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# Consultation paper on changes to ITS on supervisory reporting

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5 May 2026, 10:00 – 13:00 CEST | Public hearing (online)

# Housekeeping

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  - To maintain an optimal experience for all attendees, please **mute microphones and turn off cameras**.
  - **Rejoin or refresh your session** if you encounter connection problems
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  - When submitting a comment or question, please begin your message by stating your **full name and organisation, and indicate topic or to which speaker your question is addressed to**
  - Please provide only comments/questions which are **inside the scope of the event**
  - **The Q&A section will be moderated.** Comments will not appear straight away and will not be accepted if:
    - *Submitted without a full name and organisation*
    - *Outside the scope of the event*
  - As part of the Q&A, you may be invited to pose your question in person. **When invited, please unmute and turn on your camera**
  - The hearing **will not be recorded** and will not allow any recordings by the participants
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# Agenda

1.	<b>EBA work on simplification of supervisory reporting and introduction to the consultation paper</b>	<b>10:00 – 10:20</b>
2.	<b>Changes to FINREP reporting</b>	<b>10:20 – 10:35</b>
3.	<b>Integration of stress testing</b>	<b>10:35 – 10:50</b>
4.	<b>ESG reporting</b>	<b>10:50 – 11:05</b>
	<b>Questions and answers</b>	<b>11:05 – 11:35</b>
	<b>Coffee break</b>	<b>11:35 – 11:45</b>
5.	<b>Changes to Liquidity and asset encumbrance reporting</b>	<b>11:45 – 12:00</b>
6.	<b>Market risk and fundamental review of the trading book</b>	<b>12:00 – 12:15</b>
7.	<b>Overview of other changes</b>	<b>12:15 – 12:30</b>
	<b>Questions and answers</b>	<b>12:30 – 12:55</b>
8.	<b>Closing remarks</b>	<b>12:55 – 13:00</b>



Session 1.  
EBA work on simplification of  
supervisory reporting and  
introduction to the consultation paper

# 1. Efficiency of the regulatory and supervisory framework



The report (EBA/REP/2025/26) was published on 1 October 2025 and can be found [here](#) with the recommendations incorporated into 2026 work programme that can be found [here](#). Overall information on the EBA simplification work can be found [here](#)

# 1. Efficiency of the regulatory and supervisory framework: reporting

## Recommendation 4: Integrated reporting

**Recommendation 5:**  
Reduction of reporting requirements

**Recommendation 6:**  
Common rules of the game for data requests

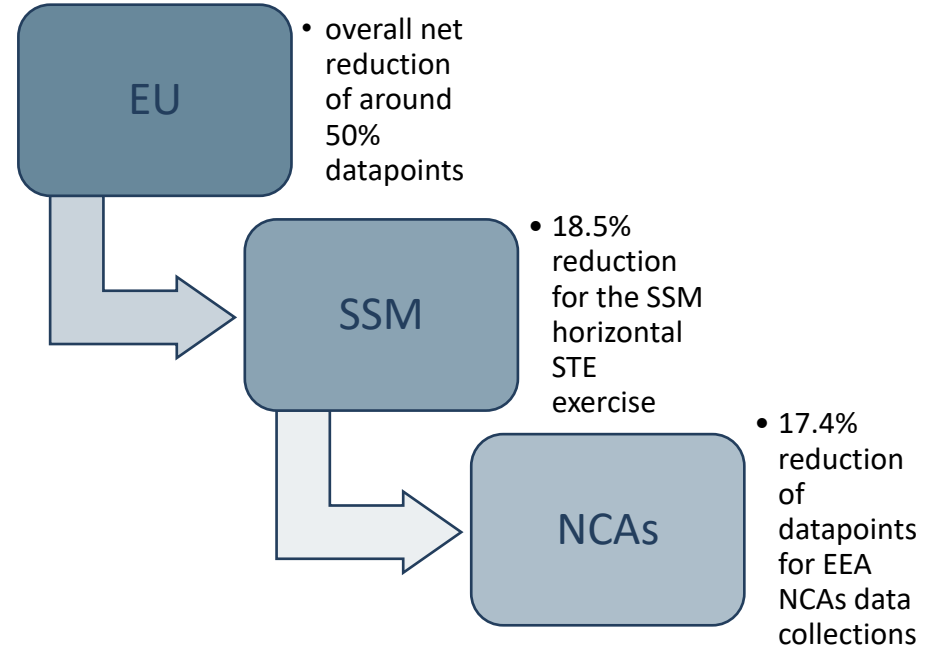
**Recommendation 7:**  
Public EU repository of data requests

**Recommendation 8:**  
Improvements to reporting change management

Consultation paper published on 10 April primarily covers Recommendations 5 and 8. Report on national data collections covers Recommendation 7

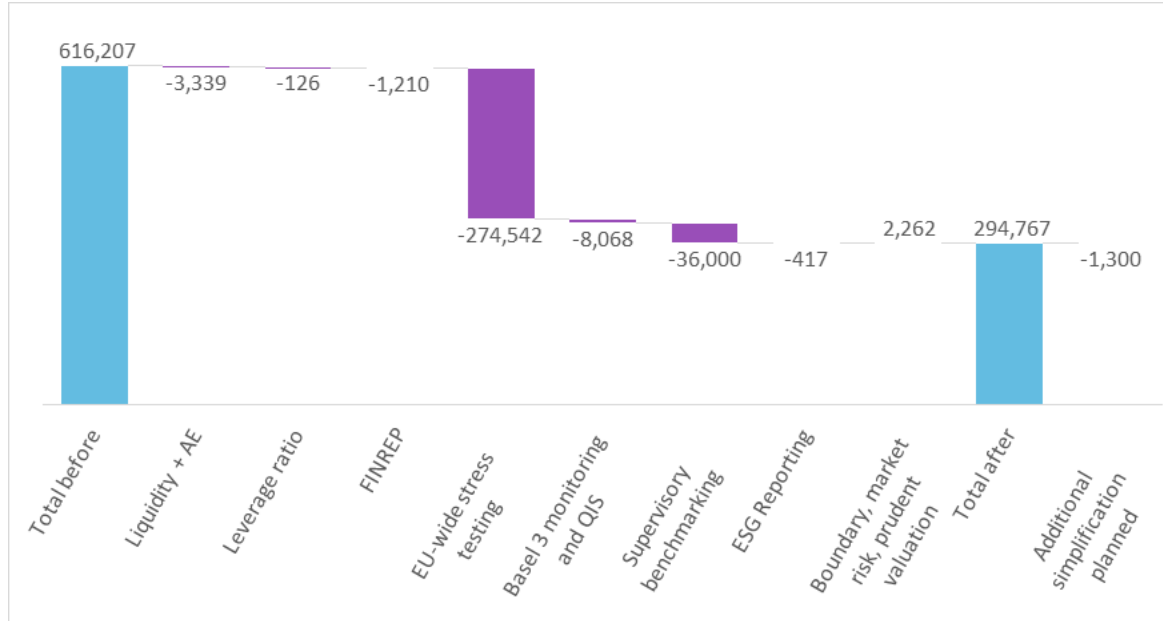
# 1. Reduction of the reporting requirements (1/2)

- **Holistic approach** to reduction of supervisory reporting requirements: EU and national level
- Overall EBA target set to 25% reduction of reporting costs → the EBA does not have information on the cost impacts, hence **responses to the consultation are very important**
- Best available proxy – number of modelled/defined datapoints
- Reductions of the data points envisaged at the EU level (regular + ad hoc reporting) and national for the ECB/SSM and NCAs



# 1. Reduction of the reporting requirements (2/2)

## Net changes to the data point count of the EBA reporting framework



### Major drivers:

- Simplification and integration of stress testing data collections into regular reporting (up to -55% datapoints)
- Simplification and integration into regular reporting of supervisory benchmarking data collections (for credit risk and IFRS 9 benchmarking) (up to -65% data points in terms of volume of reported data)
- Introduction of greater proportionality (-18% reduction of datapoints to be reported by SNCIs)
- Additional simplification measures planned for future

# 1. Structure of the consultation paper

## Modular design of the consultation paper:

- General part + legal text of the ITS
- Module 1. Liquidity and asset encumbrance
- Module 2. FINREP
- Module 3. Operational risk losses
- Module 4. Integration of stress testing data needs
- Module 5. Market risk and FRTB
- Module 6. COREP Own Funds
- Module 7. ESG
- Module 8. SNCI alignment with Pillar 3
- Module 9. Other changes (IRRBB, large exposures – shadow banking exposures, resubmission/explanations, leverage ratio other ITS amendments)

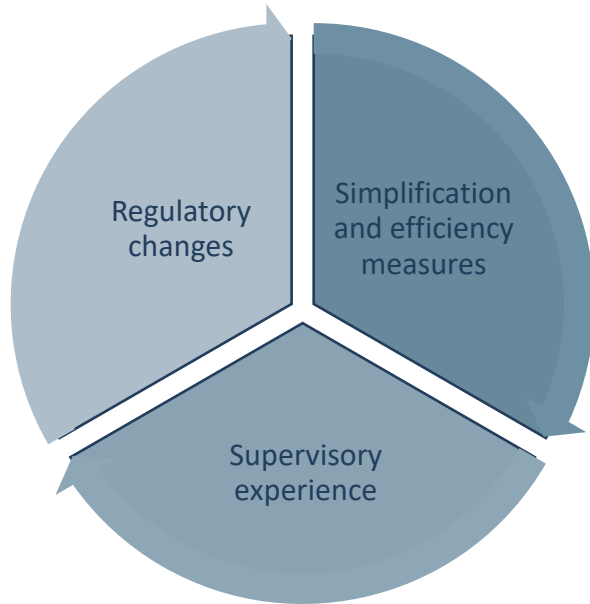
General part, including change management proposals + impact assessment, data collection on reporting costs impacts + questions for consultation

Mini consultation papers with templates instructions, impact assessment and own consultation questions

Consultation paper and its modules are available [here](#)

Changes to supervisory benchmarking reporting are being consulted under a separate consultation paper available [here](#)

# 1. Drivers for the changes to the reporting requirements



## Key **simplification** drivers:

- Continuous implementation of the 2021 EBA cost of compliance report recommendation
- 2025 EBA simplification recommendations aligned with the EU Commissions simplification objectives
- Supervisory experience with using reported data

## Key **regulatory change** drivers:

- IFRS 18 implementation
- FRTB implementation, including revised rules on the boundary between the trading and non-trading (banking) books and structural foreign exchange positions
- New taxonomy for operational risk losses
- Integration of ESG risks into prudential framework

# 1. General approach to simplification measures

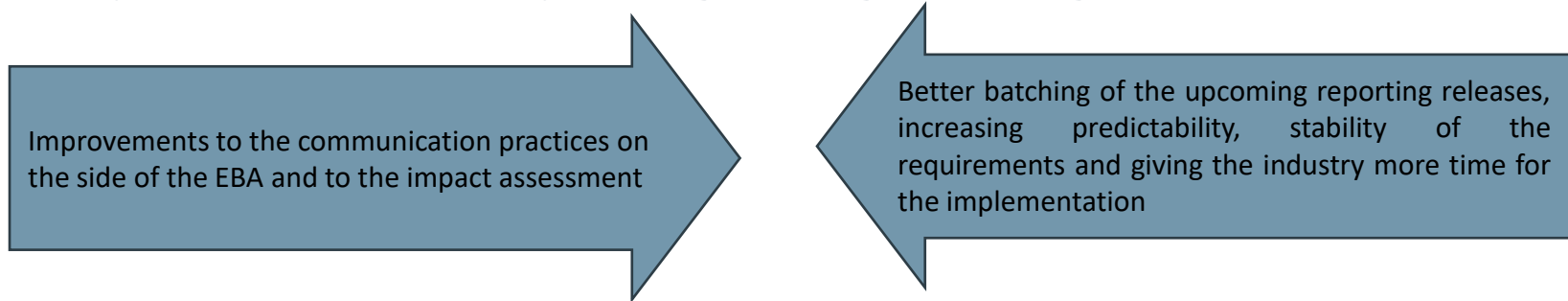
The simplification proposals set out in both consultation papers focus on:

- reduction of data points and templates
- reduction of frequency and scope adjustments
- introduction of greater proportionality for SNCIs
- wider use of 'core + supplement' approach
- introduction of synergies through the integration into regular reporting and streamlining of separate data collections such as EU-wide stress testing and supervisory benchmarking and
- qualitative effects, e.g. through better alignment of definitions across the modules → supporting the work on semantic integration

Simplification measures proposed reflect the supervisory experience with using the reported data and also build on the input from the industry collected in 2025 through the ECB-led engagement with the industry under the ECB simplification work

Simplification efforts leverage on the modernisation of the EBA toolkit and benefit from the modern reporting technology (incl. data point model 2.0 standard and DPM Studio), xbrl-csv taxonomies and new tools offered: reporting time traveller and signposting tools

# 1. Improvements to reporting change management



## Communication

- Improvements to communication and impact assessment are implemented through the current consultation paper
- More tools are available on the EBA website (reporting frameworks page, reporting time traveller, signposting and mapping tool)

## Stability

- Better batching and longer lead time (this consultation paper is good example)
- Consideration of limiting to two batches per year → potential challenges with the underlying regulatory calendars

EBA appreciated receiving feedback on change management → dedicated questions for consultation in general part

# 1. Consultation process

- 149 questions for consultation and data regarding impacts on reporting costs collected through **11 dedicated online surveys**
- Main consultation paper: [https://ec.europa.eu/eusurvey/runner/CP\\_ITS\\_Supervisory\\_reporting](https://ec.europa.eu/eusurvey/runner/CP_ITS_Supervisory_reporting)
- Module 1. Liquidity: [https://ec.europa.eu/eusurvey/runner/ITS\\_Reporting\\_Liquidity](https://ec.europa.eu/eusurvey/runner/ITS_Reporting_Liquidity)
- Module 2. FINREP: [https://ec.europa.eu/eusurvey/runner/ITS\\_Reporting\\_FINREP](https://ec.europa.eu/eusurvey/runner/ITS_Reporting_FINREP)
- Module 2. FINREP (IFRS18): [https://ec.europa.eu/eusurvey/runner/ITS\\_Reporting\\_FINREP\\_IFRS18](https://ec.europa.eu/eusurvey/runner/ITS_Reporting_FINREP_IFRS18)
- Module 3. OpRisk losses: [https://ec.europa.eu/eusurvey/runner/ITS\\_Reporting\\_Oprisk\\_losses](https://ec.europa.eu/eusurvey/runner/ITS_Reporting_Oprisk_losses)
- Module 4. Stress testing: [https://ec.europa.eu/eusurvey/runner/ITS\\_Reporting\\_Stress\\_testing](https://ec.europa.eu/eusurvey/runner/ITS_Reporting_Stress_testing)
- Module 5. Market risk: [https://ec.europa.eu/eusurvey/runner/ITS\\_Reporting\\_Market\\_risk](https://ec.europa.eu/eusurvey/runner/ITS_Reporting_Market_risk)
- Module 6. COREP OF: [https://ec.europa.eu/eusurvey/runner/ITS\\_Reporting\\_COREP\\_OF](https://ec.europa.eu/eusurvey/runner/ITS_Reporting_COREP_OF)
- Module 7. ESG: [https://ec.europa.eu/eusurvey/runner/ITS\\_Reporting\\_ESG](https://ec.europa.eu/eusurvey/runner/ITS_Reporting_ESG)
- Module 8. SNCI alignment: [https://ec.europa.eu/eusurvey/runner/ITS\\_Reporting\\_SNCI\\_alignment](https://ec.europa.eu/eusurvey/runner/ITS_Reporting_SNCI_alignment)
- Module 9. Others: [https://ec.europa.eu/eusurvey/runner/ITS\\_Reporting\\_other\\_changes](https://ec.europa.eu/eusurvey/runner/ITS_Reporting_other_changes)

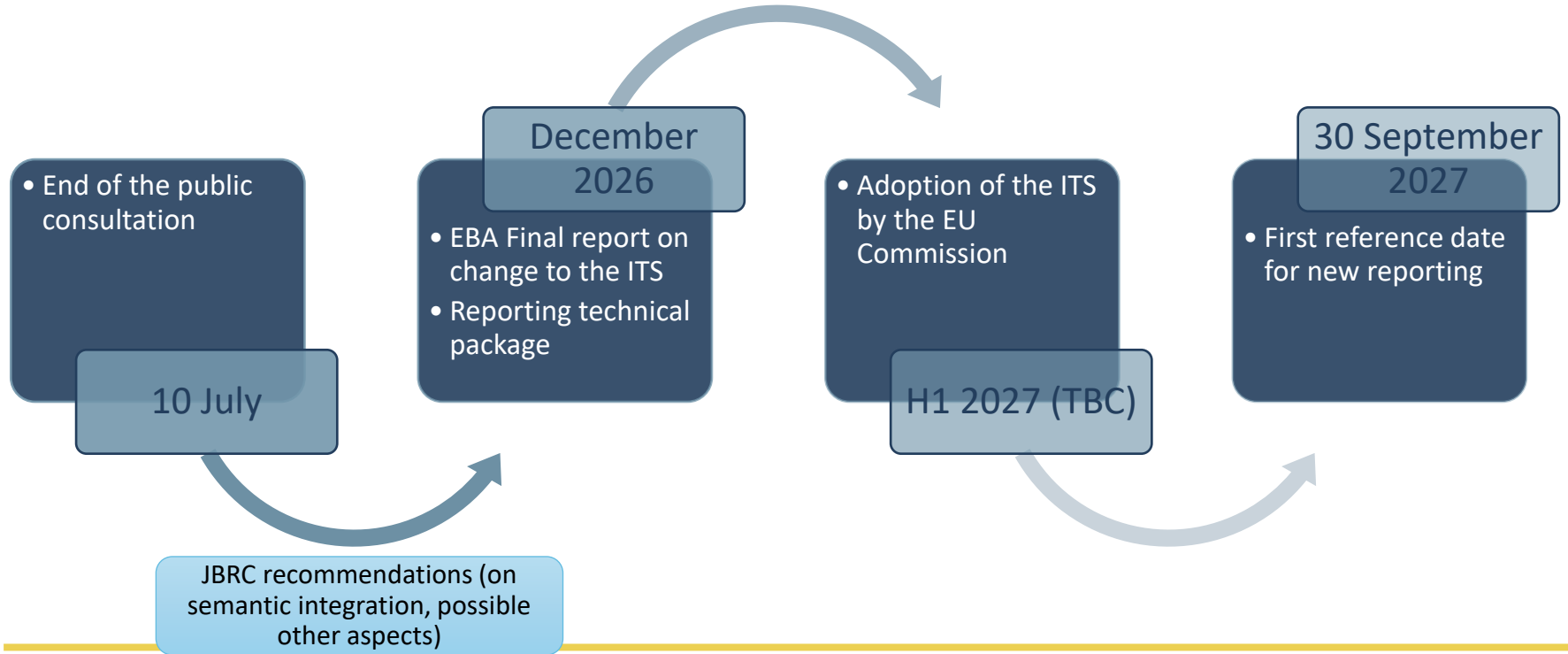
Password for all surveys:  
Reporting2026

10 May (IFRS 18) survey



10 July (everything else)

# 1. Timelines and next steps

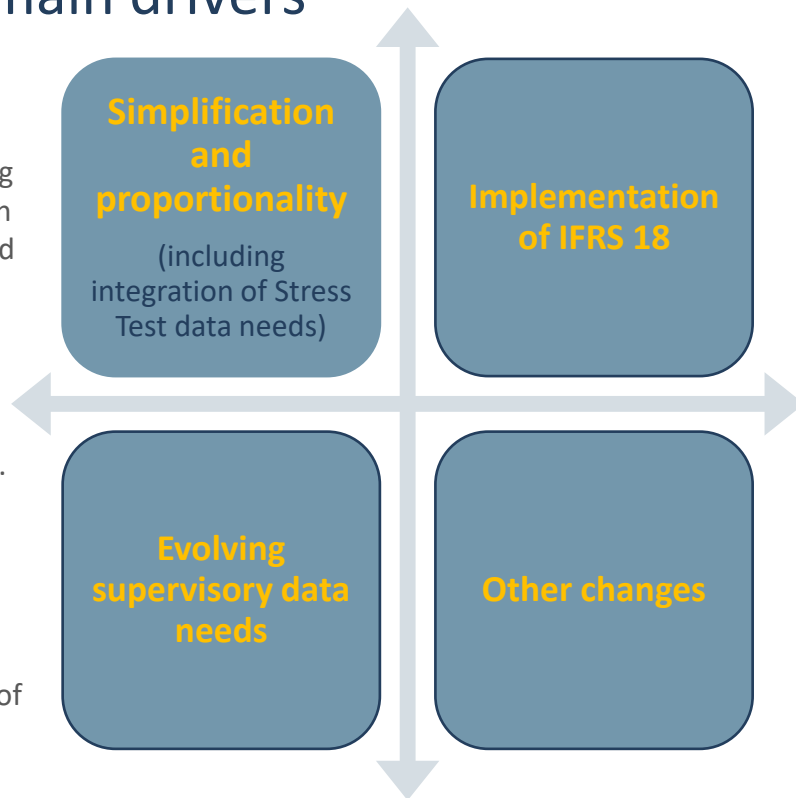




## Session 2. Changes to FINREP reporting

## 2. FINREP review: main drivers

- Overall objective of reducing institutions' reporting costs.
- Strike a balance between keeping essential supervisory information and deleting information deemed highly complex and granular.
- Integration of stress test data needs.
- Collateral additional information.
- Breakdown of 'other financial corporations'.
- Crypto-assets.
- Overlays.
- Public Guarantee Scheme.
- Derivatives in accounting hedge of interest rate risk.

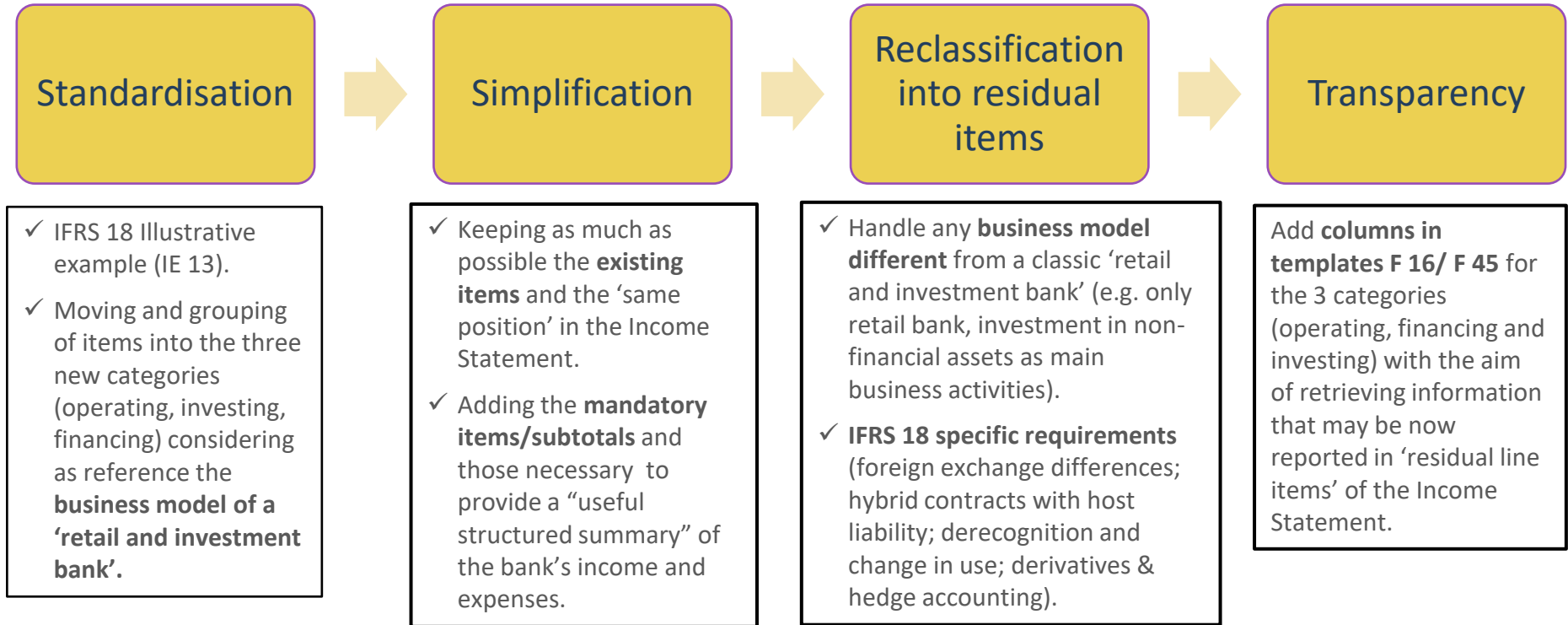


- IFRS 18 endorsement in EU by Commission Reg EU 2026/338.
- One-month public consultation for templates F 02, F 16, F 20.3, F 45 **until 10 May 2026**.
- EBA decision: temporary enforcement and timeline of new IFRS 18-compliant templates.
- Changes in the underlying legal framework (CRR 3, amendments to IFRS 7...)
- Incorporation of Q&As & EGDQ issues.
- Experience with data quality and feedback from institutions compiling data.

## 2. FINREP review: simplification and proportionality

Proposals	Templates affected	Notes
<b>Dropping templates</b>	F06.01, F 11.3, F 11.03.1, F 13.2.1, F 20.7.1, F 21, F 23.1, F 23.3, F 23.5, F 23.6, F 24.2, F 24.3, F 25.3, F 30.2, F 31.02, F 40.2, F 41.2, F 43, F 44.1, F 44.2, F 45.1, F 47	Some relevant information moved under other templates (e.g. F 21 in F42, F 43 in F 02, F 24.03 in F 24.01, F 25.03 in F 25.02) or frameworks (F6.01/F 20.07.1 in ESG reporting)
<b>Revamping templates</b>	F 07.01, F 07.02, F 09.01.1, F 09.01, F 15, F 22.01, F 22.02, F 23.2, F 23.4, F 24.1, F 25.1, F 25.2, F 26, F 30.1, F 41.1	Focus on essential supervisory information In F 41.01 increase of frequency from annual to quarterly and information on hedging interest rate derivatives.
<b>Reduction of frequency</b>	F 13.03.1/F 17 from quarterly to semi-annual; F 15 from quarterly to annual, F 30.1/F 31.01 from semi-annual to annual	F21 information moved in F 42 with an annual frequency + threshold of 10%.
<b>Increase of proportionality</b>	F 20: Aggregation of exposures < 1% under 'Other countries' F 10/11: threshold (relative and absolute) for SNCI only	Specific question on the simplification proposal for the public consultation.
<b>Core + supplement approach</b>	Core: Part1 (except F 15/F 17) + F 20 + F 22 Supplement: Current Parts 2/3/4 + F 15 + F 17	EBA CoC recommendation.
<b>Revamping the structure of the templates &amp; instructions</b>	Grouping templates and instructions in sections and legal references outside the templates	After the public consultation.

## 2. IFRS 18 implementation: FINREP approach



# 2. IFRS 18 implementation: templates

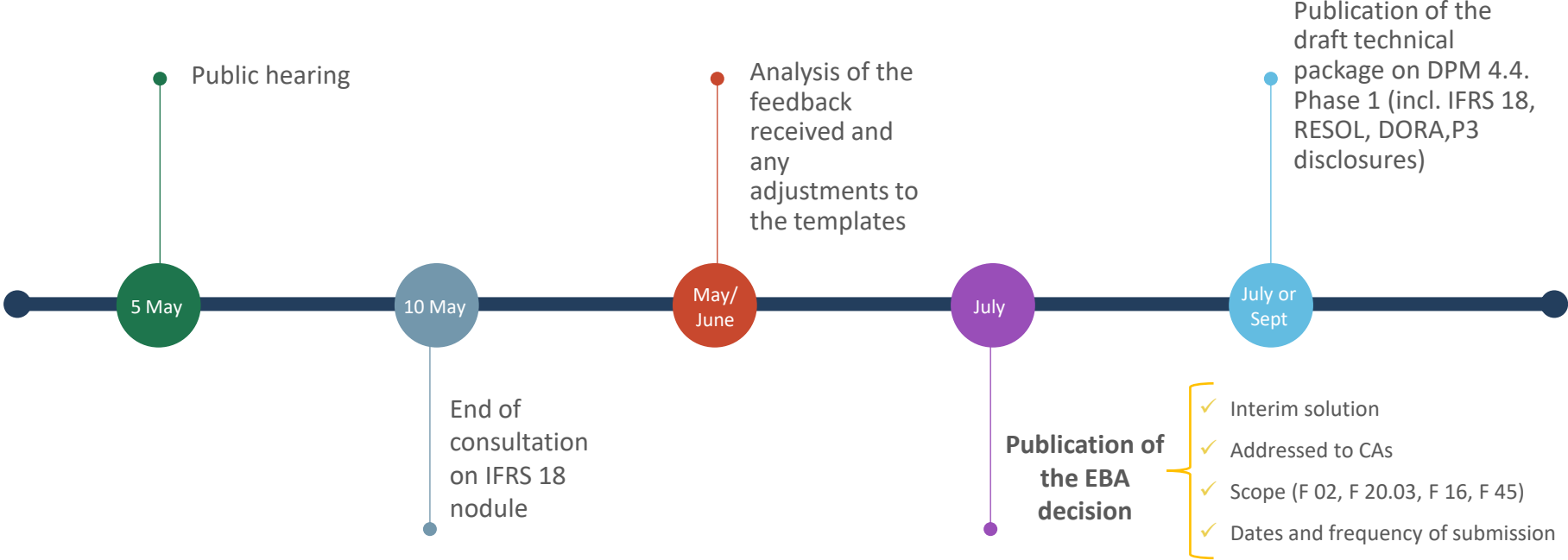
## Main changes on template F 02 (and F 20.03)

<b>Movements of items</b>	<ul style="list-style-type: none"> <li>Income and expenses from investments in subsidiaries, joint ventures and associates.</li> <li>Income and expense on investment properties and other non-financial assets.</li> </ul>
<b>Adjustment to the content of items</b>	<ul style="list-style-type: none"> <li>Interest income on other operating assets and interest expenses on other operating liabilities.</li> <li>Other operating income/expense.</li> </ul>
<b>New items</b>	<ul style="list-style-type: none"> <li>Other income or expenses on investing non-financial assets.</li> <li>Income or expenses on investing financial assets and on any related financial instruments.</li> <li>Income or expenses on non-operating liabilities.</li> </ul>
<b>Subtotals</b>	<ul style="list-style-type: none"> <li>Net intermediate income.</li> <li>Operating profit or loss.</li> <li>Operating and investing profit or loss.</li> </ul>

## Main changes on templates F 16/45

<b>Add new columns</b>	<ul style="list-style-type: none"> <li>The three categories (operating, investing and financing) shall be reported alternatively.</li> <li>The aim is to keep the same level of detail as today in the breakdown of income and expenses, although some of them may be now reported in residual line items of template F 02.00.</li> </ul>
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# 2. IFRS 18 implementation: timeline on the EBA decision



## 2. Collateral additional information

**Purpose** – tackle the lack of comparability and consistency for robust treatment of collateral due to different legal and supervisory practices, as well as differences in recovery rates across jurisdictions due to different insolvency frameworks.

Changes on templates F 13.01 and F 18.02	New templates F 37 and F 48
<p><b>F 13.01</b></p> <ul style="list-style-type: none"> <li>• Separation between performing and non-performing exposure.</li> <li>• Clarification of the meaning of “Maximum amount of the collateral that can be considered”:               <ul style="list-style-type: none"> <li>✓ Latest available amount for the purpose of impairment calculation;</li> <li>✓ After the application of any haircut by institutions;</li> <li>✓ In accordance with any applicable guidance by relevant CA.</li> </ul> </li> </ul>	<p><b>F 37</b></p> <ul style="list-style-type: none"> <li>• Gross carrying amount of non-performing real estate (RE) loans.</li> <li>• RE collateral value on NPE broken-down by DPD exposures’ vintages and by type of real estate collateral.</li> <li>• Financial guarantees received on non-performing RE loans broken-down by DPD exposures’ vintages.</li> <li>• Weighted average of haircuts (%) applied to non-overcollateralised loans.</li> </ul>
<p><b>F 18.02</b></p> <ul style="list-style-type: none"> <li>• LTV not available or cannot be calculated to be reported separately from LTV &lt; 60%.</li> </ul>	<p><b>F 48</b></p> <ul style="list-style-type: none"> <li>• RE collateral value on NPE broken-down by valuation methods used and type of valuer and loan recoveries during the year.</li> </ul> <p><b>Proportionality</b> Supplement (not SNCI) with semi-annual frequency (F 37.00) and annual frequency (F 48.00).</p>

## 2. Collateral additional information: snapshot of F 37

Gross carrying amount		Maximum amount of the collateral that can be considered								Weighted average of haircuts applied to non-overcollateralised loans (%)	Maximum amount of the guarantee that can be considered									
		0010	0020	Unlikely to pay that are not past-due or past-due <= 90 days	Material Past due > 90 days <= 180 days	Material Past due > 180 days <= 1 year	Material Past due > 1 year <= 2 years	Material Past due > 2 year <= 5 years	Material Past due > 5 year <= 7 years		0090	0100	0110	0120	0130	0140	0150	0160	0170	0180
				Annex V.Part 2.376	Annex V.Part 2.379, 380	Annex V.Part 2.379	Annex V.Part 2.379	Annex V.Part 2.379	Annex V.Part 2.379											
0010	Commercial real estate (CRE) loans to small and medium-sized enterprises																			
0020	of which: residential																			
0030	of which: office																			
0040	of which: retail																			
0050	of which: industrial																			
0060	of which: tourism																			
0070	of which: other types of CRE																			
0080	Commercial real estate (CRE) loans to non-financial corporations other than SMEs																			
0150	Households Loans collateralised by residential immovable property and other loans for house purchase																			
0160	of which: loans collateralised by the main residence subject to specific legal enforcement procedures																			

The totals include also any CRE loan (ESRB definition) covered only by financial guarantee (without CRE collateral)

Breakdown by collateral: For example, report in row 0050 a CRE loan (ESRB definition) granted to purchase an hotel but collateralised by warehouses.

**ESRB Definitions in Finrep:**  
**CRE:** any income-producing real estate, either existing or under development, including rental housing, RE for conducting its business, social housing  
**CRE loan:** aimed at acquiring or secured by CRE

## 2. Breakdown of other financial corporations

**Purpose** { monitor the links between banks and other financial corporations (loans, deposits, bank-issued securities) -> source of vulnerability in times of turmoil and address the increasing data requests to ESAs after [the EC's Consultation on risks and vulnerabilities in the non-bank financial sector \(NBFC\)](#).

### New templates F 27.01-27.02 – 27.03

- Breakdown of financial assets, liabilities, and off-balance sheet items by subsector of other financial corporations and by instrument.
- Breakdown by subsector of NBFC based on the current Finrep definition of Annex V, Part 1, par 42(d) and on the definitions provided by European Laws (e.g. CRR, MiFID, Solvency, ESA 2010) and used in other reporting frameworks: *investment firms, investment funds, insurance companies, pension funds, collective investment undertakings, and clearing houses as well as remaining financial intermediaries, financial auxiliaries and captive financial institutions and money lenders*.
- In F 27.01 inclusion of information on debt instruments to counterparties primarily involved in private credit activities (e.g. private credit funds, business development companies).

### Proportionality

- Supplement part (not SNCI).
- **Quarterly frequency and threshold of 5%** based on the bank's aggregated exposures to NBFC sector (data of templates F 04) -> banks with limited NBFC exposures excluded from reporting.

## 2. Crypto assets information

### New template F 38

<b>Purpose</b>	<ul style="list-style-type: none"><li>• Address the increasing need of data on digital transformation to properly monitor the related emerging risks for institutions by supervisors.</li></ul>
<b>Scope</b>	<ul style="list-style-type: none"><li>• Breakdown of ART, EMT, other crypto-assets held/issued (e.g. security tokens; utility tokens; non-MICAR compliant ART/EMT) by accounting portfolio and derivatives with underlying crypto-assets.</li><li>• <b>OUTSIDE</b> the scope: Tokenised traditional assets as defined by CRR Art. 5a(5).</li></ul>
<b>Different possible accounting treatments</b>	<ul style="list-style-type: none"><li>• Financial instruments.</li><li>• Intangible assets (IAS 38, IAS 2) -&gt; of which: IFRS-IC definition compliant.</li><li>• Others.</li></ul>
<b>Proportionality</b>	<ul style="list-style-type: none"><li>• Supplement (not-SNCI) with semi-annual frequency.</li></ul>

### Main changes on templates F 22.01 and F 22.02

- Added 'of which' information to consider the fee and commissions and the assets involved in the crypto assets services as defined in Regulation (EU) 2023/1114 on markets in crypto assets (MICAR).

## 2. Crypto-assets information: snapshot of F 38

	Carrying amount/ Nominal amount				
	ART	EMT	Other Crypto-assets		Derivatives with underlying crypto-assets
			of which: Non-MICAR compliant ART/EMT		
	0010	0020	0030	0040	0050
0010	<b>Financial assets at fair value through profit or loss</b>				
0020	<b>Trading financial assets</b>				
0030	<b>Non-trading non-derivative financial assets measured at fair value through profit or loss</b>				
0040	<b>Financial assets at fair value through other comprehensive income</b>				
0050	<b>Non-trading non-derivative financial assets measured at fair value to equities</b>				
0060	<b>Financial assets at amortised cost</b>				
0070	<b>Non-trading non-derivative financial assets measured at a cost-based method</b>				
0090	<b>Other non-trading non-derivative financial assets</b>				
0090	<b>Intangible assets</b>				
0100	<b>Assets not classified in the previous rows</b>				
0110	<b>TOTAL ASSETS</b>				
0120	<i>of which: crypto-assets compliant with IFRS-IC definition</i>				
0130	<b>Financial liabilities at fair value through profit or loss</b>				
0140	<b>Trading financial liabilities</b>				
0150	<b>Financial liabilities at amortised cost</b>				
0160	<b>Non-trading non-derivative financial liabilities measured at a cost-based method</b>				
0170	<b>Liabilities not classified in the previous rows</b>				
0180	<b>TOTAL LIABILITIES</b>				
0190	<b>OFF BALANCE SHEET EXPOSURES GIVEN BY THE REPORTING INSTITUTION</b>				

To have a complete picture of bank's exposures to crypto-assets

ART/EMT should fail the SPPI test for AC/FVTOCI

Accounted for as intangible assets (IAS 38/IAS 2)

## 2. FINREP: other changes (1/2)

### Linked to the evolving Supervisory data needs and experience with data quality

#### Overlays

- Monitoring the modelling aspects of IFRS 9 ECL calculation and their related impact on credit risk allowances.
- Information on the flow and stock of overlays in F 12.01, broken-down by debt instruments and off-balance sheet exposures under IFRS 9 impairment and by IFRS 9 stages

#### Public Guarantee Scheme

- Transfer of the full or partial risk of a loan to an entity referred to in Article 214(2) CRR.
- Information on the loans to non-financial corporations and households subject to public guarantee scheme in F 18.00

#### Derivatives in accounting hedge of interest rate risk

- Monitoring unrealized gains or losses in the current context of volatility in interest rates and the impact of hedging derivatives in offsetting unrealized gains or losses on the hedged instruments
- Increased the frequency of reporting of F 41.01 'Fair value hierarchy: financial instruments at amortised cost' to quarterly and addition of the information on the fair value of interest rate derivatives used as hedging instrument for items measured at cost or amortised cost.

#### Carbon credits

- Definition in Annex II, Table 2 of the Commission Delegated Regulation (EU) 2023/2772 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards
- Reporting as intangible assets (under IAS 2 or IAS 38).



## 2. FINREP: Other changes (2/2)

### Staff expenses

- Integration in Finrep of data points reported other data collection on remuneration.
- A breakdown of variable remuneration by type (i.e. cash vs instruments)
- A categorisation of identified staff also to align with the P3 Disclosure ITS (i.e. MBMF, MBSF and senior management)

### Changes in the underlying legal framework

- **F 01.1** Balance sheet: assets: separation of goodwill from intangible assets (IFRS 18)
- **F 03** Statement of comprehensive income and **F 46** on Statement of changes in equity: IFRS 7 amendments on equity instruments at FVTOCI
- Definitions of SMEs; specialised lending exposures; off-balance sheet items -> amendments due to the CRR3

### Experience with data quality and feedback from institutions compiling data

- Facilitate the integration with statistical **reporting and ECB/SSM datasets** and improving the **data quality**.
- ✓ **F 40.01** Group structure -> enhancement of entity identification code by providing a hierarchy of pre-defined code lists to follow in the column of 'Type of code':
  1. LEI code;
  2. EUID (European Unique Identifier);
  3. National identifier in the Annex 'List of National Identifiers' published on the ECB website and used in Anacredit.

### Incorporation of Q&As and others due to the ECB's EGDQ checks

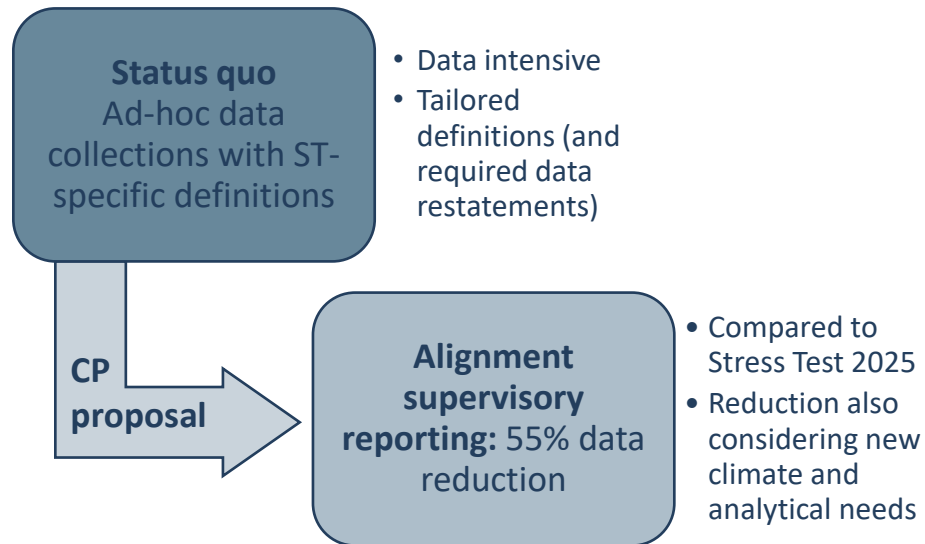
- Please refer to the list of Q&A/EGDQ in the Consultation Paper



## Session 3. Integration of stress testing data needs

### 3. Enhancing the stress test data infrastructure through streamlined supervisory reporting

- EBA stress test exercises are conducted on a **regular** basis and are a key **core supervisory tool**
- Current data infrastructure builds from ad-hoc data collection, based on specific ST definitions
- Alignment with supervisory reporting unlocks the potential to:
  - **Streamline stress test definitions** to align with accounting: reduced reporting burden and reporting only once
  - Enhance the **data quality**
  - Deliver tangible **data reductions: 55%**
  - **Reinforce supervisory toolkit** by building infrastructure to model and do desktop analysis



### 3. Integration stress test needs across supervisory reporting frameworks (1/2)

- Stress test data build from several blocks across the framework, with a common denominator:
  - Aligning from **existing concepts** and definitions whenever possible
  - Adding **country dimension** for adequate risk analysis
  - Proportional data fit for purpose
- FINREP reporting:
  - For credit risk impairments, together with market risk and administrative expenses elements
- ESG reporting:
  - For sectoral information <- feeds credit risk sectoral analysis and climate risk
- COREP reporting:
  - Risk exposure amounts and some market risk elements (CVA and Reserves).

### 3. Integration across reporting frameworks (2/2)

FINREP	
<p><b>F 49.01 (new)</b></p> <ul style="list-style-type: none"> <li>Bottom-up quality assurance and benchmarking purposes:               <ul style="list-style-type: none"> <li>Credit risk parameters (PD, TR, LGD, LRLT) and LTV ratios for instruments at amortised cost, broken-down by country</li> <li>Off-balance sheet information post-CCF</li> </ul> </li> <li>Sample: large institutions at highest level consolidation in the EU with total assets &gt; EUR 30 billion</li> <li>Frequency: annual</li> </ul>	<p><b>F 50.00</b></p> <ul style="list-style-type: none"> <li>Included information on the sensitivities to market risk (namely, delta, gamma, vega) broken-down by risk factors (IR, FX, Equity, Funds, Commodities, Credit spread, Inflation) for financial instruments measured at fair value (FVTPL, FVTOCI) and at amortised cost when included in a hedging relationship.</li> </ul>
<p><b>F 49.02 (new)</b></p> <ul style="list-style-type: none"> <li>Information for both quality assurance and analyses at amortised cost broken-down by stage and by country: gross carrying amounts, accumulated impairment, overlays, collateral received, transfers among stages + adjusted opening balance</li> <li>Sample: large and medium institutions (i.e. SCNI excluded)</li> <li>Frequency: quarterly</li> </ul>	<p><b>F 16.03</b></p> <ul style="list-style-type: none"> <li>Added two new rows on gains or losses for trading activities to capture client revenues (stable source of income coming from market making or trading activities on behalf of the client, prime services provided to clients, debt underwriting or debt issuance-related services to corporate clients) and accrued interests when the dirty price approach is applied.</li> </ul>
<p><b>F 16.08; F 44.04</b></p> <ul style="list-style-type: none"> <li>Added limited geographical breakdown (top 5 countries) for other administrative expenses and staff expenses.</li> </ul>	
<p><b>ESG D 01. 00 (new)</b></p> <p>Sectoral information for credit risk sectoral and climate risk (transition) analysis: CR parameters, gross carrying amounts and impairments by impairment stage Sample and frequency: Same as in F 49.01</p>	
<p><b>COREP: C 09.05</b> Geographical breakdown on existing COREP concepts</p>	



## Session 4. ESG reporting

# 4. Objectives and underlying context of the proposal

1

## Re-use existing data and build on the experience gained through previous data collections

- ✓ Builds on existing requirements: Pillar 3, FINREP, EBA ESG GL, ad hoc exercise
- ✓ Supports consistency: alignment between reporting and disclosure requirements in terms of definitions and methodologies
- ✓ Enhances clarity and improves data quality
- ✓ Limits implementation effort

2

## Supporting simplification and efficiency

- ✓ Focus on 'need to have' data
- ✓ Streamlines data collections-removing duplications
- ✓ Enable multi-purpose use of data (Climate Stress Test, Credit Risk Stress Test, FINREP)
- ✓ Ensures maximum harmonisation to allow competent authorities to discontinue parallel data collections

3

## Proportional reporting approach

- ✓ Differentiates both the scope and frequency of reporting based on the size and complexity of institutions
- ✓ Materiality thresholds are applied in certain templates to focus on significant exposures and avoid unnecessary reporting

### Building up the ESG Reporting framework

*\*Information included as part of the Pillar 3 ITS was already subject to consultation, therefore, feedback should focus exclusively on the additional data points introduced for supervisory purposes*

#### Work post-consultation

- ✓ Feedback from stakeholders on the data points included for supervisory reporting purposes only\*
- ✓ Further alignment with Final Draft ITS on ESG disclosures

# 4. Proportional reporting approach

Template is based on the Pillar 3 template

New template

Template	Supervisory reporting		
	Full approach	Simplified approach	
	Large institutions	Other listed institutions + Large subsidiaries	SNCI + Other non-listed institutions
D 01.00: Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Semi-annual (for large institutions with total assets >= 30 bn EUR)	-	-
D 01.02: Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity (subset of D 01.00)	Semi-annual (for large institutions with total assets < 30 bn EUR)	Annual	
D 01.01 Template 1A: Transition and physical risk	-	-	Annual
D 02.00: Climate change transition risk: Loans collateralised by immovable property - Energy performance of the collateral	Semi-annual	Annual	-
D 03.00: Indicators of potential climate change transition risk: emission intensity per physical output and by sector	Annual	-	-
D 04.00: Environment-related concentration risk (NEW)	Semi-annual	Annual	-
D 05.00: Climate change physical risk: Exposures subject to physical risk	Semi-annual		
D 05.01: Climate change physical risk: Exposures subject to physical risk		Annual	
D 10.00: Mitigating actions: Exposures contributing to sustainability objectives	Annual	Annual	-
D 11.00: Banking book- Exposures to environmental risks (beyond climate) - Physical and transition risks (NEW)	Annual	Annual	

## Scope of reporting

- Reporting at the highest level of consolidation within the EU, in line with the approach used for Pillar 3 disclosures
- Large subsidiaries, reporting may also take place at individual or sub-consolidated level

## Materiality thresholds

- Country breakdown applying FINREP materiality thresholds
- Specific thresholds for Stress test information


## First reporting reference date

- September 2027

## Feedback expected on:

- ✓ The tailored approach provided for each type of institution?
- ✓ Materiality thresholds: whether these are sufficient to enable meaningful reporting while avoiding an undue reporting burden

## 4. Climate change transition risk (D 01.00, D 01.02)

	D 01.00: Credit quality of exposures by sector, emissions and residual maturity	D 01.02: Credit quality of exposures by sector, emissions and residual maturity
Applicable to	<ul style="list-style-type: none"> <li>Large institutions &gt;30bn EUR total assets</li> </ul>	<ul style="list-style-type: none"> <li>Large institutions with &lt; 30bn EUR total assets</li> <li>Other listed institutions + Large subsidiaries</li> </ul>
Scope	<ul style="list-style-type: none"> <li>Reporting total exposures covering amortised cost and FVOCI portfolios</li> <li>Geographical breakdown – applicable for ST purposes covering only amortised cost portfolio</li> </ul>	<ul style="list-style-type: none"> <li>Reporting total exposures covering amortised cost and FVOCI portfolios as in the Pillar 3 templates</li> </ul>
Alignment with P3 template	 Fully aligned	
New data points included compared with P3 templates	<ul style="list-style-type: none"> <li>Gross interest income /gross fee and commission income</li> <li>off-balance sheet exposures</li> <li>Granular NACE breakdown</li> <li>Stage 3 assets</li> <li>Credit risk parameters</li> </ul>	<ul style="list-style-type: none"> <li>Gross interest income /gross fee and commission income</li> <li>off-balance sheet exposures</li> <li>Granular NACE breakdown</li> <li>Stage 3 assets</li> </ul>
Frequency	Semi-annual	
		<ul style="list-style-type: none"> <li>Semi-annual for large institutions</li> <li>Annual for Other listed + large subsidiaries</li> </ul>



### Enable multi-purpose use of data

- ✓ Credit and climate stress test
- ✓ ESG supervisory reporting
- ✓ Simplifications in FINREP

### Feedback expected on:

- ✓ Additional data points included for ST and supervisory reporting purposes
- ✓ Possible inclusion of RWA to support SyRB calibration for systemic climate risks
- ✓ Materiality thresholds



# 4. Climate change transition risk (D 02.00 and D 03.00)

	D 02.00: Loans collateralised by immovable property, energy performance of the collateral	D 03.00: Indicators of potential climate change transition risk: emission intensity per physical output and by sector
Applicable to	<ul style="list-style-type: none"> <li>Large institutions</li> <li>Other Listed Institutions + Large Subsidiaries</li> </ul>	<ul style="list-style-type: none"> <li>Large institutions</li> </ul>
Alignment with P3 template	 <p>Further alignment post-consultation amendments to align with the P3 template</p>	 <p>Fully aligned</p>
New data points included compared with P3 templates	<ul style="list-style-type: none"> <li>Information on covered bonds and pool of covered bonds</li> <li>Loans with improvements of the energy efficiency of collateral</li> <li>Breakdowns by LTV ranges</li> </ul>	<ul style="list-style-type: none"> <li>2 additional columns: internal short-term targets to better understand institutions' internal strategies, planning horizons and risk management approaches</li> </ul>
Frequency	<ul style="list-style-type: none"> <li>Semi-annual for large institutions</li> <li>Annual for Other listed + large subsidiaries</li> </ul>	<ul style="list-style-type: none"> <li>Annual for large institutions</li> </ul>

## Feedback expected on:

- ✓ Additional data points included for supervisory reporting purposes
- ✓ How institutions track changes in collateral energy performance to assess transition risk and improve transparency for CRE/RRE portfolios for new loans and existing collateral
- ✓ Information on LTV buckets for monitoring RRE and CRE exposures

## 4. Climate-related physical risk (D 05.00 and D 05.01)

	D 05.00: Climate related physical risk: Exposures subject to physical risk	D 05.01: Climate related physical risk: Exposures subject to physical risk (simplified)
Applicable to	<ul style="list-style-type: none"> <li>Large institutions</li> </ul>	<ul style="list-style-type: none"> <li>Other listed institutions and large subsidiaries</li> </ul>
Alignment with P3 template	 Fully aligned	 Fully aligned
New data points included compared with P3 templates	<ul style="list-style-type: none"> <li>Breakdown to assess the severity of the physical risk: highly and moderated exposed</li> <li>Credit risk indicators (LTV,PD,LGD)</li> <li>Off balance sheet exposures</li> </ul>	<ul style="list-style-type: none"> <li>Off balance sheet exposures</li> </ul>
Frequency	<ul style="list-style-type: none"> <li>Semi-annual</li> </ul>	<ul style="list-style-type: none"> <li>Annual</li> </ul>

*Captures detailed information on exposures subject to physical risks by sector, geography and hazard category*

### Feedback expected on:

- ✓ Additional data points for supervisory reporting
- ✓ Methods to assess the extent to which exposures are insured against relevant hazards
- ✓ Treatment of State-backed insurance schemes
- ✓ Type of information institutions can provide on insurance coverage
- ✓ Alternative approaches to reflect portfolio vulnerability and potential damage from physical hazards

## 4. Simplified approach: Transition and physical risk (D 01.01)

### D 01.01: Simplified ESG information for SNCI and Other non-listed institutions covering both transition and physical risk

*Provides an overview of exposures subject to transition and physical risk with a reduced scope of geographies, ensuring proportionality while preserving supervisory usefulness*

#### Feedback expected on:

- ✓ Additional data points included for ST and supervisory reporting purposes

#### Applicable to

- SNCIs
- Other non-listed institutions

#### Alignment with P3 template



Further alignment post-consultation amendments to align with the P3 template

#### New data points included compared with P3 templates

- Off-balance sheet items, to provide a more comprehensive view of institutions' exposures

#### Frequency

- Annual

# 4. D 04.00 - Environment-related concentration risk

*New template  
not part of P3*

## Main objective

- To identify and monitor concentration risks arising from exposures to counterparties operating in selected sectors subject to environmental factors

## Applicable to

- Large institutions (Semi-annual)
- Other listed institutions and large subsidiaries (Annual)

## Counterparty identification

- Single-name / obligor-level reporting of exposures to NFC, active in predefined sectors based on NACE codes

## Obligor-level risk parameters

- Gross carrying amount (on- and off-balance sheet), including breakdowns for new exposures
- Stage 2 exposures and non-performing exposures
- Accumulated impairment and provisions
- Probability of default (12-month and lifetime, where applicable)
- Exposures subject to physical risks
- Nominal amounts of off-balance-sheet exposures

## Climate Mitigation

- The existence of a counterparty transition plan
- Alignment with sectoral decarbonisation pathways
- Financed emissions and emissions intensity indicators

**Feedback expected on:**

- ✓ Sectoral scope of the template
- ✓ Comparability of obligor level information: output-denominated emission intensity vs revenue-based emission intensity
- ✓ Materiality thresholds proposed and proposals for an additional threshold

**Materiality thresholds**

- Institutions shall report counterparties for which the total exposure level exceeds EUR 10 million
- An additional threshold should be defined to ensure that institutions are only asked to report material information on relevant counterparties

# 4. D 10.00: Mitigating actions-Exposures contributing to sustainability objectives

## Main objective

- To ensure that institutions disclose all exposures that mitigate climate related risks, irrespective of their alignment with the EU Taxonomy
- Captures investments in assets and activities contributing to CCM, CCA and other environmental objectives

## Applicable to

- Large institutions (Annual)
- Other listed institutions and large subsidiaries (Annual)

	Gross carrying amount	Mitigating actions			Qualitative information on the nature of the mitigating actions
		Climate change mitigation	Climate change adaptation	Other mitigating actions	
		0010	0020	0030	
<b>0010 Exposures mitigating climate change transition and physical risks</b>					
0020 Equity instruments					
0030 Financial corporations					
0040 Non-financial corporations					
0050 Other counterparties					
0060 Debt securities					
0070 Financial corporations					
0080 Non-financial corporations					
0090 Other counterparties					
0100 Loans and advances					
0110 Financial corporations					
0120 Non-financial corporations					
0130 Of which: Small and Medium-sized Enterprises					
0140 Households					
0150 Of which: Loans collateralised by residential immovable property					
0160 Of which: Building renovation loans					
0170 Other counterparties					
<b>0160 Exposures financing assets and activities contributing to the transition</b>					
0170 Equity instruments					
0180 Financial corporations					
0190 Non-financial corporations					
0200 Other counterparties					
0210 Debt securities					
0220 Financial corporations					
0230 Non-financial corporations					
0240 Other counterparties					
0250 Loans and advances					
0260 Financial corporations					
0270 Non-financial corporations					
0280 Of which: Small and Medium-sized Enterprises					
0290 Households					
0300 Of which: Loans collateralised by residential immovable property					
0310 Of which: Building renovation loans					
0320 Other counterparties					

# 4. D 11.00: Exposures to Environmental Risks (Beyond Climate)

**New template  
not part of P3**

## Main objective

- Manage and monitor climate-related and broader environmental risks (e.g., biodiversity loss, ecosystem degradation, pollution, resource overuse, invasive species) that could materially impact financial soundness through disruptions to counterparties

## Applicable to

- Large institutions (Annual)
- Other listed institutions and large subsidiaries (Annual)

**Feedback expected on:**

- ✓ Scope and content of the template
- ✓ Materiality thresholds proposed

D 11.00 - Banking book: Exposures to environmental risks (beyond climate) - Physical and transition risks

Z-axis	Gross carrying amount			Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
		Of which: Assets with significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)	Of which: Non-performing exposures		Of which: Assets with significant increase in credit risk since initial recognition but not credit-impaired (Stage 2)	Of which: Non-performing exposures
a) Country by country exposures	0010	0020	0030	0040	0050	0060
b) Total exposures						
c) Total EU exposures						
0010 Total exposures to environmental risks beyond climate						
0020 Of which: Exposures to environmental risks beyond climate (by environmental impact)						
0030 Exposures to companies whose activities negatively impact land/freshwater/ ocean use change						
0040 Exposures to companies whose activities contribute to pollution						
0050 Exposures to companies whose activities negatively impact overexploitation of resources						
0060 Exposures to companies whose activities have detrimental impacts regarding invasive species						
0070 Of which: Exposures to environmental risks beyond climate (by ecosystem service dependency)						
Exposure to companies whose activities depend on water supply						
0080						
Exposure to companies whose activities depend on provisioning services (other than water supply)						
0090						
Exposure to companies whose activities depend on regulating and supporting ecosystem services						
0110						
Exposure to companies whose activities depend on cultural ecosystem services						
0120						



# Questions and Answers





## Session 5. Changes to liquidity and asset encumbrance reporting

# Objectives and underlying context for the proposed amendments to Liquidity and Asset encumbrance reporting

## Strengthen Supervisory Insight into Liquidity Risks

- 1 Update templates to reflect market developments and supervisory experience

## Integrate and Harmonise Existing National Reporting

- 2 Reduce reliance on ad-hoc national data collections and non-standardised reporting

## Support Resolution Authorities' Liquidity Analysis

- 3 Shared use of data  
Promote shared concepts and definitions to reduce costs and improve data quality

## Reduce reporting burden

- 4 Maintain and enhance proportionality  
Focus on "need-to-have" criterion

## Facilitate Institutions' Compliance

- 5 Provide clearer instructions, examples, and aligned definitions

# 5. Main changes to the ALMM reporting framework and feedback expected

## Section 9 'REPORTING ON ADDITIONAL LIQUIDITY MONITORING METRICS'

AMM TEMPLATES		
Template number	Template code	Name of the template /group of templates
<b>ADDITIONAL MONITORING TOOLS TEMPLATES</b>		
66	C 66.01	MATURITY LADDER TEMPLATE
66	C 66.02	MATURITY LADDER – Additional information
67	C 67.00	CONCENTRATION OF FUNDING BY COUNTERPARTY
67	C 67.01	CONCENTRATION OF FUNDING BY COUNTERPARTY (top 30)
68	C 68.00	CONCENTRATION OF FUNDING BY PRODUCT TYPE
69	C 69.00	PRICES FOR VARIOUS LENGTHS OF FUNDING
70	C 70.00	ROLL-OVER OF FUNDING
71	C 71.00	CONCENTRATION OF COUNTERBALANCING CAPACITY BY ISSUER

### Additional data requirements

- ✓ Focus on “need to have data”

### Proportionality and reduced reporting burden

- ✓ C 70.00 - is proposed to be discontinued
- ✓ For SNCI – template C 71 is proposed to be discontinued
- ✓ For Medium sized – template C 69 is proposed to be discontinued

### Main feedback expected

General questions: Clarity of templates and instructions; double reporting; definitions and semantic integration

### More targeted questions:

Instructions related to *Deposits collected via online third-party platforms*

C 66.02 – behaviour info

C 67.01 vs C 67 – template design; feedback on streamlined definitions (e.g. counterparty sector/product type)

C 68 – e.g. central bank funding

C 69 – e.g. product type and interest rate

C 71.00 – costs for SNCIs

### Cost of compliance

**Indicate any parallel national data collection that could be discontinued due to overlaps**

# 5. New template – C 66.02 applicable just to Large institutions

## C 66.01 - MATURITY LADDER

## C 66.02 - MATURITY LADDER - Additional information

Item	0010	0020	0030	0040
<b>OUTFLOWS</b>	<b>Initial stock</b>	<b>Overnight</b>	<b>of which: Open Maturity items</b>	<b>Greater than 12 months</b>
<b>Liabilities resulting from securities issued (if not treated as retail deposits)</b>				
of which: Intragroup or IPS				
unsecured bonds due				
of which: negotiable certificates of deposit and commercial paper				
covered bonds with preferential treatment (art. 124(4)(a) CRR)				
securitisations due				
other				
<b>Liabilities resulting from secured lending and capital market driven transactions collateralised by (Counterparty is non-Central Bank)</b>				
of which: Intragroup or IPS				
Level 1 tradable assets				
Level 1 excluding covered bonds				
Level 1 central bank				
Level 1 (CQS 1)				

Code	ID	Item	0010	0020	0030	0040	0050	0060	0070	0080	0090	0100	0110	0120	0130	0140	0150	0160	0170	0180	0190	0200
6		<b>BEHAVIOURAL CASH FLOWS FROM OPEN MATURITY ITEMS</b>	Overnight	Greater than overnight up to 2 days	Greater than 2 days up to 3 days	Greater than 3 days up to 4 days	Greater than 4 days up to 5 days	Greater than 5 days up to 6 days	Greater than 6 days up to 7 days	Greater than 7 days up to 8 days	Greater than 8 days up to 9 days	Greater than 9 days up to 10 days	Greater than 10 days up to 11 days	Greater than 11 days up to 12 days	Greater than 12 days up to 13 days	Greater than 13 days up to 14 days	Greater than 14 days up to 15 days	Greater than 15 days up to 16 days	Greater than 16 days up to 17 days	Greater than 17 days up to 18 days	Greater than 18 days up to 19 days	Greater than 19 days up to 20 days
6.1		<b>Behavioural Cash flow from selected liabilities</b>																				
6.1.1		Existing and new cash flows resulting from open maturity deposits (excluding deposits received as collateral)																				
6.1.1.1		of which: deposits obtained through online deposit platforms																				
6.1.1.2		of which: term deposits with an early withdrawal option																				
6.1.1.3		Stable retail deposits																				
6.1.1.4		Other retail deposits																				
6.1.1.5		Operational deposits																				
6.1.1.6		Non-operational deposits																				
6.1.2		Cash flows resulting from secured lending, capital market driven transactions and reverse repos and other open maturity liabilities																				
6.2		<b>Behavioural Cash flows from selected assets</b>																				
6.2.1		Margin due from existing and new open maturity loans and advances, other than margin accounts or central bank reserves																				
6.2.2		Cash flows resulting from secured lending, capital market driven transactions and reverse repos and other open maturity assets																				
6.3		<b>Net values</b>																				
6.3.1		Net open maturity gap																				
6.3.2		Committed and open maturity gap																				
4		<b>Additional details on outflows due to downgrade triggers</b>	Overnight	Greater than overnight up to 2 days	Greater than 2 days up to 3 days	Greater than 3 days up to 4 days	Greater than 4 days up to 5 days	Greater than 5 days up to 6 days	Greater than 6 days up to 7 days	Greater than 7 days up to 8 days	Greater than 8 days up to 9 days	Greater than 9 days up to 10 days	Greater than 10 days up to 11 days	Greater than 11 days up to 12 days	Greater than 12 days up to 13 days	Greater than 13 days up to 14 days	Greater than 14 days up to 15 days	Greater than 15 days up to 16 days	Greater than 16 days up to 17 days	Greater than 17 days up to 18 days	Greater than 18 days up to 19 days	Greater than 19 days up to 20 days
4.1		<b>Outflows due to downgrade triggers</b>																				
4.1.1		of which: Early redemption of outstanding collateralised liabilities																				
4.1.2		of which: outflows of collateral related to margin calls or loss of eligibility or changes in the haircut																				
4.1.3		of which: changes in collateral posted on contracts subject to margining, including initial margins requested by Central Counterparties (CCPs)																				
4.1.4		of which: flows of collateral related to loss of eligibility and changes in the haircut schedule of non-issued covered bonds and Asset Backed Securities (ABS)																				

1090-1140	4	CONTINGENCIES
1090	4.1	<b>Outflows from committed facilities</b>
1091	4.1.0.1	of which: Intragroup or IPS
1100	4.1.1	<b>Committed credit facilities</b>
1110	4.1.1.1	considered as Level 2B by the receiver
1120	4.1.1.2	other
1130	4.1.2	<b>Liquidity facilities</b>
1131	4.1.3	<b>Outflows from uncommitted funding facilities</b>
1140	4.2	<b>Outflows due to downgrade triggers</b>

On the behavioural section, the EBA is seeking views from the institutions on their ability to provide the 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.

# 5. Main changes to the AE reporting framework and feedback expected

## Mapping between revised version of AE reporting and CBC in ML reporting

- ✓ The experience of the supervisory authorities, stemming from national collections, has shown that Asset encumbrance is an aspect relevant for the purposes of liquidity assessments and can be used as a complement information to the already existing ALMM templates
- ✓ AE templates have been amended in particular to align with liquidity reporting, moving away from Finrep alignment

Market value of non-encumbered assets		Fair value of non-encumbered assets				
COUNTERBALANCING CAPACITY Section (C66)		Fair value of non-encumbered assets	Of which: central bank eligible for MPO	Of which: Tradable assets	Of which: Tradable Level 2B	Of which: Tradable Level 2C
<b>Level 1 tradable assets</b>	<b>A</b>			<b>A</b>	<b>D</b>	<b>E</b>
Level 1 including covered bonds				B		
Level 1 central bank	<b>B</b>			F		
Level 1 (OBS 1)				I		
Level 1 (OBS2, OBS3)						
Level 1 (OBS4)						
Level 1 covered bonds (OBS5)	<b>C</b>					
<b>Level 2B tradable assets</b>	<b>D</b>				<b>T</b>	<b>S</b>
Level 2B corporate bonds (OBS6)						
Level 2B covered bonds (OBS7, OBS8)	<b>U</b>					
Level 2B public sector (OBS9, OBS10)	Other than					
<b>Level 2B tradable assets</b>	<b>E</b>			<b>G</b>		
Level 2B ABS (OBS11)	For all ML					
Level 2B covered bonds (OBS14)	<b>F</b>					
Level 2B corporate bonds (OBS13)	<b>S</b>					
Level 2B other						
Level 2B public sector (OBS12)	Other than					
<b>Other tradable assets</b>	Other than					
central government (OBS15)	Sum of L1 + O-B					
central government (OBS16)						
Other						
covered bonds	J (EOPF)					
ABS	Other than ML					
Other tradable assets	Indicated by difference between AE and EBC					
<b>non tradable assets eligible for central banks</b>	<b>G</b>			<b>H</b>		
<b>non encumbered eligible for central banks</b>	<b>H</b>					

# 5. Main changes to the AE reporting framework and feedback expected

## Section 8 'REPORTING ON ASSET ENCUMBRANCE'

ASSET ENCUMBRANCE TEMPLATES		
Template number	Template code	Name of the template /group of templates
<b>PART A - ENCUMBRANCE OVERVIEW</b>		
32.1	F 32.01	ASSETS OF THE REPORTING INSTITUTION
32.2	F 32.02	COLLATERAL RECEIVED
32.1	F 32.11	On-BALANCE SHEET ASSETS OF THE REPORTING INSTITUTION
32.2	F 32.12	COLLATERAL RECEIVED and OWN ISSUED DEBT SECURITIES
32.3	F 32.03	OWN COVERED BONDS AND SECURITISATIONS ISSUED AND NOT YET PLEDGED
32.4	F 32.04	SOURCES OF ENCUMBRANCE
<b>PART B - MATURITY DATA</b>		
33	F 33.00	MATURITY DATA
<b>PART C - CONTINGENT ENCUMBRANCE</b>		
34	F 34.00	CONTINGENT ENCUMBRANCE
<b>PART D - COVERED BONDS</b>		
35	F 35.00	COVERED BONDS ISSUANCE
<b>PART E - ADVANCED DATA</b>		
36.1	F 36.01	ADVANCED DATA, PART I
36.2	F 36.02	ADVANCED DATA, PART II
36.1	F 36.11	ADVANCED DATA, PART I
36.2	F 36.12	ADVANCED DATA, PART II

### Additional data requirements

- ✓ Focus on “need to have data”

### Proportionality and reduced reporting burden

- ✓ Discontinue template F 34.00
- ✓ For SNCI – templates F 32.04, F 35.00 are proposed to be discontinued
- ✓ For Medium sized – template F 36.00 is proposed to be discontinued

### Main feedback expected

General questions: Clarity of templates and instructions; double reporting; definitions and semantic integration

### More targeted questions:

Mapping between the CBC and the AE information

### Cost of compliance

Indicate any parallel national data collection that could be discontinued due to overlaps

# 5. Streamlined definitions and clarity on the concepts used

The draft ITS on ALMM and AE has been revised to ensure concepts are **semantically integrated and uniquely defined**, trying as much as possible to align definitions and avoid redundancies stemming from unjustified “similar but not the same definitions” concepts.

Template 1: Overview of selected concepts and associated definitions

Concept	Definition/Reference
Assets	Covers on-balance sheet assets (e.g. recognised in the balance sheet according to the applicable accounting framework), collateral received and own debt securities issued and retained (irrespective of the accounting framework classification of the latter).
Tradable assets	<u>Assets</u> traded in large, deep and active repo or cash markets subject to a short settlement period. OBSERVATION! These may or may not be central bank eligible as collateral.
Non-tradable assets	Assets that are not tradable
Un-encumbered assets	An <u>asset</u> shall be deemed to be unencumbered where the credit institution is not subject to any legal, contractual, regulatory or other restriction preventing it from liquidating, selling, transferring, assigning or, generally, disposing of such asset via active outright sale or repurchase agreement. Synonym: non-encumbered
Encumbered assets	OBSERVATION: definition aligned with Article 7 (2) <a href="#">Commission Delegated Regulation (EU) 2015/61</a> except for the reference to the 30 days horizon Assets that are not deemed to be <u>un-encumbered</u> . <b>Further guidance:</b> An asset shall be treated as encumbered if it has been pledged or if it is subject to any form of arrangement to secure, collateralise or credit enhance any transaction from which it cannot be freely <u>withdrawn</u> . It is important to note, that assets pledged that are subject to any restrictions in withdrawal, such as assets that require prior approval before withdrawal or replacement by other assets, shall be considered encumbered. The definition is not based on an explicit legal definition, such as title transfer, but rather on economic principles, as the legal frameworks may differ in this respect across countries. The definition is however closely linked to contractual conditions. The EBA sees the following types of contracts being well covered by the definition (this is a non-exhaustive list): <ul style="list-style-type: none"> <li>secured financing transactions, including repurchase contracts and agreements, securities lending and other forms of secured lending. To be noted that a collateral received via securities financing transactions that is subsequently sold short does not give rise to encumbrance, neither it could be reported as non-encumbered, since it is not possible for the</li> </ul>

Concepts and hierarchical relationships	associated DEFINITIONS
<b>financial customers</b>	Article 411(1) of Regulation (EU) 575/2013
credit institutions	Article 4(1) point (1) of Regulation (EU) 575/2013
<b>other financial customers</b>	Customers or counterparties that <b>are</b> financial customers, <b>other than credit institutions</b> .
<b>non-financial customer</b>	Customers or counterparties <b>other than financial customers</b> .
central bank	Article 4 point (46) of Regulation (EU) 575/2013
retail customers	Leveraging on Article 411, point (2), of Regulation (EU) No 575/2013
non-financial corporates	As referred to in Commission Delegated Regulation (EU) 2015/61
sovereigns, multilateral development banks and public sector entities	
<b>other non-financial customers</b>	Customers or counterparties <b>other than financial customers</b> , central banks, non-financial corporates, sovereigns, MDB and PSE

**Main feedback expected**

Feedback on definitions and semantic integration

*Feedback expected also from the JBRC EGSINT*

Full list -> See instructions for ALMM and AE



- ✓ Main aim was not to change the concepts used, but just to make it more clear in instructions what they mean
- ✓ Streamlined instructions, avoiding repetition and ensure consistent reference to the same concept
- ✓ Work in progress to extend the list

## 5. LCR – changes focused on simplification

### C 75.01 on Collateral swaps

- ✓ Exempt SNCI from reporting this template
- ✓ Large and Medium-sized institutions, introduce a quarterly reporting as opposed to monthly and no reporting in significant currency

*! To note that the changes to reporting are with no prejudice to the correct calculation of the LCR, in line with the regulation.*

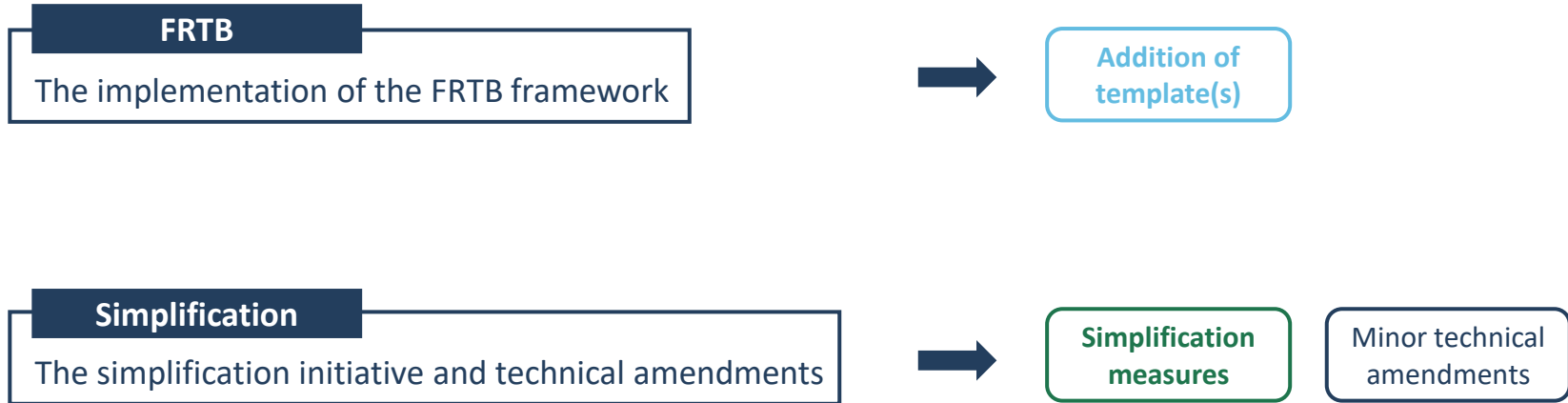
### Main feedback expected

Are the changes proposed for simplification in the LCR reporting, cost reducing to the institutions?



## Session 6. Market risk and fundamental review of the trading book reporting

## 6. Rationale and main sources of changes



## 6. Overview of the proposals in the Consultation Paper (CP):

TOPIC(S)/AREA	CONTENT OF THE CONSULTATION PAPER
I) Boundary and thresholds	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid green; border-radius: 10px; padding: 5px; text-align: center;"> <span style="background-color: #ffc107; padding: 2px;">NEW</span>  <b>Simplification measures</b> </div> <div style="border: 1px solid blue; border-radius: 10px; padding: 5px; text-align: center;"> <span style="background-color: #ffc107; padding: 2px;">NEW</span>  <b>Addition of template(s)</b>  <span style="background-color: #ffc107; padding: 2px;">but already consulted on in the past</span> </div> </div>
II) Market risk approaches	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid green; border-radius: 10px; padding: 5px; text-align: center;"> <span style="background-color: #ffc107; padding: 2px;">NEW</span>  <b>Simplification measures</b> </div> <div style="border: 1px solid blue; border-radius: 10px; padding: 5px; text-align: center;"> <span style="background-color: #ffc107; padding: 2px;">NEW</span>  <b>Addition of template(s)</b>  <span style="background-color: #ffc107; padding: 2px;">but already consulted on in the past</span> </div> <div style="font-size: 2em; margin: 0 10px;">+</div> <div style="border: 1px solid black; border-radius: 10px; padding: 5px; text-align: center;">             Minor technical amendments (incl. clarifications due to 3<sup>rd</sup> DA on FRTB)           </div> </div>
III) Prudent valuation, Counterparty credit risk, Credit Valuation Adjustment	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid green; border-radius: 10px; padding: 5px; text-align: center;"> <span style="background-color: #ffc107; padding: 2px;">NEW</span>  <b>Simplification measures</b> </div> <div style="font-size: 2em; margin: 0 10px;">+</div> <div style="border: 1px solid black; border-radius: 10px; padding: 5px; text-align: center;">             Minor technical amendments           </div> </div>

## 6. Overview of the proposals in the CP by topic:

### (I) Boundary and thresholds

	C 90.00 Thresholds	C 90.05 Composition of trading book	C 24.01 Reclassifications	C 24.02 Structural FX positions
Content of the CP	/	<b>Simplification measure:</b> Narrowed reporting population <i>(via trading book size            threshold)</i>	/	<b>Addition of            template</b> <i>substance already consulted            in EBA/RTS/2025/09</i>

## 6. Overview of the proposals in the CP by topic: (II) Market risk approaches

	C 18.01 – C 23.01 SSA	C 24.00 IM	C 91.01 – C 94.03 ASA	C 95.00 – C 98.02.2 AIMA	C 99.00 P&L
Content of the CP	Addition of template(s) <small>substance already consulted in EBA/RTS/2024/02</small>				
	<b>Simplification measure:</b> Reduction in reporting requirements <i>(via removal of the z-axis)</i>		<b>Simplification measure:</b> Reduction in reporting requirements <i>(via reduced 'offsetting group'-reporting)</i>	<b>Multiple simplification measures:</b> Deletion of 2 templates and reduced / less complex reporting requirements in others	<b>Simplification measure:</b> Narrowed reporting population <i>(via use of double threshold)</i>
	Minor technical amendments (incl. impact of 3 <sup>rd</sup> Delegated Act on FRTB)				

## 6. Overview of the proposals in the CP by topic: (III) Prudent Valuation, CCR, CVA

	C 32.01 – C 32.04 Prudent Valuation	C 34.01 – C 34.11 Counterparty credit risk	C 25.01 Credit Valuation Adjustment
Content of the CP	<p><b>Simplification measure:</b> Deletion of templates C 32.03 and C 32.04</p>	<p>Minor technical amendments</p>	

## 6. Summary

### MAIN CHANGES

- ❖ **Simplification: proportionality and reduced reporting burden**
  - For entities with reduced market risk related activities – C 90.05 and C 99.00 not required
  - For SSA entities – Breakdowns by currency and market removed in respectively C 18.01 and C 21.01
  - For ASA entities – simplified offsetting-group based reporting
  - For AIMA entities – C 96.01.2 and C 96.05.2 deleted
- ❖ **Addition of new templates**
  - C 24.02
  - C 91.01 to C 99.00

### MAIN FEEDBACK EXPECTED

- ❖ Alignment with the regulatory framework (BOU, MKR, PRUVAL, CCR, CVA)
- ❖ Clarity of the reporting requirement (BOU, MKR, PRUVAL, CCR, CVA)
- ❖ Simplification measures
- ❖ Cost of compliance with the reporting requirements



## Session 7. Overview of other changes to ITS on supervisory reporting

# What is covered by other changes

1. Operational risk losses
2. COREP OF changes
3. COREP Large Exposures – exposures to shadow banking
4. COREP Leverage Ratio
5. Interest Rate Risk in Banking Book
6. Alignment for SNCI reporting with Pillar 3 disclosures
7. Voluntary reporting for SNCI and medium-sized institutions
8. Reasons for resubmissions

# 7.1 Operational risk loss reporting

- New RTS on operational risk taxonomy to start to apply in H2 2026 → **more detailed and granular taxonomy** for operational risk losses (7 Level 1 types, 26 Level 2 categories and 15 attributes)
- Traditional approach to reporting template design would have led to quite big and complex template and increase in datapoints



- The EBA is proposing a switch to **granular reporting** with simple and open table reflecting what institutions need to maintain internally for operational risk management purposes
- All institutions in the CRR scope of operational risk loss reporting will be required to report **individual operational risk losses above the CRR thresholds** on a semi-annual basis + **one-off reporting of aggregate data** on operational risk losses over a 10 financial years window (Article 318 (1) of CRR)
- Institutions not in the CRR reporting scope would be able to report on a voluntary basis

## Specific transitional arrangements for 2026-2027:

Maintain existing reporting of operational risk losses and report only Level 1 loss data that has not changed + all individual losses for the period 2026-2027 once the first reporting under the revised ITS on supervisory reporting start to apply

# 7.2 Main changes to the COREP OF reporting framework and feedback expected

## Section 1 'REPORTING ON OWN FUNDS AND OWN FUNDS REQUIREMENTS'

COREP TEMPLATES		
Template number	Template code	Name of the template / group of templates
<b>CAPITAL ADEQUACY</b>		
1	C 01.00	OWN FUNDS
2	C 02.00	OWN FUNDS REQUIREMENTS
3	C 03.00	CAPITAL RATIOS
4	C 04.00	MEMORANDUM ITEMS
<b>TRANSITIONAL PROVISIONS</b>		
5.1	C 05.01	TRANSITIONAL PROVISIONS
5.2	C 05.02	GRANDFATHERED INSTRUMENTS; INSTRUMENTS NOT CONSTITUTING STATE AID
5.3	C 05.03	IMPACT OF CERTAIN TRANSITIONAL ARRANGEMENTS
<b>CREDIT RISK</b>		
7	C 07.00	CREDIT AND COUNTERPARTY CREDIT RISKS AND FREE DELIVERIES; STANDARDISED APPROACH TO CAPITAL REQUIREMENTS
8.1	C 08.01	CREDIT AND COUNTERPARTY CREDIT RISKS AND FREE DELIVERIES; IRB APPROACH TO CAPITAL REQUIREMENTS
GEOGRAPHICAL BREAKDOWN		
9.1	C 09.01	GEOGRAPHICAL BREAKDOWN OF EXPOSURES BY RESIDENCE OF THE OBLIGOR; SA EXPOSURES
9.2	C 09.02	GEOGRAPHICAL BREAKDOWN OF EXPOSURES BY RESIDENCE OF THE OBLIGOR; IRB EXPOSURES
9.5	C 09.05	GEOGRAPHICAL BREAKDOWN OF EXPOSURES BY RESIDENCE OF THE OBLIGOR FOR STRESS TESTS PURPOSES; IRB EXPOSURES
CREDIT RISK: EQUITY - IRB APPROACHES TO CAPITAL REQUIREMENTS		
10	C 10.00	CREDIT AND COUNTERPARTY CREDIT RISKS AND FREE DELIVERIES; IRB EXPOSURES SUBJECT TO OUTPUT FLOOR
11	C 11.00	SETTLEMENT/DELIVERY RISK

## Proportionality and reduced reporting burden

- ✓ C 11.00 – discontinued, simplifying settlement risk reporting
- ✓ C 05.01 / C 05.02 – discontinued, replaced by C 05.03 for transitional arrangements
- ✓ C 09.05 – new, integrating stress test reporting into COREP
- ✓ C 09.01 / C 09.02 – possible thresholds, reducing granularity (under consultation)

## Main feedback expected

### General questions:

Clarity and usability of templates and instructions;  
consistency with CRR3 calculations

### More targeted questions:

C 05.03 – design and level of detail for transitional arrangements  
C 03.00 / C 04.00 – fully loaded capital ratios and output floor adjustments  
C 07.00 – new row for OBS items; FX-mismatch column  
C 01.00 – prior permissions and retained earnings  
C 10.00 – new IRB RWEA column; potential simplifications  
C 09.01 / C 09.02 – geographical breakdown; possible materiality thresholds

### Cost of compliance:

Identify elements with high implementation or ongoing costs; distinguish one-off vs recurring burden;  
suggest simplifications or alternative approaches

## 7.3 COREP Large Exposures – exposures to shadow banking

- Expanded reporting on Shadow Banking Entities: beyond the existing reporting of the 10 largest exposures, CRR3 now requires institutions to report aggregate exposures to shadow banking entities on both a consolidated and solo basis.
- Regarding those additional reporting requirements, institutions have now to report their aggregate exposure in addition to the 10 largest exposures to shadow banking entities. This obligation is also introduced for Pillar 3 disclosures, entailing consistency between reporting and disclosure.
- Guidelines on limits to exposures to shadow banking entities to be updated within 30 months, followed by a report to the Commission by 31 Dec 2027 and possible legislative proposal by 31 Dec 2028.
- Template C 26.00 updated: row labels 0020 and 0030 amended to explicitly include investment firms, aligning the template with revised Article 395(1) CRR.
- New template LE4 (C 37.00) added to the Large Exposures framework to report aggregate exposures to shadow banking entities, covering direct/indirect and on-/off-balance sheet exposures, with a proportionate and simplified initial design that may be expanded following the future CRR3 policy review.

## 7.4 Leverage ratio- changes focused on simplification and feedback expected

- ✓ reducing reporting frequency for template C 44.00 (LR5) from quarterly reporting to annual reporting.
- ✓ template C 43.00 (LR4) it is proposed to be discontinued.
- ✓ in Template C 47.00 (LRCalc) it is proposed to remove the granular rows 0193 to 0198 and instead require institutions to report an aggregated value.
- ✓ In addition, few rows are proposed to be removed in C 47.00 template referring to transitional arrangements which are no longer applicable, accordingly.

### Main feedback expected

General questions: Clarity of templates and instructions; double reporting;

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

# 7.5 Interest Rate Risk in the Banking Book

## What This Consultation Covers

- Gathers stakeholder feedback on how IRRBB reporting should be designed as part of the EBA's broader ITS simplification and alignment initiative.
- Focus on ensuring that these templates deliver meaningful risk insights proportionate to institution size.

## Why a Public Consultation Before Finalising

- **Alignment with industry practice:** Allows fine-tuning of reporting requirements to reflect real-world IRRBB management challenges.
- **Efficiency and cost reduction:** Identifies data points or procedures that add limited supervisory value but high operational cost.
- **Improved data quality and usability:** Ensures final templates produce consistent, comparable data fit for supervisors' analytical needs.

# 7.6 Alignment for SNCI reporting with Pillar 3 disclosures

## What is the Pillar 3 Data Hub (P3DH)?

### Access to data

SNCI's Pillar 3 figures computed and published by the EBA based on their supervisory reporting data (CRR mandate). Centralised data available to all institutions in the EEA.

### Downloading options

Users have the possibility to download data for several or all institutions to create their own comparisons, charts, etc.



- ✓ To fully meet the CRR mandate, **all the information** to compute the Pillar 3 figures need to be collected under the **supervisory reporting framework**.
- ✓ Collecting the relevant information through the supervisory reporting framework **directly reduces the volume of data that institutions would need to compile and disclose**.
- ✓ Consolidating all required information within a centralised disclosure process would provide a **simpler and more transparent approach for all involved parties**.
- ✓ **No additional burden** for institutions.

# 7.6 Alignment for SNCI reporting with Pillar 3 disclosures

## Summary of proposals

Pillar 3 Template / Table	Institutions subject to requirement	Analysis' results	Proposal (Supervisory reporting ITS)
EU KM1: Key metrics template	All SNCIs	All datapoints available	-
EU OV1: Overview of total risk exposure amounts	Listed SNCIs only	A few datapoints missing	Two datapoints to be added in COREP (minimum necessary)
EU CR1: Performing and non-performing exposures and related provisions	Listed SNCIs only	One datapoint missing FINREP not available at individual level	Add Pillar 3 template to supervisory reporting ITS for solo institutions
EU CQ1: Credit quality of forborne exposures	Listed SNCIs only	FINREP not available at individual level	Add Pillar 3 template to supervisory reporting ITS for solo institutions
EU CQ3: Credit quality of performing and non-performing exposures by past due days	Listed SNCIs only	FINREP not available at individual level	Add Pillar 3 template to supervisory reporting ITS for solo institutions
EU CQ7: Collateral obtained by taking possession and execution processes	Listed SNCIs only	FINREP not available at individual level	Add Pillar 3 template to supervisory reporting ITS for solo institutions
EU CVA4: RWEA flow statements of credit valuation adjustment risk under the Standardised Approach	Listed SNCIs only	All datapoints available	-
EU REM1: Remuneration awarded for the financial year	Listed SNCIs only	Not all institutions under the scope of EBA Guidelines on remuneration	Add Pillar 3 template to supervisory reporting ITS for listed SNCIs
EU REM2: Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)	Listed SNCIs only	Not all institutions under the scope of EBA Guidelines on remuneration	Add Pillar 3 template to supervisory reporting ITS for listed SNCIs
EU REM3: Deferred remuneration	Listed SNCIs only	Not all institutions under the scope of EBA Guidelines on remuneration	Add Pillar 3 template to supervisory reporting ITS for listed SNCIs
EU REM4: Remuneration of 1 million EUR or more per year	Listed SNCIs only	Not all institutions under the scope of EBA Guidelines on remuneration	Add Pillar 3 template to supervisory reporting ITS for listed SNCIs

### Three options for **qualitative information**:

- **Option A:** Take no action - SNCIs would need to continue disclosing this information;
- **Option B:** Submission of a report in PDF format under the supervisory reporting framework;
- **Option C:** Use the DPM - some limitations for the inclusion and transmission of qualitative information.

## 7.7 Voluntary reporting

In some situations, SNCI (or medium-sized institutions) may see a benefit in reporting what is otherwise required to be reported by Large institutions



- The legal text of the ITS is proposed to be amended to allow for such voluntary reporting.
- Technical solutions will be also adjusted to ensure that such voluntarily reported data is accepted

Similar approach is proposed to be applied in operational risk loss reporting allowing for the voluntary reporting by institutions below the CRR thresholds

## 7.8 Reasons for resubmission

- The CP explores mechanisms to record why a resubmission has been made — e.g., error correction, updated interpretation, system change — to help supervisors understand the drivers behind corrections.
- Without explicit reasons, resubmissions are simply “new versions” of reports with little context. Capturing reasons can improve the interpretability and comparability of reporting changes over time.

### Options Proposed for Capturing Resubmission Reasons in the CP

- ❑ **“report.json” approach** - the EBA XBRL Filing Rules would be amended to include the definition and technical specifications of additional JSON objects that could be reported inside the report.json file
- ❑ **“Metadata as data” approach** - all reporting modules would be amended to include two new technical tables. These tables would be designed exclusively for metadata (e.g. comments on data points, explanations of validation failures, resubmission reasons). They could be updated all at once or in a staggered approach.
- ❑ **No action**

# Questions and Answers

# References

- EBA simplification and efficiency work ([here](#))
- Reporting simplification interactive page ([here](#))
- Consultation paper on changes to ITS on supervisory reporting and access to consultation surveys ([here](#))
- Consultation paper on changes to ITS on supervisory benchmarking (credit and IFRS 9 benchmarking) ([here](#))
- 5 May 2026 public hearing page, including these slides ([here](#))



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