



Brussels, 9<sup>th</sup> November 2024

MR/MM

**EACB comments on**

**EBA Draft Implementing Technical Standards**  
**on IT solutions for public disclosures by institutions, other than small and non-**  
**complex institutions, of the information referred to in Titles II and III of Part Eight of**  
**Regulation (EU) No 575/2013**

**(EBA/CP/2024/20)**

**General comments**

The EACB appreciates the opportunity to comment on the EBA Draft ITS on IT solutions for public disclosures by institutions, other than small and non-complex institutions, of the information referred to in Titles II and III of Part Eight of Regulation (EU) No 575/2013. We welcome the EBA efforts to promote an active participation of the industry in developing such pivotal projects like the Pillar 3 Data Hub (P3DH).

To support the EBA in its mandate to improve usability and comparability of prudential information by all interested users with the aim of strengthening the transparency of the EU banking sector, the EACB recommends a number of adjustments that would streamline process and implementation efforts. We would also like to stress that the feedback presented below remains partial given that substantial elements and further obligations are yet to be defined, in particular regarding the requirements for small and non-complex institutions (SNCIs) that will be addressed at a later stage.

**Answers to selected questions**

**Question 1:** Do you agree with the proposed IT solutions that would support the implementation of the P3DH to Large and Other institutions? If not, please explain the reasons why.

**EBA mapping tool**

Para. 25 specifies that the disclosure requirements are aligned with the reporting framework, which means that the quantitative information to be disclosed is also included in the supervisory reporting. However, this is not fully the case, as the EBA Mapping Tool under Article 431 (1) CRR shows, since it indicates “No mapping (to reporting)” in many data fields. We would therefore welcome a complete mapping in the EBA Mapping Tool. It would also be helpful to specify the additional data to be submitted not included in the EBA Mapping Tool (for example, the MREL and TLAC disclosures and phase in disclosures) via the ITS itself or a complementary tool to the EBA Mapping Tool.

**XBRL-csv file and DPM**

Differently from the discussion paper of December 2023, the current draft ITS introduces a more burdening managing of the accompanying narrative. Art. 6(2) and para. 35 specify that quantitative data have to be submitted in the XBRL-csv format and need to include accompanying narrative. During the public hearing on

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October 21, 2024, it was reiterated that the accompanying narrative for the individual quantitative forms should be included in both the XBRL-csv and PDF files. In our opinion, this form of double mapping should generally be avoided in order to prevent additional, burdensome manual work and lead to typos or wrong positioning of the information, also considering the difficulty of inserting text in an XBRL-csv format. We would also like to stress that the technical specifications for the submission would only be published in DPM 4.1. A technical implementation and the development of the necessary processes in only 3 months would be already a significant challenge, without mentioning the complexity of including the accompanying narrative in the XBRL-csv file. For these reasons, **we suggest to reassess the EBA expectations and withdraw the request to including accompanying narrative with the quantitative data.**

In relation to the DPM 4.1, the EBA reported during the public hearing that the final draft of technical standards will not be published until Q1 2025 or perhaps even Q2 2025. This is too late and jeopardises the timely and high-quality implementation of the DPM by software providers and institutions. We therefore request that the P3DH section in DPM 4.1 should be published as soon as possible, preferably in Q4 2024. This would also be in line with Article 430 (7) CRR which requires that any new reporting requirements (ITS) shall not be applicable earlier than six months from the date of their entry into force.

#### **PDF file(s)**

We suggest to clarify whether the zip file with the submission report may also contain more than one PDF file, and not only for language and/or currency reasons. The text, in fact, remains ambiguous given that in Art. 6 (1) is specified that “the institutions should submit to the EBA a single PDF report containing all the qualitative and quantitative information”, meanwhile in art 6(3) is reported that “Pdf report(s) shall be submitted” to the EBA. A simple clarification and better instructions will avoid confusion during the submission process.

Furthermore, according to Article 437 (c) CRR, the terms and conditions of the capital instruments must be disclosed in addition to the description of the main features of the instruments (as required under Article 437 (b) CRR). In the public hearing on EBA/DP/2023/01, the EBA indicated that the terms and conditions of the capital instruments are not to be uploaded to the P3DH and shall continue to be published on the website of the respective institution. In row 37a, the form EU CCA contains a link to the full terms and conditions of the capital instruments on the website of the respective institution. We kindly request language that explicitly confirms such this procedure, as we believe that this would enhance overall readability.

#### **Test environment**

During the hearing, the EBA announced the establishment of a test environment for the P3DH, but only for the implementation phase. For the submission of Pillar 1 reports, several NCAs offer the technical possibility to carry out test submissions in a test environment. We therefore ask the EBA to provide a test environment on a permanent basis so that test submissions can be made at any time. We believe that this would significantly improve the submission process and the data quality.

#### **Language**

Para. 50 states that national languages may be used for the explanations. It should therefore be technically ensured that all characters deviating from the English alphabet are accepted and not changed during transmission or publication.

**Question 2:** Would you agree with the specification to provide the information on remuneration policies separately? If not, please explain the reasons why.

NA



**Question 3:** Would you agree with the proposal on the collection of contact points information, including the suggested monthly frequency?

Institutions should be able to choose between vLEI and the template “X 00.01 - P3DH: Institutions contact persons for P3DH” in order to be able to submit the contact persons for Pillar 3 disclosure to the EBA. The introduction of redundant reporting requirements (vLEI and form X 00.01) should be avoided. Furthermore, the template “X 00.01 - P3DH” (if this option is chosen) should **only need to be reported in the event of an update to the contact persons and not on a monthly basis. In other words, we are of the view that institutions** provide to the EBA the contact persons once at the start of the Data Hub, and thereafter only when changes will take place. It is in the interest of the banks to update the EBA database with their relevant contact persons, as it is the responsibility of the banks to make sure that the information in the hub is correct and complete. It would thus be appropriate to do so without undue administrative burden.

**Question 4:** Would you have any comments or suggestions on the most adequate profile of the contact persons within the institution?

In our view, it is responsibility of the bank and in their own interest (see Question 3) to make sure that they appoint relevant and knowledgeable EBA contact persons and inform the EBA when they change positions. So there is no need to define a profile for the contact persons in template “X 00.01 - P3DH: Institutions contact persons for P3DH”. It is also not a requirement indicated under the CRR.