EBA BSG 2026 015 rev. 1

Banking Stakeholder Group

17 February 2026 | 09:30 – 15:00

Location: EBA premises

EBA Regular Use

Banking Stakeholder Group

Minutes of the meeting on 17 February 2026

Agenda item 1: Welcome and approval of the agenda

1. The Banking Stakeholder Group (BSG) Chairperson welcomed the Members and asked whether they had any comments on the agenda of the meeting. The Members did not raise any comments on the agenda.

2. The Chairperson welcomed two new BSG Members - Ms Mathilde Bonneau, representing financial institutions and Mr Michael Troge, representing independent top-ranking academics. Both new Members briefly introduced themselves.

3. The BSG Chairperson informed the Members that the Minutes of 11 December 2025 have been approved by the BSG in the written procedure and would be published on the EBA website.

Conclusion

4. The BSG approved the agenda of the meeting.

Agenda item 2: BSG update on the latest developments

5. The coordinators of technical working groups (TWGs) updated the Members on the ongoing work in each group.

6. The coordinators of TWG 1 (Capital & Liquidity Recovery & Resolution) informed about the response to the Consultation paper on common procedures and methodologies for the supervisory review and evaluation process (SREP) and supervisory stress testing on which TWG 1 worked together with TWG 2 and which was submitted to the EBA at the beginning of February. The coordinators noted that the Consultation paper addressed a high number of issues, many of which were of a technical nature. They also mentioned that there was not a quorum in TWG 1 to prepare a response to the Consultation paper on RTS and ITS on

prudentially material transactions. However, TWG 1 would like to contribute to the response to the Consultation paper on amending Guidelines on appropriate subsets of sectoral exposures for the application of the Systemic Risk Buffer (SyRB).

7. The coordinator of TWG 2 (Governance & Supervision, Accounting, Reporting & Disclosure) mentioned that there was no support in TWG 2 to prepare a response to the Consultation paper on the Guidelines on supervisory independence of competent authorities (CAs). TWG 2 contributed to the response prepared by TWG 1 on SREP and was also interested in contributing to the response on the SyRB amending Guidelines.

8. The coordinator of TWG 3 (Consumer Protection) informed that TWG 3 has not taken on any new consultation responses and/or other initiatives since the last meeting in December 2025.

9. The coordinator of TWG 4 (Sustainable Finance) confirmed that TWG 4 would coordinate the response to the Consultation paper on SyRB.

10. The coordinator of TWG 5 (Payments) noted that TWG 5 was expecting finalization of mandates under PSD3 and PSR and that the new BSG Member representing financial institutions was planning to join the group.

11. The coordinators of TWG 6 (Financial Innovation & Digitalisation) reflected on the tabled presentation on white labelling. The coordinator also proposed to include, on the agenda of one of the upcoming BSG meetings, a discussion on proportionality and cost benefit analysis and how the BSG could contribute to the work of the EBA on these two aspects.

12. The coordinators of TWG 7 (AML/CFT) said that they have been waiting whether the EBA would be engaged in any further work on AML related issues.

13. The BSG Chairperson noted that the BSG would welcome if the EBA could schedule public hearings on consultations papers earlier in the consultation process in order to allow subsequent discussion at the BSG level. He also mentioned his status as an observer in the EBA's Advisory Committee on Proportionality (ACP). With regard to TWG 7, he mentioned that the future role of the group should be reviewed in the coming weeks.

14. The EBA Executive Director noted the comments and said that the public hearings were scheduled closer to the end of the consultation papers as this allowed the EBA to progress the work and to collect initial feedback. He pointed out that there was some planned prudential work with a few AML aspects and therefore, he suggested keeping the respective TWG for some more time. He also reflected on proportionality and suggested a liaison between the ACP Chairperson and the BSG Chairs.

15. The BSG Chairperson concluded by noting the work by the TWGs and thanked all BSG Members involved.

Agenda item 3: EBA update on the latest developments

16. Firstly, the EBA Executive Director informed the Members that since the departure of the EBA Chairperson, the EBA Vice-Chairperson has replaced him in all Chairperson related roles.

17. Secondly, the Executive Director updated the Members on the EBA's work on efficiency and simplification and reminded them that the EBA published in October 2025 a report which included 21 recommendations. The EBA has been intensively working on the implementaiton of these recommendations in four areas - regulatory products, reporting, holistic picture, and internal organisation. He said that the EBA has been more engaged in the legislative process and developed a methodology to assess the materiality of L2 and L3 mandates. This methodology took into account the materiality of a given L2 and L3 mandate for both the institutions within its scope and the regulator or supervisor, together with additional criteria, such as the type of institutions subject to the mandate and the possible sensitivity of stakeholders to this mandate. Application of the methodology has already led to reduction of mandates under PSD3/R and the EBA would further use it to assess the usefulness of the L2 and L3 mandates under consideration and when preparing its annual work programme to prioritise the allocation of its resources. In other three areas, the EBA's focus was on the Single Rulebook, in particular with regard to credit risk, governance and stressed test; integrated reporting; stacking orders and change management, including improving coordination between competent authorities. In relation to the work on simplification, the Executive Director mentioned recently published European Commission's consultation on the competitiveness of the banking sector and said that there were 97 questions in total across 3 areas - Banking competitiveness in the EU and globally; The single market and the banking union, and Complexity and effectiveness of the regulatory framework. He noted that the EBA would be responding to the consultation and encouraged the Members to participate in the consultation as well.

18. Thirdly, the Executive Director updated the Members on recent developments regarding the securitization file at the level of the European Parliament and said that there were ongoing discussions on the role and tasks for the ESAs.

19. Fourthly, the Executive Director followed up on the discussion during the last BSG conference call and said that on 1 January 2026, the EBA and AMLA completed the transfer of all AML/CFT mandates and functions, including key EBA tools and expertise, such as the EuReCa database, supervisory insights, and risk assessments. He stressed that all existing EBA AML/CFT guidelines and standards remained in force until replaced by AMLA, guaranteeing regulatory continuity for industry and supervisors. Under the new framework AMLA would complete the EU's Single Rulebook, advance supervisory convergence, coordinate the work of FIUs to enhance cross-border exchange of financial intelligence, and directly supervise 40 of the most complex financial institutions or groups in the EU. The Executive Director clarified that the EBA would continue to address money laundering risks

through prudential regulation, working with AMLA to maintain a coherent framework. The EBA was also planning to closely cooperate with AMLA on the dry-run exercise.

20. The Executive Director then mentioned tools that the EBA has been developing to simplify use of data available to its stakeholders and said that in the past few weeks, the EBA launched two new portals: 1) EDAP - The European Data Access Portal (EDAP) a central hub for supervisory data in the EU/EEA. For the first time, the EBA Risk Dashboard was published within this platform, marking a major step forward in transparency and accessibility. EDAP would soon host a wide range of data-driven exercises and disclosures. Importantly, stakeholders could directly download the underlying data, making it easier to access, analyse, and use supervisory information. This development further strengthens the EBA's commitment to making banking data more accessible and user-friendly for all stakeholders across Europe; and 2) Pillar 3 data hub in which prudential information from all EEA institutions was made publicly accessible through a single, harmonised digital platform. The hub disclosed the data that large and other institutions began submitting on 26 January 2026, and significantly enhanced the availability, usability and comparability of prudential information across the EU.

21. The Executive Director then focused on recent publications and mentioned that there were two fraud-related publications on 15 December 2025. Firstly, the EBA and ECB published the 2025 edition of their joint report on payment fraud. The report covered the semi-annual data for 2022 to 2024 and assesses payment fraud reported by industry across the European Economic Area (EEA). It examined the total number of payment transactions and the subset of fraudulent transactions in terms of value and volume. Alongside aggregated values, the report also presented data broken down by means of payment, such as credit transfers, direct debits, card payments, cash withdrawals and e-money transactions. Country-specific breakdowns were also included. Secondly, the three European Supervisory Authorities published two factsheets designed to help consumers protect themselves from crypto and other online frauds and scams and explain how fraudsters increasingly use artificial intelligence (AI) to deceive consumers. The factsheets provided practical tips to help consumers recognise and avoid different types of frauds and scams.

22. With regard to other publications, the Executive Director referred to Q3 2025 Risk Dashboard (RDB). The data confirmed that asset quality, solvency, liquidity and profitability in the banking sector of the European Union/European Economic Area (EU/EEA) remained stable, even amid heightened macroeconomic and geopolitical risks. Also in the risk area, on 26 January, the EBA published a Report on the medium- to long term objectives of its interest rate risk in the banking book (IRRBB) Heatmap, including key observations and recommendations for institutions and supervisors. Together with the other ESAs, the EBA published the Joint Guidelines on environmental, social, and governance (ESG) stress testing. These Guidelines provided national insurance and banking supervisors with clear guidance on how to integrate ESG risks into supervisory stress tests, both when using established frameworks and when conducting complementary assessments of ESG risk

impacts. They set common standards for embedding ESG risks into stress testing methodologies across the EU's financial system.

23. The Executive Director concluded on publication by mentioning the EBA's work on equivalence as there have been developments since the BSG discussion 2025. On 18 December 2025, the EBA updated its confidential Report on equivalence monitoring activities and submitted it to European Parliament, the Council, the European Commission and the other European Supervisory Authorities (ESAs). To enhance transparency, the EBA also published a public summary outlining recent regulatory and supervisory developments in 26 non-EU jurisdictions deemed equivalent under the Capital Requirements Regulation (CRR). The Report provided factual information on regulatory and supervisory changes, identified areas that may require continued monitoring, and ensured that the criteria for equivalence decisions continue to be met. The public summary offered insight into the EBA's monitoring approach, while respecting the confidentiality of the detailed Report. The summary provided information on the methodology, scope, parameters, and inherent limitations of the equivalence assessments. On 22 December 2025, the EBA published updated Guidelines on the equivalence of confidentiality and professional secrecy regimes in third countries, reinforcing the EU's commitment to safeguarding confidential information and enabling effective cross border supervisory cooperation. The revised Guidelines expanded the scope of the original 2022 Guidelines to reflect new requirements under the Markets in Crypto Assets Regulation (MiCAR) and incorporated the latest EBA equivalence assessments. The updated framework confirmed that the confidentiality and professional secrecy regimes of several authorities, including those in Australia, China, Montenegro, Peru, Serbia and the UK, were now considered equivalent to EU standards.

24. With reference to ongoing consultations, the Executive Director invited the Members to respond to: the Consultation paper on amendments to the RTS on certain prudential requirements for CSDs with a deadline on 3 March 2026, the Consultation paper on RTS and ITS on prudentially material transactions under CRD with a deadline on 5 March 2026, and Consultation paper on amending Guidelines on appropriate subsets of sectoral exposures for the application of the Systemic Risk Buffer (SyRB) with a deadline on 30 April 2026.

25. The Members welcomed the update. Several Members commented on the Pillar 3 data hub which they considered as a very welcomed development. In this relation, two Members asked if the EBA was planning to exercise any form of post-implementation project on Pillar 3 data. One Member mentioned that some banks were providing more data under Pillar 3 than others and questioned whether the data hub would include only the common set of collected data. Other Member stressed the importance of the work on simplification which should also cover simplification and burden reduction for investment firms. One Member highlighted the issue of fraud and questioned how the EBA was planning to tackle various

aspects of fraudulent actions observed on the market. Another Member pointed out issues related to opening of accounts for companies.

26. In his response, the Executive Director reflected on the EBA's educational initiatives aimed at consumers in the area of payments and fraud. With regard to Pillar 3 data hub, he clarified that for smaller banks, the EBA has been pre-populating data which the banks then later confirm as this allowed significant burden reduction on the side of the banks. He confirmed that investment firms were in the scope of simplification initiatives and that the EBA was also focusing on governance of institutions. Finally, the Executive Director referred to peer reviews, a tool used by the EBA to assess post-implementation practices by selected competent authorities.

27. The BSG Chairperson concluded by noting the comments raised by the Members.

Agenda item 4: BSG Reimbursement rules – update

28. The EBA Acting Head of Governance and External Affairs Unit (GEA) informed the Members that the EBA has been in the process of updating its reimbursement rules and that the respective decision would be published on the EBA website in the coming weeks. She briefly summarised the main aspects of the reimbursement policy and highlighted the deadline of 30 days after the meeting/conference call for submission of supporting documents for the reimbursement.

29. The Members did not raise any comments.

30. The Chairperson concluded by noting the update of the reimbursement rules.

Agenda item 5: Risks and Vulnerabilities in the EU

31. The EBA Senior Bank Sector Analyst (Analyst) updated the Members on the latest developments in the EU related to risks and vulnerabilities. He provided an overview of recent political and geopolitical developments and their impact on EU/EEA banks' market performance. He acknowledged sharp volatility and rapid repricing across metals, USD, and equity markets as investors reassessed geopolitical risk, growth, and inflation expectations. The Analyst noted that despite the volatility, credit spreads and default indicators remained stable, suggesting limited credit risk transmission and no immediate systemic concern in bank credit portfolios. With regard to banks' performance, he summarised that EU banks continued to show strong performance throughout 2025 - EU bank equities outperformed US peers and broader indices, despite increased price swings. Q4 2025 earnings were robust, with revenues supported by net interest income (NII) and fees. Cost of risk stayed low, aligned with market signals of stable asset quality. Overall, the sector demonstrated solid profitability and resilience heading into 2026. The Analyst then focused on the outlook for 2026 and mentioned general expectations of 3–5% revenue growth, supported by stabilising rates and solid loan growth; stable deposit bases, with a

shift away from term deposits into sight deposits; cost increases around 2% and cost of risk to remain low, supported by strong labour markets and fiscal expansion. He also mentioned that there was a growing interest among banks in diversifying their income streams beyond Net Interest Income (NII) by acquiring wealth and asset management as well as insurance businesses. Furthermore, domestic consolidation deals led the market, while cross-border banking transactions were likely to continue, primarily through minority stake acquisitions. He pointed out that despite the positive outlook, there were several remaining structural and cyclical risks and mentioned global trade disruptions and geopolitical developments; higher investor scrutiny on tech investment efficiency and persistent cybersecurity threats; domestic political risks, fiscal concerns, and discussions about potential bank tax increases as well as potential deregulation in the US that could affect EU banks' competitiveness. The analyst also reflected on the bank funding forecast for 2026 and said that the outlook was generally positive, supported by strong fundamentals like stable profitability, capital, and liquidity, with limited systemic credit risks and steady policy rates. He noted that AT1 issuances may decline due to reduced capital needs, while Tier 2 supplies may remain steady; covered bond issuance could rise slightly with spreads remaining tight in early 2026. The analyst concluded by mentioning ESG and green bond issuance and said that data indicated that the greenium remained mostly in the positive in recent quarters, i.e. offering a price advantage for banks issuing green bonds. Green issuances focused on senior bonds, in particular preferred ones. Social and sustainable issuance remained marginal.

32. The BSG Chairperson welcomed the update and highlighted cyber risk as a significant concern, noting its relevance beyond the banking sector. While acknowledging the introduction of a new framework under DORA, he questioned whether the EBA could share its initial experiences within the DORA framework, provide an overview of the data collected, and offer a cross-sectoral perspective.

33. During the subsequent discussion, one Member observed that non-traditional risks may not be sufficiently recognized by the market and, as a result, may not be adequately addressed. Another Member questioned whether credit spreads accurately reflected the current market situation. One Member raised concerns regarding the repo markets and the asset quality of NBFIs, while another Member requested further information on social and sustainable bonds.

34. In response, the Analyst noted that the EBA has received its initial data sets from DORA reporting, which could be presented at an upcoming BSG meeting. He emphasized the importance of monitoring cyber risk. He pointed out the proactive stance banks were taking, including the implementation of early warning systems to manage asset quality.

35. The EBA Director of the Economic and Risk Analysis Department (ERA) commented on the currently underdeveloped market for social and sustainable bonds.

36. The Executive Director explained that, under the new DORA framework, the EBA has been closely coordinating with other EU institutions, particularly ENISA.

37. The BSG Chairperson concluded by noting the comments raised by the Members.

Agenda item 6: The sharing of client information by non-bank FIs with CIs to prepare for depositor payouts under the forthcoming DGSD3)

38. The EBA Policy Expert (Expert) introduced the item by summarising the legal background and said that in November 2025, the provisional agreement for the revision of the Deposit Guarantee Scheme Directive (DGSD3) was published as part of the Crisis Management and Deposit Insurance (CMDI). According to DGSD3, client funds deposited by non-bank financial institutions (NBFI) were protected in line with requirements for segregating client funds and the EBA has been mandated to develop Regulatory Technical Standards (RTS) to specify several aspects for credit institutions (CI) and DGSs to be able to protect and repay client fund deposits. The Expert clarified that to repay depositors, CIs should transmit to the DGS the personal information of their depositors, including personal information of the beneficiaries of client funds deposits. If CIs did not have that information available, the CI should receive it from non-bank financial institutions (NBFI). She added that this transmission of data served not only to enable the reimbursement of depositors when a credit institution fails, but also to support stress-testing activities. In this context, stress testing of the DGS happened at a certain frequency, to test the systems and procedures of all stakeholders, to ensure a smooth payout should a credit institution fail, in order to protect depositors. During a DGS stress test, the credit institution remained in going concern. The Expert then summarised the main findings of the EBA's analysis of whether the transmission of personal information from NBFI to credit institutions would result in any potential issues. She said that from a data protection perspective, the EBA did not identify any apparent concerns because the processing of data for the purpose of the DGS stress testing and payouts (and thus the protection of the clients) was compliant with the GDPR. On the other hand, the EBA could not conclude whether any competition issues existed. The potential risk was associated with the need for NBFIs to transmit personal client information which could be of interest to the CI from a business perspective. Concerns could arise especially in relation to the transmission of information for the purpose of stress-testing (meaning the bank was not insolvent), compared to a DGS payout (when the bank would be out of business). In this regard, the Expert invited the Members to provide their views.

39. The Members welcomed the work and agreed that there were no significant concerns from a competition perspective if the transmission of data happened for a DGS payout. One Member commented that regulatory information sharing did not result in competition issues under competition law as long as there was a strong justification for the requirement. Some Members requested clarification on whether personal client information would be shared even when banks were not insolvent and mentioned that PSPs

could be reluctant to share their client information in that situation. One Member observed that issues could especially arise in situations where the activities of banks and NBFIs overlapped. A few Members questioned the necessity of sharing specific data, such as client names, and suggested the possibility of anonymising information due to concerns about potential fraud. One Member commented that the requirement for information for stress testing could be considered to be debatable, as the stress test always considered the worst-case scenario. Another Member enquired if only a subset of data could be shared and whether banks were obliged to share their data as well. Additionally, one Member asked why NBFIs segregated client funds were granted the same protection under the DGS framework as banks, and whether they contributed to the DGS funds. Another Member raised the question of whether NBFIs could be regarded as falling within the scope of the DGS directive.

40. In response, the Expert clarified that NBFIs were required to share data for stress test purposes and that the information had to be complete and non-anonymised to enable the immediate identification of eligible clients and swift payouts which were needed for the protection of depositors and preventing endangering the business continuity of the NBFIs. She further explained that credit institutions were also obliged to provide the same set of client information. The Expert noted that while NBFIs did not contribute to the DGS scheme, the costs were likely to be passed on to them. The Expert also indicated that the EBA has been exploring various options for anonymized, encrypted or partial sharing of client information, with discussions ongoing at the expert level.

41. The BSG Chairperson concluded by acknowledging the Members' comments.

42. Agenda item 7: Report on white labelling and follow-up actions regarding consumer awareness

43. The EBA Policy Expert (Expert) introduced the item and briefly summarised the EBA's mandate to monitor and assess market developments and said that in line with its mandate, the EBA identified three priorities on innovative applications for 2025/26: (i) artificial intelligence and machine learning; (ii) decentralised finance, crypto and tokenisation; and (iii) value chain developments. Among these priorities, in 2025 the EBA analysed the growing phenomenon of white labelling of financial products and services and published a report (the 2025 report) setting out conclusions and follow-up actions in 2026. The follow-up actions focused on (i) raising supervisory awareness of the business model, having integrated white labelling in competent authorities' supervisory priorities for 2026, thus enhancing visibility for the purposes of supervision/enforcement; and (ii) facilitating consumers' awareness of risks. The Expert then focused on white labelling model, in particular on opportunities and risks for consumers and on the proposed actions to facilitate consumer awareness. She mentioned better pricing, more choice and improved financial inclusion as potential opportunities and lack of transparency, unclear information and fraud as the main potential risks for consumers. To improve consumer awareness the

EBA has been planning a factsheet for consumers identifying key risks and setting out elements to 'know and check' before engaging financial products and services via white labelling. The EBA has identified a number of elements, including the identification of provider, costs and fees, product features as the things to identify and check before engaging services via white labelling. The Expert concluded her presentation by inviting Members to provide comments on the elements that could be helpfully set out in a factsheet for consumers.

44. A presentation by a BSG Member followed. In her presentation, the Member referred to Banking-as-a-Service (BaaS), embedded finance, and white labelling models. The presentation began with an overview of key concepts and then provided insights from multiple perspectives, namely those of banks, the broader industry, and regulators. The BSG Member summarised notable issues that have been observed in the market, drawing on experiences and challenges encountered by each stakeholder group. In addition, the presentation highlighted two concrete cases, examining their significance and impacts. The analysis of these cases offered practical examples of how BaaS, embedded finance, and white labelling models have been (re-)shaping the financial landscape.

45. Several Members voiced their support for efforts to address current market practices, noting a widespread lack of transparency that frequently prevented consumers from identifying the responsible providers of services. They emphasised that consumers often struggle to discern which entities were accountable for the services on offer. The Members agreed that a clear and transparent framework should exist. Such a framework should ensure that consumers, could easily understand who was responsible and how to contact them, without having to investigate the specific details themselves. Furthermore, they highlighted that the human aspect of service provision was often missing, leaving consumers without a clear point of contact to raise queries, and submit complaints.

46. The BSG Chairperson raised the important question of how to uphold the integrity of the licensing process. This query underscored the need for robust measures to ensure that licensing procedures remain trustworthy and effective and that all parties in the value chain hold appropriate licences/registrations for the activities undertaken and that relevant regulatory measures (e.g. in the context of outsourcing).

47. In response, EBA Experts thanked Members for the rich discussions and acknowledged that raising consumer awareness was simply a complementary element to broader efforts to strengthen white labelling practices. Indeed, there was no intention to displace the responsibilities of service providers – rather the purpose of the factsheet was simply to help raise consumers' awareness of additional elements to consider when engaging financial services via digital means. Providers bear full responsibility for regulatory and compliance obligations of the products they offered. Partners too, depending on the specific activities performed, may be subject to regulatory obligations (e.g. under financial services measures as intermediaries, distributors, agents, and/or non-financial measures such as the Distance Marketing Regulation and Digital Services Act). Supervisory convergence work

in 2026 – not described in the presentation to the BSG – remained of high importance to continue to promote supervisory awareness of business models and bring greater scrutiny in supervision activities (hence the integration of white labelling in the Union Strategic Supervisory Priorities 2026). The Experts welcomed further examples of business cases and noted the intention to present to BSG on supervisory convergence work.

48. A presenting BSG Member highlighted the differences between financial institutions offering products from other financial institutions, financial institutions offering non-financial products, and non-financial institutions offering financial services. She observed that consumer awareness varied considerably across these scenarios and was to be taken into account.

49. The Executive Director remarked on the distinctions between branded services, co-branded offerings, and general marketplace products, noting that these variations further impact consumer understanding and awareness.

50. The BSG Chairperson concluded by noting the Members' comments and supported further work on the topic within a technical working group and future discussions in the setting of the BSG.

Agenda item 8: Future direction of the EU-wide stress test

51. The EBA Head of Risk Analysis and Stress Test Unit (RAST) introduced the item by reminding the Members that the most recent EU-wide stress test was concluded in the summer of last year and confirmed the strong resilience of the EU banking sector under adverse scenarios. Following the exercise, the EBA has continued its medium- to long-term work on the evolution of the stress testing framework, with a hybrid approach that combines bottom-up and top-down elements, while improving efficiency and usability. This work was also closely aligned with the recently published Report on the efficiency of the regulatory and supervisory framework, in which stress testing features as an important component. Taking into account the lessons learned from recent exercises, the strategic objectives set by the Board of Supervisors, and the broader efficiency agenda, the EBA has developed a proposal outlining the future direction of the EU-wide stress test, including concrete steps on simplification and enhanced synergies with supervisory reporting. The Head of RAST continued by summarising objectives, focus and criteria of the EU-wide stress test exercise's revision. He highlighted two main objectives – 1) simplification of the bottom-up framework by streamlining data templates and integrating stress reporting into supervisory reporting framework for starting points, and 2) development of top-down models for credit risk based on supervisory reporting. The Head of RAST also noted that the EBA was aiming at improving infrastructure for collaboration across supervisors/regulators and banks by using NII platform where banks were provided with projections based on their starting points, and by developing a collaboration platform for usage of models by supervisors across the EU. The Head of RAST then focused on potential applications of the top-down model and mentioned benchmarking tool, assessment of impact of various shocks on the

banking sector and identification of common risks and vulnerabilities, as well as exploring targeted scenarios beyond solvency. With regard to the simplification to the bottom-up approach, he highlighted data reduction, proportionality and synergies with supervisory reporting. He said that the goals included reducing burden on banks and authorities. Furthermore, the EBA was planning to introduce a climate risk module in 2027 EU-wide stress test. The Head of RAST concluded by saying that the EBA was preparing a consultation on reporting changes in Q2 2026 and on stress test methodology in July 2026.

52. The BSG Vice-Chairperson emphasized the significance of the methodology and raised concerns about conducting the consultation during the summer months. Some Members asked for some information on the industry consultation with banks.

53. The Members expressed support for the proposed changes to the EU-wide stress test exercise. One Member asked whether liquidity could be included in the scope of the stress test exercise, noting that liquidity was last stress tested in 2019 by the ECB-SSM, and suggested that both the EBA and ECB should further analyse this area. The Member also inquired about possible reforms to the LCR following recent bank failures and reiterated his concerns that the current LCR for foreign currencies was not currently enforced at the level required by regulation even though EU systemic universal banks came under significant stress during the US dollar liquidity crisis of 2011. Another Member highlighted the need for balanced liquidity requirements and asked whether including climate risk in the main exercise would replace the dedicated climate risk stress test done by some authorities in the past like the ECB_SSM. The Member also welcomed the alignment with FINREP and COREP as this would decrease requests for data to banks. Finally, he asked about the coordination of the exercise and changes with the SSM. One Member questioned how the projections under bottom-up and top-down models diverged and how proportionality has been addressed in the exercise.

54. The Head of RAST outlined the process for updating the methodology, noting industry consultations and the necessity to publish the final methodology by November, which limited the possibility of extending the consultation period. He explained that the EBA was required to – in cooperation with the European Systemic Risk Board – initiate and coordinate Union-wide stress tests based on Article 32 of the EBA Regulation. The EBA practice was to run the exercise every two years and therefore, in those years when there was no EU-wide stress test, the ECB conducted other types of exercises. He clarified that the EBA's plan was to further expand on the climate risk and include it as a regular feature in future exercises. With regard to the liquidity, the Head of RAST explained that it was outside the scope of the exercise. He confirmed close cooperation with the ECB SSM and explained that in practice. He concluded by noting that proportionality has been considered by the EBA in the exercise.

55. The Executive Director added that the EBA's focus was primarily on systemic risks.

56. The Director of ERA complemented by noting that the EBA did not consider only data collected in the exercise but also business models and other aspects.

57. The BSG Chairperson concluded by noting the comments raised by the Members.

Agenda item 9: Discussion paper on simplification and assessment of the credit risk framework

58. The EBA Senior Policy Expert (Expert) introduced the item by reminding the Members that the EBA published in October 2025 ‘Report on the efficiency of the regulatory and supervisory framework’ (TFE report), which provided a set of principles to assess and strengthen the simplicity and efficiency of the regulatory and supervisory framework. The report listed several actions to implement these principles; one of these actions was to launch a comprehensive review of both the new flow of mandates as well as to the existing stock of products coming from previous mandates, starting with credit risk-related mandates. He also mentioned the EBA roadmap on the implementation of the EU banking package published in 2023 and noted that in the area of credit risk, EBA received most mandates – around 40 - as part of the EU Banking Package. Next to that, the flow of mandates given to EBA related in many cases to the stock of existing regulations issued and implemented upon previous CRD-CRR requirements. Hence, the implementation of the CRR provided an opportunity to streamline, update and bring about increased consistency. The Expert than focused on the recently published Discussion paper (DP) and said that that the DP explored simplicity across three chapters, seeking to engage with the industry at an early stage on challenges identified in the standardised approach (SA) approach (chapter 2), concrete suggestions for simplification in the IRB approach (chapter 3), and an assessment framework to be applied in the context of the CRR mandates that required the EBA to assess the appropriateness of some targeted L1 elements (chapter 4). On the SA approach, he highlighted the systemic importance and sensitivity of real estate (RE) lending. As also noted in the DP, the EBA’s mandate to reassess risk weights for RE was subject to challenges posed by data limitations, jurisdictional deviations, and technical issues with loss data reporting. The Expert also said that the second aspect considered in the DP related to the EBA’s current work on the mapping of external ratings, in particular in relation to the removal of government support in these ratings. On IRB approach, he explained that the DP included concrete proposals to simplify EBA’s L2/L3 products within the IRB approach. Two aspects were covered – 1) how to consolidate the IRB products in order to simplify the presentation of the rules, concerning the readability, coherence, and consistency of the framework; 2) proposal of areas where to simplify the design of the rules, related to the calculation of Pillar 1 requirements. This related to areas where the risk sensitivity of the current guidance was limited in comparison to the modelling burden. The proposed simplified approaches aimed to be “opt-in” to minimize transition costs, stay conservative and not deviate from Basel standards. On the chapter 4 of the DP, the Expert clarified that in the context of the L1 reports where the EBA was mandated to evaluate the appropriateness of various aspects of the CRR, the DP included proposals for a framework

to assess simplicity in relation to other important factors such as risk sensitivity and the stability of the framework. The Expert concluded by listing next step and invited the Members to respond to the DP by 10 May 2026.

59. The Members welcome the publication of the DP and questioned whether in addition to the proposals included in the DP, the stakeholders could point out other concerns. One Member noted that in the DP, the EBA reflected on the compliance with Basel III requirements and asked if there were other criteria that the EBA considered.

60. The Expert clarified that the DP was exploring a set of proposals, but that the industry was welcome to suggest other areas where simplifications could be achieved. This included, in particular, some targeted modelling aspects, as well as the framework proposed to draft the report to assess L1. He also clarified that the compliance with Basel III requirements was one criterion as part of the overall assessment to be conducted by the EBA.

61. The Executive Director invited the Members to reply to the DP, including on additional aspects of the credit risk framework which were not covered by the scope of the DP.

62. The BSG Chairperson concluded by noting the comments raised by the Members.

Agenda item 10: AOB

63. The BSG Chairperson reminded the Members of the 2026 meeting dates: 21 April 2026 (afternoon) – Joint BoS/BSG physical meeting; 22 April 2026 – BSG physical meeting; 30 June 2026 – virtual meeting; 20 October 2026 (afternoon) – Joint BoS/BSG physical meeting; 21 October 2026 – physical meeting; 17 December 2026 – virtual meeting.

Annex 1: Attendance list

Participants of the Banking Stakeholder Group meeting on 17 February 2026

Attending

First Name	Surname	Institution	Country
Alin Eugen	Iacob	AURSF	Romania
Christian	Stiefmueller	Finance Watch	Belgium
Christophe	Nijdam	ADAM	France
Dermott	Jewell	Consumers' association of Ireland (CAI)	Ireland
Edgar	Loew	Frankfurt School of Finance and Management	Germany
Erik Isak	Bengtzboe	Eurofinas - European Federation of Finance House Associations	Sweden
Gema	Diaz Ufano	Banco Santander	Spain
Gonzalo	Gasos	European Banking Federation	Spain
Guillermo	de la Fuente	EACT	Switzerland
Julia	Strau	Raiffeisen	Austria
Kęstutis	Kupšys	Lithuanian Consumers Alliance	Lithuania
Laura	Grassi	Politecnico di Milano	Italy
Laura	Nieri	Universita de Genova	Italy
Maria	Angiulli	Italian Banking Association	Italy
Paolo Giuseppe	Grinaschi	Italian trade union for financial sector	Italy
Mathilde	Bonneau	PayPal	France
Michael	Troege	ESCP	Germany
Patricia	Bogard	Crédit Agricole	France
Patricia	Suarez Ramirez	ASUFIN	Spain
Sandra	Burggraf	FIA – European Principal Traders Association	France
Sangeeta	Goswami	Human Security Collective	the Netherlands
Thaer	Sabri	Electronic Money Association	Belgium
Vinay	Pranjivan	DECO	Portugal

EBA

Executive Director	Francois-Louis Michaud
Directors	Kamil Liberadzki
Heads of Unit	Angel Monzon Anne Tiedemann

Experts	Tea Eger Alessia Benevelli Elisabeth Noble Achilleas Nicolaou Hannah May Elenbaas Slawek Kozdras Guillaume Olivier

For the Banking Stakeholder Group

Done at Paris on 12 May 2026

[signed]

Christian Stiefmueller

BSG Chairperson