
WORK PROGRAMME 2027

SEPTEMBER 2026 EBA/REP/2026/18

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Abbreviations

ACP	EBA Advisory Committee on Proportionality	HR	Human resources
AMLA	Anti-money laundering authority	ICT	Information and communication technology
AI	Artificial intelligence	IFD/IFR	Investment Firm Directive and Regulation
ART	Asset-referenced token	IFRS	International Financial Reporting Standard
AST	Assistant	IMM	EMIR Initial margin models
BCBS	Basel Committee on Banking Supervision	IRB	Internal ratings-based
BoS	Board of Supervisors	IRRBB	Interest rate risk in the banking book
BRRD	Banking Recovery and Resolution Directive	IT	Information technology
CA	Competent authority	ITS	Implementing technical standards
CRD	Capital Requirements Directive	JC	Joint Committee
CRR	Capital Requirements Regulation	LCR	Liquidity coverage ratio
CSDR	Central Securities Depository Regulation	MFF	Multi-annual financial framework
CTPPs	Critical ICT Third-Party providers	MiCA	Markets in Crypto-assets Regulation
DGSD	Deposit Guarantee Scheme Directive	MREL	Minimum requirement for own funds and eligible liabilities
DORA	Digital Operational Resilience Act	NCA	National competent authority
EBA	European Banking Authority	NPL	Non-performing loan
EC	European Commission	PSD/PSR	Payment Services Directive / Regulation
ECA	European Court of Auditors	Q&A	Questions and answers
ECB	European Central Bank	RTS	Regulatory technical standards
EFIF	European Forum of Innovation Facilitators	SA	Standardised approach
EIOPA	European Insurance and Occupational Pensions Authority	SDFA	Supervisory Digital Finance Academy
EMAS	Eco-Management and Audit Scheme	SNE	Seconded national expert
EMIR	European Market Infrastructure Regulation	SREP	Supervisory review and evaluation process
EMT	E-money tokens	SPD	Single Programming Document
EP	European Parliament	TA	Temporary agent
ESA	European supervisory authority	TBC	To be confirmed
ESG	Environmental, social and governance	TLAC	Total loss-absorbing capacity
ESIU	European Savings and Investment Union		
ESMA	European Securities and Markets Authority		
ESRB	European Systemic Risk Board		
EU	European Union		
EUCLID	European centralised infrastructure for supervisory data		
FIDA	Financial Data Access Act		
FinTech	Financial technology		
FRTB	Fundamental review of the trading book		
GL	Guidelines		

Executive Summary

The EBA's work programme for 2027 is set against a demanding and fast-evolving environment for the EU banking and financial sector. Geopolitical tensions, macro-financial uncertainty, rapid technological change and structural shifts in financial intermediation continue to test the resilience of institutions and markets. At the same time, the European Union is seeking to strengthen the competitiveness, efficiency and integration of its financial system, while preserving financial stability, market confidence and a high level of consumer protection.

Against this background, the EBA will continue to foster an effective functioning of the Single Market for banking, payment services and crypto-assets through a regulatory and supervisory framework that is robust, proportionate, efficient and fit for the future. Its 2027 work programme follows the strategic direction set out in the draft Single Programming Document 2027–2029 approved last January, and represents an initial step towards a more developed medium-term strategy, which will be articulated further in the next Single Programming Document covering years 2028-2030 to evolve in three complementary directions: as a **next-generation regulator**, as a body developing **supervision at new frontiers**, and as a **provider of services to the supervisory and resolution community**, including through data, tools, analysis, coordination and capacity-building. This reflects both the development of its mandates and the need to ensure that its tools, methods and organisation keep pace with changes in the financial sector and the broader policy environment.

The work programme is organised around three cross-cutting drivers: **fostering resilience**, **improving efficiency** and **supporting transformation**. These drivers underpin the EBA's work across all core activities and provide the framework for its priorities in 2027.

The EBA's areas of focus for 2027 include finalising the implementation of the 2024 "banking package", implementing the new payment services framework, supporting crisis management and deposit insurance reforms, contributing to the Savings and Investments Union and securitisation agendas, implementing a new supervisory convergence framework, enhancing stress testing and simulation capacity, advancing integrated reporting and data sharing, and strengthening internal governance and IT resilience. The EBA will also continue to embed its new responsibilities under DORA, MiCA and EMIR.

The 2027 work programme is closely aligned with the Commission's banking competitiveness agenda, which emphasises simplification, reducing unnecessary regulatory and administrative burden, supporting innovation and deepening the Single Market. The EBA will build on its existing simplification and efficiency work, supporting these objectives by contributing to a more proportionate and efficient prudential and supervisory framework, advancing integrated reporting and more efficient data sharing, fostering greater supervisory consistency across Member States, and strengthening the conditions for trusted digital finance. In doing so, it will support both the resilience and the competitiveness of the EU financial sector. The EBA will have to ensure flexibility to adjust its planning and activities to address new or evolving circumstances.

Taken together, the EBA's work in 2027 combines continuity in its core responsibilities with adaptation to new risks, new technologies and new mandates, and lays the groundwork for further strategic development in the years ahead.

1. 2027 priorities and areas of focus

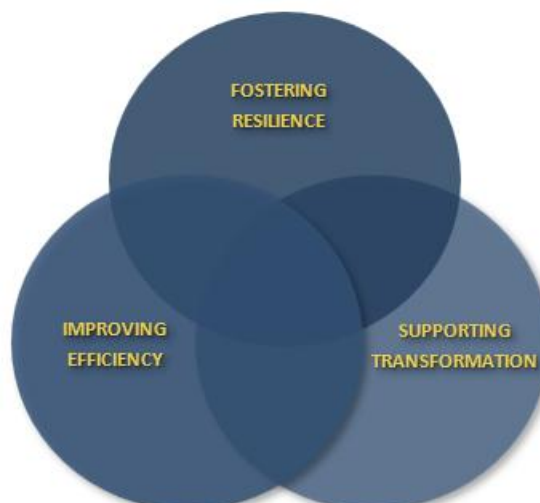
1.1. Overview and outlook

In 2027, the EBA will pursue its mandate in a more volatile, more digital and more demanding environment. The EU banking and financial sector continues to face heightened uncertainty stemming from geopolitical tensions, macro-financial risks and structural change. Rapid innovation, including artificial intelligence, crypto-assets, tokenisation and digital infrastructure, is reshaping banking and payments, introducing new vulnerabilities along with opportunities. The EBA is also heavily engaged in ensuring that the EU regulatory and supervisory framework remains robust, but also proportionate, efficient and better capable of supporting a more integrated and competitive single market for financial services.

The EBA's work programme for 2027 is designed for regulation and supervision to adequately support a financial system that is resilient in the face of shocks, efficient in the way it provides sustainable funding to the economy, and capable of adapting safely to technological change. It also embeds the EBA's new responsibilities including as lead overseer of 19 critical third-party providers of ICT services under the Digital Operational Resilience Act (DORA), supervisor of significant issuers of crypto-asset tokens under the Markets in Crypto-assets Regulation (MiCA), and as validator of initial margin models under EMIR.

In doing so, the EBA will continue to evolve in three complementary directions: as a **next-generation regulator** that is more modern, data-driven and forward-looking; as a **supervisor at the frontier**, including in areas shaped by digital innovation and new operational dependencies; and as a **provider of services** to the supervisory and resolution community, including through data, tools, analysis, coordination and capacity-building. This orientation is consistent with the strategic direction set out in the EBA's Single Programming Document 2027–2029 with its priorities of the rulebook, risk assessment and innovation. The 2027 work programme takes a significant step in the direction of these medium-term strategic objectives, which will be developed in the next Single Programming Document covering 2028–2030.

In this context, the EBA's work in 2027 is organised around three cross-cutting drivers:



These drivers are closely interconnected and underpin the EBA's work across all its activities. They support the EU's broader priorities including competitiveness and deeper Single Market integration, green and digital transition, innovation and consumer protection. **Resilience** reflects the EBA's role in contributing to the stability and effectiveness of the European financial system, including resilience to geopolitical, macroeconomic, cyber, technological and environmental risks, as well as risks affecting consumers. **Efficiency** reflects the need to streamline supervisory and regulatory rules and processes while safeguarding financial stability, including through simplification, more integrated reporting, better coordination and internal processes.

Transformation reflects the technological changes affecting the financial sector and public authorities, the emergence of new supervisory tasks and methods, and the need to support innovation while addressing the risks arising from new technologies and business models.

Reflecting this shift to complementary drivers, the areas of focus set out below show how this strategic direction will be translated into the EBA's work in 2027 based on its core activities.

Activity	Area of focus 2027
Policy development	· Contributing to regulatory framework changes to strengthen the banking sector · Finalising implementation of the 2024 banking package · Implementing new payment services framework · Implementing crisis management and deposit insurance reform · Supporting the Savings and Investments Union and securitisation framework
Supervisory convergence and enforcement	· Implementing a new supervisory convergence framework · Monitoring consistent implementation of SREP and Pillar 2 (including IRRBB and liquidity) · Strengthening supervisory technological capacity (AI Act, crypto, DLT and value chain) · Protecting consumers (over-indebtedness, de-risking and education, innovation)
Risk and financial stability analysis	· Enhancing EU-wide stress testing capacity · Preparing crisis simulation exercises · Delivering timely risk analysis and market outreach · Analysing ICT incidents, cyber threats, and risks from quantum computing, DLT · Tracking risks to consumers
Oversight and supervision	· Embedding DORA oversight of critical ICT providers · Implementing effective MiCA supervision · Implementing EMIR initial margin model validation
Data	· Delivering a more integrated reporting framework · Expanding data sharing, data-driven supervision and data services
Governance	· Implementing new internal governance and strategic steer · Monitoring equivalence of regulatory, supervisory and confidentiality frameworks beyond the EU · Deepening international cooperation and dialogue
Operations	· Enhancing IT resilience, security and digital sovereignty · Renewing the EBA's premises

1.2. Areas of focus for 2027

1.2.1 Policy development

1.2.1.1. Contributing to regulatory framework changes to strengthen the banking sector

The EU Commission adopted its communication on the competitiveness of the EU banking sector on 17 July 2026, identifying three core barriers that must be addressed for the sector to move

from merely resilient to a stronger engine of EU growth and strategic autonomy, with a formal legislative proposal expected in Q1 2027.

Given its mandate to promote a safe, resilient and efficient banking system across the 27 member and 3 EEA/EFTA states, EBA is well positioned to contribute to the discussions, especially in the context of its work on the implementation of its 21 TFE October 2025 recommendations.

The EC report contains 38 proposals under four themes to address the current challenges to competitiveness of the banking sector. Most proposals in the report (almost 80%) link already ongoing or upcoming EBA work. Of these, 21 measures correspond directly to a recommendation issued by the Task Force on Efficiency. 11 proposals correspond to prior EBA analytical or policy work which can support further reflections on the implementation of the competitiveness agenda.¹

Recommendations of the EBA's Advisory Committee on Proportionality (ACP)

In connection with the above the EBA will also consider the recommendations of the EBA's ACP for the EBA 2027 Work programme. These suggest putting focus on the following general and specific areas:

General considerations:

A general recommendation focuses on a clearer, more explicit and more systematic articulation of proportionality in the design and presentation of all EBA outputs, including reports, guidelines, technical standards, impact assessments, and consultation or discussion papers. It should also be foreseen to feed back of proportionality related lessons learnt at the end of the supervisory circle. As part of this, the ACP suggested reflecting on ways to implement proportionality through dimensions other than size.

DORA Oversight:

As part of its activities the ESAs will also consider the recommendations of the ACP for building a centralised process to support efficient and proportionate dissemination and follow-up of recommendations coming from the ESAs' oversight of CTPPs.

In addition, focus should be put on supervisory convergence of competent authorities' practices towards smaller and less complex financial entities, and in particular i) on achieving supervisory convergence on a limited number of priority areas that are critical for ensuring sound ICT risk management across financial entities, and ii) on topics related to the operationalisation of DORA.

MiCA Supervision:

Focus on exploring the margins for calibrating the intensity of ongoing supervision. More specifically they suggest focus on size-driven and complexity criteria to trigger proportionality.

¹ Work on these recommendations with relevance for 2027 is discussed below and covered in the deliverables for the different activities under section 2. An overview of the deliverables grouped by recommendation is included in annex III.

1.2.1.2 Finalising implementation of the 2024 banking package

Work on the banking package has progressed well and very largely in accordance with the planning and timelines foreseen in the roadmap published in 2023². Although most mandates were delivered on or ahead of time, some adjustments to the planned delivery became necessary as a result of developments, as for example the delay to the implementation of the FRTB and the related decisions at EU level. Other adjustments were made to accommodate the increase of focus on simplification as evidenced by the work of the TFE.

In 2027, focus will be on the completing the bulk of its work on the EU Banking Package, which generally will focus more on a review of existing framework. Part of this work will be intertwined with the EBA work related to simplifying the prudential framework, especially in the area of credit risk, and linked to the broader considerations to the Commission work on the competitiveness of the EU banking system. Especially, in the credit risk area, the follow-up work on the simplification of the credit risk framework will be a priority for the EBA and will to a large extent rely on the existing mandates given to the EBA, including the completion of the RTS on IRB assessment methodology, guidelines on use of permanent partial use and initiate a review of the existing ECAI mappings.

Of notable review deliverables, this includes the report assessing whether the prudential framework under the CRR has implications for the financing of agricultural activities and for the transition to more sustainable farming practices, for which the work has started in 2026. Furthermore, EBA will assess the functioning of the so-called IRB shortfall in a separate report.

On own funds, as part of the holistic review of the EU regulatory and supervisory framework for banks (TFE recommendation 2), the EBA will revise the RTS on own funds (OF) and eligible liabilities (EL) with the aim of enhancing the efficiency of the prior permission framework for the reduction of OF and EL.

In 2027 the EBA will contribute to the broader policy debate on the expanding role of non-bank financial institutions in financing the real economy and the potential risks that increased interlinkages may pose to the stability of the banking sector.

In the area of governance, the objective is to complete the delivery of the Joint GL on suitability assessment, aiming at the implementing the relevant mandate coming from the banking package while making sure that this takes place in a proportionate and streamlined way following up to the TFE recommendation 2.2.

Finally, the EBA will continue its overhaul of the interactive single rulebook (ISRB), making it more user-friendly, comprehensive and up to date, simplifying access to and compliance with the relevant parts of the regulatory framework at EU and, increasingly, at national level.

² See <https://www.eba.europa.eu/publications-and-media/press-releases/eba-publishes-roadmap-implementation-eu-banking-package> for the roadmap; for progress on the roadmap please refer to: https://ebprstaewspublic01.blob.core.windows.net/public/tools-prod/assets/roadmap/roadmap_progress_list.html.

1.2.1.3 Implementing new payment services framework

Following the adoption of the revised Payment Services Directive and Regulation (PSD3/PSR), which is expected at the end of 2026 and which is estimated to confer 18 mandates on the EBA, the EBA will deliver a first batch of five mandates and will publish Consultation Papers for a second batch of four mandates. These will contribute to the objectives of PSD3/PSR of bringing about inter alia a single EU payments market, more secure payment transactions, and more innovative and convenient payment solutions.

The topics addressed in these batches are likely to include, but are not limited to, safeguarding, own funds calculation, limited network exclusion, commercial agent exclusion, and strong customer authentication.

1.2.1.4 Implementing crisis management and deposit insurance (CMDI) reform

Following the CMDI adoption, on the resolution side the EBA will focus on delivering requested regulatory requirements in the area of early intervention measures (broadening of existing GLs mandate) and MREL (wider scope of the existing Technical Standards on the estimation of P2R and CBR), as well as with respect to the role of DGS in resolution (new set of GLs related to the cap of DGS contribution in resolution). In parallel the Authority will monitor and report on resolvability assessment, protection of retail investors and state of play of implementation of resolution tools and powers in resolution.

Regarding the revised Deposit Guarantee Schemes Directive (DGSD3), the EBA will continue strengthening and standardising depositor protection standards and preserving financial stability across the EU. More specifically, the EBA will finalise and publish a first “batch” of four mandates, which comprises the Technical Standards on client funds, which will establish rules to ensure DGSs receive the data needed to identify and reimburse clients whose funds are held in intermediary accounts; the Technical Standards on the harmonised content and formats of the information sheets for depositors; the Technical Standards on the procedures, templates and minimum requirements for information exchange between national deposit guarantee schemes (DGSs) in bank failure scenarios; and the Guidelines on the investments by DGSs, which will set out how DGSs should invest their funds to ensure diversification, low risk and sufficient liquidity.

In addition, the EBA will publish Consultation Papers on a second group of mandates, which comprise the Technical Standards on available financial means and fund target, the Guidelines on cooperation within the Union, and the Guidelines on GL on lifting the cap on DGS contributions to resolution.

1.2.1.5 Supporting the Savings and Investment Union and securitisation framework

The securitisation package is at the time of preparation of the work programme still subject to finalisation by co-legislators. It is however expected that EBA will be given a number of mandates, either to EBA or to the Joint Committee. These mandates range from review of disclosure templates, regulatory deliverables – for instance in the area of risk retention - and strengthening the supervisory convergence of supervision. EBA is therefore preparing its work in this area and is committed to ensuring a well-functioning securitisation market.

In addition to the work following as a part of the securitisation review, EBA will continue its broader work on securitisation, including clarifying elements on the functioning of the securitisation framework and the securitisation ECAI mapping.

1.2.2 Supervisory convergence and enforcement

1.2.2.1 Implementing a new supervisory convergence framework

In 2027 the EBA will implement a new framework for its supervisory convergence work as part of its rebalancing from development of ex-ante requirements to ex-post assessment of implementation of the regulatory framework, and accounting for this work. This is a significant reorientation of how the EBA, together with CAs, structures, prioritises and resources its supervisory convergence work.

The new convergence framework is based on:

- A supervisory convergence cycle, based on 4 pillars (risk identification / planning / execution / follow-up). The cycle will be risk-based, data driven and focused on convergence outcomes.
- Structured evidence collection – internal/external data and stakeholder input will be gathered in early 2027 to identify the most impactful supervisory convergence topics, assess them consistently, and prioritise them for action, driving convergence activities in future work programmes.
- A clearer framework for the types of convergence activities carried out, from the establishment of supervisory expectations, capacity-building and supervisory training, to assessment through peer reviews and enforcement in potential breach of Union law investigations and mediations between CAs.

The convergence priorities for 2027 are outlined in Annex IV. Future convergence cycles will use the structured evidence collection to provide a more data-driven set of priorities.

In addition, the EBA will promote supervisory convergence in the area of prudential consolidation to prevent fragmentation resulting from the inconsistent application of prudential requirements across institutions. To this end, the EBA will follow up on the findings of its 2026 Report on EU prudential consolidation and monitor the implementation of its Guidelines on ancillary services undertakings.

1.2.2.2 Monitoring consistent implementation of SREP and Pillar 2 (including IRRBB and liquidity)

As the revised SREP GL will become applicable, its implementation will be monitored, in particular on the application of the output floor and on the consistency of supervisory approaches to the setting of P2R capital requirements and expectations (P2R and P2G) and to their communication to institutions. The application of proportionality in the SREP, the monitoring of key indicators and the actual supervision of internal governance aspects will also be areas further investigated to strengthen supervisory practices and promote convergence across the EU, where applicable also leveraging on relevant BCBS work.

The EBA will also continue to monitor the implementation of existing regulatory products and follow up on the impact of interest rates evolutions on IRRBB management and the modelling underlying assumptions. Particular attention will be given to areas where adherence to the current framework is weaker, such as CSRB, as well as where guidance has not yet been provided.

The EBA will furthermore continue monitoring the implementation of the LCR and NSFR focusing on emerging topics (such as deposits onboarded via online-deposit brokers), and exploring the need for additional guidance on innovative topics having an impact on liquidity.

1.2.2.3 Strengthening supervisory technological capacity (AI Act, crypto, DLT and value chain)

Focus on artificial intelligence and machine learning (AI/ML)

The EBA will continue to contribute to the implementation of the AI Act in the EU banking and payments sector: (i) taking forward follow up actions identified in the 2025 AI Act mapping exercise; and (ii) continuing to assess AI Act implications. This will be done in close cooperation with the EC and its AI Office and other ESAs with the objective to promote consistency in the application of the AI Act to the EU banking sector.

The EBA will broaden its analysis of AI market trends, related risks and opportunities looking into general purpose AI (GPAI) use cases and identify any follow-up actions as may be appropriate. Importantly, the EBA will complete its thematic analysis of the provision by third parties of AI systems to the EU banking and payment sector, with a thematic report expected mid-2027 providing insights into dependencies, including regarding advanced AI models. (See also section 1.2.3.4 for work on related risks). The EBA will continue to support knowledge-building among supervisors about how innovative technologies, including AI, can be integrated into supervisory business processes via the SDFA (e.g. SupTech Hackathon) and other initiatives as appropriate.

Crypto, DLT and value chain evolutions

With transformation as one of the cross-cutting drivers of the EBA's work, and in view of ongoing value chain evolution, including via use of DLT in the banking and payments sector, the EBA will extend previous years' analysis of tokenised settlement assets to challenges, opportunities and trends regarding the provision of tokenised investment products by EU banks. Moreover, the EBA will continue to monitor how ARTs and EMTs are being used in the context of centralised and non-centralised applications (DeFi), including borrowing and lending. The EBA stands ready to support the EC in any follow-up actions further to the May 2026 EC targeted consultation on the review of MiCA and the EBA's September 2026 response. In terms of value chain evolutions, in 2027 the EBA will commence new targeted analysis of the use of Agentic AI in payments, in particular to inform PSD3/R implementation activities (e.g. on SCA), and the distribution of credit products via embedded finance. The EBA will also continue to lead joint-ESA European Forum for Innovation Facilitators (EFIF) BigTech monitoring initiatives, including the 2027 BigTech monitoring exercise (building on 2023 and 2025 exercises).

Finally, the Authority will focus on enhancing discussions on business models and technological innovation of a cross-sectoral relevance (e.g. embedded finance), to deepen supervisory understanding of opportunities, challenges and risks, and strengthen convergence in supervisory

expectations. Additionally, the EBA, EIOPA, ESMA, and the EC will continue to support the EC Supervisory Digital Finance Academy (SDFA) which supports the build-up of EU supervisory capacity in innovative digital finance.

1.2.2.4 Protecting consumer (over-indebtedness, de-risking and education, innovation)

In its 2024/2025 Consumer Trends Report, the EBA identified important risks to consumers from over-indebtedness and de-risking. Following up on this, the EBA will assess lenders' compliance with the revised Consumer Credit Directive (CCD2) provisions that require creditworthiness assessments, based on an action plan this is being developed by Q4 2026 for execution in 2027. The EBA will also publish, jointly with AMLA, a Consultation Paper on the Guidelines on derisking mandated under the AMLR, based inter alia on the findings of a supervisory convergence exercise that the EBA carried out in Q2 of 2026 with a sample of credit institutions.

Furthermore, the EBA will finalise its ongoing work on effective supervision of retail banking products provided across borders, which is a follow-up to a supervisory convergence report published by the Joint Committee of the ESAs (JC/2019-22).

With regard to implications of innovation the EBA will continue its work to strengthen consumers' understanding of opportunities and risks when using digital interfaces to access financial products and services. Targeted analysis of Agentic AI in payments and the distribution of credit through embedded finance platforms will have a particular focus on the opportunities and risks for consumers.

1.2.3 Risk and financial stability analysis

1.2.3.1 Enhancing EU stress testing capacity

The EBA will run the 2027 EU-wide stress test and publish results around summer. The EBA has substantially simplified the process with a reduction of data points of 55% compared to the 2025 EU-wide stress test, aligning with supervisory reporting (TFE recommendations 2.4) while retaining, and enhancing risk sensitivity. The exercise includes an additional climate risk module which will assess transition and physical risk (river floods). Further integration of climate risk into the stress test will be considered in future exercises. Further efficiency efforts will allow stress test starting point data to be collected directly from regular reporting through amendments to the ITS on supervisory reporting. This will also allow the EBA and CAs to carry-out desktop analysis to enhance risk analysis and reinforce the supervisory toolkit for stress testing.

1.2.3.2 Preparing crisis simulation exercises

The EBA has been given by the CMDI (in new article 128c of the BRRD) an important new task to carry out EU-wide crisis simulation exercises, strengthening and ensuring the preparedness of all CAs. Those simulations should cover the coordination and cooperation between competent authorities and resolution authorities during the deterioration of the financial situation of institutions and entities, testing the application of the toolbox in recovery and resolution planning in a holistic manner. The EBA will develop a methodology, setting up and coordinating the needed structures that would be involved. EBA will be preparing and agreeing on a multi-annual plan / cycle of exercises, doing an overview of market structures, interconnections, key players,

specific vulnerabilities. These activities will involve agreeing on the scope and the focus of the exercise (e.g. potential vulnerabilities to target, CAs to be involved), working on the scenario and preparing for a first exercise in 2028.

1.2.3.3 Delivering timely risk analysis and market outreach

The EBA will be assessing the impact of geopolitical risks and uncertainties on credit, market, liquidity and operational risks as well as on profitability to inform its own regulatory and convergence work, while its reports and dashboards (e.g. the regular EBA Risk Assessment reports) will help support CAs in their risk-based supervision and resolution planning and inform stakeholders. Credit risk will continue to be monitored as part of the regular risk assessments, as downside credit risks for vulnerable households and corporates remain elevated amid a highly uncertain economic and geopolitical outlook and high levels of indebtedness. Funding and liquidity of EU/EEA banks and their interlinkages with market developments – including primary market activity and spread developments – will also be monitored. As part of operational risk, the implications for banks' operations from cyber risks and developments in artificial intelligence and quantum computing will be part of this work.

In this regard, the EBA will continue developing its Early Warning Indicator (EWI) tool. This interactive and harmonised supervisory dashboard will strengthen the early detection of vulnerabilities in banks across the EU. It enables the analysis of banks' capital, leverage, resolution and liquidity headroom through interactive visualisations and incorporates scenario and sensitivity analysis to assess the impact of adverse developments on institutions' resilience. By providing a consistent and comparable assessment of banks' resilience against key regulatory thresholds, the tool will support financial stability monitoring and supervisory decision-making.

The interconnectedness of the banking sector with the NBFIs sector will also require on-going close monitoring.

1.2.3.4 Analysing ICT incidents, cyber threats and risks from quantum computing, DLT

The EBA will continue to monitor the risks stemming from the progressive diffusion of Advanced AI models with cyber capabilities, DLT (including tokenisation) and their impact on the financial sector, with the aim to promote a consistent, risk-based and forward-looking supervisory approach. In addition the EBA will deepen its analysis of the impact of quantum computing and its relevance for preparedness of banks and payment institutions, with a focus on critical data asset identification and migration to post-quantum cryptography (PQC). It will continue to analyse developments in the cyber threat landscape, also leveraging on the reports on major-ICT incidents received by NCAs. Together with the other ESAs, the EBA will analyse the ICT threat landscape and provide transparency and improve resilience through the ESAs Annual Report on ICT incidents. It will contribute to the operationalisation of the pan-European systemic cyber incident communication and coordination framework ("EU-SCICF"), to facilitate a coordinated response in case of systemic cyber incidents.

1.2.3.5 Tracking risks to consumers

The EBA will strengthen consumer protection by identifying and assessing the main risks faced by retail customers and translating this into future consumer protection priorities. By updating its

annual retail risk indicators as part of the EBA Risk Assessment Report, as well as its biennial Consumer Trends Report, the EBA will support the early detection of emerging vulnerabilities and help ensure that consumer protection action remains targeted, timely and risk-based. In the area of payment fraud, our joint work with the European Central Bank will provide data for a convergent and successful mitigation of fraud risks across the EU, contributing to the fraud-related mandates under the forthcoming PSD3/PSR framework.

More broadly, by analysing input from consumer associations, national ombudsmen, CAs, the financial services industry and desktop research the EBA will identify the most pressing consumer risks and issues in retail banking are identified and shared.

1.2.4 Oversight and supervision

1.2.4.1 Embedding DORA oversight of critical ICT providers

In 2027, the EBA, ESMA and EIOPA will continue their joint oversight activities of critical third-party providers (CTPPs). This will include (i) carrying out thematic deep-dives or onsite inspections on specific high-risk areas of CTPPs, with a special focus on cybersecurity and frontier AI models, (ii) issuing recommendations and follow-up from 2026's examination activities, and (iii) ongoing monitoring through periodic information gathering and interactions with CTPPs. This will entail close cooperation with relevant EU and non-EU authorities.

The ESAs will also perform horizontal oversight activities, such as the risk assessment and oversight planning for 2028 and the annual update of the list of CTPPs.

1.2.4.2 Implementing effective MiCA supervision

In 2027 the EBA will perform its annual significance assessment of EMTs and ARTs issued by authorised issuers in the EU. Based on supervisory methodologies and arrangements, any potential direct supervisory activity on significant tokens will be performed following a supervisory plan developed in 2026. Close cooperation with CA and third country supervisors will be further reinforced in 2027 in the context of an expected growing crypto market and, in particular, direct supervisory needs.

1.2.4.3 Implementing EMIR initial margin model validation

The EBA will continue to expand its work on the initial margin model validation during 2027. The work in 2026 focused on establishing the validation function, including onboarding entities subject to supervision, setting out the regulatory framework and preparing the IMMV reporting. During 2027, EBA plans to expand its analytical capacity to replicate backtesting of ISDA SIMM based on the data received, support competent authorities with supervisory tools. On the supervisory aspects, EBA in particular plan to review the documentation in place on the ISDA SIMM model.

1.2.5 Data

1.2.5.1 Delivering a more integrated reporting framework

The EBA will continue its work to improve efficiency and reduce cost of regulatory reporting, promote data sharing and advance integration of reporting. Areas of focus will be to operationalise improved change management practices, launch the public EU-wide data request repository and improved coordination of data requests among all authorities. The EBA will also review remaining parts of its reporting framework to ensure proportionate, fit-for-purpose and streamlined reporting requirements.

The EBA will also further increase standardisation and digitalisation of reporting by continued development of the DPM standard 2.0 and related IT tools (DPM Studio). As part of the DPM alliance (EBA-EIOPA-ECB) the EBA will continue to develop methodologies and enhance the DPM standard to ensure it supports further integration of reporting requirements, granularity and efficiency and provides a solid basis for a common data dictionary for banking reporting.

The EBA will continue to work on developing integrated reporting system covering prudential, resolution and statistical reporting together with the ECB and national authorities. The Joint Bank Reporting Committee will further advance in the creation of a common, semantically integrated glossary for the integrated reporting system and take steps to develop a common data dictionary. The work on integrated reporting and the common data dictionary will bring benefits by removing redundancies, harmonising definitions and supporting re-use of data.

1.2.5.2 Expanding data sharing, data-driven supervision and data services

In addition to supporting the reduction of reporting costs, the EBA data strategy 2026-2028 will continue to drive the efforts to boost data lifecycle efficiency. In line with the strategic objective of strengthening the EBA's role as a data-driven authority, the EBA will continue to increase its offer of harmonised data and analytical tools to support the EBA policy, supervisory and risk analysis work. Building on EUCLID data infrastructure, the EBA will increase its offer of data services, promote more systematic data sharing, and streamline the data-to-insight process for internal and external stakeholders.

A key priority under the data strategy is to fast-track data sharing and consolidate the EBA's role as a leading EU data hub. In this context, the EBA data hub (EDAP) will increase in coverage of publicly available regulatory data in 2027 to include more data, including Pillar 3 data for small and non-complex institutions. By widening access to timely data, EDAP will support market discipline, research and analytical work, while reinforcing transparency and the public value of EBA data assets.

In line with the strategy's emphasis on proactive data dissemination and collaboration, the EBA will continue to work with European and national authorities to provide value-adding services, offering granular data and tools for advanced analytics and data collaboration. The ESRB will be able to access a wide set of granular banking data to support its tasks to detect systemic risks in the financial sector. The EBA EU-wide stress testing exercise will be supported by a collaborative data space for authorities and participating institutions. The EBA will continue to collect

supervisory data for MiCA supervision directly from issuers via the shared reporting platform and to provide data and analysis tools to relevant authorities to support their supervisory tasks.

1.2.6 Governance

1.2.6.1 Implementing new internal governance and strategic steer

As part of the EBA TFE implementation, the EBA BoS agreed to introduce top-down guidance to selected policy developments (recommendation 20) and to review the number of substructures, their mandate and strengthen their dialogue with the BoS (recommendation 21).

Over recent years, the body of legislation that all banks are subject to has increased. In line with this, the EBA mission has broadened in scope and tasks. Membership has changed in 2019 and may change in the future in the light of EU accession. As a result, maintenance of how the EBA is organised and delivers on its mandate is necessary to ensure that the EBA remains an effective and agile authority. This implies on the one hand scrutiny to identify any outdated, unnecessary processes and working structures whilst on the other hand to improve and update where necessary. Notwithstanding, the EBA continues to prepare technical decisions alongside its governance by bringing together competent authorities' relevant experts. All this should ultimately support the consistency and quality of EBA outputs to the benefit of citizens, businesses and the EU economy.

To match expectations towards EBA products on clarity, consistency, accuracy and robustness, the EBA is enhancing its internal processes along the regulatory lifecycle, including more robust product reviews, and is reviewing its working structures to cater for the EBA's new scope and tasks.

1.2.6.2 Monitoring equivalence of regulatory, supervisory and confidentiality frameworks beyond the EU

In 2027, EBA will continue to foster international cooperation among supervisors and facilitate activity of financial market players beyond EU borders in a sound prudential environment.

Adequate confidentiality and professional secrecy rules are the backbone to international supervisory cooperation in all areas. The EBA continues to assess the rules and principles applicable to non-EU competent authorities to allow for the safe exchange of confidential supervisory information and to conclude cooperation agreements. The EBA is also enabling supervisory cooperation in new areas including crypto-assets and critical ICT third-party service providers.

The EBA also facilitates international banking activity by assessing whether non-EU countries have in place similar prudential regulatory and supervisory framework that those in force within the EU. The EBA conducts several in-depth assessments with a focus on EU accession countries and Latin America.

In addition, constant monitoring on the development of regulatory and supervisory standards, as well as confidentiality frameworks in these non-EU countries assessed as equivalent ensures that preferential treatment to our international partners is upheld.

1.2.6.3 Deepening international cooperation and dialogue

The EBA will continue its engagement in international fora to promote convergence in prudential standards and support the coherent implementation of the EU regulatory framework at global level. This includes active participation in the work of key international bodies such as the Basel Committee on Banking Supervision and the Financial Stability Board, contributing technical expertise to ongoing policy work and monitoring the consistent implementation of international standards across jurisdictions.

In parallel, the EBA will deepen its bilateral and multilateral dialogue with international partners, including the International Monetary Fund, the OECD, the European Investment Bank and the European Bank for Reconstruction and Development, with a view to exchanging expertise. The Authority will continue to support EU candidate countries and third-country authorities through technical cooperation and capacity-building activities, reflecting its broader mandate to promote sound prudential standards beyond the Union's borders. Finally, the EBA will continue to take part in dialogues organised by the European Commission with major non-EU jurisdictions which supports international consistency, help anticipate emerging cross-border risks, and reinforce the EBA's role as a trusted technical counterpart.

1.2.7 Operations

1.2.7.1 Enhancing IT resilience, security and digital sovereignty

The EBA defined the IT resilience and security as a core pillar of its IT Strategy 2026-2028. Under this pillar, the EBA will strengthen its security posture by maintaining and enhancing its cybersecurity posture and at the same time addressing new risks and upcoming threats.

As part of its keeping and improving its cybersecurity posture, the EBA will continue and entrench its security practice of cyber awareness, its security program of cybersecurity risk management of information systems and data assets, the improvement of cybersecurity governance, cybersecurity controls and defences in line with the Cyber Regulation and aiming to reach generally a maturity level 2 in the Essential8 framework of the cyber regulation. The EBA will continue the close collaboration with CERT-EU, the ECB and the ESAs to test resilience and recoverability under various crisis and threat scenarios.

The EBA will work to address digital sovereignty risks, in close collaboration with the European Commission and other EU Agencies, to mitigate risks arising from geopolitical changes. The Authority will conduct sovereignty risk assessments for the IT estate (starting with Cloud), identify risks, define mitigation and implement accordingly. It will also work to address other emerging risks from new technologies (i.e. frontier AI) and new projects.

1.2.7.2 Renewing the EBA's premises

The EBA will continue the implementation of a project to secure new office premises, with a view to ensuring suitable and cost-efficient accommodation ahead of the expiry of the current lease in 2028. The project is being carried out through a transparent and competitive procurement process, with a focus on operational suitability, optimal space utilisation and overall occupancy costs.

As part of this the Authority will continue to assess available premises options, engage in negotiations on lease conditions and prepare the documentation required for submission to the European Parliament and the Council. Subject to the outcome of the procurement process and the necessary budgetary approvals, the EBA will proceed with the finalisation of the new lease.

2. Activities in 2027

This subsection sets out EBA's work programme for 2027, linking tasks to activities and priorities. It reflects current legislative mandates conferred to the EBA, expected ones and the current outlook: it comprises 251 deliverables (grouped in 7 activities), of which 131 are of an ongoing nature and 120 have deadlines or delivery targets. New priorities and discussions of the EC and related guidance from the Board of Supervisors have been reflected in this document.³

Activity 1 – Policy development

Contributing to priority 1	Directorates: PRSP, ICC, ERA Units: LILLAC, RBM, SRRR, COPAC, DF, ESGR, EAIA
Objective	To develop and maintain an effective, simple, efficient and proportionate Single Rulebook for banking and financial activities in the EU
Description	EBA's founding regulation and specific legislations mandate the authority to contribute to a Single Rulebook for banking and financial activities in the EU by developing technical standards, guidelines or reports, and advising on new rules. This Single Rulebook establishes common rules in a wide range of areas for financial entities and the authorities which supervise them throughout the EU. It creates a level playing field for financial entities and provides high protection to depositors, investors and consumers. EBA's output is prepared based on impact assessments and giving due consideration to proportionality. Stakeholders are systematically consulted. After more than a decade of policy development and with the ongoing EU implementation of Basel 3 and key milestones achieved for digital and sustainable finance, the EBA will be increasingly focussing on the efficiency and simplicity of the Single rulebook. (TFE recommendations 1 and 2)

Main deliverables

Prudential regulation (CRR, CRD, SEC R, IFR, IFD, EMIR, CSDR...)	Delivery
- <i>Own funds and capital requirements</i>	
• Review of the RTS on OF and EL – TFE reco 2	Q4
- <i>Accounting and auditing (incl. consolidation)</i>	
• EBA response to IASB post-implementation review of IFRS 9 hedge accounting)	Q2
• Simplification/Update of GLs on accounting for ECL – TFE reco 2	Q4
- <i>Liquidity risk</i>	
• Report on LCR and NSFR implementation	Ongoing
- <i>Credit risk – TFE reco 2.1</i>	
• Report on specialised lending exposures – if not delivered in Q4 2026	
• Report on leasing exposures	Q1
• Joint Call for Advice on Private Credit	
• RTS to specify the assessment methodology for compliance with the requirements to use the IRB	Q2
• RTS on methodologies of to assess the integrity of the assignment process and the regular and independent assessment of risks.	
• RTS to specify the methodology of an institution for estimating PD under Art 143	
• Report on IRB shortfall	

³ Work on TFE recommendations with relevance for 2027 is covered in the deliverables tables for the different activities. An overview of deliverables grouped by recommendation is included in annex III.

• RTS on conditions and criteria for assigning exposures to the IRB exposure classes	Q3
• Report on capped or floored unfunded credit risk protection (follow-up on discussion paper issued in 2026)	
• RTS on comparable property – CP	
• GL on immateriality of size and risk profile of exposures	Q4
• Report on proportionality for SNCI	
• Follow-up on the discussion paper on simplification of the credit risk framework	
• ITS on ECAI mapping -CP	
• Report on the impact of requirements on agricultural financing (intermediary report)	TBC*
* Scope of work under consideration	
<i>- Large exposures</i>	
• Report on the contribution of shadow banking entities to the capital market union and institutions' exposures to shadow banking entities	Q4
<i>- Market, counterparty and CVA risk</i>	
• EU implementation of Basel III market risk, CVA and CCR framework	Ongoing
• RTS on net short credit and equity positions? *	Q3
• Guidelines on exceptional circumstances for the reclassification of a position *	
• RTS on the hypothetical portfolios of CIUs in the trading book *	
• RTS on instruments appropriate to estimate PDs *	
* All depending on FRTB implementation	
• RTS on further technical elements for regulatory CVA	
• RTS on assessment methodology for the SA-CVA – CP	Q4
• RTS on the materiality of extensions and changes for the SA-CVA – CP	
• RTS on assessment methodology for the FRTB-SA – CP *	
* Depending on FRTB implementation	
• RTS on CCP capital requirements	
<i>- Operational risk</i>	
• GL on governance arrangements for loss data sets – CP	Q3
• RTS on the operational risk management framework	
<i>- Investment firms</i>	
• RTS on waiver for authorisation of investment firms *	Q2
• RTS on the reclassification of investment firms as credit institution *	
• RTS on the monitoring of the EUR 30 bn threshold *	
* Delivery updated from Q4 2026 (in Work programme 2026)	
<i>- Internal governance (including remuneration)</i>	
• Update of joint EBA ESMA GLs on the assessment of the suitability of members of the MB	Q1
• RTS on information and documentation to be submitted to CAs to carry out the suitability assessments of members of the management body and of heads of internal control functions and the chief financial officer under CRD	
• Review of all GLs regarding remuneration, HE, gender pay gap data collections	Q4 or Q1 2028
• Review of GLs on Diversity Benchmarking	Q4 or Q1 2028
<i>- Pillar 2 buffers</i>	
• Review of the GL on sectoral systemic risk buffers to address climate risk - if not delivered in 2026	TBC
* Likely postponed from 2026 WP. Delivery to be confirmed and possibly aligned with developments at EU level	
Crisis management (BRRD, DGSD, CMDI)	
<i>- DGSD3</i>	
• RTS on Client funds	Q2
• ITS on information exchange between CIs, DGS, and EBA	
• ITS on depositor information sheet from credit institutions and DGS to consumers	
• GL on investments	

- RTS on available financial means (AFM) and fund target (codifying and extending existing own-initiative GLs) -CP - GL on cross-border cooperation within the Union – CP	Q4
- BRRD	
Revision of the RTS on estimation of own funds and combined buffer requirement	Q2
- GL on Early Intervention Measures – CP - Report on retail investors - GL on conditions to lift the 62.5% cap on the bridge mechanism – CP	Q4
- Supervisory Review and Evaluation process (SREP)	
ITS on joint decisions on institution-specific prudential requirements	Q1
Sustainable finance (CRR, CRD, SFDR)	
Inputs to sustainability work arising from applicable regulation – TFE reco 2.3	Ongoing
Reports and advice to EC on sustainable finance-related topics – TFE reco 2.3	
Report on effective riskiness of exposures to environmental and social risks – if not completed in 2026	TBC
Payment services and electronic money (PSD, PSR, FIDA)	
- Delivery of first 5 mandates, and CPs for another 4 mandates of a total of currently 18 EBA mandates expected under PSD3 / PSR (if Level-1 texts published in OJ in Q4 2026) - Strategic monitoring of the EU payments market	Q4
Consumer protection, payments and conduct	
Joint EBA-AMLA GL on derisking under Art 21 AMLD – CP	Q4*
* Delivery subject to changes	
Innovation monitoring and knowledge sharing, ICT policy and operational resilience	
Technical inputs to EU initiatives in digital finance (i.e. digital Euro, DORA, MiCA review, response to ESRB Recommendation on third-country multi-issuer stablecoin schemes)	Ongoing
Guidelines on financial inclusion and the Digital Euro under the forthcoming Act	Q4

Activity 2 – Supervisory convergence and enforcement

Contributing to priority 1	Directorate: PRSP, ICC, ERA Units : LILLAC, RBM, SRRR, COPAC, DF, ESGR, GEA, L&C
Objective	To promote a consistent and effective application of the Single Rulebook for banking and financial activities in the EU
Description	To foster consistent and transparent supervisory and resolution practices and outcomes in the EU, based on the application of the Single Rulebook, the EBA sets common priorities for prudential and resolution authorities (USSP) and monitors their implementation, runs benchmarking exercises, participates in and monitors of colleges, ensures training for authorities, performs peer reviews and other assessments of convergence. The EBA may assist authorities in resolving disputes and disagreements related to their supervision and resolution of cross-border banks through binding or non-binding mediation. It may investigate breach of Union law and issue recommendations to authorities. It monitors and fosters authorities' independence. With the Single rulebook now well developed in a wide range of areas, the EBA will gradually increase the relative importance of its convergence work vis-à-vis policy development. (TFE recommendation 17)

Main deliverables

Supervisory convergence (prudential and resolution)	Delivery
First supervisory convergence heatmap	Q2
EBA annual report on supervisory convergence work in 2026 – TFE reco 17	Q2
Union Strategic Supervisory Priorities for prudential and resolution authorities in 2028	Q3
Supervisory disclosure exercises (CRD / IFD)	

Q&A

- Q&A: answering questions of external stakeholders on the Single Rulebook Ongoing

Peer reviews

- Follow-up peer review on tax integrity (Cum ex) Q2
- Follow-up peer review on proportionality in the application of SREP Q3
- Peer review MiCA White Papers
- Follow-up peer review on deposit guarantee scheme stress testing Q4
- Peer review application of national prudential liquidity measures

Breach of Union law, Complaints and mediation

- Identification and investigation of potential breaches of EU law Ongoing
- Settlement of possible disagreements between CAs Ongoing

Training

- Training programme for competent authorities Ongoing

Prudential regulation (CRR, CRD, SEC R, IFR, IFD, EMIR, CSDR...)*- Own funds and capital requirements*

- Assessment of new CET1 instruments and maintenance of the EBA CET1 list Ongoing
- Monitoring of capital (CET1, AT1, Tier 2) and MREL-TLAC instruments (including impact of interest rates)
- Monitoring implementation of prudential consolidation provisions and follow-up report (foreseen for 2028)

- Accounting and auditing

- Opinions on financial holding company derogations Ongoing
- Monitoring of accounting standards (follow up on RMA and FICE)
- Monitoring implementation of prudential consolidation provisions – including GLs on ASUs - and follow-up report (Report foreseen for 2028)
- Follow up of the EBA IFRS 9 benchmarking reports with competent authorities

- Liquidity risk

- Monitoring of the LCR and NSFR implementation Ongoing
- Monitoring of notification and national practices on liquidity

- Interest rate risk

- Monitoring of the implementation of the RTS, GLs and the heatmap related to IRRBB Ongoing

- Credit risk

- Maintenance of credit risk lists (incl. eligible public-sector)⁴ Ongoing
- Monitoring of credit risk and credit risk modelling (incl. IRB roadmap)

- Securitisation and Covered bonds

- Monitoring of market and application of securitisation & covered bonds frameworks Ongoing

- Market, counterparty and CVA risk

- Updates to the list of diversified stock indices Ongoing
- Monitoring of market risk requirements (incl. FRTB postponement)

- Supervisory benchmarking

- 2026 Supervisory benchmarking exercise (internal approaches) Ongoing
- 2026 benchmarking report on credit risk IRB models and IFRS 9 (also for 2025) Q1
- 2026 benchmarking report on market risk models

⁴ Work marked as * deprioritised had been identified as deprioritised in previous work programmes due to resources constraints. This has been maintained.

Preparation of the 2028 benchmarking portfolios (market risk), update of ITS* * from 2027 credit risk and IFRS9 will be covered as part of reporting ITS updates	Q2
- Market infrastructure	
Work on market infrastructures (EMIR/CSDR-related)	Ongoing
- Operational risk	
Monitoring and promotion of consistent application of operational risk requirements, with primary focus on IDLC derogation and ASA grandfathering	Ongoing
- Investment firms	
Monitoring and promotion of consistent application of investment firms requirements	Ongoing
- Internal governance (including remuneration)	
- Monitoring of internal governance and remuneration requirements*: Q4 or Q1 2028 - Remuneration benchmarking: gender pay gap report - High Earners dashboard * Formats and timing may be impacted by implementation of TFE reco 2.2 re simplification of single rulebook on governance and remuneration	
- Sustainable finance (CRD, SFDR)	
- Support the implementation of requirements - Contributing to European Platform on Sustainable Finance and to NGFS	Ongoing
Crisis management (BRRD, DGSD, CMDI)	
Publication of 2027 data on the uses of DGS funds and financial means available to DGSs	Q2
Colleges	
- Monitoring of supervisory colleges - Monitoring of resolution colleges - Operationalisation of recovery and resolution planning - Monitoring convergence in the area of resolution - Preparatory work for coordinating crisis management exercises - Assess setting up supervisory platforms bringing authorities from various horizons together – TFE reco 14 and 15	Ongoing
Consumer protection, payments and conduct	
Consumer Trends Report 2026/27	Q1
Report on stock take of 2019 JC report on the supervision of cross border retail banking services	Q3
Report on the supervision of the revised Consumer Credit Directive	Q4
Digital finance	
- Innovation monitoring and knowledge sharing, ICT policy and operational resilience	
- Innovation monitoring and knowledge-sharing (FinTech Knowledge Hub, EFIF, executive engagement (BoS) on innovation) - Possible Opinions, GL or thematic reports supporting AI Act implementation for banking and payment - Mapping AI Act requirements against sectorial requirements - follow-up work - Support to the Supervisory Digital Finance Academy - Support to CAs for consistent implementation of DORA, including approach to emerging technologies such as quantum computing, DLT, tokenisation and advanced AI models	Ongoing
Thematic report on AI vendors activity (i.e. report on the provision by third parties of AI systems to the EU banking sector)	Q3
- MiCA	
- Support to CAs for consistent implementation of MiCA - Opinions on classification of crypto-assets - Monitoring of crypto-asset markets (esp. ART and EMT)	Ongoing
Review of MiCA supervisory handbook * Delivery may be postponed to Q1 2028 as start of work depends on workload.	Q4

- Response to ESRB Recommendation on third-country multi-issuer stablecoin schemes (ESRB/2025/9)

Activity 3 – Risk and financial stability analysis

Contributing to priority 2	Directorate: ERA Units: RAST, EAIA, ESGR, DFU
Objectives	1) To identify and monitor risks and vulnerabilities in the EU banking and financial sector 2) To assess the resilience of EU financial institutions and of the EU banking system as a whole to adverse developments 3) To maintain and enhance state of the art tools, models and methodologies for risk and policy analysis, stress testing and other EBA functions.
Description	The EBA monitors and analyses risks and vulnerabilities of the EU banking and financial sector from a micro, macro and resolution perspective, to identify and promote adequate regulatory and supervisory responses. This feeds into presentations to the EBA's governing bodies and external publications (e.g. Risk assessment reports, risk dashboards). The EBA's related research work creates opportunities for workshops, seminars and staff papers. The EBA strives to mobilise new technologies and AI for these analyses. Every other year, the EBA coordinates an EU-wide stress test exercise of the banking sector, with CAs and the ESRB. It will keep developing top-down methodology (as for Net Fee and Commission Income in 2023 and Net Interest Income in 2025) and gradually integrate climate and environmental risks.

Main deliverables

<i>Risk and economic analysis</i>	<i>Delivery</i>
<i>- Risk analysis</i>	
• Analyses of risks and vulnerabilities for the EU banking sector • Opinions on macroprudential measures • Publication of thematic notes (incl. on ESG risks)	Ongoing
• Quarterly risk dashboard • Early Warning Indicators (EWI) Dashboard	Quarterly
• ESG risks dashboard • MREL dashboard	Semi-annually
• Annual QIS data collection and Basel III monitoring dashboard	Annually
• JC Spring update on risks and vulnerabilities • Risk assessment questionnaires (Spring 2027) • Q2 Risk assessment report of the EU (incl. funding, asset encumbrance & liquidity) • List of other systematically important institutions (OSIIs) identified in 2026	Q2
• JC Autumn update on risks and vulnerabilities	Q3
• Q4 Risk assessment report of the European banking system (incl. retail risk indicators) • Risk assessment questionnaire (Autumn 2027)	Q4
<i>- Economic analysis</i>	
• Enhancement of EBA economic and statistical methodologies and tools • Thematic notes on economic and regulatory developments • EBA staff papers • Academic seminars and research workshops	Ongoing
• Analysis of complementarities of various sets of regulatory requirements and the implications of interactions - TFE reco 18 • Assessment of impact of regulatory changes on competitiveness, via bank lending and the broader macro environment - TFE reco 18	Q1
• Policy research workshop	Q4

<i>- Stress test</i>		
• Enhancement of the stress test methodology (incl. top-down capacity) – TFE reco 2.4	Ongoing	
• Integration of environmental risk in the stress test framework		
• 2027 EU-wide stress test exercise	Q3	
<i>- ICT threat landscape</i>		
• Assessment and analysis of major ICT incidents reported	Ongoing	
• Issuance of warnings and high-level statistics on ICT threats and vulnerabilities		
• Operation and maintenance of incident response mechanism (EU-SCICF)		
• ESAs Annual report on major ICT-related incidents	Q2	
Consumer protection, payments and conduct		
• Joint EBA-ECB Report on payment fraud	Q4	

Activity 4 – Oversight and supervision

Contributing to priority 2	Directorate: DORA Oversight, ICC, PRSP Units: DORA Oversight units, DF, RBM
Objectives	1) To oversee ICT Critical Third-Party Providers 2) To supervise issuers of significant ARTs and EMTs 3) To validate industry-wide initial margin models under EMIR3
Description	In 2026 the EBA will continue to roll out new oversight and supervisory responsibilities. This will entail close coordination and cooperation with other EU and non-EU authorities. As a lead overseer, the EBA, in a DORA joint oversight venture with EIOPA and ESMA, will perform examination activities to assess and monitor risks arising from and faced by CTPPs. This will be supported by CAs from the three sectors which may also follow-up on the lead overseer's recommendations with the financial entities they supervise, where required. MiCA entrusts the EBA with the responsibility of identifying significant ARTs and EMTs and supervising those (jointly with the home competent authority for significant EMTs). EMIR 3 established the EBA as the central validation hub for certain initial margin models.

Main deliverables

DORA Oversight	<i>Delivery</i>
• Oversight governance (JON&OF) and coordination	Ongoing
• Ongoing monitoring of CTPPs	
• International CTPP oversight cooperation	
• CTPP Risk assessment	Q2
• 2026 Oversight Activity Report	
• Oversight activity planning	Q4
• CTPP Examination activities 2027	
• Annual CTPP designation	
• Feasibility study on master data collection for the purpose of CTPP designation	
MiCA Supervision	
• Significance assessment of issuers of ART/EMT	Ongoing
• Supervision of significant ARTs and EMTs (if warranted)	
• Investigations of supervisory/enforcement decisions under MiCA	
• Execution, as appropriate, of intervention powers	
EMIR validation of initial margin models (IMM)	
• Develop internal supervision guidance and supervisory tools	Ongoing
• Approve changes to certain IMM	
• Coordinate with EU and non-EU competent authorities on changes to certain IMM	
• Monitor developments in derivatives markets	

*The specific time for performing these oversight activities may differ across CTPPs. Depending on the oversight intensity of the CTPP, their duration, recurrence and intensity may also differ across CTPPs.

Activity 5 – Data

Contributing to priority 2	Directorate: DART Units : STATS, RT
Objectives	1) To develop a simple and efficient reporting framework for financial entities in EBA's remit 2) To ensure timeliness, completeness and accuracy of reported data for users 3) To facilitate market discipline through adequate transparency in the banking sector
Description	The EBA's harmonised reporting and disclosure framework facilitate the assessment by authorities and market participants of financial entities' financial risks and compliance with regulatory requirements, and support the authority's policy development, risk assessment and convergence activities. The Authority develops technical standards and guidelines specifying the reporting to be provided by financial entities' reporting and carries out regular data collections. The EBA is developing a common data dictionary and IT tools (DPM studio) to foster bank reporting integration. EUCLID provides a secure and efficient platform for collecting and processing data from financial institutions. A dissemination portal (including a Pillar 3 datahub) facilitates access to banks' data and pillar 3 disclosures. As part of its simplicity and efficiency agenda, the EBA intends to reduce reporting costs, increase reporting proportionality, leverage its data capabilities to carry out impact assessments at an earlier stage of policy development, streamline its risk assessments (including the EU-wide stress-test), automatise data collection processes, increase data dissemination capabilities, and support the supervisory and regulatory community through new partnerships. (TFE recommendations 5, 6, 7, 8)

Main deliverables

Supervisory reporting and Transparency	Delivery
<i>- Supervisory reporting</i>	
- Maintenance of the technical package supporting reporting and Pillar 3 frameworks - Evolution of DPM 2.0 and DPM studio to support an integrated reporting system - Development of an integrated reporting system (Joint Bank Reporting Committee, Reporting Contact Group), semantically integrated glossaries of specific topics – TFE reco 4 (long-term) - Contribute to implementation of EU Supervisory Data Strategy across financial sectors - Maintenance of mapping tool between reporting and Pillar 3 - Maintenance of reporting (and disclosures) signposting tool	Ongoing
- Comprehensive final draft ITS amending FINREP, own funds, operational losses, liquidity - includes simplification * if not completed in 2026 - Repository of EU and national reporting data collections, Guidance on coordination of new national (and EU) data collections, Change management -TFE recos 6, 7, 8 * if not completed in 2026 - Technical package for 4.4 reporting framework release * Draft to be published in December 2026	Q1 *
- RTS on open Banking data reporting (Art. 48(8) PSR) - CP - Review of ITS on resolution planning reporting in light of BRRD 3 - Review of ITS on MREL/TLAC disclosure and reporting in light of CRR3 - New securitisations regime - Reporting and disclosure mandates	Q4
<i>- Transparency and Pillar 3</i>	
- Maintenance of the Pillar 3 framework - Monitoring of EU and international disclosure developments - Monitoring work on CSRD by EFRAG and opinions on sustainability reporting standards - Maintenance of the Pillar 3 data hub - Extension of Pillar 3 data hub to SNCIs*	Ongoing
* first implementation by end 2026; full implementation only by 2028	

Data infrastructure and services, statistical tools

- Support and maintain the EBA's data infrastructure - Enhance transparency via re-use of supervisory info and pre-populated templates - Data support to regulatory work and technical advice to EC - Provide support to external stakeholders for data services <i>Data support to supervisory benchmarking – *deprioritised</i> <i>Training of CA and EBA users on data and analysis tools – *deprioritised</i> - Improve data processing, analytical capabilities and access	Ongoing
- Risk dashboard (RDB) and other related tools, such as the MREL, the ESG and the Basel 3 dashboard, for internal and external data users - Bank-specific dashboards and early warning tools for internal users and CAs	Quarterly / semi-annually / annually

Activity 6 – Governance

Contributing to all priorities	Directorate: N/A Units : GEA, L&C, IT, CS
Objectives	1) To support EBA's governing bodies and management 2) To coordinate stakeholder engagement and ensure accountability
Description	The activity supports the EBA's governing bodies and management, including ensure the secretariat of the Boards, planning and monitoring the allocation of resources and the execution of the activities, managing the enterprise's risks, internal control and compliance and preparing accountability documents. It provides legal advice to the Authority. It supports and oversees EBA's working structures and the engagement with all external stakeholders. It is responsible for the Authority's internal and external communication. In application of recommendations 20 and 21 of the TFE, the EBA will also introduce top-down guidance to selected policy developments and review the number of substructures, their mandate and strengthen their dialogue with the BoS.

Main deliverables

Stakeholder engagement, planning and strategy	Delivery
- Support to EBA's governing bodies (BoS and MB) and management - Support to EBA's internal structures (BSG, ACP, BoA, ESAs JC, EBA's working structures) - Management of EBA's stakeholder engagement with EU and non-EU stakeholders - Coordination of internal policies/processes supporting EBA's activities - Planning and monitoring of the execution of the work programme - Reports and opinions on 3rd country regulatory and confidentiality equivalence - Support to implementation of EU's Association Agreement with Andorra & San Marino - Draft Single programming document (2028-2030)	Ongoing
- Annual report 2026 - with CAAR requirements - JC Annual report 2026	Q1
- Work programme 2028 - JC Work programme 2028 - Opinion on EP 2025 discharge report	Q2
MoU between AMLA prudential supervisors, NCAs responsible for MiCA and ESAs	Q3
Legal advice	TBC
- Legal advice on all relevant matters (including in case of litigation) - Enforcement - Handling of access to documents requests - Advice on new lease for EBA premises - Representation of EBA before Board of Appeal, ECJ, Ombudsman (as necessary)	Ongoing
Risk management, audits and internal control	
- Coordination of business continuity annual exercise and plan - Contribution to internal control system	Ongoing

- Follow-up to audits (ECA, EC IAS, external financial auditors)
- Monitoring of AI, data protection, ethics, whistleblowing, anti-fraud frameworks
- Identification, assessment and monitoring of EBA strategic risks
- Maintenance of EMAS registration
- Coordination of the implementation of Sustainability Reporting standards

Communication

- External and internal communication Ongoing

Activity 7 – Operations

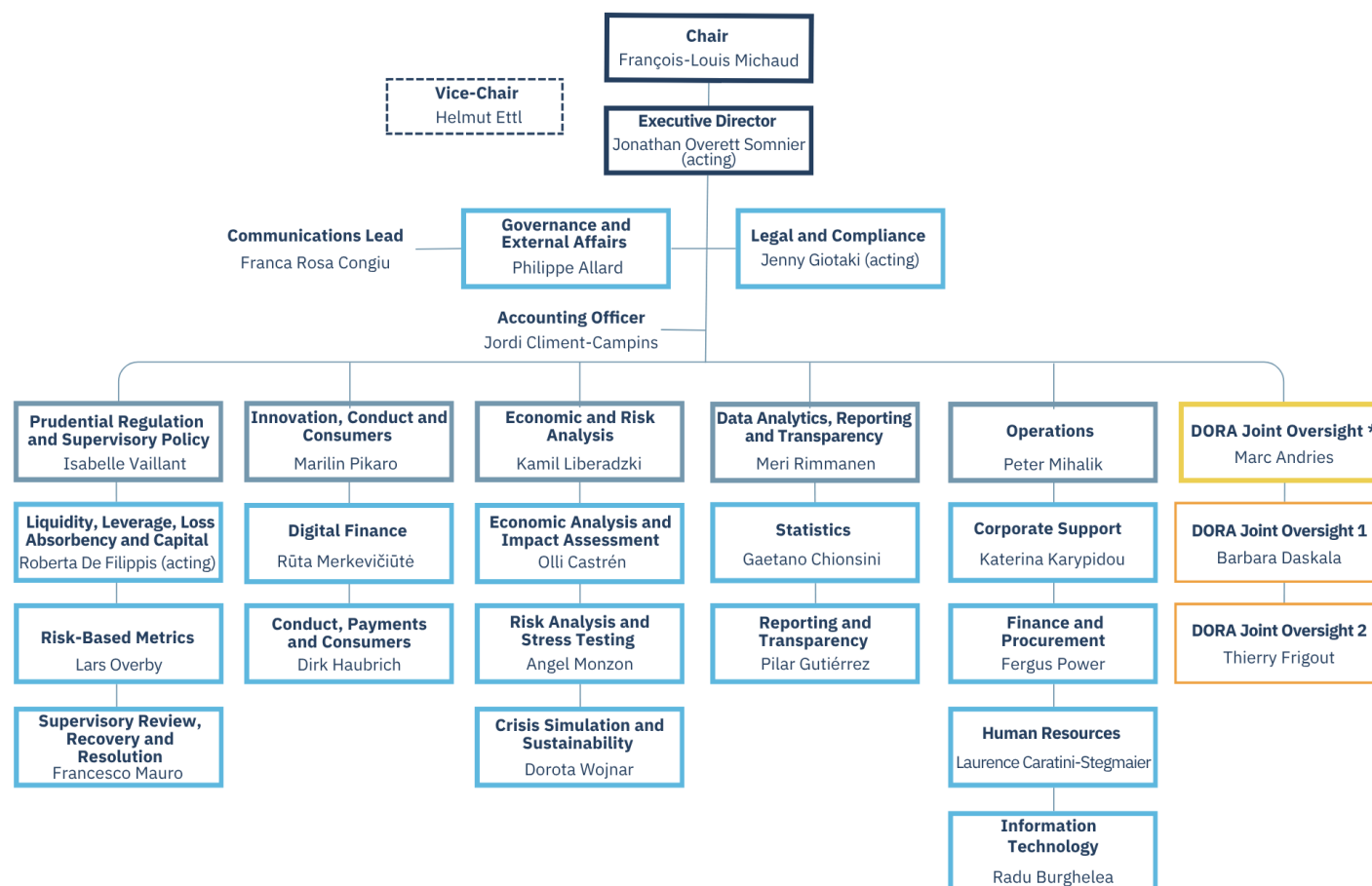
Contributing to all priorities	Directorate: Operations Units : FP, HR, IT, CS
Objective	To enable the EBA's activities in a cost-efficient and state-of-the art manner
Description	A wide range of services are necessary for the EBA's daily operations: finance and procurement, human resources, IT and corporate support. They need to be delivered in a seamless manner and to the highest possible standards, for an optimal use of the authority's human, financial and technical capabilities.

Main deliverables

HR	Delivery
• Execution of the Establishment Plan • Compliance with applicable staff rules • Execution of the EBA Horizon - Talent strategy 2024-2029 • Implementation of the EBA Learning and Development (L&D) strategy 2026-2029 • Continuation of HR digitalisation (modules' deployment of EC's SYSPER tool)	Ongoing
Finance & Procurement	
• Establishment of the 2026 annual accounts • Execution of 2027 annual budget including procurement plan • Preparations for 2028 and 2029 budgets • Refinement of fee funding tools and processes • Embedding and optimising use of new finance system (SUMMA)	Ongoing
Corporate	
• Provision of solutions for EBA premises and related services (incl. physical security) • Negotiation and implementation of new lease for EBA premises • Management of EBA assets • Organisation of EBA meetings and initiatives • Support to EBA staff missions	Ongoing
Information and communication technology	
<i>Execution of EBA's IT Strategy and 2026 Operational IT plan</i>	
<i>- Support and optimisation of Enterprise IT solutions (incl. AI)</i>	
• Document Management, Collaboration Platform, Identity & Access Management, Extranet, Intranet, EC solutions (Sysper, Missions, SUMA) • Digital workplace (user services, platform services)	Ongoing
<i>- EBA Data hub</i>	
• EUCLID evolution to support current and future data collections, future mandates (PSD3, PSR) and cross sector master data management (Delivery foreseen in Q4 2028) • Evolution of EBA analytics and dissemination capabilities (EDAP, Databricks, SAS) • Interoperability: Central services for NCAs and market entities: data modelling, collections, validations and quality assurance, risk models, data sharing	Ongoing

<i>- Digital solutions for Oversight, Supervision, Simplification</i>	
• DORA Oversight (Designation of CTPPs/ Register of information, Oversight tools)	Ongoing
• MiCA shared platform	
• EMIR IMMV validation platform	Q4
• Colleges Platform evolution -crisis simulation exercise -	
• IT Solutions for simplification (TFE report - driven tools)	
<i>-EBA Cloud and Sovereignty</i>	
• Adjustment of EBA cloud posture to respond to new geopolitical risks and cybersecurity standards	Q4
<i>- Security and Compliance</i>	
• EBA compliance and security activities	Ongoing
• Implementation of new Cybersecurity regulation	Q4
<i>-Innovation</i>	
• AI @EBA Programme (including Legal & Compliance, Literacy, Policy, Tools and adoption to deliver compliant, high-impact use cases, and achieve productivity gains).	Ongoing
<i>- IT Governance, Project, Product and Portfolio Management (PMO)</i>	Ongoing
<i>- IT Procurement and Contract Management</i>	Ongoing

Annex I: Organisation chart



*Joint ESAs Department, reports to the three ESAs Executive Directors

Annex II: Resource allocation by activity

The table below summarises the resource allocation per activity and details the type of resource: TA, CA or SNE. Management staff and their assistants are distributed over the activities within their respective remits, hence the staffing numbers per activity are not whole numbers. (Minor differences in totals are due to rounding.)

Activity	2027				
	TA	CA	SNE	Total	Cost (EUR)
1. Policy development	37.3	4.6	11.6	53.5	11 143 788
2. Supervisory convergence and enforcement	37.6	8.5	1.3	47.5	11 028 548
3. Risk, Economic analysis and financial stability	16.7	4.4	.02	21.3	5 243 398
4. Oversight and supervision	42.2	4.0	3.4	49.7	11 376 751
- DORA Oversight (fee-funded)	11.0	2.0		13.0	4 628 138
- MiCA Supervision (fee-funded)	20.0			20.0	2 257 084
- EMIR validation of IMM (fee-funded)	3.0		1.0	4.0	1 490 020
5. Data management	20.1	12.5	1.5	34.1	8 233 770
6. Governance	13.3	7.5	3.0	23.8	4 704 512
7. Operational support	34.6	11.5		46.1	18 540 466
Total	202.0	53.0	21.0	276.0	70 271 232

* Activity '2. Supervisory convergence and enforcement' includes 2 CA posts funded by SG REFORM for the EU Supervisory Digital Finance Academy.

In relation to Activity Oversight and supervision it is noted:

- For DORA oversight the situation is as follows: Further to the 6 allocated fee-funded TA posts filled by year end 2025, the EBA expects to fill 2 fee-funded CA posts and 2 fee-funded TA posts in 2026.
- For MiCA supervision the allocated EU-funded posts (2 TA and 2 CA posts) were filled in 2024 and are allocated to activity 4. Based on current estimates about future significant issuers of ART and EMT crypto-assets, it is expected to recruit 2 posts in 2027, 1 post in 2028 and 4 more in 2029, bringing the total to 7 posts by the end of that year.
- For validation of certain initial margin models under EMIR, the fee-funded TA and SNE posts should be filled in 2026.
- The costs related to Oversight and supervisory activities do not include the administrative overheads.

The above allocation includes a request for additional funding and resources made in the context of the draft SPD 2027-2029. The EBA considers this to be essential to ensure that it can deliver its tasks and activities as mandated by the co-legislators.

The EBA's additional resource request was for 3 FTEs strictly limited to a period of three years and for 4 permanent FTEs to be funded by EU contributions with matching NCA contributions. Against a background the EBA lost 8 posts at the end of 2025 (transferred to AMLA), the additional resources would increase the EBA's overall headcount temporarily by 3 staff for years 2027 to 2029 compared to the situation in 2025 and then decrease by 2 posts after 2029.

The bulk of the structural costs will be mutualised in the context of the new fee-funded posts, the EU and NCA contributions (before pension) would increase by approximately 75 KEUR in real terms compared to 2025 and thereafter would only increase by the standard 2% annually in line with the MFF.

The request is not taking into consideration the increasing demands for simplification and burden reduction of the single rulebook. Although these efforts may result in the postponement or deletion of some new or ongoing mandates, the initiative will on balance create additional work and draw on already constrained resources. Any attempts to streamline or simplify the existing rulebook will require the mobilisation of significant resources within the EBA and competent authorities.

Not obtaining the permanent resources would also impede the EBA's capacity to develop some of its other key activities, such as stress testing, given that they rely on data analytical and quantitative skills, or to meet requirements stemming from the cybersecurity regulation.

Furthermore, the jointly ESAs requested 9 additional fee-funded posts for DORA Oversight activities to cover structural staff resource insufficiencies that have been identified.

At present, the European Commission has excluded these additional elements from the budget forecast for the EBA in the 2027 Draft Budget.

Annex III: Overview of work on simplification and efficiency –by TFE recommendation

TFE recommendation 2

Activity 1 – Policy development

Prudential regulation (CRR, CRD, SEC R, IFR, IFD, EMIR, CSDR...)	<i>Delivery</i>
- Own funds and capital requirements	<i>Delivery</i>
• Review of the RTS on OF and EL – TFE reco 2	Q4
- Accounting and auditing (incl. consolidation)	
• Simplification/Update of GLs on accounting for ECL – TFE reco 2	Q4
- Credit risk – TFE reco 2.1	
Sustainable finance (CRR, CRD, SFDR)	
- Sustainable finance (CRR, CRD, SFDR)	
• Inputs to sustainability work arising from applicable regulation – TFE reco 2.3	Ongoing
• Reports and advice to EC on sustainable finance-related topics – TFE reco 2.3	

Activity 2 - Supervisory convergence and enforcement

- Internal governance (including remuneration)	
• Monitoring of internal governance and remuneration requirements*: Q4 or Q1 2028	
- Remuneration benchmarking: gender pay gap report	
- High Earners dashboard	
* Formats and timing may be impacted by implementation of TFE reco 2.2 re simplification of single rulebook on governance and remuneration	

Activity 3 - Risk and financial stability analysis

- Stress test	
• Enhancement of the stress test methodology (incl. top-down capacity) – TFE reco 2.4	Ongoing

TFE recommendations 4, 5, 6, 7, 8

Activity 5 - Data

Supervisory reporting and Transparency	<i>Delivery</i>
- Supervisory reporting	
• Development of an integrated reporting system (Joint Bank Reporting Committee, Reporting Contact Group), semantically integrated glossaries of specific topics – TFE reco 4 (long-term)	Ongoing
• Comprehensive final draft ITS amending FINREP, own funds, operational losses, liquidity	Q1 *
- includes simplification [TFE reco 5]	
* if not completed in 2026	
• Repository of EU and national reporting data collections, Guidance on coordination of new national (and EU) data collections, Change management -TFE recos 6, 7, 8	
* if not completed in 2026	

TFE recommendation 14- 15

Activity 2 - Supervisory convergence and enforcement

Colleges	
• Assess setting up supervisory platforms bringing authorities from various horizons together – TFE reco 14 and 15	Ongoing

TFE recommendation 17

Activity 2 - Supervisory convergence and enforcement

Supervisory convergence (prudential and resolution)	<i>Delivery</i>
EBA annual report on supervisory convergence work in 2026 – TFE reco 17	Q2

TFE recommendations 18

Activity 3 - Risk and financial stability analysis

Risk and economic analysis	<i>Delivery</i>
- <i>Economic analysis</i>	
- Analysis of complementarities of various sets of regulatory requirements and the implications of interactions - TFE reco 18 - Assessment of impact of regulatory changes on competitiveness, via bank lending and the broader macro environment - TFE reco 18	Q1

TFE recommendations 20, 21

Activity 6 – Governance

As per ‘description’: EBA will also introduce top-down guidance to selected policy developments and review the number of substructures, their mandate and strengthen their dialogue with the BoS.

TFE report overall

Activity 7

Information and communication technology	
- <i>Digital solutions for Oversight, Supervision, Simplification</i>	
IT Solutions for simplification (TFE report - driven tools)	Q4

Annex IV: EBA's Supervisory convergence priorities in 2027

Approach and identification of topics

The EBA's supervisory convergence work arises from its founding regulation and from specific regulations (CRD, BRRD, PSD, MiCA, DORA...). Work is ongoing to develop a comprehensive framework which enables more systematically to identify, prioritise, treat and report on supervisory convergence activities.

Going forward it is proposed to identify the areas which the EBA considers to be top supervisory convergence priorities, and then select which of those it aims to address in which year, and using which convergence tool (e.g. USSPs, sectoral priorities, peer reviews, implementation and case reviews, monitoring and knowledge sharing, training, supervisory exchanges and workshops, ...). For 2027 this identification process is done on the basis of top-down feedback from the Board of Supervisors and EBA management (see below). It is envisaged that the 2028 priorities and work programme will be able to rely on a newly developed supervisory convergence framework and incorporate a more data-driven approach that also combines evidence and input from internal and external data sources.

Topic	Potential tool
Application of national prudential liquidity measures	Peer review
DORA non-oversight, e.g. incident reporting supervisory response	Peer Review
SREP: Pillar 2 setting, communication of SREP outcomes, application of proportionality	Supervisory exchanges and implementation / thematic review
Technological capacity (focus on AI Act; crypto, DLT and Value chain)	Innovation monitoring, knowledge building/sharing, including training
Consumer protection: Credit Services Directive and CCD2	Thematic review
Geopolitical risks, threats from other external shocks, use of innovative technologies or products	USSPs
Deepening oversight and supervisory capacity for DORA and MiCA	USSPs Training

Additional information on 2027 priority topics for convergence work

The 2027 priority topics, grouped by convergence tool, are briefly described hereafter:

Peer reviews

In line with previous years' peer review work plans, the 2027 work programme will outline the new peer reviews that will be conducted, as well as the obligatory follow-up peer reviews, which

in accordance with Article 30(5) of the [EBA Regulation](#) will have to be undertaken 2 years after the publication of an initial peer review report.

New peer reviews commencing in 2027:

- Liquidity measures: the objective of the peer review is to identify and assess the application of national prudential liquidity measures that may overlap with the existing EU framework established by the CRR/CRD or result in liquidity requirements that are stricter than the LCR/NSFR, creating an uneven level playing field for EU institutions. *
- DORA non-oversight, e.g. incident reporting supervisory response: The objective would be to assess supervisory practices in relation to the implementation of DORA.

Follow-up peer reviews commencing in 2027

- Follow-up of recommendations in Peer review on the application of proportionality in SREP *
- Follow-up of recommendations in Peer review on the performance of stress tests by deposit guarantee schemes *
- Follow-up of recommendations in Peer review on gender diversity.

* Planned delivery foreseen in 2027

Supervisory exchanges, supervisory briefing and implementation/thematic/case reviews

Pillar 2 and SREP

1) Pillar 2 setting (including application of output floor): The objective would be to assess consistency in setting P2R across the EU banking sector. This will include monitoring convergence in the implementation of the revised SREP GL (in particular on the application of the output floor) and consistency of supervisory approaches to setting P2R capital requirements and expectations (P2R and P2G).

NB: Pillar 2 survey foreseen for 2026, and case reviews in 2027, possibly 2028 – TBD, taking into account the revised SREP Guidelines.

2) Communication of SREP outcomes: The objective would be to assess whether SREP outcomes are communicated in a clear, comparable, and proportionate way across the EU. The SREP framework envisages a communication towards the supervised institutions which is risk-based and proportionate, providing clear supervisory rationale. This work could focus on the actual communication from CAs to supervised institutions, including considering relevant examples from non-EU jurisdictions.

NB: Supervisory exchange foreseen in 2027, and potentially thematic review in 2027 or 2028 – TBD, taking into account the revised SREP Guidelines

3) Application of proportionality in the SREP and risk-based supervision: Enhance operationalisation of proportionality in SREP and enhance risk-based supervision. Actual operationalisation of proportionality in the SREP affecting the scope, depth and intensity of

supervisory assessments was one of the points of attention of the industry feedback on the revised SREP GL. In follow-up discussions with SGOS, it was noted that the operationalisation could be more effectively addressed through supplementary tools, and in the context of supervisory convergence.

NB: Supervisory exchange foreseen in 2027, with potential input to TFE recommendation 10 (SNCI review), and follow-up of the respective peer review taking into account the revised SREP Guidelines.

4) Monitoring of key indicators (ongoing supervision/SREP Title 3): Promote consistent supervisory practices through the use of consistent metrics when assessing institutions (revised SREP GL require regular and systematic monitoring of key financial and non-financial indicators of supervised institutions to detect changes in their financial condition and risk profiles). The use of SupTech could be also considered in the performance of the monitoring activity.

NB: Supervisory exchange foreseen in 2026 and 2027, with supervisory repository.

5) Supervision of internal governance aspects: Enhance supervisory oversight and promote effective supervisory practices on internal governance areas, taking also into account the growing AI adoption. Supervisory findings evidence persistent weaknesses in risk management, governance and internal controls. Weak internal governance and ineffective boards have repeatedly been root causes of instability—with poor oversight, inadequate risk culture, and insufficient board challenge. Targeted areas would be considered to strengthen supervisory practices and promote convergence across the EU (also leveraging on relevant BCBS work).

NB: Supervisory exchange foreseen in 2026 and supervisory briefing/supervisory implementation tools in 2027-2028 – TBD.

Innovation monitoring and knowledge sharing

Technological capacity (focus on AI Act; crypto, DLT and Value chain)

The EBA will continue to promote supervisory convergence in the context of innovative products, services and business models, encompassing the topics referred to in section 1.2.2.3. In particular, the EBA will promote convergence in the implementation of the AI Act in the banking and payments sector and promote convergence in the assessment of ICT risks in relation to DLT and tokenisation. The EBA will also continue to monitor, and where appropriate, carry out supervisory convergence activities, in relation to emerging technologies, e.g. Quantum computing.

Thematic review

Consumer protection: Credit Services Directive and CCD2

Assess how firms comply with new conduct requirements set out in sectoral Level 1 texts. The work does not assess NCAs' supervision of FIs, but how FIs themselves comply with the requirements usually via a questionnaire sent to a sample of FIs selected by NCAs.

USSP

In accordance with its founding Regulation, the European Banking Authority is mandated to support a common Union supervisory culture and consistent supervisory practices across the European Union (EU). To this end, the EBA identifies **up to two Union Strategic Supervisory Priorities (USSPs) at least every three years**, reflecting expected future developments and trends, and assesses how competent authorities (CAs) implement these priorities in their supervisory activities.

The **USSPs applicable for the 2027 supervisory cycle** are as follows:

- Contributing to single market efficiency, financial stability and sustainability in a context of heightened geopolitical risks, threats from other external shocks and the increasing use of innovative technologies or products; and
- Deepening oversight and supervisory capacity in relation to the Digital Operational Resilience Act (DORA) and the Markets in Crypto-assets Regulation (MiCA).

To help guide the effective and consistent implementation of the USSPs, the EBA identifies **a set of key topics for heightened supervisory attention**, which highlight priority risk areas that CAs are expected to consider in the setting of their own priorities and in their on-site and off-site supervisory work, while duly considering the structure, specific vulnerabilities and risk profiles of the institutions under their remit. The topics are defined taking into account the EBA's EU-wide risk analysis, its policy work supporting supervisory convergence - in particular, in the context of the supervisory review and evaluation process (SREP) - and the practical supervisory experience of CAs.

The EBA assesses how the USSPs and the key topics have been reflected in supervisory practices across the EU using the most appropriate supervisory convergence tools, which may include questionnaires to CAs, desk-based reviews, close monitoring of supervisory colleges and, where relevant, peer reviews or bilateral supervisory engagement. The **EBA reports annually to the European Parliament and the Council on the degree of convergence of supervisory practices** and the functioning of the SREP via its annual report on supervisory convergence, fulfilling its mandate under the Capital Requirements Directive (CRD).⁵

Persistent geopolitical tensions, elevated macro-financial uncertainty and the ongoing implementation of major regulatory reforms are expected to continue shaping banks' risk profiles and supervisory challenges in 2027. Against this background, the **supervisory focus is centred on two key topics** that remain relevant from the previous cycle, complemented by **updated attention points for supervisors for 2027**. The key topics and their related attention points are set out in Sections 1 and 2 of this document, while additional considerations for supervisors' attention are outlined in Section 3.

⁵ Article 107 of the CRD asks the EBA to report annually to the European Parliament and the Council on the functioning and degree of convergence of the SREP across Member States.

At the same time, the EBA will continue to take into account rapidly evolving economic and market conditions, as well as developments in local markets, which may warrant the (re)prioritisation of supervisory tasks over time.

1. Testing and adjusting to increasing geopolitical, economic and financial uncertainties

Geopolitical tensions and macro-financial uncertainty remain key sources of risk for EU/EEA banks. The recent escalation of conflict in the Middle East, episodes of global trade frictions and shifts in energy markets, as well as the Russian war, have contributed to heightened financial market volatility and sudden re-pricing. EU/EEA bank equity prices have shown marked sensitivity to geopolitical developments, while sovereign yields and commodity prices have exhibited renewed volatility with further fluctuations since the onset of the Iran war. Although macroeconomic conditions have proven resilient, downside risks remain, raising questions on the possible impact e.g. on GDP, inflation and interest rates should the conflict persist or further escalate. The materialisation of geopolitical risks through war or similar events can affect EU/EEA banks through various channels, including credit, market, and liquidity and funding risks, as well as impact on operational risk.

The *December 2025 EBA Risk Assessment Report (RAR)*⁶ indicates that exposures allocated to Stage 2⁷ under IFRS 9 have remained elevated across several portfolios, particularly in commercial real estate (CRE) and small and medium-sized enterprises (SMEs), reflecting heightened uncertainty, a more cautious approach to asset quality management, and the use of overlays to capture geopolitical and macro-financial risks. While non-performing loans (NPL) ratios remain at historic lows, the persistently high level of Stage 2 allocations underscores the need for continued vigilance over credit risk identification and forward-looking provisioning practices.

Profitability remains solid but faces medium-term challenges. Although banks have reported strong return on equity (RoE) levels, supported by low cost of risk and stable fee income, the forward-looking outlook is more uncertain. Margin compression and subdued economic sentiment could further weigh on earnings. Ensuring the sustainability of business models under different interest rate and macro-financial scenarios remains essential, including in light of structural changes driven by digitalisation and the increasing use of artificial intelligence.

Supervisors should:

- **Assess institutions' ability to adequately assess, monitor and, where needed, mitigate the impact of rising geopolitical uncertainty and a quickly changing macro-financial environment**, including where dependencies on third countries (e.g. foreign currencies) may be wider. Supervisors should in particular assess whether scenario calculation and stress testing assumptions are properly calibrated and consistent with the *EBA Guidelines on*

⁶ [Risk Assessment Report - December 2025 | European Banking Authority.](#)

⁷ Under IFRS 9, exposures are classified in Stage 2 when they have experienced a "significant increase in credit risk" (SICR) since initial recognition but are not credit-impaired. Stage 2 exposures require recognition of lifetime expected credit losses (ECL).

*institutions' stress testing*⁸, and whether relevant findings effectively channelled into management actions.

- **Assess institutions' crisis preparedness capabilities to timely respond to extreme scenarios, including those related to war or large-scale geopolitical shocks.** This should cover realistic and credible contingency and recovery plans and an evaluation of their usability, including through dedicated dry run exercises, taking into account the findings of the *EBA report on recovery planning dry-runs*⁹. Supervisors should also strengthen their own crisis preparedness arrangements in anticipation of potential geopolitical or war-related disruptions.
- **Assess if institutions' expected credit loss (ECL) models adequately capture emerging risks, including those arising from geopolitical tensions.** This encompasses continued follow-up of findings from recent *EBA IFRS 9 benchmarking exercises*, with focus on the timely and consistent identification of SICR, the prudent and well-governed incorporation of forward-looking information, and the robustness and methodological soundness of back-testing frameworks to ensure overlays adequately capture risks not fully reflected in model outputs (including emerging and hard-to-model risk drivers). Supervisors should also monitor sectoral concentration risks, ensuring that increased exposures to strategic sectors do not lead to undue risk-taking or excessive dependence on a single industry.
- **Assess institutions' ability to generate an acceptable level of returns amid increasing uncertainties,** including through an analysis of the viability of institutions' business models and the sustainability of their strategy to generate profits on a forward-looking basis. This should encompass a focus on earnings quality, cost discipline, preparedness for different interest rate and market developments, resilience of business models to structural shifts driven e.g. by digitalisation, tokenisation and the adoption of artificial intelligence, as well as prudent management of operational expenses in the event of renewed inflationary pressures.

2. Technology integration and resilience

Operational risks for EU/EEA banks remain elevated, with cyber risk and data security being most significant drivers according to the *EBA December 2025 Risk Assessment Report (RAR)*¹⁰. This is in line with the *2025 ENISA Threat Landscape Report*¹¹, which notes that the finance sector has been one of the top 5 most targeted sectors in the EU, and banks were among the subsectors most targeted by hacktivist groups, likely to create nuisances for the users of online banking services. At the same time, the ENISA report highlights heightened geopolitical tensions contribute to an increasingly complex threat environment, including the risk of state-sponsored cyberattacks aimed at disrupting operations or undermining trust in the financial system. Peaks of activity were notably observed around electoral processes in the EU Member States, as well as during tense political and societal contexts, especially when related to polarising topics. Banks represent high

⁸ [Guidelines on stress testing | European Banking Authority](#).

⁹ Forthcoming.

¹⁰ [Risk Assessment Report - December 2025 | European Banking Authority](#).

¹¹ [ENISA Threat Landscape Report 2025](#).

value target for cybercriminals as they process a significant amount of financial and personal data. Data breaches pertaining to the finance sector amounted to 64% while ransomware accounted for 36%. These developments underline the need for institutions to maintain robust resilience frameworks and for supervisors to closely monitor their effectiveness.

Fraud continues to pose a significant challenge to financial systems worldwide and constitutes a key operational risk driver perceived by banks. Based on 2025 EU/EEA supervisory reporting¹², gross operational losses from external fraud amounted to around €1.5 billion, 16% of EU banks' total gross operational losses. The *EBA December 2025 RAR* notes that fraud is increasingly amplified by the use of advanced technologies, including artificial intelligence (AI), which enables more sophisticated financial crime schemes, and exploitation of systemic vulnerabilities. Moreover, the *2025 joint EBA-ECB report on payment fraud*¹³, which constitutes a sub-category of fraud, noted an increased total value of fraud¹⁴ to €4.2 billion in 2024 from €3.5 billion in 2023 and highlighted the need for continued vigilance and for security measures to be adapted to combat new emerging types of fraud. Moreover, the upcoming Payment Services Regulation (PSR) and the revised Payment Services Directive (PSD3) are expected to introduce strengthened requirements on fraud risk management, with implications for payment service providers.

At the same time, the ongoing digital transformation of the banking sector is increasing reliance on ICT systems, ICT solutions, and data-driven processes. While these developments enhance operational efficiency and scalability, they also introduce new vulnerabilities and dependencies. Third-party risks are considerably increasing due to a growing reliance on third-party service providers, often domiciled in third countries outside the EU. Such dependencies are often concentrated on a limited number of providers, especially in critical areas such as payment systems, raising concerns related to concentration risk, supply chain complexity, and potential systemic implications in case of disruption. This underscores the need for robust third-party risk management and enhanced supervisory scrutiny. In this regard, the implementation of the Digital Operational Resilience Act (DORA) becomes important for strengthening ICT risk management, incident detection and response capabilities, and ICT third-party risk management, along with the oversight attention to the critical ICT third-party providers.

Technological innovation, including the increasing deployment of AI, is further transforming banks' business models and risk profiles. AI is gradually integrated across a wide range of banking activities, from customer interaction to risk management. While offering various benefits in terms of efficiency and cyber-defence, this also raises challenges that require appropriate safeguards and supervisory scrutiny. This relates both to consumer protection, with advanced AI enhancing concerns related to bias, fairness, explainability or interpretability and to the amplifying role that AI can have in cyberattacks, noting the cyber capabilities of frontier AI models.

¹² <https://www.eba.europa.eu/regulation-and-policy/supervisory-reporting>.

¹³ [Joint EBA-ECB report on payment fraud: strong authentication remains effective but fraudsters are adapting | European Banking Authority](#).

¹⁴ The total value of fraudulent transactions includes the sum of all fraudulent transactions reported for credit transfers, direct debits, card payments (from the issuer perspective), cash withdrawals and e-money transactions.

Supervisors should:

- **Assess institutions' cybersecurity preparedness**, including effectiveness of testing, sufficiency of ICT-related incident management, prevention and mitigation of cybersecurity risks posed by frontier AI models and level of cyber risks' awareness across the institutions. Supervisors should also assess the appropriateness of the degree of engagement of the management body in the business continuity management, including recovery and response planning.
- **Assess the soundness of financial entities' ICT third-party risk management frameworks**, including effective management of concentration and dependency risks, sufficient exit planning and effective monitoring of the supply chain supporting critical or important functions.
- **Ensure strong support and effective coordination with the DORA Lead Overseers** and assess whether Lead Overseers' activities and recommendations over critical ICT third-party providers are duly addressed in the ICT third-party risk management frameworks of financial entities.
- **Monitor the impact of fraud on institutions** through two key channels: financial impact, leveraging operational risk losses, and reputational risk. Supervisors should also assess the effectiveness of fraud detection and prevention mechanisms as well as mitigation strategies, along with assessing institutions' readiness and implementation roadmaps for PSR-PSD3.
- **Strengthen valuation frameworks to address risks related to institutions' increasing adoption of AI tools.** In line with the applicable regulatory framework, including the AI Act, supervisors should assess that challenges related to explainability and interpretability, bias and fairness, human oversight, model robustness or ICT risk management are well integrated into the risk management framework. This should also be complemented by a closer cooperation between prudential and conduct supervisors with market surveillance authorities, that will have been progressively designated by end-2027.

3. Further considerations

The prioritisation set out above may not cover all aspects – that are specific to local markets, institutions' business models or that may be affected by the materialisation of macroeconomic conditions that remain difficult to assess – to which supervisors should continue to pay due attention.

In particular, the significant dispersion across institutions in their sensitivity to interest-rate shocks, as well as in key modelling assumptions, behavioural parameters - particularly for non-maturity deposits - and the design and effectiveness of hedging strategies, suggests the continued importance of robust IRRBB risk management and of its monitoring by supervisors.

Risks stemming from banks' exposures to non-bank financial intermediaries (NBFIs), including private credit and private equity, should also be carefully monitored when assessing the situation of more exposed institutions, taking into account increasing interconnectedness, potential spillover channels and the role of such exposures in liquidity and funding dynamics.

Similarly, attention should be given to cases where technological integration enables relevant value chain evolutions (e.g. white labelling, platformisation, crypto-asset business, online deposit platforms - ODP), with potential reputational and operational impacts.

Moreover, while not identified as a standalone key topic for 2027, ensuring a consistent, proportionate and effective application of the new requirements introduced by CRD6-CRR3 remains important, including in areas such as operational risk, credit risk and ESG related financial risks. In 2027, particular attention is expected to be warranted on the implementation of ESG transition planning by small and non-complex institutions (SNCIs)¹⁵ and on the integration of ESG risks into stress testing practices¹⁶.

Key topics for resolution authorities in 2027:

For 2027, the European Resolution Examination Programme (EREP) continues to support convergence of resolution practices across the EU, while allowing flexibility for authority-specific priorities. The key topics remain unchanged compared to 2026 to ensure continuity of work, with adjustments to monitoring criteria to reflect progress and CMDI-related mandates, and taking into account alignment with the EBA Single Programming Document and simplification objectives.

- i) Operationalisation of resolution tools: RAs should continue prioritising the operationalisation of resolution tools as a core element of resolution planning and preparedness. This includes work on bail-in, in particular challenges related to third-country liabilities, as well as identifying and addressing obstacles to the execution of transfer tools. RAs should ensure adequate arrangements, stakeholder engagement (including with FMIs), and clarity on the use of resolution powers. Flexibility in executing resolution strategies, including variant strategies and combinations of tools, should be preserved. RAs should also strengthen interlinkages between resolution and recovery planning, including alignment with competent authorities.
- ii) Operationalisation of liquidity and funding strategies in resolution: RAs are expected to further develop liquidity and funding strategies in resolution, ensuring their consistency with the chosen resolution tools. This includes continued work on collateral identification and mobilisation, liquidity reporting capabilities, and the definition of resolution-specific scenarios with sufficiently conservative assumptions. RAs should also ensure consistency between recovery and resolution planning assumptions, including consideration of situations where recovery options have been used but are not successful.
- iii) Testing resolution readiness: Testing is established as a standalone priority for 2027. RAs and institutions should continue to conduct and further develop simulation exercises and multiannual testing programmes to assess their capacity to operationalise resolution procedures, tools, and capabilities. Testing should cover different dimensions of resolvability and phases of a bank failure, including governance and communication arrangements, and be

¹⁵ [The EBA publishes its final Guidelines on the management of ESG risks | European Banking Authority.](#)

¹⁶ [ESAs publish joint Guidelines on ESG stress testing | European Banking Authority.](#)

informed by severe and fast-moving scenarios. Testing should also support the identification of areas for simplification and increased efficiency.

In addition to the topics above, RAs are expected to consider the implications of emerging threats, including geopolitical risks, cyber risks and other potential disruptions, as part of their resolution planning and preparedness activities.

Further information is provided in the tables that follow.

Key priority 1: Operationalisation of resolution tools				
	Focus elements			
Element	1	2	3	4
Bail-in	Adequate arrangements in place to operationalise resolution tools and the accompanying resolution powers. Where challenges are identified, RAs work on identifying and implementing appropriate mitigants, where possible.	Adequate level of engagement with all relevant stakeholders, including with FMIs, to allow for a smooth execution of resolution tools and powers, especially where the exercise of discretionary powers by external stakeholders are necessary or envisaged. Identification of the relevant stakeholders for each resolution tool and power, the moment the interaction with the stakeholder is envisaged, and the desired outcome.	Work on identifying challenges and mitigants in relation to bailing in third country liabilities	Work on ensuring adequate interlinkage of the resolution plan and recovery plan options. Alignment between the RA and CA for the potential outcome of a resolution strategy (SPE / MPE) and envisaged resolution tools, including potential coordination and requirements for the stabilisation phase. The possible impact of recovery options implementation should continue to be assessed to make the link with the resolution plans
Bridge institution				
Sale of business				
Asset separation tool				
Resolution powers				

Key priority 2: Operationalisation of liquidity and funding strategies in resolution			
	Focus element		
Element	1	2	3
Work on collateral	Work on identification of different collateral classes and their functioning in resolution	Work on institutions' capabilities to mobilise collateral	Progress thinking on counterparty eligibility and use of different collateral types in resolution, including exchanges with relevant stakeholders such as the Central Bank
Reporting for liquidity	Continue the work on identification of relevant and crucial data points or reports for liquidity in resolution	Ensure institutions have adequate capabilities to report specific liquidity data points within needed deadlines and with satisfactory accuracy	
Standard scenario (minimum scenario features)	Usage of adequate assumptions on the speed of the crisis (fast burning) and on the severity of the scenario (leading to failure)	Use of scenarios embedding links between recovery options and resolution specific assumptions (i.e. hypothesis that recovery options were used but they were not successful leading to specific impact on the target institution, e.g. depletion of CB eligible collateral, no market funding, etc.)	

Key priority 3: Testing resolution readiness				
	Focus element			
Element	1	2	3	4
Resolution execution – RAs led simulations	Ensure that RAs test their own capabilities, improving the readiness and operational capabilities to execute resolution procedures, resolution tools and powers.	Testing internal and external governance and communication arrangements, to effectively coordinate resolution execution with external stakeholders	Scenarios should be informed by latest developments (fast-paced, liquidity driven, potential loss of central bank collateral). Where appropriate, at least one scenario should envisage an extreme and novel threat event, such as cyber incident or war.	RAs can identify during testing elements in the processes and data requirements which need to be adjusted to be fit for purpose or which are redundant thus providing room for simplification
Resolution execution – institution testing	Multiannual testing programmes set by RAs and performed by institutions should holistically test institutions' capabilities to execute the resolution strategies, resolution tools and resolution powers set out in the resolution plan, including the delivery of expected liquidity and funding			



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