Association des Banques et Banquiers, Luxembourg
The Luxembourg Bankers' Association
Luxemburger Bankenvereinigung

ABBL response

EBA Consultation Paper on changes to ITS on supervisory reporting (General part)

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General questions:

Question 1:

The ABBL broadly supports the proposed amendments to the ITS and agree with the EBA's objective of creating a simpler, smarter and more proportionate reporting framework.

The proposed integration of reporting requirements, reduction of duplications and increased consistency between reporting modules are positive developments that should improve the overall efficiency of supervisory reporting over the long term.

While the consultation highlights the deletion of a number of reporting templates, these deletions are partially offset by the introduction of new templates and additional reporting requirements. Consequently, the overall number of templates to be produced does not decrease significantly for our institution.

More importantly, several of the newly introduced templates require data that is considerably more granular and complex than existing reporting. In particular, the incorporation of stress testing information into the regular supervisory reporting framework introduces new data sourcing challenges, calculation methodologies, governance requirements and validation processes. These data are generally not readily available through existing regulatory reporting infrastructures and often require dedicated risk modelling capabilities and additional manual controls.

As a result, the implementation effort associated with these new requirements is substantial despite the reduction of certain existing templates.

We remain fully committed to supporting the implementation of the revised framework and appreciate the EBA's efforts to improve supervisory reporting. Nevertheless, we encourage the EBA to recognise that the implementation effort for

[1] *This response has been prepared with significant input from one banking member, a significant institution in Luxembourg.*

systemic institutions remains significant and that adequate implementation timelines will be essential to ensure high-quality reporting.

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

The communication tools developed by the EBA (Time Traveller, Signposting Tool and Reporting Framework Overview) are valuable initiatives that improve transparency and facilitate the understanding of regulatory developments.
These tools help institutions identify changes between framework versions and better anticipate future reporting requirements.

Further improvements could include:
• additional practical implementation examples;
• more detailed mapping between old and new templates;
• impact assessments by reporting area;
• downloadable change logs in structured formats;
• implementation guidance illustrating common use cases.

Such enhancements would further facilitate implementation planning.

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

The EBA website has significantly improved over recent years and already provides extensive documentation.
To further support reporting institutions, we would welcome:
• a consolidated implementation roadmap for each reporting release;
• a searchable database of template changes;
• links between ITS amendments, DPM releases and validation rules;
• practical implementation FAQs;
• clearer indication of mandatory versus editorial changes;
• earlier publication of final technical documentation.

Providing these resources in one central location would considerably improve implementation efficiency.

Question 4: What are the respondents' views on how change management process can be improved considering the limitations imposed by the calendars for the implementation of the underlying regulatory calendars? Following a regulatory change supervisors need updated data either by

regular reporting or by ad hoc reporting, when timelines do not allow adequate time to implement, how should data gaps and outdated regular reporting be managed?

We strongly support further improvements to the regulatory change management process.
In practice, institutions require significant lead times to analyse regulatory changes, assess business impacts, develop IT solutions, perform testing and implement governance updates.
Where regulatory implementation deadlines are particularly challenging, supervisory authorities could consider:
• temporary supervisory flexibility;
• phased implementation;
• transitional reporting arrangements;
• temporary use of best-effort reporting where data is not yet fully available.

Such approaches would reduce operational risk while ensuring supervisors continue to receive meaningful information.

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

We generally support the introduction of fixed implementation calendars.

A predictable implementation schedule would significantly improve project planning, budgeting, IT resource allocation and coordination across institutions and software vendors. Whenever possible, reporting changes should become applicable only on predefined reporting reference dates.

For quarterly reporting institutions, implementation dates aligned with quarter-end reporting periods would be the most practical solution. Predictability is one of the most effective ways to reduce implementation costs.

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

It is the ABBL's view that early implementation should remain voluntary rather than mandatory.

Some institutions may have the resources to implement changes ahead of schedule, while others, particularly institutions relying on third-party reporting solutions or complex internal infrastructures, may require the full implementation period. Allowing voluntary early adoption provides flexibility without creating competitive disadvantages or unnecessary implementation risks.Mandatory acceleration of implementation should therefore be avoided unless absolutely necessary for supervisory purposes.

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

The impact could be measured through several quantitative indicators, including:

- IT development effort (person-days);
- external consulting costs;
- software implementation costs;
- testing and validation effort;
- reporting production costs;
- number of affected templates;
- number of impacted data points;
- number of impacted validation rules;
- business resources required for implementation.

In addition, implementation predictability itself generates measurable cost savings by reducing emergency developments, overtime, parallel reporting runs and project reprioritisation.
These indirect benefits should also be considered when assessing reporting burden reductions.

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

The ABBL considers that the reduction in reporting burden will vary significantly depending on the type of institution.
For Small and Non-Complex Institutions (SNCIs), the reduction in reporting frequency and the removal of certain reporting obligations are likely to generate meaningful operational savings.
For systemic institutions, however, the expected reduction appears considerably more limited.
Although some templates and data points are removed, these are largely compensated by the introduction of new templates, additional granular information and new reporting requirements. Consequently, the overall reporting framework remains broadly comparable in size and complexity.

Furthermore, the new reporting requirements often rely on sophisticated risk information, including stress testing-related data, which require extensive data integration, methodological alignment and governance enhancements.
These implementation costs are significant and should be recognised when assessing the overall burden reduction.
In our view, the net reporting burden reduction for systemic institutions is therefore likely to be materially lower than the aggregate figures presented in the consultation paper.
Accordingly, we recommend that future impact assessments distinguish more clearly between the effects on SNCIs and those on significant or systemic institutions, as the implementation challenges and resulting benefits differ substantially between these categories.

Conclusion

Overall, ABBL supports the direction of the EBA's proposals and remains committed to constructive implementation of the revised supervisory reporting framework, while stressing the importance of proportionality, predictability and realistic implementation timelines to ensure high-quality regulatory reporting.