

Opinion of the European Banking Authority on the profit or loss reporting for the period between the date of application of the IFRS 18 and the amended Commission Implementing Regulation (EU) 2024/3117 (ITS on supervisory reporting)

Introduction and legal basis

1. The EBA competence to deliver an opinion is based on Article 29(1)(a) of Regulation (EU) No 1093/2010¹, as the EBA's main tasks are, among others, monitoring and assessing market developments in the area of its competence (Article 8(1)(f)), contributing to the development of a common supervisory culture (Article 8(1)(b)), and performing, *inter alia*, a general coordination function by means of facilitating the exchange of information between competent authorities (Article 31).
2. The above also applies to financial information and, notably, to institutions' statement of profit or loss information, where relevant and meaningful data are necessary to provide insights on institutions' performance in terms of both profitability and sustainability of business models. Thus, this information is specifically used to carry out regular supervisory activities on institutions, and to calculate profitability indicators within risk assessments' analysis of the banking sector by the EBA and by competent authorities.
3. Pursuant to Article 430(3) and (4) of Regulation (EU) No 575/2013, credit institutions and investment firms that are required to prepare their public consolidated financial statements in accordance with International Financial Reporting Standards (IFRS) as

¹ 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, [Regulation - 1093/2010 - EN - EUR-Lex](#)).

endorsed by the EU², and credit institutions that are required by supervisors to use IFRS endorsed by the EU for the determination of own funds are required to report financial information (FINREP) to their supervisors. In this regard, the EBA originally chose to align the structure of the FINREP templates to the IFRS requirements to achieve efficient regulation by avoiding any discrepancies between reporting requirements and the institutions' public financial statements.

4. In April 2024, the International Accounting Standards Board (IASB) issued IFRS 18 – 'Presentation and Disclosure in Financial Statements', which supersedes the accounting standard IAS 1 – 'Presentation of financial statements', with the aim of increasing comparability and transparency of entities' public statement of profit or loss. IFRS 18 was endorsed in the EU by Commission Regulation (EU) 2026/338 of 13 February 2026³, and it shall be applied in the institutions' public financial statements for the accounting years beginning on or after 1 January 2027.
5. Given the endorsement of the IFRS 18 in the EU and the continued commitment to maintaining consistency between financial reporting requirements and IFRS requirements, the EBA has developed draft Implementing Technical Standards (ITS) amending Commission Implementing Regulation (EU) 2024/3117 including, among others, the implementation of IFRS 18 in FINREP. The draft ITS FINREP templates (and related instructions) mainly affected by the IFRS 18 implementation (i.e. F 02.00, F 16.01, F 16.02, F 16.03, F 16.04, F 16.04.1, F 16.05, F 16.06, F 16.07, F 45.02, F 45.03, F 20.03) were published for consultation on the EBA website until 10 May 2026, whereas the consultation on the rest of the ITS 'reporting package' ends on 10 July 2026.
6. Following the end of the consultation period, and the finalisation of the revised ITS on supervisory reporting, the first application date of those ITS is expected to be at the end of September 2027- i.e. a few months after the first application date of IFRS 18 in the EU (1 January 2027). As a result, uncertainty arises as to the manner of compliance with the financial reporting requirements during the interim period in which the IFRS 18 must be used to prepare the institutions' public statement of profit or loss, before the ITS including the IFRS 18-compliant templates becomes applicable.
7. In accordance with Article 14(7) of the Rules of Procedure of the Board of Supervisors⁴, the Board of Supervisors has adopted this Opinion which is addressed to competent authorities (CAs) with the aim of providing guidance on how to implement the financial reporting requirements in a way that avoids inconsistencies between institutions' external reporting and their supervisory reporting during the interim period from January 2027 to the first application date of the amended ITS. Further, in the current wider context of simplification

² Regulation (EC) No 1606/2002 of the European Parliament and of the Council of 19 July 2002 on the application of international accounting standards (OJ L 243, 11.9.2002, pp. 1, <http://data.europa.eu/eli/reg/2002/1606/oj>).

³ Commission Regulation (EU) 2026/338 of 13 February 2026 amending Regulation (EU) 2023/1803 as regards International Financial Reporting Standard 18 (OJ L, 2026/338, 16.2.2026, <http://data.europa.eu/eli/reg/2026/338/oj>).

⁴ Decision of the European Banking Authority concerning the Rules of Procedure of the Board of Supervisors of 22 January 2020 ([EBA/DC/2020/307](http://www.eba.europa.eu/media/1000000/2020/01/22/eba_dc_2020_307.pdf)).

of the EU regulatory framework, this Opinion aims to contribute to the reduction of any potential burdens for relevant institutions, who would otherwise have to incur costs from the discrepancies between their external and supervisory reporting.

General comments

8. Following the end of the public consultation on 10 May 2026, the EBA has prepared the draft final version of the following FINREP templates of the ITS on supervisory reporting (and related instructions), which incorporate comments received by the industry: F 02.00, F 16.01, F 16.02, F 16.03, F 16.04, F 16.04.1, F 16.05, F 16.06, F 16.07, F 45.02, F 45.03, F 20.03. Annex 1 to this Opinion includes the final report on the part of the ITS relating to those templates, with the feedback table containing the comments received by the industry on these templates.
9. These templates will be submitted for their adoption by the European Commission as part of the ITS amending Commission Implementing Regulation (EU) 2024/3117. These ITS, once adopted by the European Commission in the form of the updated Commission Implementing Regulation (EU) 2024/3117, are expected to first apply at the end of September 2027.
10. With the view to assisting institutions and alleviating any potential operational costs due to a misalignment between their external reporting obligations and supervisory reporting obligations, the EBA has, in the draft final ITS, developed updated reporting templates. These contain all the data points on profit or loss specified in Commission Implementing Regulation (EU) 2024/3117 with some adjustments to the labels/instructions, as well as the additional data points on profit or loss which would be required to adapt the ITS to the new IFRS18 standard- together with the revised instructions.
11. The IT solutions (including the data point model, the validation rules and the XBRL taxonomies), which support the reporting obligations set out in these revised templates, will be part of the technical package for version 4.4 (Phase 1) of the supervisory reporting framework. The final version of the latter is expected to be published in July 2026, or at the latest by September 2026.
12. As a result, the final draft version of the revised templates provides the option, but not the obligation, for any institution that so wishes, to report the relevant FINREP templates either in accordance with the current accounting framework (IAS 1) or using the new accounting standard (IFRS 18).
13. At the time when the ITS amending Commission Implementing Regulation (EU) 2024/3117 are adopted by the European Commission and eventually start to apply, the relevant templates and IT solutions will be incorporated into the related technical package for version 4.4. (Phase 2) of the supervisory reporting framework, and the IFRS 18 module included in phase 1 of version 4.4 will cease to apply.
14. On these grounds, the EBA advises competent authorities to allow any institutions that so wish to implement the requirements of Regulation (EU) 2024/3117 on the reporting of the relevant FINREP templates on profit or loss data – using instead of the templates of Regulation (EU) 2024/3117 – these revised templates and IT solutions, with all other

reporting requirements of Commission Implementing Regulation (EU) 2024/3117 remaining the same. Competent authorities may, as part of their supervisory dialogue, engage with institutions regarding the use of the templates to ensure consistent and timely implementation of the option provided in the Opinion.

15. This Opinion is in line with the current efforts of the EBA on reducing reporting costs through a simplification and streamlining of the reporting framework in accordance with the European Commission's 2024 Work Programme and data strategy on long-term competitiveness.

Specific comments

Data to be reported

16. For the reporting period from January 2027 and until the first application date of the ITS amending Commission Implementing Regulation (EU) 2024/3117, the EBA advises CAs to allow institutions that are subject to the reporting requirements referred to in Article 430(3), (4) and (9) of Regulation (EU) No 575/2013, the option to submit the information on profit or loss based on the revised templates, as set out in Annex 2 to this Opinion.
17. In the technical package for version 4.4 (Phase 1) of the supervisory reporting framework, these revised templates will have the following interim labels: F 02.01, F 16.01.1, F 16.02.1, F 16.03.1, F 16.04.2, F 16.04.1.1, F 16.05.1, F 16.06.1, F 16.07.1, F 45.02.1, F 45.03.1, F 20.03.1 to distinguish them from the existing technical tables still in force for version 4.2 of the supervisory reporting framework. Once the ITS amending Commission Implementing Regulation (EU) 2024/3117 start to apply, these revised templates will be moved under the technical package for version 4.4 (Phase 2). At that time, the original labels will be reinstated since the technical tables for version 4.2 will no longer be in force.

Date and frequency of the submission

18. Where institutions make use of the above-mentioned option as set out in paragraph 16, CAs should continue to require the reporting of these templates with the same frequencies, reference and remittance dates set out in Articles 2, 3, 11, and 12 of Commission Implementing Regulation (EU) 2024/3117.

Format and procedure of the submission

19. Where institutions make use of the above-mentioned option, set out in paragraph 16, CAs should require the submission of the information on profit or loss pursuant to Article 23 of Commission Implementing Regulation (EU) 2024/3117, by respecting the data point definition of the data point model and the validation formulae referred to in the IT solutions set out in the technical package for version 4.4 (Phase 1) of the supervisory reporting framework. The latter is expected to be published by the EBA in July 2026, or at the latest by September 2026.

20. CAs should also ensure that the data continue to be submitted to the EBA through EUCLID, in accordance with the sequential approach set out in the EUCLID decision.

Data quality and technical implementation

21. It is important to support the operationalisation of the use of the option provided in the Opinion in the least burdensome way for both CAs and institutions, as well as preserving the completeness and the quality of the data reported during the interim period. Considering these objectives, CAs should receive notification from the institutions in their respective jurisdictions and then inform the EBA with respect to the option chosen by the end of the year 2026.

This opinion will be published on the EBA's website.

Done at Paris, 8 July 2026

[signed]

François-Louis Michaud

Chairperson

For the Board of Supervisors

ANNEX 1:

- **Final Report on the implementation of IFRS 18 in FINREP**

ANNEX 2:

- **FINREP templates IFRS 18- Annex III**
- **FINREP templates IFRS 18 – Annex IV**
- **FINREP instructions IFRS 18 – Annex V**