

**ABI POSITION PAPER ON THE  
EBA Discussion paper “PILLAR 3  
DATA HUB PROCESSES AND  
POSSIBLE PRACTICAL  
IMPLICATIONS”.**

March 2024

## General remarks

The Italian Banking Association (ABI) welcomes the opportunity to comment on the EBA Discussion paper "Pillar 3 Data Hub processes and possible practical implications".

ABI supports the project to create a single electronic access point on EBA's website in order to centralize the prudential information disclosed by institutions thus promoting the strengthening of market discipline through easier access to usable and comparable Pillar 3 information.

However, the purpose of this position paper is to highlight ABI concern relating to some aspects of the project as presented in the discussion paper and, also, is intended to be an opportunity to ask for some specific clarification.

Our major concern is about the timing of the project implementation.

Considering that the CRR 3 does not specify a deadline for the development of the Pillar 3 Data Hub project, we would have expected that all aspects of the project would have been defined first, also taking into consideration the results of the pilot that is being conducted with some banks, and that only afterwards would it be shared in a public consultation in order to analyze all possible practical implications. Instead, it is clear from the discussion paper that many aspects still need to be defined (e.g. qualitative data transmission criteria, language to be used, necessary adjustments to make the information machine readable, cyber security, data model details, etc...).

While we understand the usefulness of developing the project in the shortest time possible, we have several concerns about an approach that, even before having defined all phases of the project, is requesting some feedback on possible technical implications. Furthermore, every aspects of the project that will be analyzed at a later stage could involve as many technical and cost analyses which it would be useful to take into consideration immediately for an all-round analysis of the different possible impacts of the project itself.

However, should EBA proceed with this approach, ABI's expectation is that banks will be granted, in a second phase, an adequate timeframe to plan and implement all the adjustments necessary to adapt the banking structures and activities to the changes required.

It is important to underline that these changes are extremely pervasive and will therefore require high implementation times and costs. It will be necessary to identify the interventions to be carried out in order to evaluate their detailed costs. An approach based on a too short timeframe would represent a problem, also considering all other additional costs of adaptation and implementation that banks will be required to incur in order to implement the changes arising from the new banking package, currently under final approval.

Finally, with reference to specific aspects proposed in the discussion paper, ABI would also need confirmation that, accordingly with the CRR3, only banks that already have their Pillar 3 disclosures certified by an external auditor are required to send the relevant certification to the EBA and this obligation must follow the same frequency (e.g. quarterly, annual) and type of report (full or limited audit) established in the contractual agreements signed with the auditing firm.