



ABBL response to EBA CP 2024/06 on public disclosures by institutions of the information on operational risk under Article 446 of Regulation (EU) No 575/2013

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Question 1: Are the amended/new templates EU ORA, EU OR1, EU OR2 and EU OR3 and the related instructions clear to the respondents? If no, please motivate your response.

The templates seem clear.

Question 2: Do the respondents identify any discrepancies between these templates and related instructions and the calculation of the requirements set out in the underlying regulation?

The templates for the disclosure seem to be aligned with the requirements and regulation, however we are pointing out an inconsistency between the requirements in CP/2024/07 on supervisory reporting and the ones specified in CP/2024/06 on disclosure. On one hand, in this present CP, Template EU OR1 is requesting to provide losses for the last 10 years in accordance with the requirements set in the new CRR3 and hence respecting the criteria set for building the loss data set. On the other hand, CP/2024/07 on supervisory reporting is proposing to keep the current way of reporting losses (COREP template C.17.01 and C.17.02) arguing that the criteria to report on loss data in alignment with CRR3 need to be further specified and that such criteria will be specified later (level 2 mandate). We therefore consider that there is an inconsistency in the requirements between CP/2024/06 and CP/2024/07. Moreover, as a consequence, contrary to the templates OR2 and OR3 which can be mapped with the respective regulatory reporting templates (defined in CP/2024/07), no mapping can be established between template OR1 and the supervisory reporting on loss data.

Question 3: Do the respondents agree that the amended draft ITS fits the purpose of the underlying regulation?

Partly agree due to the remark made in question 2

Question 4: Do the respondents consider that the “mapping tool” appropriately reflects the mapping of the quantitative disclosure templates with supervisory reporting templates?

NA