The final regulation is expected only by the end of 2026. The subsequent implementation period until the end of 2027 is clearly insufficient to carry out the extensive IT developments and process adjustments required to meet these far-reaching new requirements. This applies in particular against the background that definitions for climate physical and transitional risks are missing which are required to prepare the data reference and processing (See also Q5). Instead, in line with the objectives of the Omnibus I initiative and the planned supervisory simplifications following from the EU initiative for competitiveness in the EU banking sector, extensive requirements should not be introduced prematurely. This is especially because their implementation is already proving challenging for smaller but also other institutions.

We generally welcome the intended consistency between reporting and disclosure requirements, both in terms of content and frequency. However, especially for SNCIs, reporting and disclosure requirements must remain fully aligned. This is necessary to ensure compliance with the principles of materiality, confidentiality and protection of business secrets as set out in Article 432 CRR. SNCIs no longer publish their Pillar 3 disclosures themselves; instead, the EBA derives the disclosures directly from supervisory reporting data. As a result, institutions can no longer verify whether the disclosed information complies with Article 432 CRR, and the EBA is neither expected nor practically able to perform such an assessment.

Against this background, reporting requirements must not be overly granular, as this would risk violating the principles enshrined in Article 432 CRR at the disclosure level. See also Q6.

Unfortunately, the EBA's final ESG disclosure ITS now deviates quite significantly from the ESG reporting template that was originally consulted on. In addition, different first-time application dates have been introduced for "other non-listed institutions". While the ESG reporting requirements are expected to apply for the first time in 2027, the disclosure ITS would now require "other" institutions to disclose their ESG risks already as of 31 December 2026.

In other words, the EBA appears to be reverting to its previous approach by requiring disclosures before the corresponding supervisory reporting requirements are implemented. This runs counter to the established principle that "Pillar 3 follows Pillar 1". As a result, institutions would face significant and unnecessary implementation efforts.

* **Question 5.** Do you have any views on the proportionality approach proposed?

For institutions applying the requirements for the first time, a sufficiently long preparation period is essential. In particular, the required mapping and transformation of existing sector classifications into NACE structures is, in practice, highly complex, resource-intensive and prone to error.

Moreover, ESG supervisory reporting is likely to have significant spillover effects on other regulatory areas. These include links to Pillar 2 requirements, such as ESG risk plans, to stress testing exercises, and to potential supervisory cross-checks across different reporting frameworks. This results in a cumulative implementation effort that goes well beyond reporting itself and must be addressed at an early stage. Against this background, an initial reporting requirement for 2027 appears premature.

For SNCIs and non-listed institutions, there is also a lack of clarity regarding the underlying definition of physical climate risks. Template D01.01 does not provide specific instructions on how to assess and report the exposure of individual sectors. While reference is made for other institution groups to “EU - CRFR2.1: Climate related physical risk: Exposures subject to physical risk (simplified)” as set out in Annex XL of Implementing Regulation (EU) 2024/3172, this does not provide sufficiently concrete guidance for determining exposure.
It is therefore necessary to establish a clear definition specifying under which conditions an exposure is to be classified as subject to physical or transition risks. However, this should not result in an expansion of requirements that would ultimately undermine the principle of proportionality.

Furthermore, a clear delineation of borderline cases is required. In principle, all real estate is exposed to physical risks; however, the actual level of risk can vary significantly. For example, a factory located near a river may face an elevated risk due to potential flooding. If, however, the mere existence of such general exposure was deemed sufficient, a very large proportion of exposures would need to be classified as subject to physical risk.

It should also be noted that the data required for physical and transition risks will, in many cases, not be readily available in the near term. A transitional phase should therefore be introduced, during which only new business is required to be reported. This would significantly improve the quality of the reported data.

From a proportionality perspective, greater differentiation based on the accounting and supervisory standards applied by institutions would also be appropriate, as already outlined in Q1. These aspects are currently not sufficiently considered, resulting in uncertainties for institutions applying national accounting standards or not following the AIRB approach. As a consequence, certain data points may, in practice, not be reportable.

* **Question 6.** Are the proposed materiality thresholds for geographical breakdowns sufficient to provide meaningful reporting without imposing undue reporting burden?

As Template 01.01 is intended for smaller institutions, which typically operate in more geographically limited markets, the combination of a detailed geographical and sectoral breakdown can very easily lead to data being traceable to individual companies (which would then also be disclosed). Therefore, Template 01.01-simplified should not include a breakdown into five geographical areas; instead, disclosure of country-level granularity seems feasible.

The principle of materiality/confidentiality pursuant to Article 432 must be ensured in the reporting, as it also forms the basis for the disclosure conducted by the EBA.

The same applies to the proposed reporting of non-performing exposures in column 0010 as well as to the proposed granularity of NACE codes in the reporting framework. In the case of small institutions, this may also allow conclusions to be drawn about individual borrowers. Therefore, in principle, only information should be reported at a level of granularity that can also be disclosed by the EBA without reservations.

The introduction of the “Z-axis” for geographical breakdowns is a particular concern within the proposed ESG module. Although the concept is known from FINREP, it creates a structural break with the existing Pillar 3 ESG disclosure framework and complicates the reuse of already implemented technical data supply chains. Compared with the current Pillar 3 disclosures, the geographical breakdown not only leads to additional effort in general but also to a multiplication of the data points to be reported.

In our view, this runs directly counter to the stated objective of simplification and will, in fact, lead to a significant increase in complexity and reporting effort, particularly for ESG data.

In addition, further rules must be implemented to operationalize materiality thresholds. Irrespective of these thresholds, all data points must in principle be maintained for the calculations required for reporting preparation. If the breakdown via the “Z-axis” remains a requirement, we consider a significant increase in the threshold to be an important relief measure.

The proposed materiality approach contradicts the objective of simplifying and streamlining reporting requirements. A threshold of 1% could result in more than 10 templates for large institutions. Combined with the proposal to populate (within each of these templates) only those rows where the exposure share is at least 0.5% of total exposure, this design would produce a substantial number of partly empty templates.

It would also result in a highly unstable structure: whenever a bank’s exposures cross either the 1% country-exposure threshold or the 0.5% NACE level 2 threshold, templates or individual rows would need to be added or removed. This would not only impose unnecessary procedural steps on banks but would also lead to an unbalanced panel structure for supervisory data collection.

In our view, a more economically meaningful country threshold, for example 5%, combined with full reporting within each country template, would be a more practical solution. As less material EU countries would still be included in a “Rest of EU” template, no data or information would be lost.

As already has been mentioned here on several occasions, the proposed materiality approach leads to higher complexity and also makes the values non-comparable with those in other reports; therefore, some banks prefer not to use the materiality approach.

* **Question 7.** Is or are there any element(s) of this proposal for new and amended reporting requirements that you expect to trigger a particularly high, or in your view disproportionate, effort or cost of compliance? If yes, please:

- specify which element(s) of the proposal trigger(s) that particularly high cost of compliance,
- explain the nature/source of the cost (i.e. explain what makes it costly to comply with this particular element of the proposal) and specify whether the cost arises as part of the implementation, or as part of the on-going compliance with the reporting requirements,
- offer suggestions on alternative ways to achieve the same/a similar result with lower cost of compliance for you.

The EU Omnibus Initiative aimed to protect SMEs from excessive reporting burdens. This objective should also apply to ESG supervisory reporting, particularly where information is requested directly from counterparties. Templates should therefore be limited to clients subject to CSRD (or equivalent thresholds for non-EU companies). Otherwise, banks would in some sectors need to request supervisory data from SMEs, which should be avoided. In this context, we would also like to refer to GBIC submissions to the “Targeted consultation on the competitiveness of the EU banking sector”, in which we have described the challenges related to ESG data availability in detail.

For smaller banks, the introduction of the new highly granular requirements results in significant IT implementation costs as well as additional training costs. This is compounded by the excessively short initial implementation timeline.

Template D 04.00 could require a lot of additional effort in case there is no additional threshold such as a limit of Top 20 of counterparties that need to be reported (see also Q6).

The frequency mixing between semi-annual and annual frequency needs to be carefully executed to have a meaningful benefit. We note that the inclusion of column 0020 in template D 01.00 seems to contradict the EBA No-action-letter from August 2025 which lifted the requirement to report CCM-exposures for the 30.06. of each year. As this information is closely connected to EU taxonomy reporting, the banks’ sustainability reports and template D 10.00 – all of which have an annual frequency – we think that this column should likewise be requested with annual frequency, if at all. A deletion would be the most meaningful option likewise the other taxonomy-related templates and data points.

In a similar vein, we note that Fee and Commission Income as well as Interest Income have been moved from the STE Climate Risk template (annual) to template D 01.00 (semi-annual). It is not clear what should be reported for these two components for the 30.06. date (income during the previous half year (Q1+Q2) or during the previous four quarters (Q1 + Q2 + from the previous calendar year Q3 + Q4). In our view it leads to unnecessary complexity to collect these data semi-annually. In particular, for stress-testing purposes, fee and commission income as well as interest income will presumably only be needed on a full year basis which already would mean a more frequent reporting than before.

The data for the additional credit parameters are currently mostly available only in risk systems. Integrating them into both FINREP (F 49) and the ESG data pool entails not only implementation costs (process alignment, interfaces) but also significant ongoing efforts for reconciliation and validation. As these data are primarily used for stress testing, the justification for semi-annual reporting is, in our view, unclear.In many cases, the data required for a breakdown of physical risks into moderate and high physical climate risks are not currently available from commonly used data providers. As a result, this leads to a significant implementation effort, as adjustments would be required both on the side of the data providers and across the entire data supply chain to the ESG data pool in order to ensure automated data delivery.

Data on the total revenue of the respective counterparty at the highest level of consolidation (“total revenue of the counterparty”) are currently not fully available for all required counterparties (e.g. CRE; SPV financings). As a result, institutions face additional effort to obtain these data either manually or via external data providers. This means more frequent reporting and higher the associated effort. Therefore, these data should be required at most on an annual basis.

D 01.00 – Climate Change Transition Risk: Credit quality of exposures by sector, emissions and residual maturity

* **Question 8.** Do you have any views on the additional information included for supervisory reporting purposes in template D 01.00?

The additional information proposed in template D 01.00 goes significantly beyond the scope of the existing Pillar 3 ESG disclosure. These new requirements would require a preparatory phase for implementation that must extend beyond 2027.

First, the added value of the column 0020 “Exposures considering mitigating actions” is limited. We advocate the deletion of this column as the granularity of data in template D 10.00 on mitigating actions is sufficient.
For the credit risk columns, more guidance should also be provided on how these are to be populated where an institution does not apply the IRB approach (i.e. under the KSA approach) or applies it only partially (partial use). It should also be clarified which LGDs are to be reported where these are not internally estimated, for example under the FIRB approach or under the KSA approach.

According to the draft ITS, ‘gross fee and commission income’ (column 0077) shall follow FINREP F 16.01. However, F 16.01 covers interest income and expenses, not fee and commission income. While F 22.01 includes fee and commission income, it only provides an activity-based breakdown without counterparty sectors. Consequently, no FINREP template currently supports the sectoral breakdown required in D01.00. We therefore suggest referencing F 22.01 as the closest proxy, acknowledging that only total figures can be reconciled.

The draft ITS specifies that materiality thresholds shall be based on total exposures to non-financial corporations (row 0780, column 0010). At the same time, template D01.00 includes row 0710 for financial sector exposures (NACE section L), with the corresponding cells not greyed out.
Clarification is therefore needed on whether financial sector exposures are to be reported in row 0710 and which rows are included in the aggregation of row 0780. Explicit guidance in the ITS would help ensure consistent application of materiality thresholds across institutions.

For the newly introduced row 0850 “Coverage of portfolio with use of proxies (according to PCAF) (in %)”, clarification is sought regarding the correct denominator. Possible interpretations include the gross carrying amount of total exposures to NFCs (row 0780) or only the gross carrying amount of exposures arising from financing activities for which financed emissions are reported. We recommend that the ITS explicitly specify the appropriate denominator in order to avoid divergent reporting practices.

For the row block 0800 to 0850, it is also unclear how LGD is to be determined for transactions that are secured by multiple properties and therefore need to be split across several rows. This split requires an assessment at the level of the combination of exposure and collateral, whereas LGD is a pure exposure-level metric. From our perspective, it would therefore be more appropriate to move this information to the columns of Template 2.

Furthermore, it is not clear why the new data point “Households (loans for home purchase)” has been introduced and requested in Template D 01.00 (rows 0800–0850). If anything, integration into Template D01.02 would be more appropriate. Given the significant overlap in content with the subset of “loans collateralised by residential immovable property”, the introduction of this additional data point should be reconsidered.

For the ECB STE Climate template (FY2025), it was confirmed that financed emissions are based on financing-related exposures at counterparty level, where emissions data can be attributed in line with recognised standards (e.g. PCAF). Exposures not linked to financing activities (e.g. receivables or overdrafts) are therefore excluded. We suggest confirming that this interpretation also applies to template D01.00.

The draft ITS states that row 0015 (fossil fuel sectors) shall follow NACE level 1 and be exempt from materiality thresholds. However, this may implicitly require reporting at more granular NACE levels even where exposures are non-material. From an operational perspective, a consistent reporting approach across all NACE levels in the Total Exposures Template may be more efficient. Further clarification of the intended approach would be welcome.

Finally, clarification is requested regarding the treatment of off balance sheet items in template D 01.00, in particular whether ESG data, including financed emissions, are expected to be reported for such items, and whether nominal amounts of off balance sheet items should be included in materiality threshold calculations. Based on the current structure of the template, our understanding is that off balance sheet items are not included in the calculation of materiality thresholds and that ESG data reporting is not required for these exposures. Explicit confirmation in the ITS would ensure clarity and consistent implementation.

* **Question 9.** The EBA is assessing the introduction of data points requesting RWA in Templates D 01.00 and D 05.00 to enable national authorities to calculate potential Systemic Risk Buffer (SyRB) in case of systemic risks. What are your views on the inclusion of this information, both from an operational and from a macroprudential perspective? Do you foresee significant operational challenges related to the inclusion of this information? What alternative approaches would you suggest?

From a macroprudential perspective, we are fundamentally opposed to addressing potential climate related risks through a nationally defined Systemic Risk Buffer (SyRB). In our view, the current legal and supervisory framework already provides sufficient flexibility to consider environmental and climate related risks where justified. Introducing a SyRB specifically for climate risks risks fragmenting the regulatory framework and could lead to inconsistencies across jurisdictions. Moreover, RWAs should be interpreted with caution as an indicator of systemic risk, given the significant differences in business models, portfolios and risk profiles across institutions. This limits their suitability as a uniform basis for assessing systemic climate related risks.

From an operational perspective, the inclusion of additional RWA data points in templates D 01.00 and D 05.00 may be technically feasible for institutions. However, it would further increase the already extensive reporting burden and runs counter to the overarching objective of simplifying and streamlining supervisory reporting.

From an operational perspective, technical implementation is only feasible with a sufficiently late submission timeline. Specifically, both the FINREP reporting and the Own Funds reporting must first be finalized in order to ensure consistency and proper quality assurance. It should also be noted that Own Funds reporting is based on a fundamentally different measurement basis than the gross carrying amounts used in FINREP, meaning that there is no direct reconciliation between gross carrying amounts and RWAs. In addition, COREP reporting includes credit risk mitigation techniques, such as the transfer of exposures through guarantees, which would need to be clarified in advance. Where RWAs are reported, additional reporting of risk parameters such as PD, LGD and TR should be avoided. As noted elsewhere, the inclusion of PD, LGD and TR entails significant uncertainties, particularly for institutions applying the KSA or FIRB approaches. These challenges could be avoided by streamlining the reporting requirements to focus solely on risk weights. Moreover, from our perspective, the additional disclosure of these parameters provides little to no incremental value compared to the standalone reporting of risk weights. We therefore advocate for a corresponding simplification, whereby only risk weights would be reported going forward.

The incremental supervisory value of such additional data should therefore be carefully weighed against the operational effort required for implementation and ongoing reporting.
As another alternative approach, we would encourage authorities to make use of existing supervisory tools and data already available under the current framework, rather than introducing new reporting requirements. Where climate related systemic risks are identified, these could be addressed through targeted supervisory assessments, stress testing or the consistent application of existing macroprudential instruments, without the need for additional RWA based reporting fields linked to a potential SyRB.

D 01.02 – Climate Change Transition Risk: Credit quality of exposures by sector, emissions and residual maturity

* **Question 10.** Do you have any views on the proposed template D 01.02?

CP Module 7 Annex 2, paragraph 1 states that, inter alia, other non-listed institutions are required to report Template D 01.02.
This contradicts the delineation of reporting requirements across the three categories of institutions, according to which other non-listed institutions are only required to report Template D 01.01. We therefore kindly request a correction of the instructions.

D 01.01 – Simplified ESG Information (for SNCIs and other non-listed institutions)

* **Question 11.** Do you have any views on the proposed Template D 01.01?

As SNCIs no longer have control over which Pillar 3 information is disclosed, as this is now directly performed by the EBA, it is all the more important to ensure full alignment between supervisory reporting and disclosure data.

Furthermore, the data to be reported must not be overly granular, in order to comply with the principles of materiality, confidentiality and protection of business secrets enshrined in Article 432 CRR. Therefore, the information to be reported should be limited to a high-level aggregation (e.g. geographical or sectoral level). See also Q4.

In the consulted version, additional rows and columns have been introduced which go beyond the disclosure templates. As the instructions refer to the explanations of the disclosure templates, the content of these reporting fields is not sufficiently clear. This concerns in particular:

- Column Off-balance sheet items: Based on the current template structure, we understand that such items are excluded from geographical allocations and that ESG data do not need to be reported. Explicit confirmation in the ITS would provide clarity and ensure consistent implementation.
- Column Accumulated impairment / accumulated negative changes in fair value due to credit risk
- Column Non-performing exposures
- Row 0005 “NUTS 2 code”

In addition, row 0015 (“of which: exposures to fossil fuel sectors”) is intended to aggregate information on fossil fuel sectors. However, the description of the aggregation is not sufficiently clear (row 080 is a sub-item of row 0070) and should therefore be reviewed.

D 02.00 – Climate Change Transition Risk: Loans collateralised by immovable property

* **Question 12.** Do you have any views on the proposed Template D 02.00?

The additional information proposed in template D 02.00 goes beyond the scope of the existing Pillar 3 ESG disclosure framework and introduces new data requirements and parameters. We reiterate our view that supervisory reporting requirements should remain aligned with the established Pillar 3 disclosures to avoid unnecessary complexity, duplication and operational burden.

The description of column 0015 ("Loans with an improvement of the energy efficiency of the collateral compared with the previous periods") is unclear. In particular, it is not specified how this data point should be determined for loans secured by multiple properties, especially where both improvements and deteriorations occur across individual properties within the reporting period.
In addition, the underlying EPC buckets themselves may change over time (e.g. due to stricter threshold values for EPC labels). As a result, genuine improvements in the energy efficiency of the collateral may not be reflected as such if the property remains within the same bucket due to these adjusted thresholds.
Furthermore, this requirement would pose significant challenges for institutions in distinguishing between improvements resulting merely from changes in the methodology (often based on externally sourced estimates) and improvements resulting from actual physical enhancements of the underlying properties.

Moreover, we doubt, that the level of detail provided by the additional column "EP score of the collateral (primary energy use) – column 050 "Of which: > 50; <= 100" is necessary. If it is a "need to have", it would be better to implement 2 columns: "0;<=50" and "> 50;<=100".

In our view, information on improvements in energy efficiency of CRE and RRE portfolios is not usable for assessing the reduction of transition risk in the mortgage portfolio. For existing business, it is generally not possible to require energy performance certificates from clients, which is why data availability is limited and estimates are used in a portfolio approach. Therefore, we believe that this parameter does not adequately capture the development of transition risk and recommend to remove the new column.

If the column is not removed, please revise the illustrative example. According to the example to describe the interpretation of column 0015 for a loan that "improves the EPC label of the collateral from D in reporting period t-1 to C in t, the gross carrying amount of the loan should be reported under EPC label category D." In our view it should be category C, otherwise the template for reporting period t would contain outdated values. Please clarify.

Up to now, the requirement has been that Template 2 Pillar 3 ESG must include the values for "EP score of the collateral (primary energy use)" in addition to the EPC labels, because EPC labels are not implemented uniformly across Europe. In fact the current energy labelling can lead to different classifications within the EU, and new labels won´t be aligned in the EU before 2030. Regardless of that, there is the question, why the EPC labels cannot be eliminated entirely from Template 2 CRR Pillar 3 ESG and D 02.00. The reporting of energy consumption is clear and consistent. A duplicate form of identification concerning the energy needed is not required.

* **Question 13.** Do you have any comments on the inclusion of information on covered bonds?

Reporting obligations related to covered bonds are already addressed under Art. 14 of the EU Covered Bond Directive (Directive 2019/2162) which ensures transparency and investor protection, next to other existing market channels, such as harmonized transparency templates and regular investor reporting. With regard to the disclosure of climate risk at the cover pool level, the EBA recommends in its Advice on the review of the EU Covered Bond Framework from September 2025 to the EU Commission to amend Article 14 of the CBD to include relevant information. To avoid fragmented disclosures and inconsistencies on reporting frequencies, the ESG related information should be embedded in the dedicated covered bonds reporting tools.

We suggest removing the rows “covered bonds” from template D02.00 to avoid fragmented disclosures. In any case however, a double reporting obligation must be avoided, especially with different data requirements.

In the event that the requirement is retained, it should be clearly specified that it exclusively relates to the characteristics of the assets financed by the bank and secured by covered bonds and does not include any implicit collateral that could be attributed to the bank in the context of covered bonds.

* **Question 14.** Do you have any comments on the new column for EPC estimates?

In the past, EPC labels were not allowed to be estimated. Template 2 Pillar 3 ESG has been revised for both Pillar 3 and the STE, and it took several Q&As to achieve consistency in the various interpretations of the guidelines. It would be better to concentrate only on EP scores and to waive the requirement concerning EPC labels.

* **Question 15.** To what degree do institutions consider assessing transitions in the energy performance of collateral (e.g., EPC label or energy performance score categories) to be relevant for evaluating the evolution of transition risk exposures and enhancing transparency on improvements in energy efficiency of CRE and RRE portfolios? Please indicate how such transitions are currently monitored for both existing collateral and newly originated loans.

No comments.

* **Question 16.** To what degree do institutions consider that adding the same information on LTV buckets by EPC label and energy performance score categories for RRE exposures as for CRE exposures would facilitate identification of risk concentrations, improve comparability across portfolios, and support more effective prudential assessment?

A breakdown by LTV buckets and EPC labels would create an additional reporting burden with no added value, in our view. In the credit decision process, the client's disposable income is ultimately the decisive factor for granting further loans. Given, the very limited data availability (see Q12) we advise against such reporting.

D 03.00 – Indicators of potential transition risk: Emission Intensity by Sector

* **Question 17.** Do you have any views on the proposed Template D 03.00?

The deletion or, at minimum, a substantial simplification of the proposed Template D 03.00 would be appropriate.

In its current form, institutions are required to report information that their counterparties themselves are not obliged to disclose. This is particularly problematic for small and medium-sized enterprises, where it is questionable whether data on physical emission intensities are even available at counterparty level. Requiring institutions to collect such information would effectively introduce an implicit reporting obligation for smaller companies, which runs counter to the objective of previous simplification efforts.

Restricting the template to counterparties subject to CSRD reporting requirements would address this issue and, at the same time, ensure greater data availability for institutions.
With regard to short-term targets, we also see a risk that institutions may be incentivized to set less ambitious

targets in order to avoid underperformance in time-series analyses. Obligatory short-term targets / distance to short-term targets are difficult to leverage for custodian banks. It is rather realistic to follow a long-term target trajectory.

With respect to the newly introduced columns, we kindly seek clarification whether the establishment and reporting of short term targets constitute a mandatory requirement for all institutions.

By way of background, certain specialized business models are characterized by financing activities primarily originating from specific portfolios that are designed to support client needs rather than traditional lending.

In such cases, institutions may have limited or no involvement in primary market loan syndication and may not directly engage with counterparties, depending on the nature of the business model. Exposures to climate-relevant sectors, where present, may predominantly arise from secondary market transactions.

Consequently, the ability of such institutions to actively engage with counterparties on climate strategy or to influence their transition pathways may be limited.

This should be duly considered when applying alignment metrics under Template D 03.00, as such business models may not lend themselves to the setting of short-term decarbonization targets.

Scope of the reporting under the template:
We further suggest, similarly to template D 01.00, confirmation within the ITS that GHG intensity metric per physical output should be calculated solely for exposures that arise from financing activities.

Sector – NACE code mapping:
Finally, we recommend that the ITS provide a clear and explicit mapping of NACE codes to the sectors required to be reported under Template D 03.00. Direct regulatory guidance in this regard would reduce the risk of divergent interpretations and enhance comparability of reported data.

D 04.00 – Obligor-level environment-related corporate exposures

* **Question 18.** Do you agree with the proposed sectoral scope for D 04.00?

The sectoral scope is acceptable provided that, for counterparties without available data, it is possible to submit a "zero report"; the focus should be on available information. We would appreciate it if this could be clarified accordingly in the ITS.

Despite of the opinion concerning the sectoral scope, the alignment to decarbonization pathway needs to be calculated individually for each counterparty. Therefore, it was doable in the disclosure context for top 20 counterparties but the more counterparties there are, the more time intensive consuming the exercise is. Our suggestion would be to report only a limited number of counterparties, as optionally proposed in the main text of the consultation paper. If it would be top 20, it should be clarified that the template is to be reported for 20 obligors only, in total, not for 20 obligors per sector. If a sector disaggregation is a “must have”, the limitation should be by significantly less than 20 obligors per sector.

* **Question 19.** For the purpose of obligor-level information requested in this template, do you agree that output-denominated emission intensity is more comparable and informative compared to revenue-based emission intensity? Please justify your view.

Yes, we agree.

For not all sectors, appropriate metrics for determining physical emission intensities are available, as a uniform measure for physical output cannot be established. This results in significant data gaps (e.g. in the chemicals sector). Therefore, in such cases, the use of economic-based intensity metrics should be permitted.

Physical metrics would require separate data collection and are generally not readily available, whereas economic indicators are more commonly collected in practice.

Moreover, the metric “financed emissions per euro of gross carrying amount” would enable comparability across different sectors, which is not achievable when using emissions per unit of physical output.

In addition, managing risks based on emissions per unit of physical output does not align with the internal risk management practices of banks. In practice, analysis and steering are primarily based on financed emissions.

As with other templates, the scope should be limited to counterparties subject to CSRD reporting requirements. Data points should only be requested where they form part of the counterparties’ mandatory reporting. Alignment with the delegated acts under the CSRD framework should be ensured.

* **Question 20.** Do you have any views on the list of sectors proposed for this template?

The sectoral scope is acceptable provided that, for counterparties without available data, it is possible to submit a "zero report"; Focus is on AVAILABLE information. We would appreciate it if this could be clarified accordingly in the ITS.

* **Question 21.** Do you have views on whether the absolute 10 Mn EUR threshold could be replaced by a relative threshold (e.g: obligors representing above x % of total NFC exposures)?

In our view, alternatives like additional relative thresholds, higher absolute thresholds or limiting the number of obligors should be carefully assessed.

* **Question 22.** Do you have views on how to define the threshold in addition to the EUR 10 million exposure threshold (e.g: total number of obligors to be reported per institution or other Tier 1 capital-based relative threshold)?

It should be taken into account that, compared to the previous STE exercise, the number of sectors has been significantly expanded. Even with otherwise unchanged requirements, this would lead to an increase in the number of obligors and to higher manual effort.

For many large banks, a single threshold of 10 Mn EUR exposure would lead to several hundreds of individual obligors, most of which will be immaterial in an absolute sense and have little impact on the degree of concentration risk.

We prefer the use of a cap on the total number of obligors to be reported, combined with an absolute threshold. Our suggestion would be to report only a limited number of counterparties, as optionally proposed in the main text of the consultation paper. If it would be top 20, it should be clarified that the template is to be reported for the maximum of 20 obligors, in total, not for 20 obligors per sector. If a sector disaggregation is a “must have”, the limitation should be by significantly less than 20 obligors per sector.

The relevant NACE codes should be provided as an exhaustive list of four NACE-digits to ensure that the requirements remain manageable and comparable.

The additional information, compared to the previous disclosure template, would be very extensive and would need to be compiled from different bank departments and additional data sources. Furthermore, in our view, it should be justified why the relevant information is required at this level of granularity and on a semi-annual basis for supervisory purposes. An annual reporting frequency appears to be sufficient.

Question 23. Do you have any other comments on Template D04.00?

Template D 04.00 introduces requirements that go significantly beyond the scope of the existing Pillar 3 ESG disclosure framework and is too granular. The proposed implementation timeline until year-end 2027 appears insufficient.

In line with the proportionality principle and other current legislation, data points should only be reported where the respective risk is assessed as material. Where a risk is deemed non-material, institutions should be allowed to indicate this and refrain from completing the respective template.
The draft ITS instructions for column 0090 (“Gross carrying amount as a percentage of total corporate exposures”) require reporting as a share of total corporate exposures. We seek confirmation that the appropriate denominator is “TOTAL exposures to NFC” as reported in Template D 01.00, row 0780, column 0010.

In line with our comments on Templates D 01.00 and D 03.00, we suggest that the ITS explicitly confirm that the scope of Template D 04.00 is limited to exposures arising from financing activities. Such clarification would help ensure alignment across templates and avoid divergent interpretations regarding the inclusion of non-financing exposures.

Finally, clarification is requested regarding the treatment of off-balance sheet items in Template D 04.00, in particular whether ESG data, including emissions-related metrics, are expected to be reported for off balance sheet exposures and whether nominal amounts of such items should be included in the calculation of materiality thresholds. Based on the structure of Templates D 01.00 and D 05.00, our understanding is that ESG reporting ist not required for off balance sheet items, cf. Q8. However, the different structural design of Template D 04.00 introduces ambiguity. Explicit clarification would be appreciated.

We don’t see the column “Total revenue of counterparty” as necessary, as the attribute is already sufficiently being reported in other reports and there seem to be no added value from the risk perspective.
In general, it should be explained at which level the counterparties need to be reported (e.g. how to deal with mother/subsidiary companies, if they should be aggregated, in which cases etc.).

For SME-heavy portfolios, obtaining reliable data on physical emission intensities per unit of output is generally not feasible and would effectively extend reporting obligations to smaller companies, creating significant data collection challenges for institutions.
In addition, Templates D03.00 and D04.00 rely on differing and potentially misleading alignment definitions. As both templates largely overlap in scope, we consider that at most one should be retained.
As an alternative, we propose a template similar to the Fit-for-55 credit risk templates, based on a centrally defined LEI list, to improve data availability and comparability. Within Template D04.00, the focus could instead be on the top 10 counterparties by financed emissions, with alignment based on financed emissions rather than physical output—reducing burden while covering the same information needs.

In our view, column 0200 (of which: Exposures subject to physical risk’) should be removed. Physical risk information should remain in D05.00, where the methodology is based on scenarios and probabilities at portfolio level. This approach cannot be meaningfully applied to individual obligors, particularly large corporates with geographically diverse exposures. It remains unclear how to assign percentage risk values or gross carrying amounts to specific physical locations.

We would also welcome clarification on the calculation of the alignment metric at counterparty level in template D04.00 (cell 0250). A clear calculation logic, ideally supported by a numerical example, would be helpful. Our understanding is that 0% (fully aligned') corresponds to the case where the counterparty's current intensity equals the reference pathway (e.g. IEA). We kindly ask the EBA to confirm whether this interpretation is correct.

Furthermore, we would kindly ask the EBA to clarify how +100% ("transitioning much faster than the pathway") and −100% ("transitioning much slower than the pathway") should be calibrated in practice. In particular:

- Do +100% / −100% represent specific threshold values on the pathway (e.g. already achieving a long term target vs. lagging by a certain relative margin), or are they intended as generic upper and lower bounds to be defined by institutions?

- Does the following formula reflect the intended approach for deriving the alignment factor at counterparty level: (intensity value of reference pathway – intensity value of counterparty) / intensity value of reference pathway

If this is not the envisaged calculation method, we would kindly ask the EBA to specify the precise formula (including any required transformations, caps or normalisation).

D 05.00 – Climate change physical Risk: Exposures subject to physical risk

* **Question 24.** Do you have any views on the additional information included in D05.00 for supervisory reporting purposes?

While the instructions state that the template is closely aligned with Pillar 3, there are several considerable differences. A common definition of key concepts would be useful. If a distinction between high and moderate is considered relevant, this should also be included in Pillar 3. In addition, it is not clear from the instructions how mitigating measures are supposed to be treated in D 05.00. The proposed z-axis (countries) deviates from the Pillar 3 draft templates (NUTS levels), which is unnecessarily costly and complex. Rather than having different z-dimensions, EBA should apply the more useful country split on the z-axis to both disclosure and supervisory reporting.

Also, for D 05.00 the country-materiality threshold should be reviewed to include economically meaningful concentrations of physical risks, e.g. a 5% threshold than a 1% threshold.

The data point "PD – Lifetime" goes beyond the risk parameters envisaged under the planned FINREP reporting framework and should therefore, in our view, not be required.

More generally, there is a lack of clear definitions and thresholds for risks with adverse impacts, which negatively affects comparability (see also Template D 01.01).

- Country allocation
According to the draft ITS, non-financial corporates, institutions shall identify exposures subject to climate-related physical risk in relation to the location of main activities or of the financed assets. Where institutions identify exposures subject to climate-related physical risk in relation to the location of main activities of the

counterparty, exposures should be reported as subject to climate-related physical risk if any of the main activities is located in an area highly or moderately likely to be affected by physical risk event. Where institutions identify exposures subject to climate-related physical risk in relation to the location of financed assets, and there are multiple locations of assets financed by the same exposure, they should follow a proportionate allocation similar as for exposures collateralised by residential immovable property.

Based on this instruction, we understand that, for example, where 30% of a counterparty's main activities are located in country A (classified as highly or moderately exposed to physical risk) and 70% in country B (not exposed), the entire exposure would be classified as subject to physical risk. In this context, clarification is sought as to whether, when applying the country (z axis) breakdown, the full exposure should be attributed to country A.

Further clarification is also requested for cases where a counterparty's main activities are distributed across multiple countries that are all classified as highly or moderately exposed to physical risk. For example, where 50% of activities are located in country C and 50% in country D, both exposed to physical risk, it is not clear under which country the exposure should be reported in the z axis breakdown.
These clarifications are particularly important for the consistent application of country by country materiality thresholds, especially given that the country dimension in Template D 05.00 (reflecting location of counterparties' main activities) appears to differ conceptually from that used in Template D 01.00 (where, considering references to Finrep in draft ITS point 5.i., z-axis should reflect country of incorporation of a counterparty).

- Scope of physical risk assessment
In line with the comments provided for Templates D 01.00, D 03.00 and D 04.00, we suggest that the ITS explicitly confirm that physical risk assessments under Template D 05.00 are required only for exposures arising from financing activities. Explicit alignment across templates would reduce interpretational risk and promote consistent reporting practices.
Treatment of off balance sheet items
Finally, we seek confirmation regarding the treatment of off balance sheet items within Template D 05.00. In particular:

- whether physical risk assessment is expected to be performed for off balance sheet exposures; and
- whether nominal amounts of such exposures should be included in the calculation of materiality thresholds.

Based on the template structure, our understanding is that off balance sheet items are not included in the calculation of materiality thresholds and that physical risk assessment is not required for such items. Explicit confirmation of this interpretation in the ITS would enhance clarity and ensure consistent application across institutions.

* **Question 25.** What would be the most appropriate way to assess the extent to which exposures are ("adequately") insured against relevant hazards? In particular, would the inclusion of a single column indicating the percentage of insured exposures be sufficient? How to deal with potential State insurance schemes?

We find it challenging to precisely assess "adequate" insurance due to a lack of granular data and the diverse nature of insurance products covering various hazards.

The inclusion of state insurance schemes would be only meaningful, if EBA or EIOPA make direct guidance on which types of risk should be regarded as potentially covered by (explicit or implicit) state insurance schemes. Otherwise, the numbers reported by banks will be inconsistent based on the assumed degree of state insurance.

*** Question 26.** What information can credit institutions provide regarding the insurance coverage of their exposures? In particular, please indicate whether institutions can report: (i) the existence of active and up-to-date insurance coverage for a given exposure; (ii) the insured amount as a percentage of the exposure; (iii) the types of hazards covered by the insurance policy; (iv) whether the insurance is held by the institution or by the borrower; (v) whether reporting should be limited to real estate-related exposures or may also include non-real estate exposures; and (vi) any other relevant information (please specify).

We suggest that, if reporting of insurance related information is required, it should be limited to real estate related exposures only.

*** Question 27.** To better monitor the risk and losses stemming from physical impacts. Do you agree to include information on exposures highly and moderately exposed to physical risk?

We agree that monitoring risk and losses from physical impacts is crucial. While a tiered approach to categorize exposures is generally sensible, we find that simply distinguishing between "highly" and "moderately" exposed might not be sufficient to accurately capture the nuances of physical risk. Such broad categories could obscure significant differences in risk profiles and potential losses within each tier.

To date, definitions for “highly” and “moderately” exposed are missing. We do not see a real added value in including information on exposures moderately exposed to physical risk, as for many of the risk drivers, the proportion of the exposure that is moderately exposed to physical risks in the main countries is very large (for example in Germany the risk for storm is moderate in a large part of the country). Therefore, we think that this column would not allow to get useful insights. In addition, such information is currently not available from all data providers and would therefore need to be collected or sourced by institutions at significant additional cost.

*** Question 28.** Do you have alternative proposals to reflect the vulnerability of institutions’ portfolio and the potential damage that physical hazards could cause them?

No comments.

*** Question 29.** Do you have any views on whether additional information on expected losses, (excluding insurance) and reflecting the accurate vulnerability, including damage functions, would be useful?

While we acknowledge the theoretical value of incorporating additional information on expected losses, including damage functions and more granular vulnerability assessments, we consider that such an approach would significantly increase complexity without necessarily delivering commensurate supervisory benefits. There is a risk that the resulting disclosures would create a form of pseudo-accuracy driven by methodological sophistication rather than by reliable and decision-useful data.

Moreover, for institutions with business models such as custodian banks, direct exposure to physical climate risks is very limited. In this context, the relevance of detailed expected loss metrics is correspondingly low, in particular given the current constraints in data availability at asset-level regarding vulnerability and damage functions. Requiring such information would therefore impose a disproportionate burden while offering limited additional insight.

Institutions for which physical risks are assessed as non-material would nevertheless be required to perform a comprehensive assessment of their entire portfolio—including SMEs. This appears disproportionate.

D 05.01 – Climate change physical risk: Exposures subject to physical risk (simplified)

*** Question 30.** Do you have any views on the proposed Template D 05.01(simplified)?

We would like to raise concerns regarding the operational proportionality of applying Template D 05.01 (simplified) at the level of large subsidiaries. In such cases, a single operating entity may represent the core business activities, while other entities within the group perimeter act primarily as holding structures with comparatively limited balance sheets and risk exposures.

Applying Template D 05.01 at subsidiary level would require reporting based on a different geographical (z-axis) dimension, namely a NUTS 2 breakdown, compared to the approach used at consolidated level. This may result in duplicative and disproportionate reporting effort without a corresponding supervisory benefit, particularly where the subsidiary effectively reflects the group's main risk profile.

Clarification is therefore needed as to whether, in such circumstances, the application of Template D 05.00 at subsidiary level, aligned with the consolidated reporting approach, would be considered appropriate. Explicit guidance in the ITS for cases where subsidiaries effectively mirror the group's risk profile would support proportionality and consistent implementation.

The vast majority of institutions in Germany that are eligible to apply the simplified reporting framework prepare their accounts under German accounting standards, which do not provide for fair value measurement. Consequently, an appropriate reporting metric could be the specific impairment (individual loan loss provision) that must be recognized where exposures are deemed doubtful.
Appropriate clarification in the instructions would therefore be required.

To further simplify reporting, a reporting threshold for off-balance sheet items should be introduced. These positions are generally of minor relevance, and in such cases the additional column does not provide any meaningful benefit.

D 10.00 – Exposures Contributing to Sustainability Objectives

*** Question 31.** Do you have any views on the proposed Template D 10.00?

For Taxonomy-aligned assets, the proposed template would essentially duplicate the existing Taxonomy reporting. In our view, this does not provide any additional informational value and should be rejected, particularly in light of the intended regulatory simplifications under the Omnibus Initiative.

For non-Taxonomy-aligned assets, such as green bonds issued in third countries, institutions typically only have information on whether these assets contribute to a climate objective. The additional data points requested in the rows (e.g. "Exposures mitigating climate change transition and physical risks" and "Exposures financing assets and activities contributing to the transition") are not usually collected by banks and are generally not available from data providers.

In addition, there are no clear definitions for these data points, which significantly complicates their implementation.
The distinction between "Exposures mitigating climate change transition and physical risks" and "Exposures

financing assets and activities contributing to the transition" remains unclear to us. Further explanation and illustrative examples would be helpful.

A meaningful simplification of the template could, in our view, be achieved by restricting it to purpose-bound lending for which the necessary information is actually available.

Template D 10.00 includes a column on "Qualitative information on the nature of the mitigating actions." However, the instructions on ESG risk exposure reporting and information related to the EU-wide stress test that have been published do not explicitly clarify whether and to what extent this qualitative information is mandatory.

D 11.00 – Exposures to Environmental Risks (Beyond Climate)

* **Question 32.** Do you have any views on the proposed Template D 11.00?

We consider ENCORE a useful starting point for identifying sectoral environmental linkages and screening potential biodiversity-related risks. However, it is not methodologically sufficient for supervisory reporting, as it primarily captures sectoral dependencies and impacts ('pressures') rather than risks in terms of probability, timing and financial impact.

Pressures reflect environmental impacts but do not indicate the likelihood or severity of transition risks, which depend on external factors such as policy or market developments. Likewise, dependencies are not equivalent to physical risks, which materialise only when environmental changes translate into concrete financial impacts. Template D11.00 poses challenges where environmental risks beyond climate are assessed as non-material, as counterparty-level data would typically not be available. Reporting zero values would be misleading, as this could be interpreted as absence of risk rather than absence of assessment.

Institutions should therefore be allowed to submit a nil return or be exempted from completing the template in such cases. This approach should also apply to other ESG templates and would be consistent with the proportionality principle and CSRD materiality logic. Alternatively, a category such as 'without explicit assessment at company level' could be introduced.

We would also welcome clarification on the criteria for determining relevant impacts and dependencies. While ENCORE uses a qualitative scale, the ITS does not specify whether low or very low exposures should be included or whether a materiality threshold applies.

Without such thresholds, even very low impacts could trigger reporting for most corporates, reducing both proportionality and informational value. Clear guidance on the application of materiality thresholds would therefore support consistent and risk-focused reporting.

When mapping impacts and dependencies identified in ENCORE to the categories defined in Template D 11.00, additional interpretation and research are often required. To support consistency and reduce the risk of divergent mapping approaches, we would welcome clarification as to whether the EBA intends to provide reference mappings between commonly used public data sources, such as ENCORE, and the template categories.

Finally, clarification is requested regarding the allocation of exposures to non-financial corporates with material activities in more than one geographical location, in particular when these activities span multiple countries. Guidance on how such exposures should be reflected along the z-axis of Template D 11.00 would support

consistent implementation. We refer in this context to our comments provided for Template D 05.00.
In our view, the data points on environmental impacts and related environmental risks foreseen under this template can, at most, be derived for counterparties subject to CSRD reporting requirements.
However, even for these counterparties, the concrete assessment of risks and impacts remains subject to significant discretion at the level of individual institutions, meaning that comparability of the reported information cannot be ensured.

Moreover, counterparties themselves face a significant conflict of interest when providing such information, as they would be required to disclose largely unverifiable risks within the credit granting process, potentially negatively affecting their own creditworthiness assessment.
From our perspective, a more meaningful approach would be for supervisors to provide a centrally defined list of relevant counterparties (e.g. based on LEI codes), for which institutions would only report the total volume of their exposures, similar to the credit risk templates used in the Fit-for-55 exercise.
However, even under such an approach, the additional informational value compared to the data already required under Template D04.00 would be limited. We therefore consider that this template should be removed entirely.

Furthermore, a meaningful assessment of such risks would require a dedicated methodological framework comparable to the DNSH criteria. Given the associated implementation effort, the cost-benefit ratio appears highly questionable.

* **Question 33.** Do you have any views on the materiality threshold introduced in this template?

We consider the proposed materiality threshold for country-by-country reporting to be too low to meaningfully identify environmental risks, leading to largely non-informative disclosures that do not distinguish between material and immaterial exposures.

In line with the proportionality principle and the CSRD framework, as well as the Taxonomy Article 8 delegated act, data should only be reported where risks are assessed as material. Where risks are deemed non-material, institutions should be allowed to indicate this and refrain from completing the respective template.

This approach should apply exclusively to non-material risks and remain subject to supervisory review, including the possibility for competent authorities to request the underlying materiality assessment.

Contact

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Date: 10/07/2026 16:30:57

Consultation Paper on changes to ITS on supervisory reporting: Module on SNCI alignment with Pillar 3 disclosures

Fields marked with * are mandatory.

Introduction

The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions detailed below.

Comments are most helpful if they:

- respond to the question stated; indicate the specific point to which a comment relates;
- are supported by a clear rationale;
- provide evidence to support the views expressed/ rationale proposed; and
- provide alternative regulatory options for consideration by the EBA.

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Please provide your responses by **10 July 2026 close of business**. Late responses will not be considered

Many thanks for your cooperation and support!

Who is responding

* Name of the organisation

German Banking Industry Committee

* Contact name

Christoph Friedrich

* Contact email

c.friedrich@bvr.de

* Disclose comments

- (selected) Yes
- No

Questions for consultation

Assessment of SNCIs' Pillar 3 requirements

* **Question 1**: Do you agree with our assessment regarding MREL/TLAC disclosures?

The tables EU KM2, EU TLAC1, EU ILAC, EU TLAC2 and EU TLAC3 included in the overview in paragraph 10 are to be disclosed only by institutions subject to the requirements of Article 92a or 92b of the CRR (see Article 437a and Article 447(h) of the CRR). As the EBA has already noted in paragraph 19, there are in fact no SNCI institutions that fall under these requirements.

We therefore consider these tables to be unnecessary and believe they should be deleted.

* **Question 2**: Would you agree that no datapoints need to be added to the reporting framework as regards the Pillar 3 requirements applicable to non-listed SNCIs?

At this stage, no additions are necessary, cf. discussion paper on P3DH for SNCI, figure 4.
As SNCI institutions no longer disclose information themselves, but the EBA will publish the Pillar 3 information on the basis of the information that these institutions report to their respective competent authorities in accordance with Article 430 of the CRR (see Article 434a(4) of the CRR in conjunction with Article 21d of the ITS on Reporting), information to be disclosed by SNCI should not go beyond the reporting data points.

In this context, we would ask that it be made clear in the heading of Article 21d that this article applies only to listed SNCI. This would make it clear that any qualitative information required under point 3 would have to be disclosed only by listed SNCI.

* **Question 3**: Would you agree with the assessment performed as regards EU CMS1 and EU CMS2 and that no action is needed?

We agree with the assessment that SNCIs do not use internal models. These two tables are therefore unnecessary and should be omitted.

* **Question 4**: Would you agree to add in DPM the accompanying narrative for EU KM1 (applicable to listed and non-listed SNCIs)?

Based on our practical experience to date, an accompanying narrative for EU KM1 is likely to be required only in exceptional cases. We therefore cannot, as a matter of principle, object to the inclusion of such a provision in the DPM. A prerequisite, however, would be for the EBA to set out in more detail how such a narrative would be integrated into the process. In particular, clarification is needed as to when and in what procedural context the narrative information would need to be submitted, whether an existing reporting framework or procedure should be used for this purpose or whether a separate process should be established, and how any corrections are to be carried out. As long as these points remain unresolved, a definitive assessment of the proposed DPM mapping is only possible to a limited extent.

In our view, a DPM-based implementation can therefore only be considered if narrative information does not have to be definitively established at a time that is disproportionately early in relation to the disclosure process, and if it ultimately contributes to a genuine simplification compared with the existing procedure.

The EBA should also clarify that, should relevant reporting fields be added, these are intended only for strictly limited exceptional cases and do not give rise to an expectation that the quantitative data in the EU KM1 template should generally be supplemented with comments.

* **Question 5**: As regards the options presented for the disclosure of qualitative information (Options A, B, C), which one would you prefer? Please explain the reasoning followed.

We support Option A proposed by the EBA in paragraph 30 with regard to qualitative disclosures.

Alternatively, Option C could also be a viable approach. However, this is conditional upon the specific submission process being designed in a way that is workable in practice and the points raised in response to Question 4 being clarified accordingly. In our view, Option C would only be considered if it did not place any additional burden on the institutions.

Detailed amendments' proposals to reporting framework templates

* **Question 6**: Would you agree with the general approach to add datapoints to the supervisory reporting framework, so the EBA is under conditions to compute the respective Pillar 3 figures? Please explain your reasoning.

The disclosure data points should be aligned with and don't go beyond the reporting framework. This is also in line with the principle that Pillar 3 follows Pillar 1. Additional data points should only be introduced in exceptional cases where this is absolutely necessary for the central calculation of the relevant Pillar 3 disclosures. Care must be taken to ensure that this does not result in any additional burden for institutions for which the respective disclosure is not material.

Question 7: In case you are an institution and the answer to the previous question is no, how do you plan to disclose this information? How would you see the split in the disclosure process in terms of burden, usefulness and good understanding of the disclosed Pillar 3 data? Please see also question 5 on the disclosure of qualitative information.

N/A

* **Question 8**: Would you agree with the rationale followed and proposed solution to EU OV1 datapoints? Would you agree that these datapoints would be useful not only to listed SNCIs but all institutions reporting and disclosing this information?

We agree with the proposed solution to amend EU OV1 (see paragraph 31) for listed SNCI. For all other institutions, however, we see no need for such an amendment.

* **Question 9**: Would you agree with the assessment performed for the missing data point in the EU CR1 template, i.e., to disregard this information?

We agree with the EBA's assessment of the EU CR1 template (see paragraph 34).

* **Question 10**: Would you agree with the proposal to collect EU CR1, EU CQ1, EU CQ3 and EU CQ7 for listed SNCIs at solo level, that would allow that listed SNCIs do not have to keep disclosing this information separately?

We agree with the proposal to collect data using the EU CR1, EU CQ1, EU CQ3 and EU CQ7 templates for listed SNCIs.

* **Question 11**: Would you agree with the proposal to include the remuneration templates in the supervisory reporting framework for listed SNCIs, that would allow that listed SNCIs do not have to keep disclosing this information separately?

In principle, the proposal can be endorsed, provided that it prevents duplicate reporting and that the information in question does not have to be made available in parallel via other channels. This is, however, conditional upon the procedural integration being practicable, particularly with regard to the timing of reporting, the reporting procedure and the necessary flexibility on the part of the institutions.

Contact

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Contribution ID: 2f4a4267-a42d-46b8-8bf1-5ce01883eff6
Date: 10/07/2026 16:38:14

Consultation Paper on changes to ITS on supervisory reporting: Module on Other changes

Fields marked with * are mandatory.

Introduction

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Many thanks for your cooperation and support!

Who is responding

* Name of the organisation

German Banking Industry Committee

* Contact name

Christoph Friedrich

* Contact email

c.friedrich@bvr.de

* Disclose comments

- [x] Yes
- [ ] No

Questions for consultation

* **Question 1.** Are the instructions and templates clear to the respondents?

No comments.

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

No comments.

* **Question 3.** Cost of compliance with the reporting requirements: Is or are there any element(s) of this proposal for new and amended reporting requirements that you expect to trigger a particularly high, or in your view disproportionate, effort or cost of compliance? If yes, please:

- specify which element(s) of the proposal trigger(s) that particularly high cost of compliance,
- explain the nature/source of the cost (i.e. explain what makes it costly to comply with this particular element of the proposal) and specify whether the cost arises as part of the implementation, or as part of the on-going compliance with the reporting requirements,
- offer suggestions on alternative ways to achieve the same/a similar result with lower cost of compliance for you.

No comments.

* **Question 4.** Is the deletion of rows in template C 47.00 of Leverage ratio reporting, related to cash pool arrangement, cost reducing to institutions?

We appreciate the deletion of template C43.00. We still see no legal basis for maintaining template C 40.00. These templates were introduced for reporting the data required for preparing the report under Article 511 of the CRR. However, the EBA submitted this report in 2016. As retaining data reports that are no longer required for supervisory purposes places an undue burden on institutions, we advocate removing both templates, including C40.00.

Deleting the granular information on cash pooling arrangement and replacing them with aggregate information only leads to negligible cost reduction (if any, since the information needs to be derived anyways). Instead, we suggest to remove all cells related to cash pooling arrangement (rows 0193-0198) as well as regular way sales / purchases (rows 0185-0189) entirely as those two requirements add significant reporting burden while only having a very negligible effect on the Leverage Ratio. The Leverage Ratio was intended to be a simple backstop mechanism for the RWA calculation and those two requirements are the epitome of overcomplication.

Aggregate exposure to shadow banking entities (C 37.00)

* **Question 5.** Is the design for the reporting of the aggregate exposure to shadow banking entities clear enough? If you identify any issues, please specify the related instructions.

Overall, the design of the reporting framework is comprehensible and coherent. Notably, however, the European legislator deliberately refrained from prescribing a high level of specification and granularity, with the intention of keeping reporting requirements simple. Against this background, a further reduction of reporting requirements appears both conceivable and desirable. This is particularly relevant for institutions whose aggregated exposure to shadow banking entities is so immaterial that the fallback approach is applied for internal risk management purposes. For reasons of proportionality, such institutions should be fully exempted from the reporting obligation.
Alternatively, taking into account the new disclosure requirements on aggregated risk exposures to shadow banking entities non-listed SNCIs, which are exempted from these additional disclosure requirements, could also be exempted from reporting under the new template C 37.00. This would also be consistent with the objective of simplification and the aim of enhancing proportionality.

In the new template LE4, column 0090 requires the reporting of the “% of Tier 1 capital”. This figure refers to column 0350 of the existing template LE2; however, due to differing reference bases, it conveys a different informational value. While template LE2 considers exposures to a single client or a group of connected clients (GCC), template LE4 instead captures the aggregated exposure to all shadow banking entities (without taking into account the respective GCCs). Notwithstanding this difference, we would like to point out that column 0090 is redundant, as it can be derived arithmetically based on the available information on Tier 1 capital. In line with the “define once – report once” principle, this data point should therefore be removed entirely.

We welcome that reporting template C 37.00 is aligned with the familiar large exposure (LE) templates and has been designed in a more compact manner. The technical requirements of templates LE1 to LE3 remain unchanged and can be transferred to the new reporting template C 37.00. An exception concerns the instructions for completing column 0060. In template C 37.00, columns 0020 to 0050 require the reporting of direct and indirect exposures. In addition, column 0060 requires reporting of “additional exposures arising from transactions where there is an exposure to underlying assets” (see instructions for template C 37.00, columns 0010–0060: “original exposures of direct and indirect on-balance-sheet and off-balance-sheet exposures, as well as additional exposures arising from transactions where there is an exposure to underlying assets”). In contrast, the current final draft disclosure template EU SB1 provides for “original exposures of direct and indirect on-balance-sheet and off-balance-sheet exposures, including additional exposures arising from transactions where there is an exposure to underlying assets” (see draft instructions for EU SB1, columns a–b). In order to avoid misunderstandings and unnecessary implementation efforts for institutions, the instructions in reporting template C 37.00 for columns 0010–0060 should be aligned with the disclosure template and amended as follows: “original exposures of direct and indirect on-balance-sheet and off-balance-sheet exposures, including additional exposures arising from transactions where there is an exposure to underlying assets”.

Under the proposed timeline, the new reporting template C 37.00 would first be submitted as of 30.09.2027, requiring significant technical and procedural adjustments for institutions and software providers. At the same time, final draft disclosure requirements indicate that aggregated exposures to shadow banking entities may, except for SNCIs, need to be disclosed already as of 31.12.2026. This divergence would create substantial technical challenges, as the disclosure builds upon template C 37.00. We therefore advocate aligning both timelines so that the first disclosure takes place no earlier than 31.12.2027, ensuring consistency in content and timing between Pillar 3 disclosures and supervisory reporting for exposures to shadow banking entities overall.

In the context of reporting and disclosure requirements on aggregate exposure to shadow banking entities, the EBA proposes, in its consultation on the revision of the Guidelines on limits on exposures to shadow banking entities which carry out banking activities outside a regulated framework under Article 395(2) and (2a) of Regulation (EU) No 575/2013, to abolish the existing materiality threshold applicable under the guidelines. In our view, this would be a misguided approach. Instead, this threshold should be maintained for reporting and disclosure purposes, taking due account of proportionality and materiality. Pursuant to Article 430(6) CRR, the EBA is granted discretion in specifying the new reporting requirement under Article 394(2), second subparagraph CRR.

IRRBB

* **Question 6.** What are the views of respondents' on the current reporting templates? Do respondents see opportunities for simplification, and if so, how could such simplification be implemented in order to reduce reporting costs?

We would like to highlight that, in several areas, international regulatory requirements remain significantly removed from established national accounting and reporting practices. This divergence inherently creates considerable discretion and interpretative challenges for institutions. Examples include differences between IFRS and national GAAP frameworks (e.g. HGB), deviations in balance sheet and reporting line structures, as well as differing definitions of variable products. These discrepancies not only complicate implementation but also affect the comparability and consistency of reported data.

Generally, we advocate a stronger application of the principle of proportionality.
For many institutions – especially for SNCIs – the burden of reporting involves not only the exceptionally extended volume of data but also data aggregation, quality assurance, and the validation of the reporting templates. The current IRRBB reporting requirements go well beyond what is necessary for risk assessment, particularly for small and non-complex institutions. Depending on the institution’s classification, reductions of data granularity should be considered for reporting templates J02 through J11. A more consistent application of the principle of proportionality, a reduction in granularity, the elimination of duplicate reports as well as detailed

breakdowns, and a stronger focus on key risk drivers would significantly reduce future reporting efforts and costs without substantially compromising the regulatory significance of the reports.

With regard to templates J05 to J07 and J08, J09, we do not see a meaningful strategic benefit for institutions. The preparation of these templates requires extensive manual adjustments, resulting in a disproportionate operational burden. In practice, the core and most relevant supervisory information is already captured in templates J01 to J04.

Additional information related to the parameterisation of positions with non-maturity interest rate and principal structures—particularly regarding behavioural profiles (e.g. run-off assumptions) and embedded options—could, in our view, be collected more efficiently and, ultimately, more reliably at a central level. For example, such data could be obtained directly from central service providers within the banking groups, thereby reducing duplication of effort at the level of individual institutions.

Should templates J05 to J07 and J08, J09 not be fully discontinued, we strongly recommend a substantial reduction in their scope. The sheer volume of required data points constitutes a major part of the reporting burden. By way of comparison, the previous national reporting framework (SAKI) required only 19 data points, whereas the current “proportional” SNCI template (EUR only) comprises 3,045 data points.

Additionally, we propose to eliminate the current distinction of loan commitments (contingent exposures) between assets and liabilities. Where a differentiated presentation is deemed necessary, this should instead be reflected, where appropriate, within or directly below the respective underlying business position (“of which” row) to which the commitment relates.

Furthermore, building a comprehensive test portfolio of appropriate financial instruments that covers the existing reporting framework and its written instructions with concrete figures would help to prevent misunderstandings. The test portfolio would also allow the DQ checks and their findings to be continuously reviewed for plausibility and compliance with the instructions.

It would also be helpful if the instructions for specific positions in the templates, which are available in the respective national languages, were consistent in content across all language versions. One example is the difference between the English and German versions of the formula specified for calculating the duration in template J02 (column 0020).

* **Question 7.** Do respondents consider that removing certain columns, rows, or sheets (e.g. memorandum or currency breakdown) items would reduce reporting costs? Or, would it rather create additional costs due to the necessary reporting systems adjustments?

IRRBB-reporting has been as far as possible automated at the institutions. Nevertheless, in the long term, removing certain columns, rows, or sheets – particularly in the reporting templates J02 to J11 – would significantly reduce the reporting costs.

With regard to sheets J05 to J07 and J08, J09, no additional costs are expected if the templates no longer need to be fully completed. This is due to the fact that the corresponding data would not need to be extracted at the system level.

* **Question 8.** Where do the respondents consider that the main costs stem from?

The main cost driver is attributable to personnel expenses.

Reasons for resubmission

* **Question 9.** Which one of the options described above for the future treatment of submission metadata would be the preferred one, in terms of reporting costs?

In general (both for Q9 and 10):

The industry supports further integration and digitalisation of processes for exchanging requests and information related to submitted reporting data. Both options in section 1.5 of the EBA/CP/2026/07 Module 9 consultation paper are technically feasible and would require adjustments to current software components. A clearly defined, holistic communication channel for individual reporting requirements with supervisors, ideally supporting communication in both directions, is therefore strongly welcome. Nevertheless, before creating new communication channels, existing channels should first be reviewed and consolidated.

However, the chosen solution should not only support the submission of reasons for resubmissions to the ECB as one element of the QFR process. It should enable broader digitalisation and be usable beyond supervisory reporting. Instead of maintaining today's multiple streams of follow-up requests — including explanations submitted at filing, ad hoc follow-up questions, post-submission QFR rounds and year-end requests concerning resubmissions — the framework should move towards one overarching communication channel in order to prevent repeated requests on the same issues.

We express an initial preference for Option B (XBRL), subject to certain assumptions regarding its future design and implementation. In particular, our preference is based on the assumption that:

• where a "metadata as data" approach is adopted, the corresponding data collection forms can be generated automatically from the DPM taxonomy and transformed into XBRL-CSV through standard processes, thereby avoiding additional implementation and programming effort;

• the DPM/XBRL solution will allow the new forms to be established as a standalone framework that can be used consistently across multiple reporting frameworks. Under this assumption, the framework could subsequently support the transmission of supervisory comments without requiring a resubmission of reporting data and could provide a harmonised technical basis for recurring supervisory interactions, such as the ECB's Quality Feedback Report (QFR) process;

• the framework may be expanded in the future to facilitate the exchange of validation findings and outlier queries between supervisory authorities and reporting institutions. Such an approach could enable a bidirectional communication process based on a common XBRL-CSV standard, allowing supervisory requests to be transmitted, processed and responded to within the same technical framework. From the perspective of internationally active institutions, a harmonised European standard would be preferable to maintaining different national solutions for supervisory communication.

Provided that these assumptions are reflected in the final design, we consider Option B (XBRL) to offer greater long-term potential, scalability and reusability than the proposed JSON-based approach. In contrast, the JSON solution appears, based on its current design, to be limited to serving as accompanying information for a specific reporting submission and would therefore offer less flexibility for future use cases.

In this context, we propose implementing the process using the "metadata as data" approach with the following features:
- New technical tables to provide explanations in line with section 1.5.1.2 (43);

- Separate submission of comments, independent of reporting data, allowing multiple explanations on outliers and validation failures for one reporting period (QFR rounds);
- Bidirectional digital communication, enabling authorities to send requests (including failed validation rules and outliers) via the same technical templates in xbrl-csv directly to banks;
- Cross-authority usability, in general and in particular for future IReF reporting , with feedback and comments accessible to all relevant parties involved (banks, NCAs, ECB, JST and EBA);
- Potential use for exchanging requests and comments between authorities and banks for regular/recurring reporting that does not use xbrl-csv (e.g. STE reporting as part of the QFR process).

* **Question 10.** Do you have any specific comment or suggestion regarding the specifications envisaged for the transmission of submission metadata?

To generate tangible benefits for institutions – especially those under direct ECB supervision – it should also replace the current manual, Excel-based QFR process as well as additional comments provided via NCBs, e.g. via PRISMA to Deutsche Bundesbank. In addition, there should be a clearly defined central contact point on the supervisory side that banks can approach directly to clarify requirements at an early stage and resolve ambiguities in a coordinated manner. The primary objective of the framework should be to improve data quality over time, so that supervisors progressively receive a robust and reliable data basis for their tasks. From our perspective, past setbacks were often caused by parallel secondary objectives and insufficient communication. Targeted process consolidation therefore offers significant potential not only for quality improvements, but also for cost reductions.

Voluntary reporting by small and non-complex institutions (SNCIs) and by institutions other than large institutions

* **Question 11.** Do you have any comments on the possibility introduced in the ITS, for SNCIs and for institutions other than large institutions to report on a voluntary basis and with the same frequency, as respectively non-SNCIs and large institutions? If so, please explain.

As long as it is voluntary, we have no comments.

Contact

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