

EBA/ITS/2025/04

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Final Report

Final Draft Implementing Technical Standards

on the provision of information for the purposes of resolution plans pursuant to Directive 2014/59/EU and repealing Commission Implementing Regulation (EU) 2018/1624

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1. Executive Summary

Collecting relevant and accurate information on institutions is crucial for resolution authorities to draw up resolution plans and perform resolvability assessments.

Acting upon its mandate, the EBA developed the original Implementing Technical Standards (ITS) on information for resolution plans in 2014–2015. Since then, resolution authorities have gained more experience in preparing resolution plans and have refined their information requirements to reflect the evolution in the process. While the EBA updated the ITS in 2018 with a view to fostering further harmonisation, new data needs were later identified by resolution authorities based on the additional experience gained during this period, and separate data collections have been set up by the Single Resolution Board (SRB) and by other resolution authorities. These separate data collections coexist today with the EBA ITS.

The current comprehensive review of the ITS aims, on the one hand, to further promote harmonisation, proportionality and simplification in resolution planning reporting by avoiding parallel data collections, and by eliminating data points that are either redundant or of limited value. On the other hand, it aims at improving the usability of the data collected by resolution authorities, reflecting the latest developments in resolution planning, crisis preparedness and policies, and at delivering efficient practices.

Proportionality is a key principle for European legislators and the EBA has taken into account this objective and the burden on institutions. Proportionality is already embedded in the BRRD under the simplified obligations. Additionally, proportionality should be driven by these new ITS by:

- relieving entities from parallel data collections based on legal obligations coming from different authorities;
- the implementation of a modular core-plus-supplement approach that reduces the scope of reporting obligations for certain categories of reporting entities based on their size and complexity. These entities would only be subject to some core reporting requirements while the additional reporting requirements would only be applicable to the larger or more complex entities;
- The removal of duplications and overlapping data points with MREL/TLAC, CoRep and FinRep, where the reporting entity has already submitted this data.

The scope of reporting entities subject to the new ITS has been expanded with the introduction of reporting specifically targeting liquidation entities not subject to simplified obligations, and the lowering of the relevant legal entity threshold from 5% to 2%. However, the ITS require reduced reporting obligations for liquidation entities not subject to simplified obligations compared, for example, to resolution entities. Besides, for institutions under the remit of the SRB, the new ITS do not change the scope of reporting entities, since the definition of relevant legal entity (RLE) in the

new ITS reflects the current RLE definition applied in the SRB reporting. For institutions under the remit of resolution authorities within the banking union, for which the changes in the ITS are new, no change to the current reporting obligations for smaller entities is anticipated. In non-banking union jurisdictions, an increase to the entities in scope can be expected.

As concerns the remittance dates, in the Consultation Paper for these ITS, an earlier remittance date of 31 March was proposed, one month earlier than the current remittance date. This change is justified by the introduction of granular reporting of the liability data, which, as experience from resolution authorities has shown, requires additional efforts in terms of the data quality assessment performed on the data collected. Following the public consultation on the ITS, the industry was not in favour of this proposal, citing conflicts with the remittance dates of other reporting obligations. As a compromise, the EBA has split the ITS into two modules:

- a first module containing data on the organisational structure and liability data (aggregate and granular), and for which the remittance date will be 31 March;
- a second module containing data on the critical functions, relevant services and Financial Market Infrastructures (FMIs), for which the remittance date will be 30 April.

This compromise is expected to grant the time needed for banks to elaborate the reports, while enabling the resolution authorities to address data quality issues that persist in resolution reporting in a timely manner, to support the resolution planning process. Moreover, these ITS ensure harmonisation for banks subject to the reporting obligations so that all banks will now be subject to the same reporting deadlines, regardless of their jurisdiction or size.

The draft ITS will be submitted to the European Commission for endorsement before being published in the *Official Journal of the European Union*. The EBA will also develop the data point model (DPM), XBRL taxonomy and validation rules based on the final draft ITS. The draft ITS provide for the new framework to be operational in 2026, with a first reporting reference date of 31 December 2025.

2. Background and rationale

1. The EBA reporting framework, specified in binding technical standards, is uniform and directly applicable, ensuring harmonisation, a level playing field for institutions, and comparability of data.
2. The stability of the EU financial system and the efficient and orderly functioning of its banking sector depend on the implementation of an effective resolution framework for banks in the EU. The availability of sufficient and uniform bank-level information at the disposal of resolution authorities is crucial for them to draw up resolution plans and perform resolvability assessments.
3. A set of minimum standards for procedures, forms and templates for the collection of information on institutions is necessary for the consistent and effective development of bank-specific resolution plans. It is also necessary in order to provide a common information foundation supporting exchange and collective decision-making within resolution colleges.
4. Following the above rationale, the EU bank resolution framework (Article 11(3) of Directive 2014/59/EU ('the BRRD')) mandates the EBA to develop specific ITS. The EBA developed the original ITS on information for resolution plans in 2014–2015. The EBA then updated the ITS in 2018 with a view to fostering minimum harmonisation. In the intervening period, as experience has developed, separate data collections have been set up by the SRB and by resolution authorities.
5. The EBA has performed a comprehensive review of the current ITS on reporting for resolution planning and execution purposes, in order to foster further harmonisation, to review and build on good practices, and to address shortcomings identified in the current framework.
6. This endeavour is in line with the [EU strategy on supervisory data in financial services](#), supporting overall rationalisation, simplification and consistency in this field. The review also aims to reflect the latest developments in resolution planning.

2.1 Changes to the reporting framework and implementation timeline

7. The draft implementing technical standards aim to introduce changes in resolution planning reporting to foster harmonisation and enhance the usability of data. The main changes introduced in this regard include: bringing forward the submission deadlines for some of the information in order to align them across the different resolution authorities; the amendment of the RLE thresholds; the addition of information on the ownership structure; the introduction of granular reporting of liabilities data; the extension of data reported for

the criticality assessment of economic functions, financial market infrastructures (FMI) and on relevant services for operational continuity.

2.1.1 Proportionality and simplification

8. Proportionality aspects, beyond those related to the harmonisation of reporting practices across authorities, have been taken into account for institutions with simplified obligations, liquidation entities, and via a modular core-plus-supplement approach reporting (see Sections 2.2.4 and 2.3) for specific entities (resolution planning for non-credit institutions). In addition, overlapping data points identified between these ITS and other reporting requirements requested from the same reporting entities (CoRep, FinRep, MREL-TLAC) have been dropped from the ITS¹.
9. The changes reflect some of the information that resolution authorities are already and separately collecting from their institutions, notably those collected by the Single Resolution Board (SRB). In the process of harmonising the reporting in the new ITS, the information has been streamlined compared to the current SRB's data collection in place, as not only have those data requests been integrated into the EBA's overarching resolution planning data set, but this opportunity has also been used to identify and eliminate data points that were either redundant or of limited value for resolution planning.
10. As regards the increase in the scope of reporting entities in the new ITS, an effort has been made to adapt the reporting based on certain entity characteristics related to resolution planning, namely the identification of resolution entities versus liquidation entities. Besides, the concept of simplified obligations has been maintained. For institutions within the remit of the SRB, the new ITS do not change the scope of reporting entities, since the new RLE threshold in the new ITS reflects the current RLE definition applied in the SRB reporting. For institutions under the remit of resolution authorities within the banking union, no major increase is expected, noting that the concept of simplified obligations has been maintained. In non-banking union jurisdictions, an increase to the entities in scope can be expected.
11. Overall, compared to the latest version of the ITS on Resolution Planning reporting², approximately 1 500 data points have been added, of which approximately 1 440 (including data points that existed before, but the definition has changed) are already reported by institutions under the supervision of the SRB.

¹ This would apply when the scope of prudential consolidation coincides with the scope of consolidation of the resolution group.

² Commission Implementing Regulation (EU) 2018/1624 of 23 October 2018 laying down implementing technical standards with regard to procedures and standard forms and templates for the provision of information for the purposes of resolution plans for credit institutions and investment firms pursuant to Directive 2014/59/EU of the European Parliament and of the Council, and repealing Commission Implementing Regulation (EU) 2016/1066. (OJ L 277 7.11.2018, p. 1).

12. The parallel reporting currently collected by resolution authorities and by the SRB that overlaps with the reporting data, and which will be collected under the new ITS, should be discontinued³.

Mapping of changes

EBA Reporting Framework 4.2				
Template	Template Description	Short Name	Extent of Changes Compared to EBA 3.2	Extent of Changes Compared to SRB 9.0.3
Organisational Structure				
Z 01.01	Legal Entities	ORG 1	Report overhauled	New report
Z 01.02	Ownership Structure	ORG 2	New report	New report
Aggregate Liability Data				
Z 02.00	Liability Structure	LIAB 1	Report overhauled	No changes
Z 03.01	Own Funds Requirement - Credit Institutions	LIAB 2	Revised data points	Revised data points
Z 03.02	Own Funds Requirement - Investment Firms	LIAB 3	New report	New report
Z 04.00	Intragroup Financial Interconnections	LIAB 4	Revised data points	New report
Z 05.01	Major Liability Counterparties	LIAB 5	No changes	New report
Z 05.02	Major Off Balance Sheet Counterparties	LIAB 6	No changes	No changes
Z 06.00	Deposit Insurance	LIAB 7	No changes	New report
Critical Functions				
Z 07.01.1 to Z 07.01.5	Criticality assessment of economic functions	FUNC 1	Report overhauled	Revised data points
Z 07.02	Mapping of economic functions by legal entity	FUNC 2	No changes	New report
Z 07.03	Mapping of core business lines to material legal entities	FUNC 3	No changes	New report
Z 07.04	Mapping of critical economic functions to core business lines	FUNC 4	No changes	New report
Relevant Services				
Z 08.01	Relevant Services	SERV 1	Report overhauled	New report
Z 08.02	Relevant Services – mapping to assets	SERV 2	New report	New report
Z 08.03	Relevant Services – mapping to roles	SERV 3	New report	New report
Z 08.04	Relevant Services – mapping to critical functions	SERV 4	New report	New report
Z 08.05	Relevant Services – mapping to core business lines	SERV 5	New report	New report
Financial Market Infrastructures				
Z 09.01	FMI Services – Providers and Users	FMI 1	Report overhauled	Revised data points
Z 09.02	FMI Services – Mapping to Economic Functions	FMI 2	New report	Revised data points
Z 09.03	FMI Services – Key Metrics	FMI 3	New report	SRB report removed
Z 09.04	FMI Services – CCPs – Alternate provider	FMI 4	New report	NA
Granular Liability Data				
Z 11.00	Intragroup Liabilities, excluding Derivatives	LIAB G 1	New report	Revised data points
Z 12.00	Securities (Including CET1, AT1 & Tier 2 Instruments; Excluding intragroup)	LIAB G 2	New report	SRB reports removed
Z 13.00	All Deposits (excluding intragroup)	LIAB G 3	New report	Revised data points
Z 14.00	Other Financial Liabilities (not included in other tabs, excluding intragroup)	LIAB G 4	New report	Revised data points
Z 15.00	Derivatives	LIAB G 5	New report	Revised data points
Z 16.00	Secured Finance, excluding intragroup	LIAB G 6	New report	Revised data points
Z 17.00	Other Non-Financial (not included in other tabs, excluding intragroup)	LIAB G 7	New report	Revised data points

13. Where data points have already been reported for the same entity, reporting scope and reference date, Article 9 of the ITS on cooperation between competent and resolution authorities explicitly exempts double reporting, encouraging resolution authorities to seek these data points where they already exist via data sharing among authorities.
14. Finally, some initial proposals considered when reviewing the ITS were disregarded and excluded from the Consultation Paper for the sake of simplification and considering the ‘need to have’ versus ‘nice to have’ principle: reporting on funding and liquidity in resolution, the impact of DORA on the reporting of critical information systems, formalisation of the Group-Level Resolution Authority (GLRA) versus host RA reporting, expansion of the reporting scope for banks with simplified obligations.

2.1.2 Timeline and other considerations

15. The draft ITS provide for the new framework to be operational in 2026 when resolution authorities collect information as of 31 December 2025, the first reporting reference date.

³ Some jurisdictions have identified overlapping reporting that will be discontinued.

16. The planned review of the RTS on the content of resolution plans may result in further updates to the ITS on Resolution Planning reporting. It is still unclear whether this will be the case and, if so, which changes it will drive.

2.2 Reporting changes topic by topic

2.2.1 General remarks

17. The draft ITS introduce changes to reflect the evolution of resolution planning since the previous release of the ITS, as resolution authorities, learning from their experience, have developed ad hoc parallel reporting to capture the data deemed essential for resolution planning and crisis preparedness. This ITS review takes into account those separate additional data requests and aims primarily to harmonise and centralise them as a single data request to banks.
18. Policy products, in particular issued by the EBA⁴ and by resolution authorities over the years, have also influenced the scope of this ITS update.
19. Taking into account the wide scope of reporting entities subject to the ITS, an effort has been made to adapt the request based on certain entity characteristics related to resolution planning, namely the identification of resolution entities versus liquidation entities. In an effort to limit the reporting burden on banks while still providing resolution authorities with the data needed to actively fulfil their mandates, the concept of simplified obligations has been maintained.

2.2.2 Reporting deadlines

20. The draft ITS introduce a change in the submission deadline from 30 April to 31 March for the templates Z 01.01, Z 01.02, Z 02.00, Z 03.01, Z 03.02, Z 04.00, Z 05.01, Z 05.02, Z 06.00 and Z 11.00 to Z 17.00, while keeping the 30 April deadline for the rest. The split aims to address concerns raised by the industry on advancing the remittance date for all reports, and the impact this has on their reporting burden. This would give resolution authorities more time to execute data quality assessments, in particular on the granular liability data reported. The earlier delivery of certain templates also facilitates the more efficient use of the data in the resolution planning process. The anticipation of the submission deadline would be aligned with the current practice by some resolution authorities. The presence of two separate remittance dates in the ITS ensures harmonisation for banks subject to the reporting obligations, such that all banks will now be subject to the same reporting deadlines, regardless of their jurisdiction or size.

2.2.3 Relevant Legal Entity (RLE) threshold

⁴ EBA Guidelines on improving resolvability for institutions and resolution authorities under Articles 15 and 16 BRRD (Resolvability Guidelines) – EBA/GL/2022/01 and EBA/GL/2023/05.

21. The RLE threshold as defined in the ITS is reduced from 5% to 2%. The threshold is referenced to the resolution group. An absolute threshold based on total assets (above EUR 5 billion) has also been added, to be considered alongside the importance of the entity for the financial stability of at least one of the Member States in which the group has their registered offices or operates.
22. With the revised thresholds, the scope of entities for which data are collected is broader, improving data available for the Public Interest Assessment (PIA) (assessing financial interconnections, impact on FMIs, building network models to assess the group's propagation of losses), and is aligned with the current practice of some resolution authorities.
23. The reporting impact is expected to be mainly at the level of the number of entities reporting aggregate liability data and critical assessment of economic functions. Indeed, other than resolution entities, RLEs are only requested to deliver a limited number of reports, and RAs maintain the right to apply simplified obligations for smaller entities.

2.2.4 Overview of revised reporting obligations

Template	Template Description	Short Name	Institutions and Groups under Simplified Obligations	Institutions that are not part of a Group		Groups						
				Resolution Entity	Liquidation entity not subject to Simplified Obligations	Liquidation Entity not subject to Simplified Obligations		Union Parent Undertaking or Resolution Entity		RLEs that are institutions		Other RLEs
						(Sub-) Consolidated	Individual	(Sub-) Consolidated	Individual	(Sub-) Consolidated	Individual	
Organisational Structure												
Z_0101	Legal Entities	ORG 1				*		*				
Z_0102	Ownership Structure	ORG 2		*	*	*		*				
Aggregate Liability Data												
Z_0200	Liability Structure	LIAB 1		*	*	*	*	*	*	*	*	
Z_0301	Own Funds Requirement - Credit Institutions	LIAB 2		*				*	*	*	*	
Z_0302	Own Funds Requirement - Investment Firms	LIAB 3		*				*	*	*	*	
Z_0400	Intragroup Financial Interconnections	LIAB 4				*		*				
Z_0501	Major Liability Counterparties	LIAB 5		*	*		*		*		*	
Z_0502	Major Off Balance Sheet Counterparties	LIAB 6		*	*	LIAB 6	*		*		*	
Z_0600	Deposit Insurance	LIAB 7		*	*		*		*		*	
Critical Functions												
Z_0701.1 to Z_0701.5	Criticality assessment of economic functions	FUNC 1		*	*	*	*	*	*		*	
Z_0702	Mapping of economic functions by legal entity	FUNC 2						*				
Z_0703	Mapping of core business lines to material legal entities	FUNC 3						*				
Z_0704	Mapping of critical economic functions to core business lines	FUNC 4		*	*	*	*	*	*		*	
Relevant Services												
Z_0801	Relevant Services	SERV 1		*				*				
Z_0802	Relevant Services – mapping to assets	SERV 2		*				*				
Z_0803	Relevant Services – mapping to roles	SERV 3		*				*				
Z_0804	Relevant Services – mapping to critical functions	SERV 4		*				*				
Z_0805	Relevant Services – mapping to core business lines	SERV 5		*				*				
Financial Market Infrastructures												
Z_0901	FMI Services – Providers and Users	FMI 1		*	*	*		*				
Z_0902	FMI Services – Mapping to Economic Functions	FMI 2		*				*				
Z_0903	FMI Services – Key Metrics	FMI 3		*				*				
Z_0904	FMI Services – CCPs – Alternate provider	FMI 4		*				*				
Granular Liability Data												
Z_1100	Intragroup Liabilities, excluding Derivatives	LIAB G 1							*		*	
Z_1200	Securities (Including CET1, AT1 & Tier 2 Instruments; Excluding intragroup)	LIAB G 2		*					*			
Z_1300	All Deposits (excluding intragroup)	LIAB G 3		*					*			
Z_1400	Other financial Liabilities (not included in other tabs, excluding intragroup)	LIAB G 4		*					*			
Z_1500	Derivatives	LIAB G 5		*					*			
Z_1600	Secured Finance, excluding intragroup	LIAB G 6		*					*			
Z_1700	Other Non-Financial (not included in other tabs, excluding intragroup)	LIAB G 7		*					*			

24. The table above provides an overview of the reporting obligations of the revised ITS and how they are expected to apply to the various types of reporting entities. Articles 2 to 5 of the draft legal act elaborate on these changes.
25. An explanation of the changes to the various sections resulting from this ITS is provided in the sections below.


2.2.5 Reporting by liquidation entities

26. To the extent that liquidation entities (regardless of whether they are part of a group) are not subject to simplified obligations, they will be subject to reporting only the organisational structure, aggregate liability data, providing a criticality assessment of their economic functions, and reporting on FMI. The intention here is to limit the reporting burden on these entities, while ensuring that resolution authorities receive representative data from the banks in their jurisdiction.

2.2.6 Removal of overlapping data points

27. Where a data point in the ITS has already been reported by the reporting entity for the same consolidation scope and reference date under CoRep, FinRep or MREL-TLAC, the entity is not required to report this data point a second time for resolution planning.
28. The aim is to reduce the burden on banks so they only report once, as resolution authorities can already access this data.
29. Where the reporting entity is not subject to CoRep or FinRep reporting obligations or has provided them for another reporting scope or reference date, the reporting obligation in the ITS needs to be fulfilled.

2.2.7 Organisational structure

Scope	What has changed	Why
Z 01.01 – Legal Entities	- Coverage of all entities in the consolidated accounting perimeter (no materiality threshold)	For completeness of reporting
	- Identification of LEI code of the Point Of Entry for each entity reported	To facilitate the identification of resolution groups
	- Reporting on Contribution to consolidated prudential and accounting figures for operating income, net income, total exposure measure and total risk exposure amount.	For completeness of reporting by subsidiaries not subject to supervisory reporting
Z 01.02 – Ownership Structure 	- New table used to characterise each legal entity of the group and qualified investors based on the consolidated accounting perimeter. - Covers all shareholders of the group's entities with more than 2% of the share capital (or equivalent) or voting rights.	Facilitates the analysis of contagion.

30. The current report on legal entities has been expanded to cover all entities in the legal structure of the group. For each legal entity, the group is expected to report the Legal Entity

Identifier (LEI) of the point of entry of the resolution group. The aim is to enable RAs to identify the resolution group structure more easily, in particular where a multiple-points-of-entry strategy is foreseen. Certain financial data points that can be accessed for other sources (e.g. supervisory reporting) have been removed to reduce the reporting burden on banks.

31. Additional data are requested on the ownership structure of the group to define all shareholders of the group's entities with more than 2% of the share capital (or equivalent) or voting rights, and all the shareholdings (or equivalent) held by entities of the group. This would enable, among other things, a more comprehensive understanding of the structure of the resolution group and the impact of contagion.
32. Reporting would apply once at the level of the group, to limit the associated reporting burden.

2.2.8 Additional liability data

Scope	What has changed	Why
Z 02.00 – Liability Structure	- Carrying Amount included	To support ongoing work on MREL policy
	- New counterparty added : « of which Insurance firms and pensions funds »	Analysis of contagion
Z 03.01 – Own Funds Requirement Credit Institutions	- Removal of reporting obligation for data points already reported by the bank for the same reference date and reporting scope under Regulation 575/2013	Reduce reporting burden on banks by removing double reporting obligations
Z 03.02 – Own Funds Requirement Investment Firms	- Dedicated Own Funds definitions applicable to Investment Firms, based on Regulation (EU) 2019/2033	To clarify reporting obligations for investment firms
Z 04.00 – Intragroup Financial Interconnections	- Expansion of scope to include liabilities excluded from bail in	To better assess financial interconnections within the group, influencing the decision on the SPE vs MPE approach.
	- No thresholds on the size of the entities in scope (no RLE/MLE threshold applied)	More complete scope of data collected.
	- This is a new report for banks under the SRB remit.	Harmonisation of reporting obligations across Member States
Z 05.01 – Major Liability Counterparties	NO CHANGE	Data fit for purpose
Z 05.02 – Major Off Balance Sheet Counterparties		
Z 06.00 – Deposit Insurance		

33. The proposal expands the current scope of reporting on the Liability Structure to include the 'Carrying Amount' in addition to the 'Outstanding Amount', to support ongoing policy developments on MREL.
34. Following the introduction of the MREL-TLAC reporting in 2022, and given the access to prudential data already reported by banks, the reporting on own funds has been simplified. As concerns reporting of own funds by investment firms, a dedicated table has been introduced referring to those data points applicable to these types of entities.

2.2.9 Criticality assessment of economic functions

Scope	What has changed	Why
Z 07.01.1 to Z 07.01.5 – Criticality assessment of economic functions	- Introduction of Regional level reporting	Flexibility enabled to support resolution planning, but this is OPTIONAL.
	- Expanded reporting on Impact and Substitutability analyses	To reflect the data needs for a more efficient assessment by banks and RAs of a bank's critical functions.
	- Onboarding capacity	To assess the theoretical capacity of an entity to absorb the critical functions of a failing bank.
	- 'Comments from the Group' section	Enable the bank to specify assumptions used in criticality assessment, e.g. for market share estimation. This contributes to better data quality and improved communication between RAs and banks.
Z 07.02 Mapping of economic functions by legal entity Z 07.03 Mapping of core business lines to material legal entities Z 07.04 – Mapping of critical economic functions to core business lines	Immaterial changes	Data fit for purpose

35. The proposal expands the current scope of reporting of critical functions to request more details on impact and substitutability analysis and additional numeric indicators relevant to the functions. These changes are in line with existing data requests to banks under the SRB remit. The objective is to improve the quality of the RA assessment of the criticality of the bank's functions.
36. For all functions reported, an impact and substitutability analysis is required, in accordance with Commission Delegated Regulation (EU) 2016/778 on critical functions, and covers the following aspects:
 - a. The nature and reach of the activity – this covers size indicators to specified by the reporting entity based on a predefined list of values.
 - b. The relevance of the institution, on a local, regional, national or EU level, as appropriate for the market concerned.
 - c. The market structure (market concentration).
 - d. The timing (expected time for substitution). and
 - e. Ability for substitution (this assesses any legal barriers to market entry or expansion, as well as operational requirements for substitution).
37. A comments section has also been introduced to enable banks to communicate the reasoning behind their assessment. This facilitates the review and understanding by RAs of the banks' criticality assessment and is expected to reduce requests for resubmissions stemming from RAs.
38. In addition to these changes, which apply across the board to reporting on all functions, other quantitative data requests specific to the underlying function reported have been added.

39. For the Deposit functions, the value on accounts is required, with a new obligation to specify the amount that is uninsured and the amount that is related to recurrent accounts. Similarly, the numeric indicator on what number of clients has been reported will be complemented with additional quantitative data on the number of accounts (including the details of recurrent accounts) and an indicator of cross-border activity.
40. For the Lending activities, the outstanding amount of cross-border values has been added.
41. For the Payments function, the value of transactions on recurrent accounts has been added, similar to the request for deposits. Further details are requested on the cross-border activities, including the value of transactions, the value of open positions and the value of assets under custody. Note that these data points are only expected to be reported in line with the underlying function (e.g. the value of open positions is only relevant for CCP clearing services). This aim is providing increased clarity on the definition of the values to be reported, to ensure that the data received by RAs are relevant for resolution planning.
42. For Capital Markets, similar to Payments, the definition of cross-border values to be reported has been refined to specify the values that apply to the different types of economic functions reported (notional amount, carrying amount, fee income). Reporting on the number of counterparties and the number of transactions has also been introduced.
43. For Wholesale Funding, the additional quantitative data requested covers reporting on (reverse) repurchase agreements, cross-border values and the value at credit institutions for the economic functions reported.
44. The notion of onboarding capacity has been introduced for Deposits and Payments functions, which aims to assess the theoretical capacity of an entity to absorb the critical functions of a failing bank. Specifically, the number of applications from new customers that can be processed over 1 and 7 working days is used as a proxy to assess the onboarding capacity.

2.2.10 Extension of data reported on Relevant Services

Scope	What has changed	Why
Z 08.01 – Relevant Services	Additional data points integrated to cover: <ul style="list-style-type: none"> - critical intra-entity services, - essential services (intra-entity, intra-group and external), - operational assets, - staff/roles. 	To improve the analysis of operational continuity in resolution and separability, including requirements from the OCIR guidance (and EBA resolvability assessment guidance) that are currently provided by banks on ad-hoc basis. Aim: avoid double requests for reporting and ensure a consistent approach across the house.
Z 08.02 - Relevant Services – mapping to assets		
Z 08.03 - Relevant Services – mapping to roles		
Z 08.04 - Relevant Services – mapping to critical functions		
Z 08.05 - Relevant Services – mapping to core business lines		
Z 10.01 - Critical Information Systems (general information) Z 10.02 - Mapping of Information Systems	Removed	Data no longer relevant given other changes to reporting on Relevant Services

45. The draft ITS include an extension of the current scope of reporting on services mapped to Critical Functions ('Critical Services') to services mapped to Core Business Lines ('Essential Services'). The reporting would include critical intraentity services, essential services (intraentity, intragroup and external), operational assets and relevant roles, in the form of limited additional data fields to align with requirements for operational continuity in resolution (OCIR) guidance such as that issued by the SRB.
46. The rationale is that the ITS are currently focused on critical services and resources linked to critical functions, while essential services and essential resources linked to Core Business Lines are not reported at all, even though this is a key OCIR expectation. For the sake of completeness, critical and essential assets and roles – together with a limited number of other necessary information fields – have been added in the proposed reporting changes. Moreover, an additional level of granularity for the identification of relevant services has been included in the template, in order to allow for more comprehensive reporting of the services.
47. In line with the extension of data reported on FMI, the objective is to improve the analysis of continuity in resolution and separability, including requirements from the EBA resolvability assessment guidance and the SRB OCIR guidance that are currently provided by institutions on ad hoc basis. The aim is to reduce ad hoc requests for reporting and ensure a consistent approach for all reporting entities.
48. In general, templates Z 10.01 and Z 10.02 have proven to be of limited use in the assessment of resolvability, but rather a source of information on IT systems (IT services are already covered in the revised Z 08.xx) that sometimes helps resolution authorities to confirm or reconcile with other data sources. These templates are proposed to be deleted.
49. Only Union parent undertakings or, if different, resolution entities (including institutions not part of a group), would be subject to the reporting obligations on relevant services.

2.2.11 Extension of data reported on FMIs

Scope	What has changed	Why
Z 09.01 – FMI Services – Providers and Users	Inclusion of mapping of FMI relationships with contracts.	Improvement of data accuracy and reliability; mapping of contracts supporting FMI relationships and monitoring solution-resilience. Experience in FMIR data exploitation and relevance for resolution planning.
Z 09.02 – FMI Services – Mapping to Economic Functions	Introduction of limited additional qualitative and quantitative data fields; removal of fields not strictly necessary for FMIR exploitation.	
Z 09.03 – FMI Services – Key Metrics		
Z 09.04 – FMI Services – CCPs – Alternate provider		

50. It is proposed to add limited information on FMI reporting, namely on contracts identification, notional derivatives, and initial margin. The proposal also clarifies the instructions of existing data fields already reported in the current ITS. The reporting of the resolution resilience of contracts has been introduced to support resolution planning, similar to what is also introduced for the reporting on relevant services.
51. To better assess the theoretical alternatives to CCP providers in the event of a resolution, a new table has been introduced.
52. These changes would allow data reliability and efficiency of exploitation to be improved. Moreover, they would limit the need for further ad hoc request to banks, while allowing the RAs to fulfil their mandate pursuant to Regulation (EU) 2021/23 on the recovery and resolution of central counterparties.

2.2.12 Granular liability data

Scope	What has changed	Why
Z 11.00- Intragroup Liabilities, excluding Derivatives	Reporting level: Individual only Reported by: <ul style="list-style-type: none"> - Union parent undertaking, or - Resolution entities part of a group; - Non-resolution entities (RLEs) part of a group; 	Introduction of granular reporting of liability data to the ITS. This data request has always existed for entities under the SRB remit.
Z 12.00- Securities (Including CET1, AT1 & Tier 2 Instruments; Excluding intragroup)	Reporting level: Individual only Reported by: <ul style="list-style-type: none"> - Resolution entities part of a group and - Institutions (RLEs) not part of a group. 	The introduction of granular reporting to the ITS will increase transparency and report standardisation, and provide clear reporting guidelines in resolution reporting requirements by integrating current SRB reporting obligations to the ITS.
Z 13.00- All Deposits (excluding intragroup)		
Z 14.00- Other financial Liabilities (not included in other tabs, excluding intragroup)	Level of granularity: <ul style="list-style-type: none"> - Securities – granularity at the level of ISIN code issuances and potentially of the counterparty - Deposits: All deposits at contract level, except Not-Covered Not-Preferred deposits with a residual maturity of less than 1 year and Covered deposits and Not Covered but Preferential deposits (regardless of their residual maturity), which should be grouped by counterparty type, by insolvency ranking, and the whether the deposit is secured or unsecured. 	
Z 15.00– Derivatives		
Z 16.00- Secured Finance, excluding intragroup		
Z 17.00- Other Non-Financial (not included in other tabs, excluding intragroup)	<ul style="list-style-type: none"> - Derivatives – granularity at the level of Master Agreement ID - Secured Finance - granularity at the level of Master Agreement ID - Other Financial and Non-Financial Liabilities – contract level granularity and potentially of the counterparty 	

53. It is proposed to expand the scope of the existing reporting of intragroup liabilities (Z 04.00) to include liabilities excluded from bail-in. The introduction of this data request stems from the requirement for the bank to identify mandatory exclusions under Article 44(2) BRRD / Article 27(3) SRMR. The structure of the granular reports enables resolution entities to demonstrate their ability to accurately report the relevant creditor hierarchy of all liabilities in the scope of the aggregate liability reporting⁵. In this way, the resolution entity is able to report the most relevant information about capital instruments, bail-inable subordinated liabilities and senior preferred debt securities.
54. The introduction of granular reporting also enables the RA to analyse, among other aspects, the financial interconnections for the purpose of informing the decision between an SPE or an MPE approach, as well as the mandatory exclusions from bail-in, which may differ between jurisdictions (e.g. Deposit Guarantee Schemes (DGS) application). Note that the entities in scope for Z 04.00 have been extended: all financial interconnections between legal entities (and not just relevant legal entities) that are included in the consolidated financial statements of the group.
55. The draft ITS include the reporting of granular (contract level) data on intragroup liabilities; securities; deposits (not excluded from bail-in); secured financing; financial and non-financial

⁵ SRMR Article 12c(5) and (9d), 17, 20 (16)-(18), 21(10), 27(3); BRRD Article 48, 59, 60; Section B of the Annex to BRRD (point 18); Section C of the Annex to BRRD (points 9, 12 and 17)

liabilities. This type of granular information is already being required by some RAs, including the SRB. The granular reporting would apply to:

- a) resolution entities (all granular tables, at individual scope of reporting);
- b) non-resolution RLEs (limited to reporting on intragroup liabilities).

- 56. The addition of the reporting obligations on granular data to the ITS is expected to increase transparency and report standardisation, and to provide clear reporting guidelines in resolution reporting requirements. The data are of particular use in the analysis of the bail-in-ability of liabilities reported, as it provides details on the insolvency ranking, maturities, counterparties, MREL eligibility, etc., of these liabilities.
- 57. Non-resolution entities (that are RLEs) would be requested to provide granular data at an individual level only on intragroup liabilities, to facilitate analysis by RAs of the level of subordination for internal MREL and to analyse the internal loss transfer capabilities.
- 58. The non-banking union resolution entities and smaller resolution entities within the banking union are expected to be the most impacted entities, to the extent they do not already report some of these or similar data points.
- 59. Liquidation entities and those with simplified obligations would be exempted from granular reporting.

2.3 Cost of compliance

- 60. Proportionality is a key principle for European legislators. This is embedded in the BRRD under the right of resolution authorities to set simplified reporting obligations for institutions whose failure would have limited impact on financial stability.
- 61. The CRR also aims to enhance proportionality, as the rules are better adapted to the size, risk and systemic importance of the institutions. The EBA was mandated under the CRR2 to measure and gain insights into the costs that institutions incur when complying with the supervisory reporting requirements. The EBA was also tasked with assessing whether these reporting costs are proportionate compared to the benefits delivered for the purposes of prudential supervision. Based on that assessment, the EBA made recommendations on how to reduce reporting costs, particularly for small and non-complex institutions (SNICs). The findings from this analysis were included in the EBA study on the cost of compliance with supervisory reporting requirements, published in 2021⁶. The conclusions and recommendations included in this report have been present in the EBA work on successive framework releases since the publication of the report.

⁶ https://www.eba.europa.eu/sites/default/documents/files/document_library/Publications/Reports/2021/1013948/Study%20of%20the%20cost%20of%20compliance%20with%20supervisory%20reporting%20requirement.pdf

62. The EBA has taken into account, in these draft ITS, the objective of proportionality and the need to facilitate compliance by institutions:
63. For institutions that are not part of a group, reporting is expected as follows:
 - a. Resolution entity:
 - i. reporting solely at individual level, by definition, meaning reports relating to group structures are out of scope;
 - ii. introduction of granular reporting of liability data.
 - b. Liquidation entity (not subject to simplified obligations):
 - i. to limit the reporting obligations, only data on the Organisational Structure (shareholdings), Aggregate Liability Data, Financial Market Infrastructures Report (FMIR) and Critical Functions will be requested;
 - ii. reporting solely at individual level, by definition, meaning reports relating to group structures are out of scope.
64. For reporting by Groups:
 - a. Union parent undertaking or Resolution Group:
 - i. both consolidated and individual reporting will exist for this category of reporting entities;
 - ii. 'Host' banks are considered here as Union parent undertakings;
 - iii. reporting at the sub-consolidated level is explicitly introduced into the ITS to formalise existing data requests at this level;
 - iv. granular reporting will be introduced at the individual level only;
 - v. to avoid double reporting, where the resolution strategy is a multiple point of entry, consolidated reporting will only be at the level of and for the scope of the resolution group where the head of the resolution group is also the union parent undertaking;
 - vi. reporting on Organisational Structure, Critical Functions, Critical Services, and Financial Market Infrastructures should only be reported once at the consolidated level for a given resolution group;
 - vii. the criticality assessment of economic functions and the mapping of critical economic functions to Core Business Lines should also be reported at the individual level, in particular where the group has more than one subsidiary

in the same country, and the distinction between entities cannot be derived from the consolidated report.

- b. An 'RLEs that are institutions' category is introduced, with similarly limited reporting obligations as liquidation entities/groups, covering:
 - i. entities that are subject to Internal MREL requirements, as well as;
 - ii. liquidation entities as defined in Article 2(1), point (83aa) of Directive 2014/59/EU.
- c. Other RLEs:
 - i. where there are RLEs in the group that are not institutions, resolution authorities may request data for resolution planning purposes, in line with Article 8 of the ITS;
 - ii. otherwise, these entities are out of scope for the ITS.
- d. Liquidation entities that are part of a group and are not subject to simplified obligations:
 - i. reporting by these entities has been aligned with the reduced reporting obligations of liquidation entities that are not part of a Group.

3. Draft implementing technical standards

COMMISSION IMPLEMENTING REGULATION (EU) .../...

of **XXX**

laying down implementing technical standards with regard to procedures, standard forms and templates for the provision of information for the purposes of resolution plans for credit institutions and investment firms pursuant to Directive 2014/59/EU of the European Parliament and of the Council, and repealing Commission Implementing Regulation (EU) 2018/1624

(Text with EEA relevance)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Directive 2014/59/EU of the European Parliament and of the Council of 15 May 2014 establishing a framework for the recovery and resolution of credit institutions and investment firms and amending Council Directive 82/891/EEC, and Directives 2001/24/EC, 2002/47/EC, 2004/25/EC, 2005/56/EC, 2007/36/EC, 2011/35/EU, 2012/30/EU and 2013/36/EU, and Regulations (EU) No 1093/2010 and (EU) No 648/2012, of the European Parliament and of the Council⁷, and in particular Article 11(3) thereof,

Whereas:

- (1) Commission Implementing Regulation (EU) 2018/1624 of 23 October 2018⁸ specifies the procedure and introduces a minimum set of templates for the provision of information to resolution authorities by credit institutions or investment firms for the purpose of drawing up and implementing resolution plans for institutions. Since

⁷ OJ L 173, 12.6.2014, p. 190, ELI: <http://data.europa.eu/eli/dir/2014/59/oj>.

⁸ Commission Implementing Regulation (EU) 2018/1624 of 23 October 2018 laying down implementing technical standards with regard to procedures and standard forms and templates for the provision of information for the purposes of resolution plans for credit institutions and investment firms pursuant to Directive 2014/59/EU of the European Parliament and of the Council, and repealing Commission Implementing Regulation (EU) 2016/1066 (OJ L 277 7.11.2018, p. 1, ELI: http://data.europa.eu/eli/reg_impl/2018/1624/oj).

the adoption of that Regulation, resolution authorities have gained experience in the area of resolution planning and Directive 2014/59/EU has been amended. In light of that experience and to account for the new provisions of that Directive, it is necessary to update the minimum set of templates for the collection of information for resolution planning purposes.

- (2) Implementing Regulation (EU) 2018/1624 set out a procedure and a minimum set of templates for the provision of information by institutions to resolution authorities in a way that enables resolution authorities to collect that information in a consistent manner across the Union and facilitates the exchange of information among the relevant authorities. However, experience has shown that a harmonised approach to the collection of that information has only been partially achieved. It remains necessary to ensure that resolution authorities collect minimum information relating to an institution or group across the Union on a regular basis. This does not prevent resolution authorities from collecting any additional information they deem necessary to draw up and implement resolution plans or to lay down simplified information obligations in accordance with Article 4 of Directive 2014/59/EU.
- (3) To ensure that group resolution plans cover effectively the group concerned, the reporting obligations imposed on the Union parent undertakings should not be limited to resolution entities only but should also concern other relevant legal entities. Such relevance should, however, be properly delineated to exclude reporting for entities that are not relevant for the group or not systemically important. To that end, relevant thresholds should be set to define the relevant legal entities for the group, on which resolution reporting requirements will be imposed. Furthermore, Directive (EU) 2024/1174 of the European Parliament and of the Council⁹ amended Directive 2014/59/EU and introduced the definition of liquidation entity. To take into account this new definition, there is a need to differentiate resolution reporting requirements for liquidation entities, resolution entities and entities belonging to resolution groups. In particular, there is a need to specify reporting obligations taking into account whether the entities are stand-alone or belong to groups and whether such entities or groups have been identified, or include entities which have been identified, as liquidation entities. These reporting obligations should be set out on an individual, sub-consolidated or consolidated level in a way that ensures proportionality by implementing a core plus supplement approach, does not compromise effective resolution planning, and relieves entities from parallel data collections coming from different authorities, as well as removes overlapping data points with supervisory reporting frameworks. Particular attention should also be given to resolution groups consisting of credit institutions permanently affiliated to a central body and the central body itself to ensure that resolution reporting effectively covers all the credit institutions permanently affiliated to the central body of that resolution group, the central body itself, and their respective subsidiaries, on an individual, sub-consolidated and consolidated level.
- (4) To ensure efficient resolution planning while preserving proportionality, the scope of application of resolution reporting requirements may have to differ from the scope of application of prudential reporting requirements, when this is necessary to ensure

⁹ Directive (EU) 2024/1174 of the European Parliament and of the Council of 11 April 2024 amending Directive 2014/59/EU and Regulation (EU) No 806/2014 as regards certain aspects of the minimum requirement for own funds and eligible liabilities (OJ L, 2024/1174, 22.04.2024, ELI: <http://data.europa.eu/eli/dir/2024/1174/oj>).

that resolution authorities have adequate and credible data to perform their tasks. In this context, it is necessary to ensure that resolution reporting is not impeded by prudential waivers or by resolution groups not subject to prudential consolidation requirements.

- (5) In order to ensure that resolution plans are based on a minimum set of data of consistently high quality and precision, a single data point model should be adopted, as is the practice in supervisory reporting. The single data point model should consist of a structural representation of the data items and identify all relevant business concepts for the purpose of uniform reporting for resolution planning and should contain all the relevant specifications necessary for further developing uniform IT reporting solutions.
- (6) In order to safeguard the quality, consistency and accuracy of data items reported by institutions, those data items should be subject to common validation rules.
- (7) Due to their very nature, validation rules and data point definitions are updated regularly in order to ensure that they comply, at all times, with applicable regulatory, analytical and information technology requirements. However, the time currently required to adopt and publish the detailed single data point model and validation rules means that it is not possible to carry out modifications in a sufficiently rapid and timely manner that would ensure the permanent provision of uniform information regarding resolution plans in the Union. Therefore, stringent qualitative criteria should be established for the detailed single data point model and the detailed common validation rules which will be published electronically by the European Banking Authority (EBA) on its website.
- (8) In accordance with Article 11(2) of Directive 2014/59/EU, competent and resolution authorities should cooperate in order to minimise the duplication of information requirements. For that purpose, Implementing Regulation (EU) 2018/1624 introduces a cooperation procedure between competent and resolution authorities, which should be maintained so that competent and resolution authorities jointly verify whether some or all of the requested information is already available to the competent authority. Where the information is available to the competent authority, it is appropriate that it transmits it to the resolution authority directly.
- (9) Given the extent of the necessary amendments to Implementing Regulation (EU) 2018/1624, it is preferable, for reasons of legal certainty and clarity, to adopt a new Implementing Regulation and, therefore, to repeal and replace Implementing Regulation (EU) 2018/1624.
- (10) This Regulation is based on the implementing technical standards submitted by the EBA to the Commission.
- (11) The EBA has conducted open public consultations on the implementing technical standards on which this Regulation is based, analysed the potential related costs and benefits and requested the advice of the Banking Stakeholder Group established in

accordance with Article 37 of Regulation (EU) No 1093/2010 of the European Parliament and of the Council¹⁰,

HAS ADOPTED THIS REGULATION:

Article 1

Definitions

For the purposes of this Regulation, the following definition applies:

‘relevant legal entity’ means a group entity as defined in Article 2(1), point (31), of Directive 2014/59/EU, other than a resolution entity, which is established in the Union and meets any of the following conditions:

- (a) it provides critical functions;
- (b) its individual total risk exposure amount calculated in accordance with Article 92(3) of Regulation (EU) No 575/2013 of the European Parliament and of the Council¹¹ equals or exceeds 2% of the consolidated total risk exposure amount of the Union parent undertaking. For a group comprising more than one resolution entity, an entity shall be regarded as a relevant legal entity also where its individual total risk exposure amount equals or exceeds 2% of the total risk exposure amount of the resolution entity at the resolution group consolidated level;
- (c) its individual total exposure measure referred to in Article 429(4) of Regulation (EU) No 575/2013 equals or exceeds 2% of the consolidated total exposure measure of the Union parent undertaking. For a group comprising more than one resolution entity, an entity shall be regarded as relevant legal entity also where its individual total exposure measure equals or exceeds 2% of the total exposure measure of the resolution entity at the resolution group consolidated level;
- (d) its individual operating income equals or exceeds 2% of the group’s consolidated total operating income calculated at the level of the Union parent undertaking;
- (e) its individual total assets exceed EUR 5 billion;
- (f) it is important for the financial stability in at least one Member State.

Article 2

Resolution reporting by institutions that are not part of a group subject to consolidated supervision pursuant to Articles 111 and 112 of Directive 2013/36/EU

¹⁰ Regulation (EU) No 1093/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Banking Authority), amending Decision No 716/2009/EC and repealing Commission Decision 2009/78/EC (OJ L 331, 15.12.2010, p. 12, ELI: <http://data.europa.eu/eli/reg/2010/1093/2021-06-26>).

¹¹ Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and amending Regulation (EU) No 648/2012 (OJ L 176 27.6.2013, p. 1, ELI: <http://data.europa.eu/eli/reg/2013/575/2021-09-30>).

1. An institution that is not part of a group subject to consolidated supervision pursuant to Articles 111 and 112 of Directive 2013/36/EU¹² and is a resolution entity shall submit to the resolution authority the information specified in all the templates of the Annex to this Regulation, except the information referred to in templates Z 01.01, Z 04.00, Z 07.02, Z 07.03 and Z 11.00, on an individual basis.
2. An institution that is not part of a group subject to consolidated supervision pursuant to Articles 111 and 112 of Directive 2013/36/EU and is a liquidation entity not subject to simplified obligations for which the resolution authority has not determined the requirement referred to in Article 45(1) of Directive 2014/59/EU in accordance with Article 45c(2a), second subparagraph, of that Directive shall submit to the resolution authority the information specified in templates Z 01.02, Z 02.00, Z 05.01, Z 05.02, Z 06.00, Z 07.01.1 to Z 07.01.5, Z 07.04 and Z 09.01 of the Annex to this Regulation, on an individual basis.
3. An institution that is not part of a group subject to consolidated supervision pursuant to Articles 111 and 112 of Directive 2013/36/EU and is a liquidation entity not subject to simplified obligations for which the resolution authority has determined a requirement referred to in Article 45(1) of Directive 2014/59/EU in accordance with Article 45c(2a), second subparagraph, of that Directive shall submit to the resolution authority the information specified in templates Z 01.02, Z 02.00, Z 03.01, Z 03.02, Z 05.01, Z 05.02, Z 06.00, Z 07.01.1 to Z 07.01.5, Z 07.04 and Z 09.01 of the Annex to this Regulation, on an individual basis.

Article 3

Group resolution reporting – resolution groups

1. The Union parent undertaking shall submit to the group-level resolution authority the information specified in templates Z 01.01, Z 01.02 and Z 08.01 to Z 09.04 of the Annex in relation to all group entities.
2. The Union parent undertaking shall submit to the group-level resolution authority the information specified in template Z 04.00 of the Annex in relation to the financial interconnections between all group entities.
3. The Union parent undertaking shall submit to the group-level resolution authority the information specified in templates Z 02.00 of the Annex as follows:
 - (a) on an individual basis for all the group's resolution entities, including the Union parent undertaking, and for all the relevant legal entities that are institutions;
 - (b) on a consolidated basis or, where applicable, on sub-consolidated basis for all the group's resolution entities, including the Union parent undertaking, and for all the relevant legal entities for which the resolution authority has determined a requirement referred to in Article 45(1) of

¹² Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC (OJ L 176 27.6.2013, p. 338,

ELI: <http://data.europa.eu/eli/dir/2013/36/2024-01-09>).

Directive 2014/59/EU on a consolidated or sub-consolidated basis, regardless of whether these entities are subject to Part One, Title II, Chapter 2 of Regulation (EU) No 575/2013.

4. The Union parent undertaking shall submit to the group-level resolution authority the information specified in templates Z 03.01 or Z 03.02 of the Annex as follows:
 - (a) on an individual basis for all the group's resolution entities, including the Union parent undertaking, and for all the relevant legal entities that are institutions for which the resolution authority has determined a requirement referred to in Article 45(1) of Directive 2014/59/EU on an individual basis;
 - (b) on a consolidated or sub-consolidated basis for all the group's resolution entities, including the Union parent undertaking, and for all relevant legal entities that are institutions for which the resolution authority has determined a requirement referred to in Article 45(1) of Directive 2014/59/EU on a consolidated or sub-consolidated basis regardless, of whether these entities are subject to Part One, Title II, Chapter 2 of Regulation (EU) No 575/2013.
5. The Union parent undertaking shall submit to the group-level resolution authority the information referred to in templates Z 07.01.1 to Z 07.01.5 of the Annex at the level of each Member State in which the group operates.
6. The Union parent undertaking shall submit to the group-level resolution authority the information referred to in templates Z 07.02 to Z 07.04 of the Annex in relation to the critical functions and core business lines provided by any group entity.
7. The Union parent undertaking shall submit to the group-level resolution authority the information specified in templates Z 05.01, Z 05.02, Z 06.00, Z 07.01.1 to Z 07.01.5, Z 07.04 and Z 11.00 to Z 17.00 of the Annex for all the group's resolution entities, including the Union parent undertaking, on an individual basis.
8. The Union parent undertaking shall submit to the group-level resolution authority the information specified in templates Z 05.01, Z 05.02, Z 06.00, Z 07.01.1 to Z 07.01.5 and Z 07.04 of the Annex for all the relevant legal entities that are institutions on an individual basis.
9. Paragraph 2, paragraph 3, point (a), and paragraphs 4 to 6 of this Article shall apply notwithstanding any derogation from the application of prudential requirements granted in accordance with Article 7(1) or (3) of Regulation (EU) No 575/2013 or Article 8 of Regulation (EU) 2019/1033 of the European Parliament and of the Council¹³ or any waiver of the application of the minimum requirement for own funds and eligible liabilities granted in accordance with Article 45f of Directive 2014/59/EU.

Article 4

Group resolution reporting – groups comprising only liquidation entities

¹³ Regulation (EU) 2019/2033 of the European Parliament and of the Council of 27 November 2019 on the prudential requirements of investment firms and amending Regulations (EU) No 1093/2010, (EU) No 575/2013, (EU) No 600/2014 and (EU) No 806/2014 (OJ L 314, 5.12.2019, p. 1, ELI: <http://data.europa.eu/eli/reg/2019/2033/oj>).

The Union parent undertaking of a group comprising only liquidation entities that are not subject to simplified obligations shall submit to the group-level resolution authority:

- (a) the information specified in templates Z 01.01, Z 01.02, Z 07.01.1 to Z 07.01.5 and Z 09.01 of the Annex in relation to all group entities, template Z02.00 on a consolidated basis and template Z 04.00 in relation to the financial interconnections between all group entities;
- (b) for itself and for each relevant legal entity for which the resolution authority has not determined the requirement referred to in Article 45(1) of Directive 2014/59/EU, in accordance with Article 45c (2a), second subparagraph, of that Directive, the information specified in templates Z 02.00, Z 05.01, Z 05.02, Z 06.00, Z 07.01.1 to Z 07.01.5, Z 07.04 of the Annex to this Regulation on an individual basis;
- (c) for itself and for each relevant legal entity for which the resolution authority has determined the requirement referred to in Article 45(1) of Directive 2014/59/EU, in accordance with Article 45c(2a), second subparagraph, of that Directive, the information specified in templates Z 02.00, Z 03.01, Z 03.02, Z 05.01, Z 05.02, Z 06.00, Z 07.01.1 to Z 07.01.5, Z 07.04 of the Annex to this Regulation on an individual basis.

Article 5

Adjustments to group resolution reporting

1. For a group the Union parent undertaking of which is a liquidation entity and which comprises resolution entities, the following shall apply:
 - (a) the Union parent undertaking shall submit the information referred to in Article 3 for the group entities belonging to resolution groups;
 - (b) the Union parent undertaking shall submit the information referred to in Article 4 for the liquidation entities not subject to simplified obligations and that are not part of any resolution group.
2. For a resolution group as defined in Article 2(1), point (83b), (b), of Directive 2014/59/EU, the information referred to in Article 3 of this Regulation shall be submitted at least by one of the group's resolution entities, and it shall effectively cover all the credit institutions permanently affiliated to the central body of that resolution group, the central body itself, and their respective subsidiaries, on an individual, sub-consolidated and consolidated basis, as appropriate.

Article 6

Frequency, reference dates and remittance dates

1. Institutions or, in the case of groups, Union parent undertakings shall submit the information referred to in Articles 2 to 5 as follows:
 - (a) For the templates Z 01.01, Z 01.02, Z 02.00, Z 03.01, Z 03.02, Z 04.00, Z 05.01, Z 05.02, Z 06.00 and Z 11.00 to Z 17.00, at the latest by 31 March each year in respect

of the last day of the previous calendar year. If 31 March is not a business day, the information shall be provided on the following business day;

- (b) For the templates Z 07.01.1 to Z 07.04, Z 08.01 to Z 08.05 and Z 09.01 to Z 09.04, at the latest by 30 April each year in respect of the last day of the previous calendar year. If 30 April is not a business day, the information shall be provided on the following business day.
- 2. Resolution authorities shall specify whether the information shall be directly submitted to the resolution authority or, where applicable, whether it shall be submitted instead to the competent authority.
- 3. Institutions or, in the case of groups, Union parent undertakings may submit unaudited figures. Where audited figures deviate from submitted unaudited figures, the revised, audited figures shall be submitted without undue delay.
- 4. For the purposes of paragraph 3, unaudited figures are figures that have not received an external auditor's opinion and audited figures are figures audited by an external auditor expressing an audit opinion.
- 5. Corrections to the submitted reports shall be submitted without undue delay.

Article 7

Data exchange formats and information accompanying the submission

- 1. Institutions or, in the case of groups, Union parent undertakings, shall submit the information referred to in Articles 2 to 5, as specified in the templates set out in the Annex, in accordance with the instructions, the definitions of the data point model and the validation rules made available on the EBA website and the data exchange formats and representations specified by resolution authorities.
- 2. In addition to the obligation referred to in paragraph 1, institutions or, in the case of groups, Union parent undertakings shall ensure the following:
 - (a) information that is not required or not applicable shall not be included in a data submission;
 - (b) numerical values shall be submitted as follows:
 - (i) data points with the data type 'Monetary' shall be reported using a minimum precision equivalent to ten thousands of units;
 - (ii) data points with the data type 'Percentage' shall be expressed as per unit with a minimum precision equivalent to four decimals;
 - (iii) data points with the data type 'Integer' shall be reported using no decimals and a precision equivalent to units.
 - (c) institutions and insurance undertakings shall be identified solely by their Legal Entity Identifier (LEI);
 - (d) legal entities and counterparties other than institutions and insurance undertakings shall be identified by their Legal Entity Identifier (LEI), where available.

3. Institutions or, in the case of groups, Union parent undertakings, shall accompany the submitted data by the following information:
 - (a) reference date;
 - (b) reporting currency;
 - (c) accounting standard;
 - (d) Legal Entity Identifier (LEI) of the reporting entity;
 - (e) Level of application as set out in Articles 2, 3 and 4.

Article 8

Provision of additional information for the purpose of individual or group resolution plans

1. Where a resolution authority or a group-level resolution authority considers information not covered by any template set out in the Annex or information from entities subject to simplified obligations to be necessary for the purposes of drawing up and implementing resolution plans, or where the format in which additional information is provided by the competent authority pursuant to Article 9(2) is not suitable for the purposes of drawing up or implementing resolution plans, the resolution authority or the group-level resolution authority shall request such information or new format from the relevant institution or the Union parent undertaking.
2. For the purposes of the request referred to in paragraph 1, the resolution authority shall:
 - (a) identify the additional information to be provided;
 - (b) specify, taking into account the volume and complexity of the information required, the appropriate timeframe within which the institution or, in the case of groups, the Union parent undertaking shall provide the information to the resolution authority;
 - (c) specify the format to be used by institutions or, in the case of groups, by Union parent undertakings in order to provide the information to the resolution authority;
 - (d) specify whether the information has to be provided on an individual, sub-consolidated or consolidated basis and whether its scope is local, Union-wide or global;
 - (e) specify the exact recipient, as well as the data exchange formats and the information accompanying submissions, for the purposes of providing the additional information.

Article 9

Cooperation between competent and resolution authorities

1. Competent and resolution authorities shall jointly verify whether part or all of the information to be provided to the resolution authority pursuant to Articles 2 to 5, 7 and 8 is already available to the competent authority.

2. Where part or all of the information is already available to the competent authority, that authority shall provide such information to the resolution authority in a timely manner.
3. In the case referred to in paragraph 2, resolution authorities shall ensure that institutions or, in the cases of groups, Union parent undertakings, are informed of the information which is required to be included in the submission of information pursuant to this Regulation. They shall identify that information by reference to the templates set out in the Annex.

Article 10

Repeal

Implementing Regulation (EU) 2018/1624 is repealed.

References to the repealed Implementing Regulation shall be construed as references to this Regulation.

Article 11

Entry into force

This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

For the Commission

The President

[Ursula von der Leyen]

For the Commission

The President

[Ursula von der Leyen]

4. Accompanying documents

4.1 Draft cost-benefit analysis / impact assessment

As per Article 15 of Regulation (EU) No 1093/2010 (EBA Regulation), any draft implementing technical standards (ITS) developed by the EBA shall be accompanied by an Impact Assessment (IA'), which analyses 'the potential related costs and benefits'.

This analysis presents the IA of the main policy options included in the Consultation Paper on the draft ITS repealing and replacing Commission Implementing Regulation (EU) 2018/1624 concerning resolution plans reporting ("the Draft ITS"). The analysis provides an overview of the identified problem, the proposed options to address this problem as well as the potential impact of these options. The IA is high level and qualitative in nature.

A. Problem identification and background

Article 11(3) of Directive (EU) No 2014/59 mandates the EBA to develop ITS to specify procedures and a minimum set of standard forms and templates for the provision of information for the purpose of resolution plans. Under this mandate, since 2014 the EBA has developed several ITS to create the resolution plans' reporting templates and their instructions but also, over time, to adapt these reporting templates and instructions to the related resolution authorities' ('RAs') needs and requirements. These ITS, adopted by the Commission, are now published by the Commission under Commission Implementing Regulation (EU) 2018/1624 and thus gathers the latest resolution plans' reporting templates and instructions. Nonetheless, the most recent adaptation of these reporting templates and instructions was in 2018 and, since then, the new needs and requirements of the resolution's authorities – mainly due to the latest developments in resolution planning, crisis preparedness and policies – were not reflected in these ITS but treated with separate data collection.

As such, in order to avoid parallel data collections and to reflect the latest developments in resolution planning, crisis preparedness and policies, but also, more generally, to foster harmonisation in resolution planning reporting and deliver efficient and harmonised practices, these ITS need to be updated.

B. Policy objectives

The draft ITS, repealing and replacing Commission Implementing Regulation (EU) 2018/1624 concerning resolution plans reporting, aim to update the resolution plans' reporting templates and instructions in order to align with the latest developments in resolution planning framework and in order to avoid parallel data collections.

C. Options considered, assessment of the options and preferred options

Section C presents the main policy options discussed and the decisions made by the EBA during the development of the draft ITS. Advantages and disadvantages, as well as potential costs and benefits from the qualitative perspective of the policy options and the preferred options resulting from this analysis, are provided.

Commission Implementing Regulation (EU) 2018/1624 contains some reporting requirements that are not applicable to all institutions but rather to a certain type of institutions, among which institutions that qualify as ‘relevant legal entity’ (‘RLE’). Commission Implementing Regulation (EU) 2018/1624 currently sets the criteria for the definition of RLE and, in the context of the elaboration of the draft ITS, the EBA considered two policy options in relation to those criteria.

Option 1a: To keep the existing criteria for defining the ‘relevant legal entity’, as in Commission Implementing Regulation (EU) 2018/1624.

Option 1b: To amend the criteria for defining the ‘relevant legal entity’ to expand the scope of RLE and to add the criteria of importance for the financial stability of at least one of the Member States in which the entity would have its registered offices or operates. This option has been considered in light of existing practices implemented by the SRB for entities under its remit.

On the one hand, keeping the existing criteria would have the advantages of simplicity and of not increasing reporting costs for institutions outside of the SRB remit, to whom this change does not yet apply. On the other hand, this option would not go in the direction of the avoidance of ad hoc data collections (which would reduce costs) and in the direction of harmonisation of resolution planning reporting. For those reasons, option 1a was rejected. Considering an amendment to the definition of RLE in light of the practice implemented by the SRB – which extends the number of entities in the scope of the reporting obligations of this ITS compared with the existing ones – and adding the criteria referred to above on the importance for financial stability would have the benefit, both for concerned entities and for RAs, of avoiding ad hoc data collections for entities not included in the RLE definition. For RAs, this would also have the benefit of having more resolution planning data and information at disposal and support them in their duty of, among others, drawing up resolution plans. This change would have the benefit of leading to the harmonisation of the RLE criteria inside and outside the banking union and fostering convergence in resolution planning practices among all RAs.

Based on the above, Option 1b has been chosen as the preferred option and the draft ITS will consider the criteria for defining the ‘relevant legal entity’ with the criteria currently used by the SRB and add the criteria of importance for the financial stability of at least one of the Member States in which the entity would have its registered offices or operates.

The current templates and instructions for resolution plan reporting, as set out in Commission Implementing Regulation (EU) 2018/1624, contain requests for aggregate information on liabilities but does not contain – as it is the case in the reporting used in the banking union by the SRB –

requests for granular data on liabilities. In this regard, the EBA considered two options for the draft ITS.

Option 2a: Not requiring reporting on granular liability data.

Option 2b: Requiring resolution entities and non-resolution RLEs that are institutions to report granular liability data.

Granular liability data are data related to intragroup transaction liabilities, securities, deposits, secured financing, other financial and non-financial liabilities and derivatives. Requiring entities to report data related to those liabilities would have the benefit of increasing transparency and reporting standardisation. Furthermore, these data are of particular use in the analysis of the bail-in-ability of liabilities reported as it provides, among other information, details on the insolvency ranking, maturities and MREL eligibility of these liabilities. This is important for RAs when performing resolvability assessments and preparing resolution schemes. Furthermore, requiring entities to report those data would have the benefit of avoiding ad hoc data collection, which is one of the aims of the draft ITS, and – on the cost side – the costs related to the additional templates would be compensated by the decrease in the number of ad hoc data collections. In addition, in order to reduce the costs of reporting for certain entities, the granular liability data would be requested only for resolution entities and non-resolution RLEs. Finally, it is also worth mentioning that the granular liability data required in the draft ITS would be based on the SRB reporting and this would, on one hand, increase harmonisation of reporting across the EU and, on the other hand, minimise the costs of these additional templates for entities already under the SRB remit.

Based on the above, Option 2b has been chosen as the preferred option and draft ITS will require resolution entities and non-resolution RLEs to report granular liability data.

The draft ITS will repeal Commission Implementing Regulation (EU) 2018/1624 in order to adapt the reporting templates and instructions on the resolution plan to the related resolution authorities needs and requirements. The draft ITS will also enhance the alignment of the resolution planning reporting with the RAs and the SRB practice and decrease the number of ad hoc data collections. For the institutions, the draft ITS requirements are expected to trigger costs, given that more information will be requested. However, these costs would be lowered by the introduction of some proportionality and simplification in the reporting: the core-plus-supplement approach, the removal of overlapping data points between these new ITS and other reporting requirements requested from the same reporting entities. Moreover, these requirements are necessary to allow RAs to perform their duties of drawing up resolution plans and this benefit exceeds the costs for institutions and the additional costs of monitoring that will be incurred to the RAs. Overall, the impact assessment on the draft ITS suggests that the expected benefits are higher than the incurred expected costs.

4.2 Feedback on the public consultation

The EBA publicly consulted on the draft proposal contained in this paper.

The consultation period began on 30 July 2024 and ended on 30 October 2024. 14 responses were received, of which 11 were published on the EBA website.

This section presents a summary of the key points arising from the public consultation, the analysis and discussion triggered by these comments and the actions taken to address them if deemed necessary.

In many cases, several industry bodies made similar comments, or the same body repeated its comments in the response to different questions. In these cases, the comments and EBA analysis are included in the section of this paper where the EBA considers them most appropriate.

Changes to the draft ITS have been incorporated as a result of the responses received during the public consultation.

Summary of key issues and the EBA's response

Respondents showed general support for the EBA's proposal of amendments to the ITS on Resolution Planning reporting related to Commission Implementing Regulation (EU) 2018/1624. In particular, the proposed integration of the existing data request with the data request from the SRB is seen as a positive development in harmonising reporting obligations and simplifying reporting by cross-border institutions.

Respondents highlighted the high cost of compliance related to the amendments, in particular due to the extent of the changes required to institutions' ICT systems and the time available to implement those changes before the entry into force of the reporting obligations. In response, the EBA underlines that proportionality is a key driver in this work. As such, compliance costs should be reduced with the efforts that have been made to adapt and limit the scope of data needed from entities based on the specific profile of the reporting entities. This has led to a modular core, with minimum reporting requirements applicable to all institutions and extended reporting for resolution entities. Where data points have already been reported for the same entity, reporting scope and reference date, the ITS explicitly exempt double reporting.

Many of the respondents raised issues on the short timeline for the implementation of these amendments (expected delivery of the final DPM 4.2 ITS pack is in Q3 2025), and the first reference date for reporting is 31 December 2025. They suggest ways to decrease the burden, such as publishing the final updated ITS and relevant DPM as soon as possible, postponing the reporting of new templates, and maintaining the existing remittance date. In response, the EBA will maintain the remittance date at 30 April for the non-liability data, and limit the earlier remittance date (30 March) to liability data to facilitate data collection and data quality assurance processes.

While some respondents highlighted the limited impact, as many of the changes put forward are already requested from banks under the remit of the SRB, for those under the direct authority of national resolution authorities, or for non-banking union entities, the extent of changes was considered more important. While the EBA understands these comments, the main goal of the ITS overhaul is to create a level playing field in the area of resolution planning reporting. This means ensuring that banks within and outside of the banking union are subject to comparable reporting obligations, and also ensuring a more harmonious application of proportionality to the reporting obligations for banks based on the consequences for resolution planning and financial stability (hence, for example, the different reporting obligations for liquidation entities compared to

resolution entities). The EBA believes that the overall benefit for the financial sector of this harmonisation outweighs the additional cost incurred by creating this level playing field.

This increased harmonisation is coupled with the need to ensure resolution authorities continue to have access to data that reflects the current needs for resolution planning purposes, which have evolved since the previous version of the reporting obligations, and which include, for example, granular data. With the experience gained by resolution authorities over the years, data that are deemed less relevant for resolution planning have been removed and, where relevant, the definitions for data points requested have been revised and additional clarifications have been provided in the instructions. This aims to facilitate the work of the reporting entities in better understanding the reporting obligations.

The EBA's Banking Stakeholder Group (BSG)

The EBA consulted the EBA's Banking Stakeholder Group in February 2025. No feedback was received from the BSG.

Summary of responses to the consultation and the EBA's analysis

Comments	Summary of responses received	EBA analysis	Amendments to the proposals
Responses to questions in Consultation Paper EBA/CP/2024/18			
1. Are the instructions and templates clear to the respondents?	<ul style="list-style-type: none"> a. Participants questioned the existence of the SRB's data request in parallel with the revised ITS, which is perceived as double reporting. b. Clarification in Annex II, Section II '20 Z 08.01 – Relevant services (SERV 1)' in relation to 'II.8.1 General instructions', on the conditions under which – ideally with specific examples – the 'Core Business Lines' and their 'Essential Services' should be recorded. c. One question was raised concerning the ability to re-use the ITS data to support reporting obligations for calculation contributions to the Single Resolution Fund. d. Suggestion made to divide the templates into two modules: one focused on liability data and the other module for the remaining reporting obligations. This would limit the amount of information to be resubmitted in case of errors. e. Suggestions were made with regards to the scope of reports that should be provided by the various types of entities covered in the ITS. The main concern related to the need for 	<ul style="list-style-type: none"> a. To the extent that the final version of the ITS approved by the Commission does not exclude those elements of the SRB data request that have been introduced into the revised ITS, the SRB will no longer request the Liability Data Report (LDR), Critical Functions Report (CFR) and Financial Market Infrastructures Report (FMIR). b. Core business lines have to be recorded in earlier templates (07.03, 07.04), and they have to be mapped with the essential services and recorded in 08 Templates under SRB expectations and EBA Resolvability Assessment Guidelines. c. The application of the data collected under the ITS for Resolution Planning Reporting for the needs of Contributions Collections for the Single Resolution Fund is out of scope of this ITS review. d. The EBA takes note of the suggestion and will introduce it alongside the other 	<ul style="list-style-type: none"> a. No amendments b. No amendments c. No amendments d. No amendments e. No amendments f. No amendments g. No amendments h. Some amendments were made to instructions. i. No amendments

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	<p>this data to be collected by resolution authorities. Similar remarks were made concerning the level of consolidation of the data reported.</p> <p>f. Comment made that it is unclear what discretion RAs would have going forwards to decide on the reporting scope independently.</p> <p>g. The industry appreciates the effort made to reduce the reporting burden by removing reporting obligations that already exist in other ITS, although minor modifications may be needed where banks have automated the reporting process to fill these data points.</p> <p>h. Regarding the removal of duplicated data points: does this imply that certain data points will be left blank in ITS reporting? For example, RWA, capital buffers, and SREP requirements are data points found in both the new ITS and in COREP.</p> <p>i. In addition, it is not fully clear why LIAB1 and LIAB2 are needed for RLEs both at individual and sub-consolidated level. It would be appreciated if the EBA could please clarify that those reports are only for the scope where iMREL is applied (for example sub-consolidated); this should be sufficient. For example, LIAB1 reporting according to applicable reporting requirements can be a significant admin burden even if there is just one subsidiary with a very simple balance</p>	<p>technical developments needed for the ITS implementation.</p> <p>e. The collection of data to support resolution planning is not limited to setting MREL targets for the reporting entities. As such, data needs to be collected, even from liquidation entities, to support, for example, the Public Interest Assessment. The maintenance of the notion of simplified obligations in the ITS limits the reporting burden to smaller entities.</p> <p>f. The ITS do not change the powers of the RAs with regards to the scope of data they can request, but mainly aims to harmonise data requests across Member States while still applying proportionality. As such, RAs can extend the reporting obligations, as the ITS is still proposed as minimum reporting obligations; RAs can also continue to apply simplified obligations, as is already the case, to reduce reporting obligations. In any event, RAs will continue to communicate the reporting obligations to banks in line with what is already done under the existing ITS.</p> <p>g. This was indeed the intention of the EBA: to reduce the reporting burden by</p>	

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	<p>sheet – therefore such requests should be targeted for the specific needs, meaning that if case LIAB1 data points are not known to influence iMREL calibration or resolution strategy, as they should not be needed at individual level.</p>	<p>re-using data available at the level of the resolution authority.</p> <p>h. Where the reporting scopes match perfectly and the data point definitions are exactly the same, then indeed some fields could be left blank so as not to force the reporting entity to report twice. However, where any of the above differs, e.g. where the resolution and prudential reporting scopes differ, these data points would have to be reported.</p> <p>i. Resolution actions are implemented on a legal entity basis. Therefore, the individual level is needed by default in resolution planning. For the purpose of MREL determination, following the implementation of the Daisy Chains Directive, a deviation from the general rule (individual basis for iMREL) is possible under certain circumstances (for instance, cases where capital requirements are set on a sub-consolidated basis for an opco structure). However, the setup of a requirement on a sub-consolidated basis also requires assessing the alternative of the individual MREL determination. Therefore, whenever the sub-consolidated level is required, the individual level is still needed.</p>	

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2. Do the respondents need further clarification to understand which of the minimum reporting obligations would apply to their specific profile (resolution entity, liquidation entity, RLE, non-institution...?)	<p>a. Which minimum reporting obligations would be relevant for entities which are part of the group but not part of the resolution group and not a member of the banking union (e.g. outside the EU) (e.g. a subsidiary of a Croatian bank in Montenegro, whose ultimate parent company is in Austria)</p> <p>b. Whether the thresholds of 2% and 5 bn assets are also applicable for liquidation entities not subject to simplified obligations, which we recommend specifying in the ITS. Otherwise, the reporting burden for liquidation entities that are not subject to simplified obligations would be extremely high.</p> <p>c. The EBA uses ‘recurrent account’ for both ‘Deposit functions’ and ‘Payment functions’ in paragraphs 35 and 37 respectively. We would suggest that the EBA provide a definition or a reference to a legal text in order to be able to report these requirements correctly, given that neither Directive (EU) 2015/2366 nor Regulation (EU) 260/2012 provide a definition.</p> <p>d. Where an entity has not been designated as a liquidation entity as per Directive (EU) 2024/1174, especially those that are not RLE nor subject to simplified obligations, they</p>	<p>a. These entities are out of scope for the ITS. Data on these entities would only be reported where consolidated group accounting data are required, e.g. in Z 01.01, to the extent that these are legal entities.</p> <p>b. As regards the thresholds for determination of RLEs, they would also apply for liquidation entities – as they can also be considered RLEs. Their reporting obligations will be limited in line with the reporting obligations defined for liquidation entities not subject to simplified obligations.</p> <p>c. A definition was proposed in Annex II (Instructions), namely ‘Recurring accounts are accounts where the account has been debited or credited at least with five monthly transactions on average over the 6 months preceding the cut-off date, except for annual fees, other charges and interest payment related to the account.’</p> <p>d. The reporting obligations defined for liquidation entities that are not subject to simplified obligations reflect a compromise, to minimise the reporting obligations for this category of entities, while providing RAs with the data needed to support resolution planning. To the</p>	<p>a. No amendments</p> <p>b. No amendments</p> <p>c. No amendments</p> <p>d. No amendments</p> <p>e. No amendments</p> <p>f. No amendments</p>

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	<p>should not be subjected to reporting requirements beyond the Z 01 templates.</p> <p>e. Will there be a change to the way in which the sequential reporting process is applied?</p> <p>f. The Z 07.01 reporting scope should be limited to Member States (identified as ‘country’) in which the group is active and has one or more functions considered critical in the market for the relevant country, i.e. should the institution be active but have no critical functions in a given country, that country should be left outside of the reporting scope.</p>	<p>extent that an entity is not yet defined by the RA as a liquidation entity, that the entity is not subject to simplified obligations, and that it fulfils the criteria in the ITS that give rise to reporting obligations, it is expected to submit the data in line with the ITS requirements.</p> <p>e. The data collection process will not change following the ITS update.</p> <p>f. For the reporting of critical functions, all economic functions need to be reported, with the assessment of the criticality of the function to be detailed in the report. This approach enables a 2-step approach to assessing the criticality of the functions for resolution planning: a first assessment by the reporting entity, followed by an assessment by the RA, as required by the BRRD.</p>	
3. Do the respondents identify any discrepancies between these templates and instructions and the determination of the requirements set out in the underlying regulation?	<p>a. Template Z 10.06 – Securities financing transactions, excluding intragroup (LIAB-G-6) – It would be appreciated if banks could be provided with the missing guidance for the Column ‘Type of Liability’.</p> <p>b. The instructions are showing, in some cases, only three digits instead of four in the column ‘Columns’: e.g. Annex II, page 95 II.33 Z 10.03</p> <p>c. In some cases, the same column number appears twice in the instructions, whereas in</p>	<p>a. This is an erratum in the template.</p> <p>b. This is a typo and should be 0050 instead of 005.</p> <p>c. This is a typo – should be adjusted, e.g. 0070 and 0075.</p>	<p>a. Template amended.</p> <p>b. Some amendments were made to instructions.</p> <p>c. Some amendments were made to instructions.</p> <p>d. Some amendments were made to instructions.</p>

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	the template there are two different numbers: e.g. Annex II, page 97 II.34 Z 10.04.		
4. Cost of compliance with the reporting requirements. Is or are there any element(s) of this proposal for new and amended reporting requirements that you expect to trigger a particularly high, or, in your view, disproportionate, effort or cost of compliance? If yes, please:	No comments	No comments	No amendments
4 i. Specify which element(s) of the proposal trigger(s) that particularly high cost of compliance	<p>a. The change of the submission date from 30 April to 31 March.</p> <p>b. The extension of the current scope of reporting on services to services mapped to Core Business Lines ('Essential Services' and mapping with DORA declarations for IT providers and services) implies a deep review of the current methodology that the banks have implemented over the past few years. Different banks identify their own business lines following their business model. Retrieving data could be very difficult and less reliable for business lines in case they do not match with the internal reporting view. Changing the business lines generates very significant costs both in economic and in workload terms, requiring a complete revision of the current method of data aggregation (both financial and qualitative</p>	<p>a. Already addressed in question 5</p> <p>b. The SRB already asks for this on an ad hoc basis. It is also part of existing SRB expectations under EBA Resolvability Guidelines. No new mapping for DORA, just one identifying column for the service and one identifying whether the provider is critical under the ESA published list.</p> <p>c. In practice, the SRB already applies these thresholds to entities that are part of the banking groups under its remit and has not seen a material increase in the number of entities subject to reporting. For entities under the remit of national resolution authorities, the continuing application of the simplified obligations, and the reduced reporting</p>	<p>a. See feedback for question 5</p> <p>b. No amendments</p> <p>c. No amendments</p> <p>d. No amendments</p> <p>e. No amendments</p>

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	<p>ones). Furthermore, the identification of Core Business Lines is strictly connected with the determination of essential services, for which the methodology should be revised accordingly. Similarly, the inclusion of a new sub-aggregated taxonomy for the identification of critical services entails a different way of mapping all data (assets, staff, contracts) in a further, more granular way, changing de facto all the instruments and methodologies developed so far.</p> <p>c. Lowering the RLE threshold to 2% or EUR 5 billion could result in more entities qualifying as RLEs, which expands the scope of reporting across additional legal entities within larger groups. This expanded entity-level reporting obligation increases the complexity of data collection, aggregation, and maintenance. Institutions may need to implement more detailed data management frameworks to monitor RLE thresholds consistently, creating ongoing compliance costs, particularly for those with varied entity structures.</p> <p>d. Introduction of new reporting obligations for critical functions, in particular the notion of ‘recurrent’ accounts, and the reporting on the onboarding capacity for deposits and payments as part of standard reporting obligation as opposed to an ad hoc/one-off data request.</p>	<p>obligations for liquidation entities that are not subject to simplified obligations, should ensure that there is limited impact on smaller entities.</p> <p>d. See specific comments on changes to the reporting obligations for critical functions in the feedback to Question 9.</p> <p>e. The entities in scope specifically for the reporting of critical functions has not increased compared to the current reporting obligations. A consolidated report is required at a minimum for the consolidating entity/resolution group, supplemented by individual reports only if the data on that entity cannot be derived by the RA from the consolidated report.</p>	

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	e. High costs result from the number of entities/business units subject to Critical Functions reporting performing deposits and payment functions and, therefore, to the number of tools from which extracting the data and the number of processes computing such metrics to be adapted.		
4 ii. Explain the nature/source of the cost (i.e. explain what makes it costly to comply with this particular element of the proposal) and specify whether the cost arises as part of the implementation, or as part of ongoing compliance with the reporting requirements	<p>a. Reporting teams would need to be reinforced to cope with the additional reporting obligations (e.g. expanding the scope of Z01.00 to include a lot more of our subsidiaries).</p> <p>b. A planned review of the policy RTS on resolution plans is expected to trigger further changes to the ITS on Resolution Planning reporting, resulting in higher costs for banks.</p> <p>c. Qualitative reporting in English, for example reporting on critical services, is not easy to automate from existing sources where this is available in another language.</p> <p>d. The costs are unnecessarily high in case the same information needs to be provided multiple times in different reports/templates/layouts.</p>	<p>a. As explained in the last paragraph of Section 3.1, the planned review of the RTS on resolution plans is likely to trigger changes in the ITS on resolution plan reporting in the future.</p> <p>b. These reporting obligations to banks in the English language already exist. The revised ITS do not change that.</p> <p>c. The EBA has addressed this by removing the reporting obligation where the data point has been reported elsewhere for the same entity, reference date and reporting scope.</p>	<p>a. No amendments</p> <p>b. No amendments</p> <p>c. No amendments</p>
4 iii. Offer suggestions on alternative ways to achieve the same/a similar result with a lower cost of compliance for you	<p>Suggestions for better managing the additional reporting obligations include:</p> <p>a. Limit the entity scope.</p>	a. The ITS have maintained the application of simplified obligations and have introduced reduced reporting obligations for liquidation entities that are not subject	

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	<ul style="list-style-type: none"> b. Delay the implementation of the changes to the ITS. c. RAs should assess duplications and avoid these in reporting requests d. Concerning all proposed changes, when new fields (i.e. columns) are introduced, the codes of the fields that remain unchanged should not change, as adjusting all the codes to the introduction of new fields makes it more difficult for banks to implement the proposed changes. 	<ul style="list-style-type: none"> to simplified obligations to reduce the reporting burden to banks. b. Given the evolution of resolution planning practices since the previous version of the ITS in 2018, the EBA believes that the revised ITS should be introduced in 2026 (reference date 31.12.2024) and any further delays should be avoided. c. This is already foreseen in the ITS (see feedback to 4.iii.d above). d. The EBA will take this into consideration when developing the technical package for the resolution planning reporting ITS. 	
5. Change of the submission date from 30 April to 31 March. How does this change impact your organisation's ability to report resolution data in a timely manner while still retaining data quality?	In general, there was no support from the respondents for the change in the remittance date to 31 March, citing the time needed to reflect changes to the ITS in the banks' reporting systems. The workload impact of having to submit other financial reports with similar deadlines, and the need to integrate data from other sources, were also provided to justify this response.	<p>The EBA takes note of these concerns. As the aim is to harmonise the reporting obligations, while reducing the reporting burden on banks, two remittance dates will be introduced:</p> <p>This means that resolution authorities may request certain modules (e.g. liability data) or reports from certain categories of banks (e.g. significant Institutions) at an earlier date, as is already the case today.</p>	The ITS have been amended accordingly: 31 March for all liability data (aggregate and granular); unchanged at 30 April for all other reports.
6. The relevant legal entity (RLE) threshold defined in the ITS is proposed to be reduced from 5% to 2%. Do you have any comment on the changes in the	<ul style="list-style-type: none"> a. Could the EBA please confirm that 'Other RLEs' would be strictly limited to financial institutions and holding companies established in the Union, i.e. no reporting will be requested from insurance companies, important service 	<ul style="list-style-type: none"> a. The notion of 'Other RLEs' aims to cover financial institutions and holding companies in particular. Insurance 	<ul style="list-style-type: none"> a. No amendments b. No amendments

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definition of the RLE threshold, including the absolute threshold of EUR 5 billion?	<p>providers and other entity types established within or outside the Union?</p> <p>b. Could the EBA please confirm that the geographical scope of 'RLEs that are institutions' is strictly limited to credit institutions or investment firms established in the Union, as well as related branches established outside the Union, i.e. no reporting will be requested from institutions established outside the Union?</p>	<p>companies are explicitly out of scope for bank resolution planning.</p> <p>b. The scope of the question is outside of the BRRD mandate on the ITS. The BRRD sets the scope of application of reporting.</p>	
7. Identification of the legal v resolution group structure.	No comments	No comments	No amendments
7 i. Do you identify any issues with expanding the scope of Z01.01 to all entities in the group, bearing in mind that this report would only be requested at the level of the group?	<p>a. Request to clarify whether branches are to be included in the revised scope</p> <p>b. Request for further details for the reporting of shareholders v shareholdings of the legal entities of the group, since the impression is that this would generate multiple rows to be indicated for the same legal entities in both roles as 'Investor' and 'Investee', with a potentially high impact on the reporting entity.</p> <p>c. Banks would also like to better understand the purpose of this revised table, as they consider that the data are already available at group level in FINREP (FIN40). They also question how the reporting of more granular information in Z0102 is consistent with the simplification objective.</p>	<p>a. Branches should be excluded as they are not legal entities.</p> <p>b. This is the data that the RAs need to collect for the group. The fact that this report is only requested once for the group already limits the reporting obligations compared to the current ITS.</p> <p>c. The reporting of the Z0102 provides an overview of the group structure that enables the resolution authorities to make the link with the resolution group information provided in Z0101. This provides better data for assessing, for example, the impact of contagion in resolution.</p>	<p>a. Amendments were made to instructions.</p> <p>b. No amendments</p> <p>c. No amendments</p>

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7 ii. Do you see an issue in the ability of the group to identify the resolution group to which each entity reported in the organisational structure belongs?	No issues identified by participants.	No comments	No amendments
8. Aggregate liability data. The expectation is that all reporting entities, as a minimum, are required to report on their Liability Structure, at an aggregate level, in line with the current reporting obligations. In particular, the reporting introduces the notion of 'Carrying Amount' in addition to the 'Outstanding Amount', to support ongoing policy developments on MREL.	No comments	No comments	No amendments
8 i. Are the data point definitions provided for reporting of the Carrying Amount sufficiently clear?	<p>a. Further guidance is needed concerning the Carrying Amount since it is not fully clear for each type of instrument and liability product how the carrying amount is calculated. Some banks are reporting Carrying Amount to the SRB in line with the definition in the SRB's Guidance on the LDR.</p> <p>b. Template Z 02.00 – Liability Structure (LIAB 1); Field: Credit institutions (Columns 0040-0041). Issue: Please clarify the guidance on if the</p>	<p>a. The definition has been provided in Annex 2, II.3.1 8) b) and the definition is aligned with the one already used by the SRB for resolution planning reporting.</p> <p>b. Yes, the internal counterparty should also be reported as credit institution if it meets the criteria. This will be clarified in the Instructions.</p>	<p>a. No amendments</p> <p>b. Some amendments were made to instructions.</p>

Comments	Summary of responses received	EBA analysis	Amendments to the proposals
	reporting should include intragroup institutions as defined in Article 2 (23) BRRD.		
8 ii. Do the revised data points for the reporting of own funds by Investment Firms better correspond to the reporting obligations for these types of institutions? If not, please elaborate on what changes you deem appropriate.	No issues identified by participants.	No comments	No amendments
8 iii. Do you anticipate any difficulties in providing the additional data required for the reporting of intragroup financial connections (for liabilities excluded from bail-in)?	<ul style="list-style-type: none"> a. Question raised on how to reconcile the Z0200 template with the granular liability data reports introduced in the ITS. b. It is not fully clear what the purpose of Z04 is compared to the new Z 10.01 report (intragroup liabilities excluding bail-in). c. Z 04.00 is requested on a consolidated level for group resolution entities. As in consolidated reports, intercompany transactions are eliminated by definition; no exposures will be reported in Z 04.00. 	<ul style="list-style-type: none"> a. The reconciliation of the revised Z 04.00 with the Z 02.00 is not currently foreseen. b. Z 04 covers accounting scope and all interconnections between all entities at an aggregated level for the group. As such, the scope covers far fewer data points than Z 10.01. Z 10.01 is required at the individual level for resolution entities and RLEs only, with a much higher granularity (e.g. highlighting the applicable insolvency ranking or governing law for contracts), and as such is complimentary to Z 04.00. c. The reference to the consolidation level is intended to define the scope of entities to be covered and not the scope where the intragroup transactions are eliminated (consolidation in the usual sense). This means that the Z 04.00 should cover transactions between all members of the 	<ul style="list-style-type: none"> a. No amendments b. No amendments c. No amendments

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		group for which the report is being prepared, as is already the case today.	
8 iv. Do you see merit in providing additional clarification about any data point definition existing in the previous version of the CIR on Resolution Reporting? If so, for which specific data points?	<p>a. Z 02.00 Liability Structure row 0334 – Sum of net liability positions taking into account prudential netting rules. After the introduction of the SA-CCR approach in CRR2, the SRB amended the method for reporting derivatives liabilities for the purpose of the SRF through Commission Delegated Regulation (EU) 2023/662 of 20 January 2023 amending Delegated Regulation (EU) 2015/63 as regards the methodology for the calculation of liabilities arising from derivatives, essentially going back to the Mark-to-Market Method. It is not fully clear why the EBA has not decided to align with this method. This method is easier to implement, and banks would have to maintain only one calculation method for derivatives liabilities instead of two.</p> <p>b. Intragroup liabilities may relate to entities of the group that fall under Deposit Guarantee Schemes (DGS) in the categories of Micro & SME and Corporate, which in r210 are blocked cells.</p> <p>c. Other MREL eligible liabilities may contain part of the liability that falls under the bucket of <1y (e.g. accruals from eligible instruments). An update in the guidelines is needed where the remaining part should be presented in the template. The same applies to the own funds</p>	<p>a. The current interpretation stems from the level 1 text (as confirmed by the EBA QnA 2015_1824) and cannot be changed via delegated regulation.</p> <p>b. Under 44(2)(h), only liabilities towards institutions, financial holding companies and financial institutions are excluded – and those should be reported in different columns (e.g. ‘Credit institutions’ or ‘Other financial corporations’). That is why the ones relating to households or SMEs are blocked cells.</p> <p>c. The non-MREL eligible part should be reported in line with the character on the liability. If it does not fall under any categories, it could be reported as residual liability.</p> <p>d. Not included so as not to increase the burden. They can be calculated.</p> <p>e. For the cases where the scope is identical with the one covered by COREP, there is now no need to report these data points. In the case where the resolution group scope is different from the prudential scope, this needs to be determined by the bank and reported explicitly.</p>	<p>a. No amendments</p> <p>b. No amendments</p> <p>c. No amendments</p> <p>d. No amendments</p> <p>e. No amendments</p>

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	<p>instruments that are presented as nominal amounts under r500-r531, and their accruals should be presented separately. In addition, in T04, for those cases, only one line can be selected.</p> <p>d. Additional rows to present the combined buffer requirement also in % would be useful.</p> <p>e. We do not understand why the capital requirements are requested at all, since they are already reported in COREP.</p>		
9, The revised ITS introduce the possibility of reporting on critical functions at a Regional level, where this is relevant for a given jurisdiction, in addition to reporting at the EU and national levels.	<p>a. Template Z 07.01 – Column 0040 – Value of transaction of which recurrent – It would be appreciated if the EBA could please explain how ‘with 5 monthly transactions on average over the 6 months preceding the cut-off date’ should be interpreted.</p> <p>b. We have doubts about the situation of a company that is part of resolution group which is obliged to complete Z.07.01 on individual basis according to the proposed amendment of Regulation 2018/1624, but this company does not play a critical function (according to the decision of the competent authority). Is this company obliged to fulfil this requirement in this situation?</p>	<p>a. In order to provide clarity on the reporting of recurrent accounts, the instructions were modified.</p> <p>b. The expectation is that the Z0701 is prepared at consolidated level for the resolution group, detailing the various functions deemed critical in the various Member States in which the resolution group operates. Where more than one legal entity operates within a given Member State, RAs may request visibility of the legal entities via an IND Z0701 report from each of these entities to identify in which entity the critical functions are situated.</p>	<p>a. Some amendments were made to instructions</p> <p>b. No amendments</p>
9 i. Do you have questions on how the new instructions on onboarding capacity should be	<p>a. Overall question raised on the utility of this data for RAs and how it will be used by RAs when identifying critical functions.</p>	<p>a. The additional elements requested on bank’s assessment of the criticality of economic functions will enable the RAs to</p>	<p>a. No amendments</p> <p>b. No amendments</p>

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interpreted for your organisation?	<p>b. Perceived overlap between this reporting obligation and the SRB's questionnaire Criticality Assessment of Deposit and Payment Functions.</p> <p>c. For banks that have received instructions on onboarding capacity when a questionnaire on the criticality assessment was requested, the situation should, however, be clear as long as the new instructions are the same as in the questionnaire and also included in the ITS and the SRB's Guidance on the CFR.</p> <p>d. Paragraph 40 of the consultation indicates that onboarding capacity will be assessed for 1, 7 and 14 days – but Annex I appears to show only 1 day for deposits (Column 0190 in tab Z07.01 FUNC 1 DEP) and 1 and 7 days for payments (Columns 0200 and 0210 in tab Z07.01 FUNC 1 PAY) – could the EBA please clarify whether this is correct?</p> <p>e. Should the assessment of onboarding capacity consider standard onboarding processes (i.e. including an <i>ex ante</i> KYC process) or purely the IT/technical steps? Should the onboarding capacity also be included in the Critical Function Reports at Member State level?</p> <p>f. Is the onboarding information only required for payment services activities? How would RAs assess this information for non-payment services?</p>	<p>better challenge the bank's own assessment.</p> <p>b. To the extent the proposed changes to the ITS on reporting of critical functions are approved by the Commission, this SRB questionnaire would cease to exist.</p> <p>c. Indeed, the EBA proposal builds on previous work done by the SRB in this field.</p> <p>d. The EBA assessed that it would be sufficient to request fewer data points, namely 1 and 7 days. We will align to 1 and 7 days for both.</p> <p>e. The definition used for assessing the onboarding capacity implies that KYC was done.</p> <p>f. The scope for the introduction of reporting on the onboarding capacity to this ITS is limited to the deposits and payments functions. The instructions elaborate on what needs to be reported for both functions.</p>	<p>c. No amendments</p> <p>d. Some amendments were made to instructions.</p> <p>e. No amendments</p> <p>f. No amendments</p>

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9 ii. Do you find the availability of a comments section useful to explain your assessment of the critical functions? Would you suggest another means of doing this, and if so, what?	Proposal generally appreciated by participants	No comment	No amendments
'10. The reporting on Critical Services has evolved into reporting on Relevant Services.	No comments	No comments	No amendments
10 i. Do you see any issue in identifying 'relevant services' as defined in the revised ITS?	<p>a. The data model for the new Z08 report remains unclear. It is not fully clear if 'Service Identifier' data are an incremental value for identifying each line of each tab of the report, used independently in each tab of the report (tab SERV1 would have its own incremental list which would not correspond to SERV2-3's own incremental lists, those three lists being linked in SERV4 and serv5 to Critical Functions (CF) and Core Business Lines (CBL)) respectively, or a unique reference to identify services in SERV1, to be used as key data to be linked to assets, roles, CF and CBL in other tabs of the matrix.</p> <p>b. Z08.01 – c0130 Contract ID: reporting multiple contracts related to a unique service provider. A reported service might (and will in most cases) be underpinned by more than one contract. Displaying each relevant contract in</p>	<p>a. The service identifier data (0005, 0010, 0020) is a unique reference to identify services in SERV1, and is used to link to assets, roles, CFs and CBLs in other tabs of the matrix (SERV2-5).</p> <p>b. c0130 can be included in the combination of values reported in columns 0010, 0020, 0040, and 0060 of this template to form a primary key. The same amendment is made for Z 08.02 (0080 is added to form the primary key).</p> <p>c. Field 0050 can be removed in SERV 4 and 5.</p>	<p>a. No amendments</p> <p>b. Some amendments were made to instructions and template.</p> <p>c. Some amendments were made to instructions and template.</p> <p>d. No amendments</p> <p>e. No amendments</p> <p>f. No amendments</p> <p>g. No amendments</p>

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	<p>its own row will conflict with the requirement of 'General instructions item 7)'. The combination of values reported in columns 0010, 0020, 0040, and 0060 of this template forms a primary key, which has to be unique for each row of the template.</p> <p>c. Z08.04 – c0050 Relevance for the Critical Function: Acc. Annex I of 'OPERATIONAL GUIDANCE ON OPERATIONAL CONTINUITY IN RESOLUTION – November 2021 update' (13) degree of criticality [of services] should be assessed as high / medium / to be assessed. The introduction of a more detailed assessment (high / medium high / medium low / low) requires additional effort (change in the IT system, inputs required from service providers, etc.).</p> <p>d. 'Z 08.01– Relevant services (SERV 1)' Column 0060 Code: We understand the EBA's reasoning in wanting to receive a LEI code for external contractual partners. However, the SRB has not yet requested any such information. As such, this requires integrating new data sources, which means implementation will be more complex. Implementation may also take longer. We therefore suggest foregoing this data point or allowing for reporting of alternative codes. These comments also apply to Column 0070 Type of Code.</p>	<p>d. An alternative is already provided (LEI or corporate registration number under national law).</p> <p>e. Resolution resilience applies to all contracts even intra entity contracts, so this amendment would align.</p> <p>f. This aligns with EBA Resolvability Assessment Guidelines paragraph 18.</p> <p>g. Under EBA expectations for the contract repository all contracts should have IDs, in order to identify them for the mapping.</p>	

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	<p>e. 'Z 08.01– Relevant services (SERV 1)' Column 0150 Resolution Resilience features: The EBA proposes four characteristics. We suggest that N/A be reported not just for intraentity group services but also for intergroup services. Internal group contracts (e.g. agency agreements) should not be required to exhibit 'resolution resilience features'. Here, it should be appropriate to have a process with which these agreements can be ad hoc designed as 'resolution-resilient' in the event of resolution.</p> <p>f. 'Z 08.01– Relevant services (SERV 1)' Column 0160 Business Reorganisation Plan (BRP): In our opinion, there is no need to collect this data, as the subject of BRP is already included in Column 0150. If the EBA disagrees, we ask for an explanation as to why this data should be reported in addition to Column 0150.</p> <p>g. 'Z 08.02– Relevant services mapping to operational assets (SERV 2)' Column 0080 Contract ID: We fail to understand why there is a need to report a contract ID. N/A should also be a valid answer here. There are some configurations (e.g. 'owned') for which there is no contract ID or for which an entry would not be expedient. Furthermore, fields 0090 to 0120 would also not be reported.</p>		
10 ii. Do you think that that the data request on relevant	a. The relevance of the service to the critical function (Low to High) – reference: Tabs Z 08.04 (SERV 4) and Z 08.05 (SERV 5); Fields:	a. The EBA agrees with this observation.	a. Some amendments were made to instructions and template.

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services, as covered in the revised ITS, is sufficiently clear?	<p>Relevance for the critical function / core business line (0050). We identify Essential Services as per definition reiterated in section II.8.1 General instructions, i.e. all identify essential services that seriously impede or prevent the performance of CF / CBL. We would see all those items of high relevance and therefore we find this field contradicts the definition and is redundant.</p> <p>b. Z08.01 – c0010 Service type: It is not clear which services would be expected to be reported under 1.3 ‘external communication’. Is it purely linked to external communication related to HR? Other ‘types’ of external communication, as Investor relations, Brand Management, Marketing would – in our view – not fit into category 1. ‘Human resources support’, but should be reflected in its own Level 1 category (or under 11 ‘Other’).</p> <p>c. Z 08.01 – c0170 Alternative mitigation actions: In line with ‘OPERATIONAL GUIDANCE ON OPERATIONAL CONTINUITY IN RESOLUTION – November 2021 update’ (42ff), we would understand that alternative mitigation actions only have to be explored if a contract is not assessed as resolution-resilient, i.e. c0150 and/or c0160 is ‘no’. Therefore, we would expect to use ‘n/a’ in c0170 for all cases, where c0150 or c0160 are marked as ‘yes’ (as if the contract is resolution-resilient, no other mitigation actions have to be applied).</p>	<p>b. ‘External communication’, which was not previously in the list, can be removed.</p> <p>c. Instructions amended to put ‘n/a’ in c0170 for all cases, where c0150 or c0160 are marked as ‘yes’ or ‘n/a’ (as if the contract is resolution-resilient, no other mitigation actions have to be applied).</p> <p>d. Added an additional type ‘Self-Service devices in branches & ATMs’ to Z08.02 – c0040 (types of assets).</p> <p>e. As per the Consultation cover note, the changes also seek to avoid excessive reporting by banks by incorporating certain key elements of the assessment of OCIR which are currently not included in the ITS and are requested ad hoc from reporting entities. In addition, the revised reporting includes these limited additional data fields to align with requirements from expectations and guidance on OCIR such as issued by the EBA and the SRB. According to these expectations and guidance, banks should develop certain deliverables, including a service catalogue and contract database, however, this is the bank’s own MIS and not a reporting requirement.</p>	<p>b. Some amendments were made to instructions and template.</p> <p>c. Some amendments were made to instructions and template.</p> <p>d. Some amendments were made to instructions and template.</p> <p>e. No amendments</p> <p>f. No amendments</p> <p>g. Some amendments were made to instructions and template.</p>

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	<p>d. Z08.02 – c0040 Type of assets: We would suggest an additional type ‘Self-Service devices in branches & ATMs’ as these assets are substantial assets for a Retail Bank.</p> <p>e. Do the amended EBA requirements (in particular, template Z 08.XX) negate the requirement to create/submit deliverables for dimension 4 (in particular the service catalogue and contract database)?</p> <p>f. Further clarification is needed given the extension of the data points required in the new proposed Z08: Extension of scope to intra entity services: Intra entity services are currently out of scope of the Z08 report, and we question the relevance of having information on these services. Also, we would welcome more guidance on the granularity of the information to be provided, because there is no contractual arrangement between departments of the same entity; the actual validation rules of the template do not allow similar suppliers and providers. ‘Name of the ultimate parent company of the service provider’: it would be welcomed to have guidance on how the banks should report the parent entity of the external service provider, as it is not available to banks. ‘Resolution resilience’: further guidance is needed on this information, as it is requested to ensure the continuity of the service, including during the implementation of the business reorganisation</p>	<p>f. As per the Consultation cover note, the reporting would include critical intra entity services, essential services (intra entity, intragroup and external), operational assets and relevant roles, in the form of limited additional data fields to align with requirements from OCIR guidance, such as issued by the SRB. In case of no contractual arrangements between departments of the same entity, the relevant cell can be left blank, as provided for in I.6(6) of the instructions. The validation rules of the template do allow similar recipients and providers (see 0030 of Z.08.01). ‘Name of the ultimate parent company of the service provider’ would normally be expected to be available to the bank. Potentially, if software/applications are assessed as critical or essential assets by the bank, they can be included. Nominative information in the sense of names is not requested. Further details on the specific guidance requested can be found in the EBA guidance and SRB expectations and guidance on OCIR, e.g. on intra entity arrangements, roles, assets, resolution resilience and business reorganisation plan.</p> <p>g. Fields 0050 (Relevance for the critical function) in Z08.04 and field 0050</p>	

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	<p>plan. We also would like more guidance on the link to BRP, DORA, resolution-resilient features at asset level. 'Type of assets': we would like to know if the software/ applications are included; 'Mapping to roles': we would like further guidance on the definition of the 'roles' and a clear conformation that nominative information will not be requested.</p> <p>g. Templates Z08.04 – Relevant Services – Mapping to critical functions (SERV 4) and Z08.05 – Relevant Services – Mapping to core business lines (SERV 5) – The relevance of the service to the Critical Function (Low to High); Fields: Relevance for the Critical Function / Core Business Line (Column 0050). We identify 'Essential Services' as per definition reiterated in Section II.8.1 General instructions (4), i.e. all essential services that would seriously impede or prevent the performance of Critical Functions/Core Business Lines. We would see all those items of high relevance and therefore we find this field contradicts the definition and is redundant.</p>	<p>(Relevance for core business line) in Z08.05 will be removed</p>	
10 iii. Do you see any overlap between this data request and related data requests on relevant/critical services raised by your Resolution Authority as part of the resolvability assessment?	<p>a. Up until now, the SRB requested various/the same information on services (critical and essential) (especially service catalogue and contract repository). The submission deadline was 31.12. each year. The alignment of the EBA's request and SRB's data request is highly appreciated, and it would be appreciated if the data delivery to the SRB with a submission date</p>	<p>a. Regarding the fields in the Annex, these are all required to be part of the bank's internal Management Information Systems in the context of EBA and SRB Guidance on Operational Continuity, only some of which feed into the reporting obligations.</p>	<p>a. No amendments b. No amendments</p>

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	<p>of 31.12. could be replaced by the data delivery to the EBA with submission date 31.3 or 30.4. Nevertheless, it should be noted that the SRB's 'OPERATIONAL GUIDANCE ON OPERATIONAL CONTINUITY IN RESOLUTION – November 2021 update' requires further minimum fields (see Annex I and Annex II), so that further alignment would be appreciated to be able to replace the SRB's reports (service catalogue, contract repository) by the EBA resolution reporting.</p> <p>b. We see the following overlaps:</p> <p>i. With the SRB's Expectations for Banks that led to the establishment of significant capabilities to carry out and maintain comprehensive identification of 'relevant services' within a searchable up-to-date database. The outputs of this database are already shared with the SRB's Internal Resolution Teams on a regular basis and, therefore, do not merit inclusion in the annual resolution templates either. Duplication of this requirement would require revision and investment to ensure the information is provided in a new format, as well as undermining the case for the database, which came with multi-million-euro investments from affected firms at the time.</p> <p>ii. With CASPER for outsourcing and DORA reporting for ICT services, while the</p>	<p>b. We refer to the Consultation Paper cover note: the changes also seek to avoid excessive reporting by banks by incorporating certain key elements of the assessment of operational continuity, which are currently not included in the ITS and are requested ad hoc from reporting entities. In addition, the revised reporting includes these limited additional data fields to align with requirements from OCIR expectations and guidance, such as issued by the EBA, and the SRB Resolvability Assessment guidance. According to the Expectations for Banks, banks should have searchable databases, including a service catalogue. However, this is the bank's own Management Information System and not a reporting requirement.</p>	

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	<p>reporting structure is not the same between these three requirements, which increases the workload.</p> <p>iii. With the SRB's Operational Continuity in Resolution where, as part of annual deliverables, banks submit the inventory relevant operational assets, an overview of the relevant contracts' essential data fields and an overview of the relevant services to the SRB, in line with the requirements of the SRB. The extension of scope with services supporting CBLs is in line with the SRB's ad hoc requests from 2023 and 2024.</p>		
11. Financial Market Infrastructures. The ITS introduce reporting on the substitutability of CCP segments. The ITS also introduce data points on contract identification, a notional amount for derivatives and clarify instructions for existing data fields.	No comments	No comments	No amendments
11 i. Is the definition of 'substitutability' provided in the new reporting on Alternative CCP providers (Z09.04 c0030) sufficiently clear? If not, what	<p>a. The definition is not sufficiently clear for all EBF members. While the ITS provide several aspects, they do not provide specifications per aspect. Additional clarity and guidance would be helpful on practical substitutability and alternative CCP providers. A potential way to</p>	<p>a. See point c. below.</p> <p>b. Suggestion for clarification accepted for 'Product Type' refers to Z09.04 c0020</p> <p>c. As outlined in the instructions for Z09.04 c0030, the replacement can offer</p>	<p>a. No amendments</p> <p>b. The reference Z09.04 c0020 has been added in the ITS instructions.</p>

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clarifications do you think would be necessary?	<p>address this could be to mirror the SRB's Guidance on Critical Functions Report where, for example, the specification on substitutability per aspect is provided.</p> <p>b. A specific point concerns the substitutability definition, which states the ability of the user to substitute the clearing service provider in Column 0020. However, Column 0020 of the same tabs has the 'Product Type'; for which it would be useful to specify the exact tab name or the Column 0020 reference.</p> <p>c. The purpose of the new table regarding CCP substitutability is not sufficiently clear. From our perspective, the only plausible scenario is to replace one CCP with another CCP and not with another FMI provider. Besides this, substituting a CCP seems only theoretical, as the only requirement from any CCP is that, even when going into resolution, the financial institution needs to fulfil any financial obligations to maintain access. If the financial institution will not be able to fulfil obligations towards one CCP, it is very unlikely that it will be able to move to an alternative CCP as they all have similar requirements.</p>	clearing services either directly or indirectly (i.e. it can be either a CCP or an intermediary); and is expected to have a contractual relationship with the reporting entity at the time of reporting. The purpose of the table is to monitor the status quo, and the difficulty of substitution in certain cases is acknowledged.	c. No amendments
11 ii. Are there additional or modified data points that you propose to include in Z09.03 to adequately capture the activity	a. FMI code: ISO MIC (Market Identifier Code) codes should be allowed for FMI trading venues.	a. FMI code: The LEI remains the preferred code and, in the absence of the LEI of the entity reported, the LEI of the operator is expected. The EBA favours consistency among the types of codes reported.	<p>a. No amendments</p> <p>b. No amendments</p> <p>c. No amendments</p>

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of the reporting entity with FMI service providers?	<ul style="list-style-type: none"> b. We should be able to have several lines when we use several connectivity providers. c. It is recommended not to alter the codes of the Report fields, so that they are identical to the EBA reporting proposal. This would avoid further IT impacts. d. It is recommended to add data points related to risk taken by CCPs. 	<ul style="list-style-type: none"> b. Columns 0010 provide a unique numbering, which, among other things, allows for several lines to be reported when the reporting entities use a number of providers to access the same FMI. Z09.01 column 0260 provides for additional service providers to be reported where applicable. c. The review of the ITS introduces a limited reordering of the data fields. d. Initial margin has been added. 	<ul style="list-style-type: none"> d. Adequate amendments for clarification made
11 iii. Are the instructions across Z09.01-Z09.04 sufficiently clear and detailed, and if not, what clarifications do you think are necessary and where?	<p>A few attributes require additional details:</p> <ul style="list-style-type: none"> a. Cumulated Notional Amount. b. Operator of the FMI – Taking into consideration the information available, it is still not clear what is expected to be reported in this field. It would be appreciated if the EBA could please clarify if the field ‘Operator of the FMI’ is only required when the operator is different from the FMI, such as with payment systems. c. Z09.01 – Definition of the exact scope of entities to be reported. d. Z09.01 – Column 0120 – Contract ID – FMI contracts are often organised in a federated way, making it challenging to gather sufficient contract information in the given time. FMI 	<ul style="list-style-type: none"> a. As reflected in column 0120 instructions, cumulated Notional Amount is the sum of daily notional amounts throughout the year. b. The FMI operator, as the legal entity operating the system, is expected to be indicated in any case as apparent from instructions in column Z09.01 column 0080. c. The EBA deems that the scope of entities (both reporting entities and FMI service providers) is sufficiently outlined in II.25.51, II.25.52, and in the instructions for Z09.01 column 0020. d. Contract ID: Z08.01 column 0150 outlines the four necessary conditions for a 	<ul style="list-style-type: none"> a. No amendments b. No amendments c. No amendments d. No amendments e. No amendments f. No amendments g. No amendments h. No amendments

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	contracts are usually not captured in a single FMI contract repository.	contract to be deemed resolution-resilient.	
	e. Z09.01 – Column 0120 – Contract ID – Contract ID may not be relevant for some FMI type, as memberships are not in the form of a contract (CCP, trading venues).	e. The instructions do not mention that the ID should stem from a single repository of contracts. Contract ID is required regardless of whether the contracts are held in one or more repositories.	
	f. Z09.03 – Columns 0080-0090 – Number of transactions on proprietary and client accounts – As ‘Value of transactions on proprietary and client accounts’ is already required in Columns 0100-0110, banks would be grateful if the EBA could please clarify what would be the use of these new data points. We would be thankful if the EBA could please share the rationale for the additional attributes, i.e. the number of transactions and cumulative notional value and their value added to FMIR.	f. The contract IDs shall be reported in each row of the template, with the same ID reported multiple times if it covers multiple rows. Where standard terms and conditions govern the relationship, the contract ID refers to the subscribed membership agreement.	
	g. Concerning the resolution resilience features in contracts with FMI intermediaries to be considered resolution-resilient, it would be appreciated if the EBA could please clarify if a contract with an FMI intermediary should contain at least one, two, three or all four features proposed by EBA.	g. Z09.03 columns 0080-0090 – the cumulated notional amount provides an indication of market activity and business size. The number of transactions allows the calculation of average transaction size with minimum alteration to the existing data fields.	
	h. Concerning the resolution resilience features in contracts with FMI intermediaries – This new data point does not seem to apply, as rulebooks are applied to all counterparties and there is no possible negotiation of terms. It would be very helpful if the EBA could please	h. Resolution resilience shall be indicated for FMI intermediaries regardless of the practicability of its achievement. It should be noted that agent banks may offer access to FMI services under bilaterally negotiated agreements. Trading venues (TV) should be reported regardless of the jurisdiction of incorporation. The definition of TV has been updated.	

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	explain if it only requests the EU27-based trading venues because only those are 'Regulated Markets, Multilateral-Trading Facilities and Organised Trading Facilities'. Otherwise, the definition should be reviewed.		
'12. i Are the data point definitions provided for reporting of the granular liability data sufficiently clear? If this is not the case, for which data points would you require additional clarifications?	<p>a. The column 'Type of Liability' included in 'Z10.06 – Secured Finance, excluding intragroup (LIAB-G-6)' is not yet defined in the Guidance 'Annex II (Instructions)'. We kindly request clarification or the corresponding addition to the Guidance.</p> <p>b. As regards deposit products, further guidance is needed concerning the 'Outstanding Amount', since it is not entirely clear for each type of instrument and liability product how the outstanding amount is calculated.</p> <p>c. As regards other financial and non-financial liabilities, identification at a contract level of granularity and potentially at the counterparty level is difficult, since, for many of the liabilities, this information is not available at that level of detail.</p> <p>d. The differences between (other) non-financial liabilities and residual liabilities – these are errors in the instructions for the Z03.01 tab in the COREP references;</p> <p>e. For template Z10.03 – All Deposits (excluding intragroup), all 'Not-Covered-and-Not-Preferential deposits with a residual maturity</p>	<p>a. This data point is removed from the data request</p> <p>b. In line with the instructions, the 'Outstanding amount' is the sum of the principal amount of, and accrued interest on, the claim or instrument. The outstanding amount due is equal to the value of the claim which the creditor files under insolvency proceedings, without considering insolvency set-off provisions, and does not include any premiums or discounts on liability instruments.</p> <p>c. In the case of banks under the SRB's remit, this requirement already existed in the previous LDR guidance, and banks were given until the end of 2023 to implement the expectation. In any case, this is needed to confirm whether or not a liability is bail-inable.</p> <p>d. We observe the title of item 0460 in Z03.01 is indeed wrong in the instructions and should be corrected.</p>	<p>a. ITS updated accordingly</p> <p>b. No amendments</p> <p>c. No amendments</p> <p>d. ITS updated accordingly</p> <p>e. No amendments</p> <p>f. No amendments</p> <p>g. No amendments</p> <p>h. ITS updated accordingly</p> <p>i. No amendments</p>

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	<p>of less than 1 year, all covered deposits and all Not-Covered-but-Preferential deposits [should be grouped] by category of liability, counterparty type and insolvency ranking'. We understood that the main requirement is to report Not-Covered-and-Not-Preferred deposits with a residual maturity > 1 year individually ('must'). Therefore, banks should have more flexibility with the above-mentioned level of aggregation in line with the approach which was established for LDR purposes. In our opinion, aggregation by category of liability, counterparty type and insolvency ranking should be the minimum granularity. But more levels (and higher granularity), e.g. consideration of governing law, should be possible. This would give banks more flexibility in the technically consistent implementation.</p> <p>f. Field: Insolvency Ranking: The insolvency rank should be one of the ranks included in the insolvency rankings published by the RA of that jurisdiction. (Column 0040); Issue: How is resolution authority defined? GSIB -> SRB Annex 3 – Insolvency Ranking in the Jurisdictions of BU? Non-GSIB -> National Authority (e.g. BaFin)?</p> <p>g. Filed: Outstanding Principal Amount (Column 0090), Accrued Interest (Column 0100); Issue: Please clarify the guidance on which currency (if amount in FX) should be used for the</p>	<p>e. Although we agree with the statement, this does not require a change to the instructions.</p> <p>f. The current wording is aligned with Commission Implementing Regulation (EU) 2021/763 on MREL-TLAC.</p> <p>g. All data points should be reported in the same reporting currency expected/specified by the RA.</p> <p>h. Reference should be changed to BRRD 45(1) across all relevant granular tabs for the commented field.</p> <p>i. Transitional amount should be reported using the reporting currency (as for all other fields) (EUR in the case of entities incorporated in the banking union).</p>	

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	<p>reporting of these values? By reading the instructions (track changes) the words 'The EUR (counter) value of the' are deleted.</p> <p>h. Field: Amount meeting the conditions for MREL eligibility (Column 0205); Issue: The outstanding amount of the own funds and eligible liabilities counting towards the requirement set in accordance with Article 45a(1) of Directive 2014/59/EU, please confirm if Article 45a(1) BRRD is the correct one. The SRB LDR Guidance instructions refer to Article 45b BRRD</p> <p>i. Field: Amount Qualifying as Own Funds (Column 0220); Issue: Please clarify the guidance on if the reporting should consider phase out and in which currency the reporting of the amounts (if in FX) is expected</p>		