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European Banking Association  
(Formal submission via EBA Consultation page)

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**Response to the consultation Draft Implementing Technical Standards on Supervisory Reporting requirements for institutions under Regulation (EU) No 575/2013.**

I am setting out the Society's position on the draft proposals set out in the aforementioned Consultation released on 16 October 2019.

The Society notes the extent of change and also the relatively short time frame for implementation given an expectation that the results of the consultation will not be known until June 2020 and implementation is from reporting for the June 2021 quarter end. The PRA's Dear CEO letter of 1 November 2019 underlined the importance of robust interpretation, data sourcing and controls. There is a degree of inconsistency between this desire for greater robustness in reporting and the short implementation timeline especially given other activity on the regulatory agenda which also requires rapid implementation and the number of changes a broad range of templates. The rapid implementation period is therefore unwelcome.

The Society would therefore suggest a modest delay in implementation until reporting in 2022 and believes that this would result in more robust and fully tested reporting.

We are happy to discuss these views.

Yours faithfully,

Michele Faull

Chief Financial Officer