Consultation Response

EBA Reporting Simplification: Overarching Comments

July 2026

Consultation Questions

Overview of questions for consultation

Question 1. What are respondents' views on the proposed changes to the text of the ITS?

AFME and its members note that while the draft ITS does streamline and simplify reporting for banks in several aspects, some of the perceived simplification comes from transferring requirements from one reporting set to another, which does not lead to effective burden reduction for banks. The industry further notes that the package also includes new reporting requirements with additional implementation effort by banks. AFME notes that the burden of implementing a new requirement on banks is significantly larger than the relief coming from discontinuing reporting, as investment for the discontinued reporting has already been made. Therefore, we would advise the EBA to critically consider the need for any additional reporting as part of the package, given that the net change of data points does not fully capture the net impact on banks.

The industry observes that banks are required to report a very high number of data points under the current reporting standards. While broad reporting requirements can be seen to improve risk identification by supervisors and comparability across banks, their downside are increased compliance costs and administrative burden for banks which calls for a substantial rationalisation of requirements. AFME recalls the intent by the European Commission to reduce the reporting requirements of European corporates by 25 %, and considers it important that the EBA's objectives on simplifying reporting are aligned with the Commission's work programme. We would recommend that rather than proposing an evolution of the reporting framework, the EBA should consider a cascading review following a 'stop-the-clock and cleaning' process

AFME notes that the package includes additional requirements on top of Pillar 1 requirements, most notably the templates to transitional arrangements of the output floor. We are concerned of the costs and benefits related to this reporting, as banks are to quite rapidly (proposed start Q3/2027) to start reporting on transitional arrangements which are set to expire between 2029 and 2032.

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AFME notes that the overall quality of the EBA's reporting framework releases could also be further improved. AFME considers that fewer errors in requirements and validation rules would lead to significant operational relief for banks as well as supervisors. While we appreciate the EBA's efforts to streamline and enhance the supervisory reporting framework, we believe that several aspects of the consultation package would benefit from greater clarity and more detailed specifications.

In a number of instances, the CPs do not offer sufficiently clear instructions regarding the intended implementation of new requirements or modifications to existing reporting obligations. In order to ensure a correct and consistent implementation across institutions, it would be highly beneficial for the EBA to provide additional guidance, including practical examples and illustrative reporting cases within the instructions.

The proposed ITS appears to give limited consideration to proportionality in certain areas. New thresholds and reporting requirements may have a particularly significant impact on larger international banking groups, especially where reporting obligations are expanded without a corresponding assessment of materiality.

In the meantime, the absence of consideration given to materiality on the resubmission of historical data leads to unnecessary and costly resubmissions; the EBA should introduce transparent risk-based materiality thresholds for report resubmissions – going beyond the EUR 10k absolute threshold in current EBA guidance. An approach similar to the approach developed by ECB to identify significant resubmissions should be adopted. New thresholds should be transparent, and interim relief should be granted until a new framework is in place. We would suggest in addition that changes owing to methodological or interpretative developments should be explicitly excluded from resubmission requirements.

Given that the final EBA report is supposed to be delivered to the European Commission by the end of this year and the adoption will take place in the first quarter of 2027 at the earliest, the date of 30 September 2027 for the initial reporting deadline for the most modules appears extremely ambitious. In our view, a period of just six to nine months is clearly insufficient to make extensive system upgrades and poses significant operational challenges that are unlikely to be manageable within the given timeframe. Hence, we suggest extending the implementation period until September 2028.

More widely, we believe that an explicit commitment to stability should complement the simplification agenda. Any significant modification to reporting modules should be accompanied by a minimum stability period of five years. Such an approach would allow institutions to amortize implementation costs, enhance data quality, and reduce the operational strain associated with continuous regulatory change, ultimately supporting a more efficient and robust reporting framework for both industry and supervisors.

We have completed the EBA's survey response templates to the best extent possible but we have been restricted by the limited number of characters available and the inability to attach more detailed feedback documents. We would ask therefore the EBA considers the full feedback from AFME and its members as set out in this document and the full feedback from other respondents also. We would recommend that the EBA should review the practice of issuing restrictive feedback templates as this provides barriers to respondents being able to provide comprehensive feedback in the most effective and meaningful ways.

Question 2. What are the respondents' views on the practicability and usability of the communication tools regarding the reporting requirements provided on the EBA website (time traveller, signposting tool, reporting frameworks overview)?

The signposting tool was not updated for a long time between August 2023 and 2025, and at the time of writing it still has outdated requirements regarding Operational Risk. While it would be a helpful tool conceptually, the practical implementation is not ideal. E.g. at the time of implementing CRR3 it didn't help identify that C10 is supposed to be filled in by IMM institutions. Suggestions: A. Move it to a more robust platform (instead of Excel) B. Combine it with the time traveller tool and update it with past and upcoming filing requirements.

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

The reporting frameworks overview has significantly improved recently. It is confusing to new users that ITSs are labelled as "IT Solutions", it would make more sense to label them "Reporting templates and instructions".

Further improvements could include:

i. Combining reporting templates with instructions in an interactive manner, where instructions can be viewed alongside the reporting templates. Including references to Level 1 text where applicable.

ii. Bringing back the Single Rulebook which used to include the Level 1 text and not just a reference to the OJ.

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

<u>Rationale for reporting requirements</u>

The EBA could aim at better explaining the rationale for reporting requirements by introducing a "Regulatory Rationale Annex" for change explaining its legal basis, the diverse policy options and expected cost impact (the same transparency exercise could be set for taxonomies).

<u>Structured dialogue with the industry</u>

The EBA could envisage to have a more structural dialogue with the industry prior to the publication of supervisory reporting ITSs. While data management and reporting is organised differently across banks, having more and targeted conversations with end-users could further shape requirements in line with operational realities and could avoid an unbalanced cost-benefice trade-off.

Ex-post impact assessments after publications of supervisory reporting ITSs

The EBA could for instance review all existing consistency checks (EGDQs, validation rules) to assess relevance, accuracy and avoid overlap.

For these 2 last issues, we recommend that the EBA consults the IASB modus operandi which could serve as a source of inspiration.

Further observations

Changes to templates are a significant part of the cost of compliance for reporting teams. As such it is best if changes are implemented in batches and templates remain unchanged for several periods. An annual update cadence, e.g. for each Q3 would benefit reporting institutions. Turning off templates does not attract a high cost and is welcome at any time.

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

We support the introduction of a fixed calendar for implementing new or amended reporting requirements. We believe this approach would provide greater predictability and facilitate more effective resource planning.

Establish fixed six-month intervals for introducing new reporting changes via taxonomy releases. This cadence would allow institutions sufficient time to assess requirements, develop solutions, and conduct thorough testing;

We have noted instances where the EBA taxonomy releases have been delayed but still expect the go-live to remain the same. Therefore, we suggest that new taxonomies should be released at least 6 months before the go live date:

In instances where the EBA the taxonomy release is delayed; the taxonomy should be automatically delayed to the next 6-month release window.

Underlying regulatory requirements should be planned with sufficient lead time to accommodate the fixed calendar framework, rather than requiring reporting entities to compress their implementation timelines.

A fixed calendar will enable firms to:

- Better allocate resources and plan system changes with complete certainty;

- Reduce the risk of implementation errors due to compressed timelines;
- Minimise disruption to business-as-usual reporting activities across all reporting frequencies;
- Improve the quality of regulatory submissions through more structured preparation; and

This structured, unified approach would benefit both reporting entities and regulators by ensuring more consistent and reliable implementation of regulatory changes across the entire reporting landscape.

We note the publication of a list of known data point model issues by the EBA on 9 April which indicates that perhaps insufficient testing was performed prior to the release of new taxonomies and therefore a more considered approach might be appropriate.

Finally a Q3 / September month-end appears best for the calendar: Q4 is year-end and risky. Q1 is too close to year-end and is impacted by the requirement to resubmit Q4. Q2 is in the summer and impacted by the holiday season.

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

We would not support permitting early implementation. This would be counterproductive to the fundamental purpose of establishing fixed calendar releases and implementation timeframes.

The key benefits of a fixed calendar—predictability, structured resource planning, and operational efficiency—would be significantly undermined if firms were expected or permitted to commence reporting up to six months earlier than the scheduled dates.

- Allowing early commencement contradicts the core objective of creating certainty and standardisation across the industry;
- Firms allocate resources based on fixed deadlines; early implementation requirements would reintroduce the unpredictability the fixed calendar aims to eliminate; and
- Compressed timelines increase the risk of errors and inadequate testing, which could undermine the reliability of regulatory reporting.

The fixed calendar should be adhered to strictly, with implementation dates aligned to the predetermined schedule. Any underlying regulatory requirements should be planned with sufficient lead time to accommodate the fixed calendar, rather than requiring firms to accelerate their reporting timelines.

Question 7. How could it be possible to quantify the impacts on reporting costs of measures to improve predictability and stability?

We propose that the number of resubmissions after a change is measured across reporting institutions.

Question 8. Which share of the burden reduction is driven by changes in the reporting frequency and by the reduction of data points?

Reporting frequency reduces the burden more than the reduction in data points. Underlying each submission is a pool of data that has to be reviewed and cleansed. It is the generation and cleansing of the data pool that attracts the largest portion of the cost, and this has to be done for each reporting period.

Table 4. Other remarks

Please provide here any remarks that you deem important regarding the former tables filled. Please also make any other remark you deem important regarding the costs of reporting (for instance, remarks on: (i) has one particular EBA template – even the ones not concerned by changes in this consultation paper - or even one row in a specific template disproportionate costs? Or disproportionate costs vs the foreseen benefits? (ii) Are there particular significant information about reporting costs that would not be revealed by former tables (iii) What changes – proposed or not in this consultation - would deliver the most cost reduction? (iv) what is the degree of impact of different costs drivers? etc.).

We consider that the proposed revisions to the Asset encumbrance templates is not a simplification and consists of significant changes with an associated cost to overhaul and redesign the existing reporting build. We welcome the commitment of the EBA and other European policymakers and regulators to the simplification of the reporting framework and the constructive dialogue that has commenced.

We would urge to reconsider the template F14 of FINREP requirements to report the "change in fair value" and "accumulated change in fair value" sections – as it requires reporting institutions to join P&L data to balance sheet and create a new grossed-up analytical view solely for FINREP reporting purposes. Such grossed-up view is not used by management to analyse the P&L (i.e. nil internal management utility) and takes disproportionate amount of costs to produce the template for the supervisory value it yields.