
Efficient reporting: simpler, smarter, proportionate

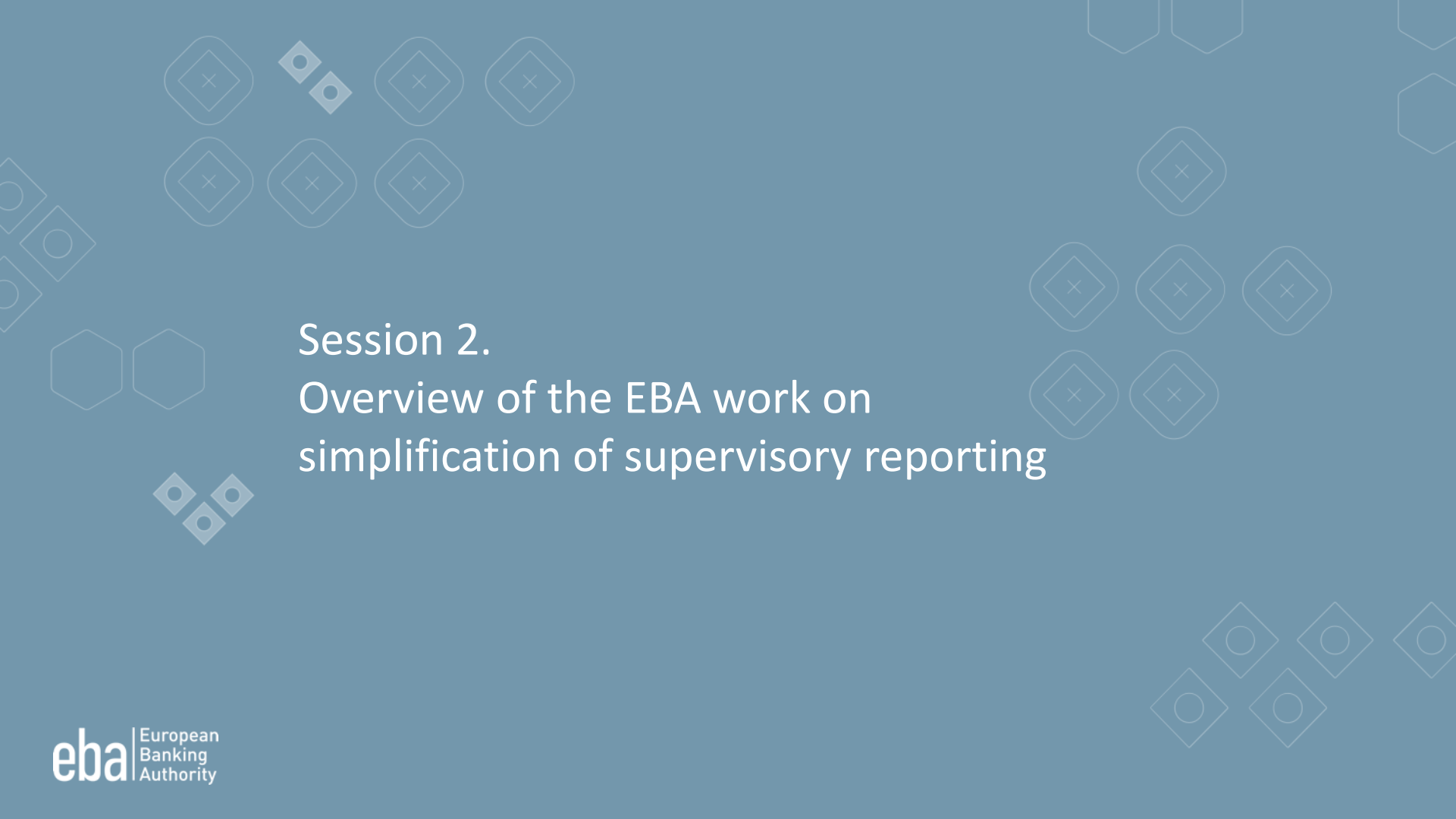
4 June 2026, 10:00 – 13:30 CEST | Workshop (online)

Housekeeping

- Ensure a **stable internet connection** for the best experience
 - 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
 - Please use the **Q&A feature** to submit written comments or questions. You can find the Q&A button on the menu bar at the top of your MS Teams screen
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 - 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*
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 - 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 workshop **will not be recorded** and will not allow any recordings by the participants
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Agenda

1.	Welcoming remarks	10:00 – 10:05
2.	Overview of the work on simplification of supervisory reporting	10:05 – 10:45
3.	Improvements to reporting change management framework	10:45 – 11:30
	Coffee break	11:30 – 11:45
4.	Better coordination of data requests	11:45 – 12:30
5.	Better understanding and measuring reporting burden	12:30 – 13:15
6.	Concluding remarks	13:15 – 13:30



Session 2. Overview of the EBA work on simplification of supervisory reporting

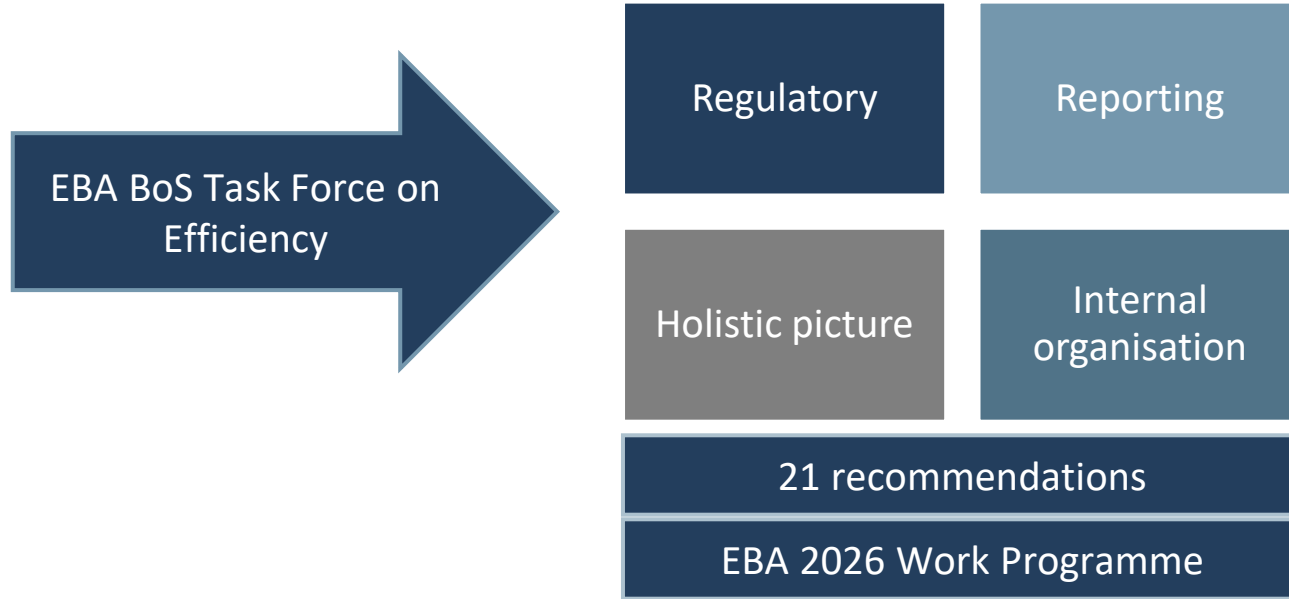
Origins of the simplification of supervisory reporting

- Major supervisory reporting simplification exercise – **2021 Study of the cost of compliance with supervisory reporting requirements** (report available [here](#))
- The objectives were (1) to understand banks' reporting costs and their drivers, (2) identify ways to reduce those reporting costs by 140 to 20% at least for SNCIs and (3) increase efficiencies of the supervisory reporting process and experience
- The EBA identified 25 recommendations with **the combined effect on the reduction of the reporting costs by 15-24%**



- Most of the recommendation from 2021 report have been by now completed and implemented with the costs savings realised by the industry
- Work on some continues as a longer-term project → work on integrated reporting
- Some recommendations are being further strengthened under the current simplification proposals (e.g. improvements to coordination of data requests)
- *See details on the completion of the 2021 recommendations in Annex ([here](#))*

Efficiency of the regulatory and supervisory framework



*Simplifying to strengthen:
building a more efficient
EU prudential 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](#)

Selected topics on simplification

- **Credit risk** remains a focus area:
 - RTS on material model change has simplified the model approval process
 - Credit risk discussion paper
 - Early feedback indicates some room for technical tweaks, but no real desire to make deep changes
- **Use of the SNCI concept** (small and non-complex institutions)
 - Mandate in Art 519f
 - Small bank regime vs more proportionality in CRR
 - Change in SNCI definition?
- **Coordination among authorities**
 - Forums/platforms to coordinate actions, share information
 - Better assessment of ultimate impact of the framework
 - **Stress testing** – simplifying process (top-down – bottom-up)
 - **Stacking order** - no easy solutions



In part, business as usual... ... and in part, adjusting our approach

- Execution of the roadmap on the Banking Package continuing
 - Mandates will continue to be consulted during 2026
- Open questions, which we are asking ourselves:
 - How to use RTS/GL mandates for efficient outcomes
 - Balance between supervision and regulation
 - How to ensure continued push for single banking market
- Commission competitiveness report will set the tone...
- ... but EBA has now also set out its own roadmap and that will filter through most of the new products coming from the EBA



Efficient reporting: simpler, smarter, proportionate

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

Driving EU-wide harmonisation of reporting requirements, with a holistic push for simplification across all actors.

Making reporting more integrated, efficient and supervisory-relevant, ensuring that every template and definition serves a clear purpose and paves way for data sharing.

Leveraging modern tools and technologies to unlock efficiency gains and future-proof the EU reporting framework.

Long-term vision: Integrated reporting

Define once, report once
Data sharing

Integration of prudential, resolution and statistical reporting

Coordination
Collaboration

Joint Bank Reporting Committee (JBRC) bringing together supervisors, resolution authorities and central banks (coordinated by the EBA & ECB) and preparers of regulatory reporting in **Reporting Contact Group (RCG)** **DPM Alliance** (EBA-EIOPA-ECB) and SRB for coordinated governance of DPM 2.0 standard

Harmonisation
Efficient design
Common data dictionary

Focus in 2026

- Semantic integration to complete **common glossary** (EU reporting)
- Preparatory work for the **common data dictionary**

Reporting costs – refit of EBA supervisory reporting

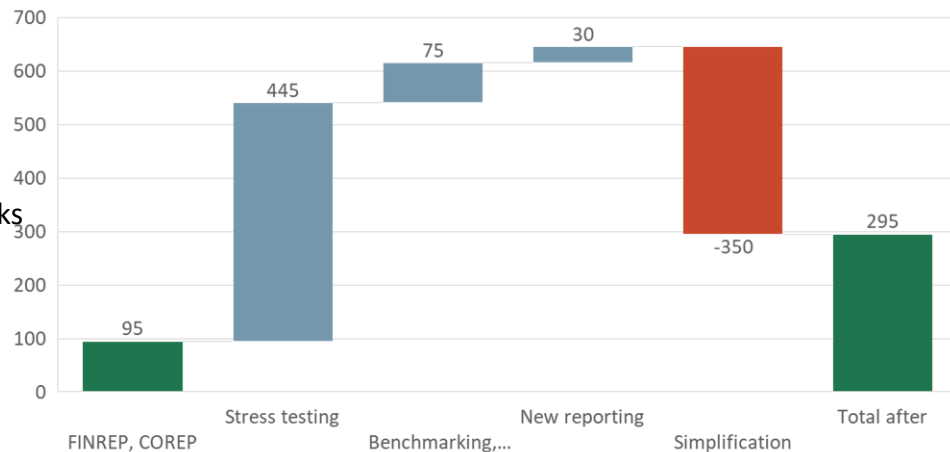
Simplification drivers

- Completion of **EBA cost of compliance report** (2021)
- EU Commission, EBA **cost reduction** targets (-25%)
- Supervisory experience of used data – further **harmonisation** (e.g. liquidity reporting)
- **Integration** of reporting: stress testing exercise, supervisory benchmarking (credit risk and IFRS9)
- Greater **proportionality** for small and non-complex banks

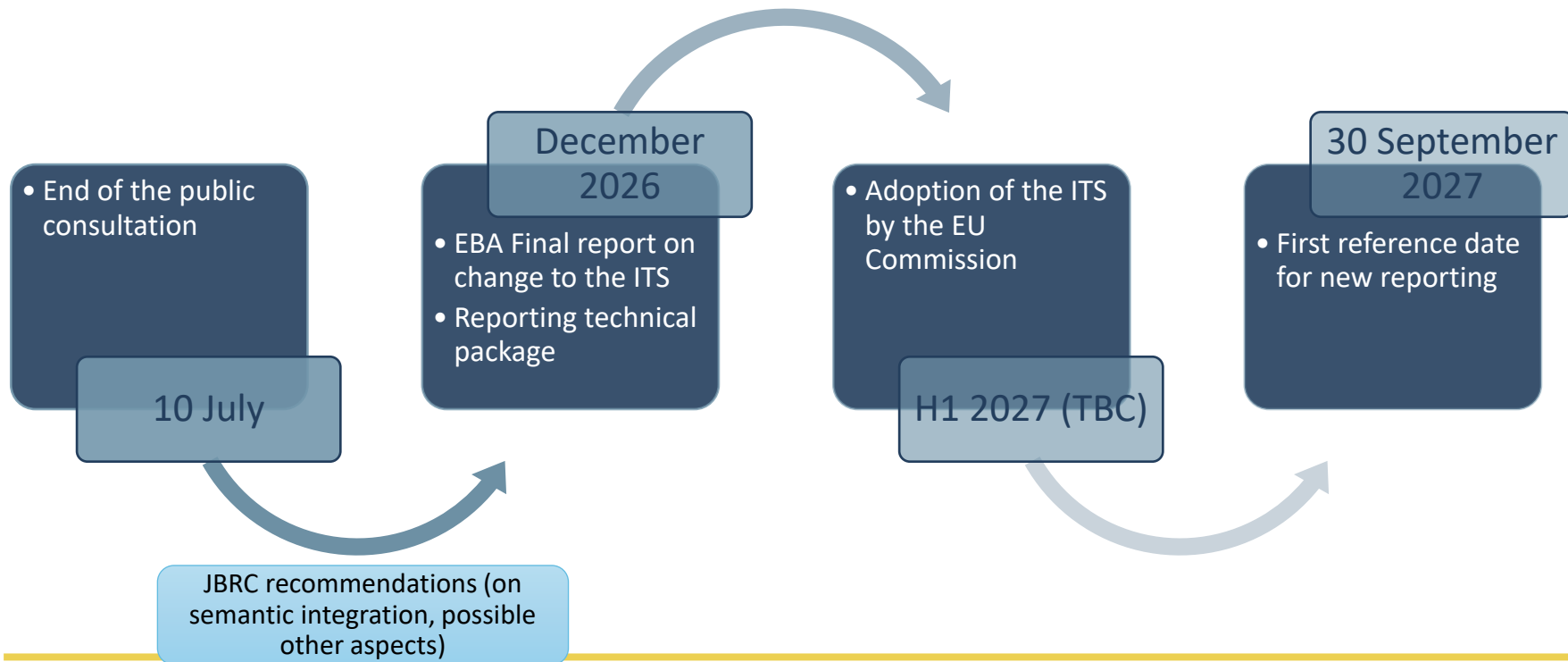
Key regulatory change drivers

- **IFRS18, FRTB** implementation
- New taxonomy for **operational risk** losses
- New **ESG** reporting

>600,000 data points -> 50% reduction



EBA Consultation timeline and next steps



Questions and Answers



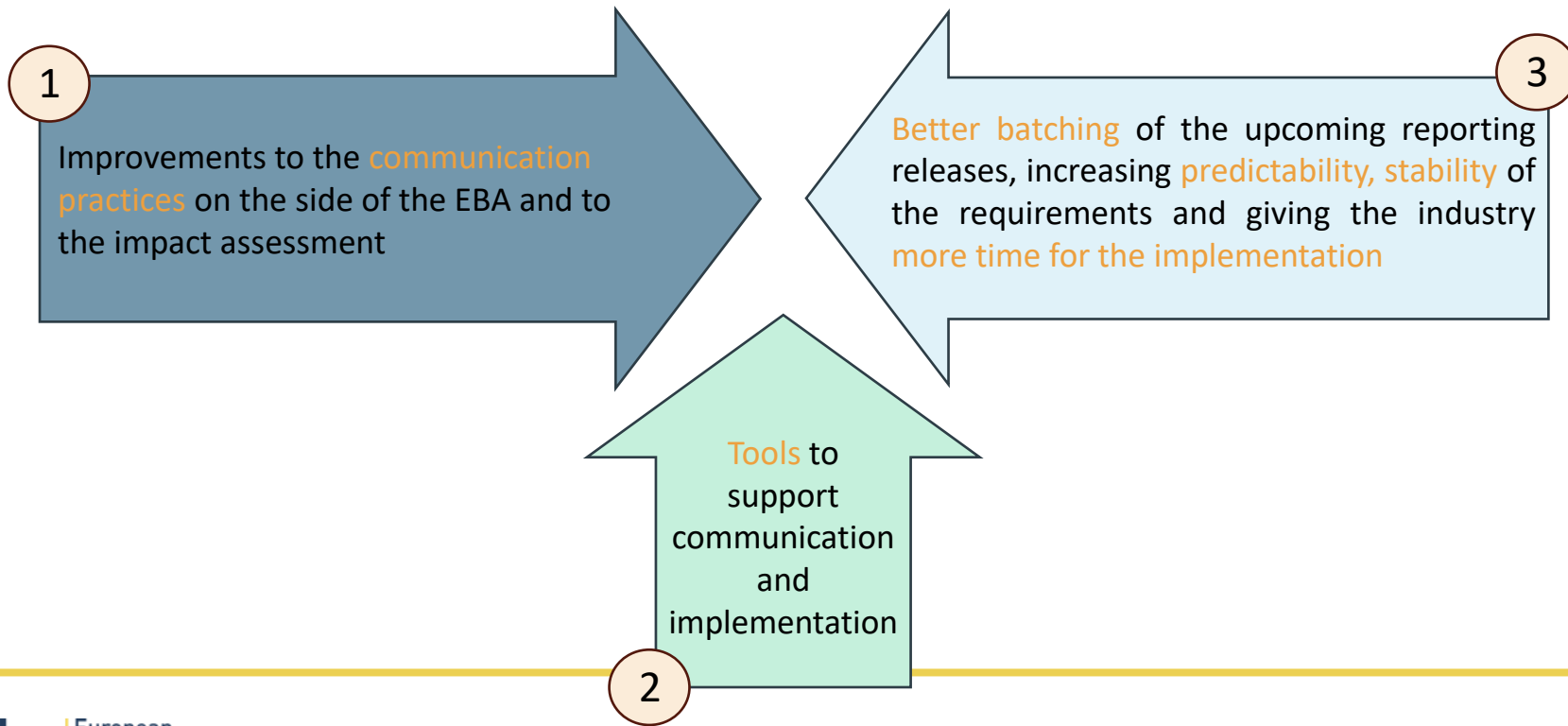
Session 3. Improvements to reporting change management framework

Industry ‘wish list’ and past suggestions for improvements to reporting change management framework

- In most recent dialogues the industry have raised the following points regarding change management (EBF, AFME, EACB, ESG input communicated to EBA in November 2025):

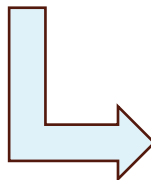
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|---|---|
| <div data-bbox="0 361 150 500" style="border: 1px solid green; padding: 5px; width: fit-content;">Communication and product development</div> | <ul style="list-style-type: none"> Better explain regulatory rationale (‘supervisory use test’ for every data point explaining how it will be used) Publish track changes (CP → final report → OJ publication) Ex ante (for new requirements) and ex post (for major changes) impact assessments Establish annual reporting forum between the industry and authorities to discuss implementation and validations Introduce standardised question into the consultation on IT impacts, timelines and costs Two-stage consultation process: (1) before development proposals and (2) on the consultation paper as currently Greater involvement of JBRC into approval of the consultation papers and final reports and establishing 2-year forward-looking planner |
| <div data-bbox="0 562 150 653" style="border: 1px solid orange; padding: 5px; width: fit-content;">Coordination</div> | <ul style="list-style-type: none"> Alignment and coordination of all reporting initiatives between all EU authorities and NCAs and joint publication of all initiatives through a central hub |
| <div data-bbox="0 751 150 871" style="border: 1px solid purple; padding: 5px; width: fit-content;">Timelines and implementation</div> | <ul style="list-style-type: none"> 3-year simplification cycle (clean-up) and sunset clauses for data collections 2-years forward-looking regulatory reporting outlook Publish technical package together with the consultation papers Extension of mandatory implementation period for the ITS on supervisory reporting from 6 to 12 months Change the logic for the application of reporting requirements and apply them not from the Level 1 calendar, but only when all necessary Level 2 acts are published in OJ Enable earlier vendor testing through test environments |

Areas of potential improvements to reporting change management



1. Better communication

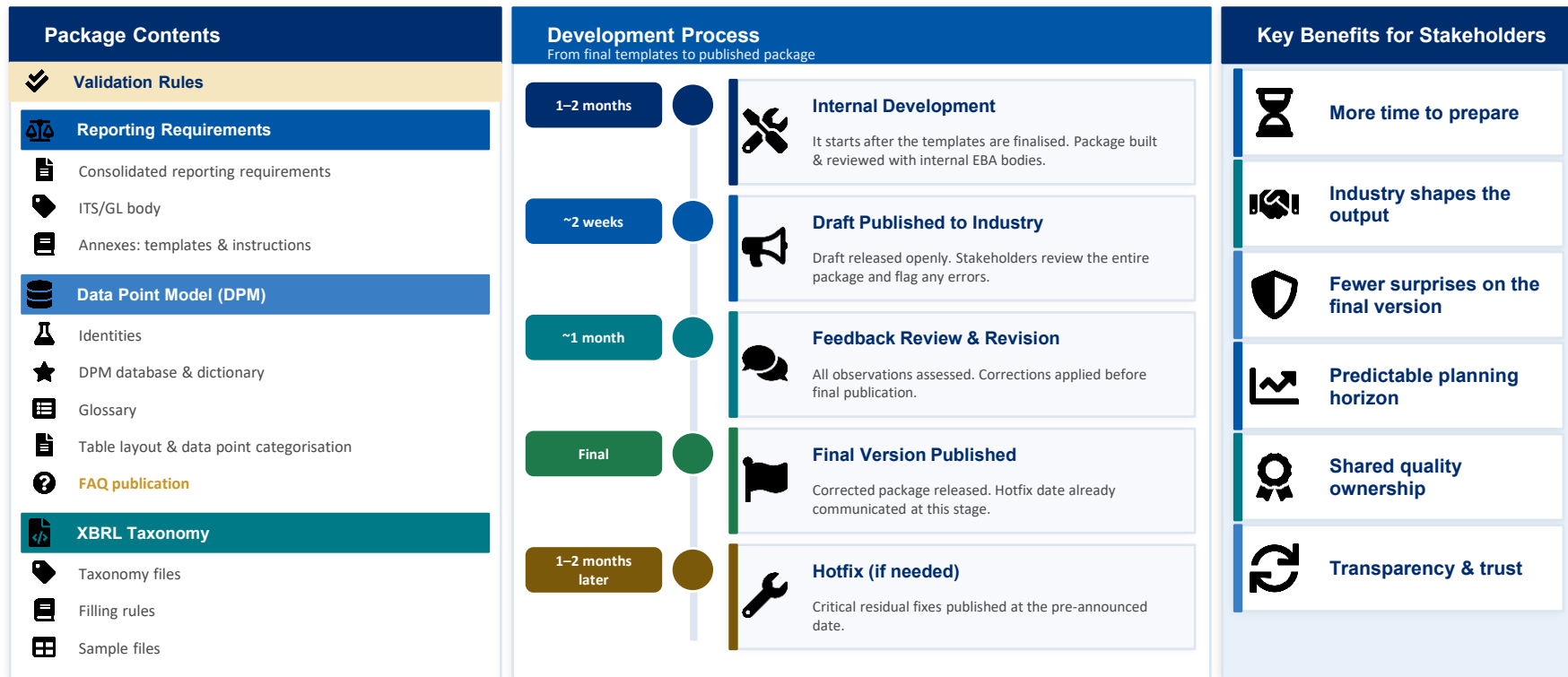
- Improvements to communication and impact assessment are implemented through the current consultation paper



- Implementation of further industry proposals would require additional EBA/CA and industry resources (e.g. two-step consultation, early publication of the technical package, early test environment etc.) and increase the gap between application of new regulation and receiving supervisory reporting based on these new requirements



2. Tools to support implementation: reporting technical package



2. Additional communication/implementation tools

- Recently revamped EBA website providing more details on the reporting frameworks with a set of specific tools:
 - [Reporting frameworks](#)
 - [Reporting time traveler](#)
 - [Signposting tool](#)
 - [Mapping tool](#)
- Introduction of more efficient and timely management of Q&As

Additional toolkit is available to the competent authorities:

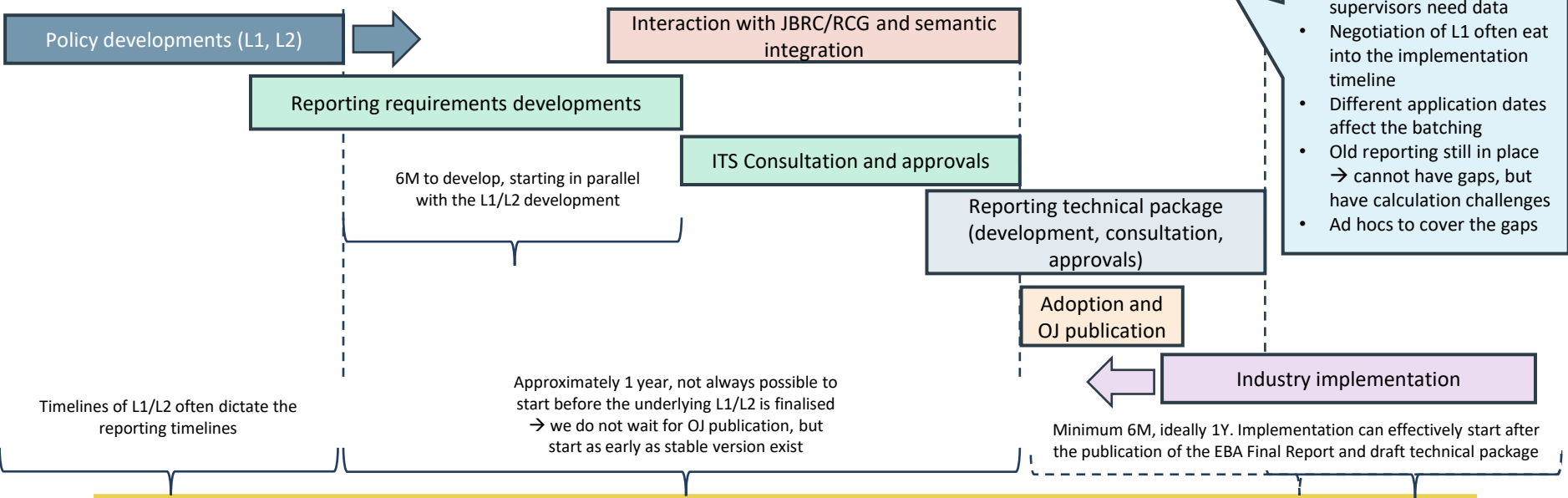
- Issues with validation rules / validation rule tracker
- Issues with data point model (DPM known issues)

Periodic publication and communication through competent authorities

3. Better batching, increasing stability and predictability: challenges

The cycle and timeline of reporting changes/new requirements often influence by external timelines (e.g. L1 underlying regulatory changes) → the process is mostly sequential

Illustrative reporting development timeline



3. Better batching, increasing stability and predictability

- Reporting requirements, as mostly used for checking the compliance with underlying regulatory requirements, **follow the implementation calendars of underlying regulatory changes**
 - Many proposals from the industry would **necessitate also changes in the legislation** (e.g. lengthening minimum implementation period, linking implementation/ application dates to publication of Level 2 acts etc.
 - However, some improvements could be made:
 - **Better batching** and longer lead time (this consultation paper is good example) → almost two years of stability since last major changes
 - Consideration of limiting to **two batches per year with fixed calendar** → potential challenges with the underlying regulatory calendars
- Risks of having situations when the **regulatory requirements apply but cannot be immediately supervised** due to missing reporting is a strong supervisory concern
 - An alternative solution that could mitigate these supervisory concerns could be an **earlier start of the reporting**, where the industry would start reporting e.g. six months before the regulatory requirements start to apply

Recall: dedicated question for discussion in the EBA consultation paper

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 traveler, signposting tool, reporting frameworks overview)?

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

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

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

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

Responses can be provided by 10 July here: https://ec.europa.eu/eusurvey/runner/CP_ITS_Supervisory_reporting

Questions for discussion

- What are your views on the communication elements and tools offered by the EBA to support implementation of the reporting requirements?
- With respect to the reporting technical package, do you find the publication of the draft technical package and accompanying tools (FAQs, DPM know issues, fix date for hotfix) helping you with implementation efforts?
- What are your views on how the reporting change management can be further improved?





Questions and Answers

EBA Workshop: Efficient reporting: simpler,
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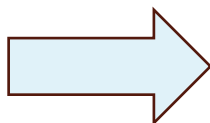




Session 4. Better coordination of data requests

Issues at stake

- **Multiple layers of supervisory data requests:** EU harmonised regular reporting, supranational, national regular reporting and ad hoc data requests
- Additional data requests are **numerous and sizable:** in 2025 671 requests of structured microprudential data totalling 978 thousand data points → compared to ca 95 thousand data points in COREP and FINREP
- Data requests **largely focused on areas that are already well covered by the EBA reporting framework**, notably credit and counterparty risk (709 thousand data points) and liquidity risk (82 thousand data points)
- **Reported overlaps between data requests** by different authorities from the same banks
- Industry concerns regarding **different definitions, templates and submission practices** as well as concerns **over predictability**



Need to improve coordination of data requests and support the holistic approach to the reduction of the reporting burden

Source: EBA report on Overview of data requests by EEA competent authorities (EBA/REP/2026/08)

Improvements to the coordination of data requests

1

Recommendation 7 of the EBA 2025 report on efficiency of regulatory and supervisory framework:

Developing harmonised ‘common rules of the game’ to coordinate data-request practices across EU and national authorities

2

Recommendation 6 of the EBA 2025 report on efficiency of regulatory and supervisory framework:

- Establishing an EU-wide public repository of supervisory data requests

1. The shift promoted by the “rules of the game” Guidelines – what it means for reporting entities

Current approach observed:

- Request first, assess later
- Similar information requested through multiple collections
- Different definitions, formats and instructions
- Broad collections "just in case"
- Limited visibility on why information is requested
- Recurring ad hoc requests becoming permanent

What the Guidelines propose:

- Assess existing information first before launching new collections
- Increased reuse of information
- Greater consistency in concepts and documentation
- Clearly identified information need and intended use
- Better justification and transparency of data requests
- Periodic review of collections and rationalisation over time

1. How the Guidelines structure the lifecycle of data requests

Identifying supervisory needs - Authorities would be expected to:

- **Clearly define** the purpose and use of requested information
- Assess whether information **already exists**
- Avoid **duplicate or unnecessary** collections
- Ensure **proportionality of scope, granularity and frequency**



Intended benefit for industry

- ✓ More targeted requests
- ✓ Fewer overlapping collections
- ✓ Better justification of requests

Designing data requests and templates - Authorities would be expected to:

- Use **consistent definitions and concepts**
- Align with **existing EU reporting structures** where feasible
- Use structured and standardised templates
- Provide **clear instructions and reporting expectations**



Intended benefit for industry

- ✓ Greater consistency across requests
- ✓ Easier implementation and interpretation
- ✓ Reduced transformation and reconciliation effort

1. Running data collections and interaction with industry

Data quality and operational interaction - the Guidelines envisage:

- Proportionate **validation and quality** checks
- Clear **communication** channels
- Timely **clarification** processes
- **Support** during implementation of complex requests

Industry interaction - Authorities would be encouraged to:

- **Engage** with institutions on feasibility aspects
- **Discuss** operational constraints
- **Identify** overlaps with existing reporting



Intended benefit for industry

- ✓ Better predictability
- ✓ Earlier identification of implementation challenges
 - ✓ Reduced ambiguity and resubmissions
- ✓ Improved quality and consistency of submissions

1. Governance, coordination and reuse

Governance expectations for Authorities- the Guidelines envisage:

- Internal **review and approval** arrangements
- **Periodic reassessment** of collections
- Decommissioning **obsolete requests**
- Better **visibility of existing data collections** across authorities

“Shareable by design” approach - Authorities would be encouraged to:

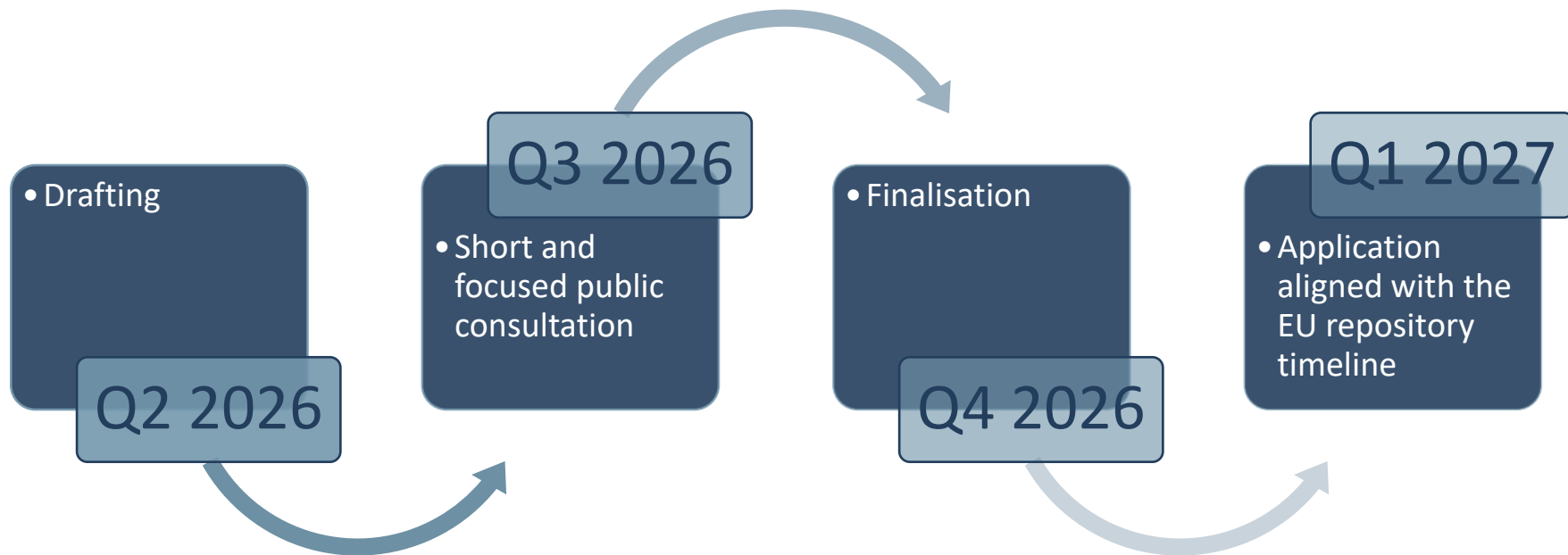
- Consider **reuse of existing data**
- Promote **interoperability and standardisation**
- Support more efficient **cross-authority data use where legally permissible**



Intended benefit for industry

- ✓ Reduced fragmentation
- ✓ Fewer overlapping requests
- ✓ More stable and predictable reporting expectations
- ✓ Lower operational reporting burden

1. Timeline for the guidelines



2. Background to EU repository of data requests

- The EBA has committed to develop **public EU repository of national data collections**, including ad hoc data collections covering data requests by supervisory and resolution authorities covering European and national dimensions. The ECB/SSM has made a similar commitment to publish the micro-prudential data collections in the SSM jurisdictions
- **Primary objectives** for the EU repository are:
 - to allow the competent and resolutions authorities to better coordinate their data requests
 - to ensure transparency, self-discipline, accountability vis-à-vis industry and public
 - to pave way to future data sharing, as required by the EU Better data sharing Regulation
- The repository will leverage on the ECB SSM-wide data collection database and experience gained from EBA 2025 stock take on national data collections (high-level outcomes published on 10 April 2026)



2. Content of repository

Scope

- All EEA supervisory and resolution authorities
- All credit institutions and their branches
- Potential expansion: other types of entities in the EBA remit, other types of authorities

What data requests

- All microprudential and resolution data requests
- All multipurpose data requests, where at least one purpose is microprudential or resolution
- All periodic and one-off data requests, including horizontal, thematic and targeted to some entities
- All structured data collections (quantitative and qualitative)

Content available to public

- Dashboard + High-level description of data requests → what, when, who
- Confidentiality filters: to protect institution-specific data (supervisory measures, market abuse etc. reasons) not all data requests will be visible to public
- No actual data!

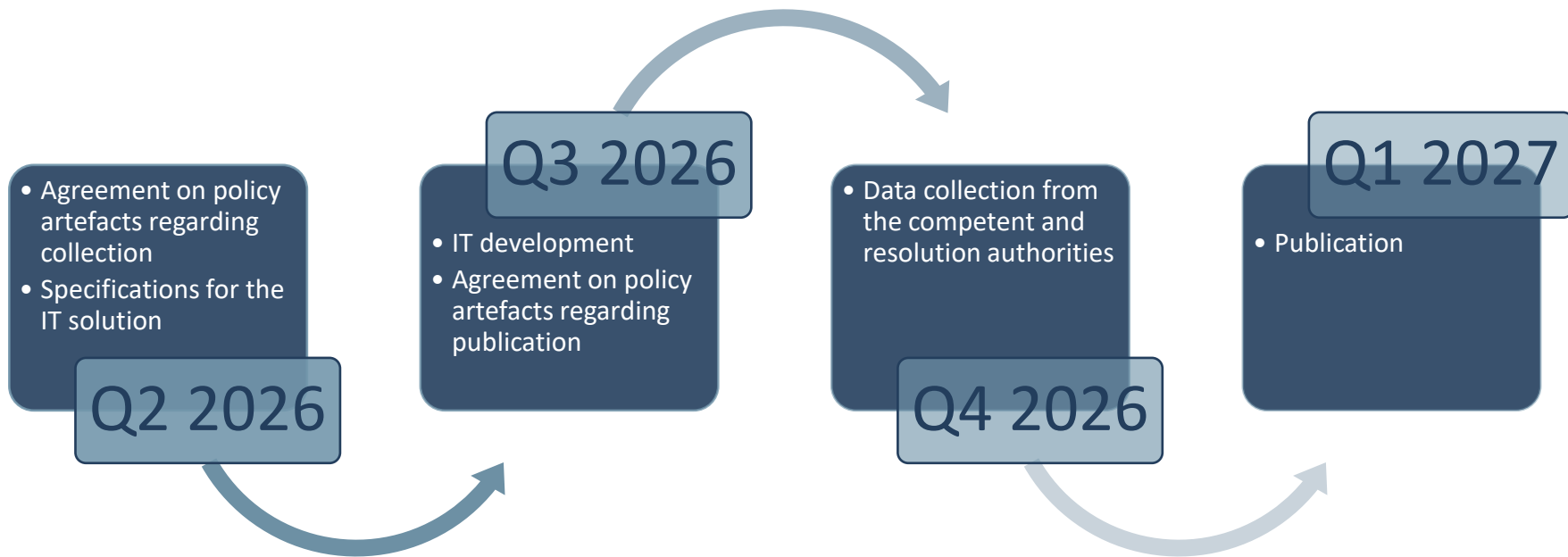
2. Public side of repository: Granular data on data requests

For every 'eligible' (non-confidential data collection) the repository could provide the following:

- Name of the data request
- Description of data request
- Coordinating authority (e.g. ECB, SRB, NCA, NRA)
- Country/jurisdiction of coordinating authority (e.g. SSM, FR etc.)
- First reference date
- Purpose of the data collection (e.g. microprudential, microprudential + resolution etc.)
- Main risk area (e.g. credit and counterparty, business model, ICT risk etc.)
- Size of the data requests (ranges of total data points requested, e.g. 500-750, 751-800)
- Frequency of the data collection (e.g. quarterly, monthly etc.)
- Perimeter (types of institutions covered, e.g. all Large, all SNCIs)
- Consolidation scope (consolidated/solo or both)
- Submission month (month derived from frequency)

No data on requests regarding individual banks and small samples

2. Timeline for repository



Questions for discussion

- What are your views on the planned work on improvements to the coordination of data requests?
- What are your views on approach to the Guidelines on making and designing data requests?
- What are your views on the public part of the Repository of data requests?
 - Is there any specific information on top what is being consider you would like to see in the repository?
- What else can be done in your view to improve coordination of data requests?



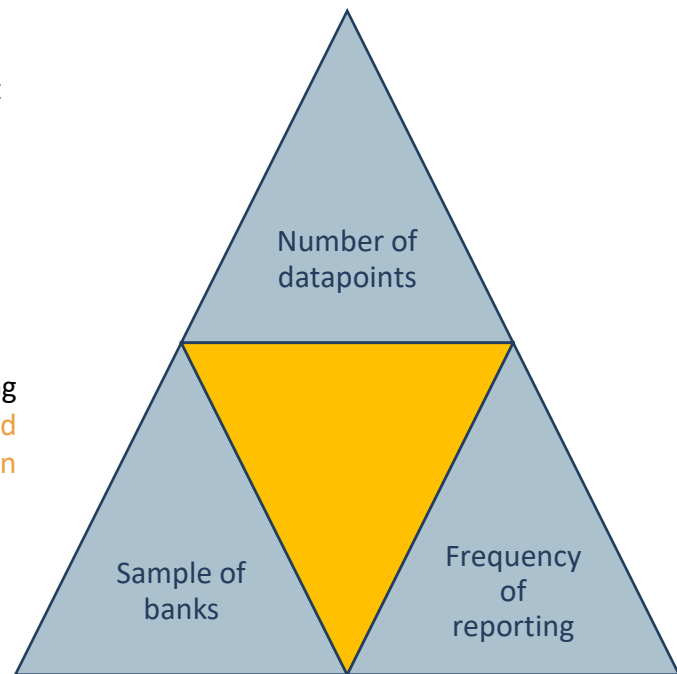
Questions and Answers



Session 5. Better understanding and measuring reporting burden

Reporting burden metrics

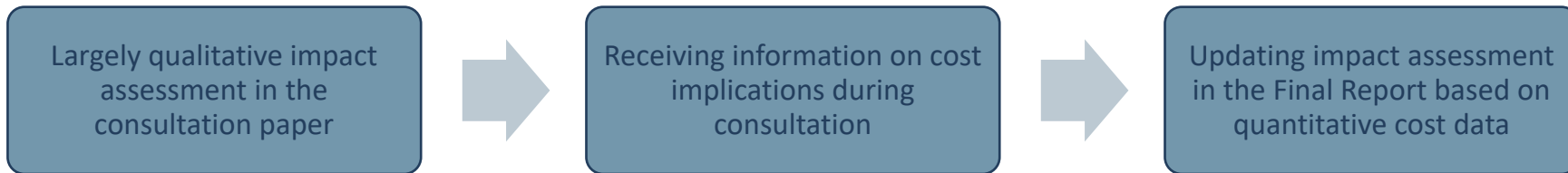
- The current EBA approach focusing only on the modelled/defined data points is not sufficient
- The EBA aims at revising the approach to combine:
 1. number of requested data points
 2. number of submitted data points
- Such combined approach is currently possible for the EBA reporting requirements
- Ongoing work on agreeing on common methodology for calculating reporting burden with competent and resolution authorities → preference to **using combined metrics** (*data points x frequency x sample*), but **challenges with getting data on submitted data points**
- Some **additional elements** being considered:
 - new/old data, regular/one-off collection → can be reflected
 - complexity and reporting cost implications → difficult to implement
- Also need to consider not only country aggregates, but averages per (types of) banks



Cost implications

Metrics based on data points does not reflect complexity, nor reporting costs

- Need to have input from the industry regarding complexity and cost implication of templates/data points
- Need to manage additional burden of collecting such data → 2021 Cost of compliance exercise was too complex for the EBA, supervisors and banks
- Possible compromise: **two-step impact assessment** introduced in the current consultation paper



Two-step approach to impact assessment (1/2)

- Consultation paper on changes to ITS on supervisory reporting requests for information regarding impacts on reporting costs differentiating between responses by (1) individual banks, and (2) associations
- Aim is to get an idea of average reporting costs, and:
 - The share of the costs associated with the EBA reporting
 - Splits between (1) implementation and (2) running/ongoing
 - Breakdown by reporting modules covered by the consultation paper
- Different approach to the answers by associations, where we do not seek to have EUR amount of costs, but just weights for different splits/breakdowns
- Open-ended question to flag most costly templates
- Questionnaire for the consultation is available [here](#) (password: Reporting2026)

Whilst the information on costs and cost impacts may be difficult to produced, it is important for the EBA to understand impacts of the proposed changes

Two-step approach to impact assessment (2/2)

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

Column	A	B	C	D	E	F
Row		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					
2	Weight of costs dedicated to 'EBA related' reports ³ (% of row 1) ⁴					
3	<i>of which AE⁵</i>					
4	<i>of which ALMM</i>					
5	<i>of which FINREP</i>					
5.1	<i>Of which stress test related changes⁷</i>					
6	<i>of which LCR</i>					
7	<i>of which Large Exposure</i>					
8	<i>of which Leverage</i>					
9	<i>of which COREP Own Funds</i>					
9.1	<i>Of which stress test related changes⁷</i>					
10	<i>of which FRTB (template C 90.00 being accounted in COREP OF row)</i>					
11	<i>of which ESG templates⁸</i>					
12	Weight of costs dedicated to reports to other authorities (% of row 1)					

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

Column	A	B	C	D	E	F
Row		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					
2	Weight of costs dedicated to 'EBA related' reports ³ (% of costs related to reports of row 1) ⁴					
3	<i>of which AE⁵</i>					
4	<i>of which ALMM</i>					
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9.1	<i>Of which stress test related changes⁷</i>					
10	<i>of which FRTB (template C 90.00 being accounted in COREP OF row)</i>					
11	<i>of which ESG templates⁸</i>					
12	Weight of costs dedicated to reports to other authorities (% of costs related to reports of row 1)					

Question for discussion

- What are your views on how information/data on the complexity of the data points/templates and cost implications can be easily obtained by the EBA without imposing additional burden on the industry?



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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