

2024 List of consultations and requests to the industry¹

Transparency and predictability are two important principles driving the work of the Single Resolution Board (SRB). The SRB therefore actively engages with the industry to clearly communicate policies, decisions and expectations as well as to consult parties impacted by its activities, with a view to achieving better results.

The tables provide an overview of public consultations (table 1) as well as the regular requests (data or surveys) and deliverables stemming from the Expectations for Banks (EfB) (table 2) the SRB is planning over the course of 2024. Their purpose is to allow banks to better allocate resources and to anticipate workload throughout the year. Bank-specific or ad hoc requests issued by Internal Resolution Teams (IRTs) were excluded from the second table, given they are not relevant to all banks under the SRB's remit. In some cases, the timeline of certain requests may be adjusted by IRTs.

The SRB reserves the right to announce additional consultations and (non-bank-specific) requests throughout the year in case of unforeseen circumstances. However, these would be announced with an appropriate notice period. The tables will be updated on a regular basis.

¹ This publication is not intended to create any legally binding effect and does not in any way substitute the legal requirements laid down in the relevant applicable European Union (EU) and national laws. It may not be relied upon for any legal purposes, does not establish any binding interpretation of EU or national laws and does not serve as, or substitute for, legal advice.

The SRB reserves the right to amend this publication without notice whenever it deems appropriate and it shall not be considered as predetermining the position that the SRB may take in specific cases, where the circumstances of each case will also be considered

List of SRB Consultations in 2024²

Topic	Title of Request	Description	Scope	Timeline
MREL	Consultation on MREL Policy Review	The SRB will run a public consultation on the MREL policy review to provide the industry as well as other stakeholders with an opportunity to submit feedback before enacting any policy changes. Via this consultation, the SRB aims to collect views from the industry on how to shape the MREL policy in the short and long run.	Open/Voluntary	Q1 2024
Expectations for Banks [5.3]	Consultation on Minimum Bail-in Data Template (MBDT)	The Minimum Bail-in Data Template (MBDT) will introduce a standardised format for providing the relevant data for the implementation of the bail-in tool as specified in the minimum SRB Bail-in data list. The SRB will run a targeted consultation with the industry to provide an opportunity to submit feedback before enacting any amendments to the existing bail-in guidance.	Open/Voluntary	Q1 2024
Expectations for Banks [general]	Consultation on the resolvability assessment policy	The SRB will run a public consultation on the envisaged changes to its resolvability assessment policy and self-assessment template to provide the industry as well as other stakeholders with an opportunity to submit feedback before enacting any policy changes.	Open/Voluntary	Q3 2024

² **Guidance on scope:** i) open/voluntary – open to all stakeholders, e.g. public consultations; or on a voluntary basis ii) all – concerns all banking groups [under the SRB's remit](#); iii) resolution groups – all banking groups under the SRB's remit, which are earmarked for resolution; iv) limited – a sub-set of banks under the SRB's remit, e.g. all banks with a bail-in resolution strategy. Please note that all aforementioned definitions might encompass subsidiaries reporting on an individual basis, so e.g. “resolution groups” will also cover some subsidiaries, in line with specific instructions from IRTs or relevant accompanying reports.

Expectations for Banks [general]	Consultation on bank resolvability testing	<p>The SRB will run a public consultation on its approach to the resolvability testing³ on banks to provide the industry as well as other stakeholders with an opportunity to submit feedback before enacting any policy changes.</p>	Open/Voluntary	Q3 2024
Other	Consultation on the preliminary amounts of administrative contributions	<p>Pursuant to EU law banks operating across the Banking Union must pay an annual levy towards the running costs of the SRB. The SRB runs consultations in relation to the determination of the individual annual contributions to the administrative expenditures on an annual basis, for the advance instalments in Q1 (only for SRB entities) and (final) contributions in Q3 (all entities). This consultation allows the SRB to better structure its dialogue with institutions in scope and facilitate the decision-making process.</p>	Voluntary	For advance instalments: 08/01/24 – 31/01/24
Single Resolution Fund	Consultation on preliminary amounts of the ex-ante contributions (only in case the target level is not reached and therefore 2024 contributions are collected) and consultation on preliminary	<p>The SRB provides institutions with the possibility to comment on the main elements of the ex-ante calculation decisions, which determine the annual fees levied on banks by EU law to pay into the Single Resolution Fund (SRF). This procedure that will continue in 2024 in case the target level is not reached but also for institutions subject to restatements enhances transparency in light of the principle of good administration and with a view to upholding an effective dialogue.</p>	Voluntary	1st half March 2024

³ Resolvability testing includes dry-runs, desktop exercises and walkthroughs when performed by banks.

	amounts for restatements			
Single Resolution Fund	Consultation on the modalities of payment of ex-ante contributions (only in case the target level is not reached)	By EU law, the SRB levies annual fees on institutions, also known as ex-ante contributions, to pay into Single Resolution Fund (SRF) every year. The SRB invites all banks in scope of paying these contributions to provide comments and in particular to indicate whether they want to pay the contribution partially in Irrevocable Payment Commitments or not. This procedure (that will continue in 2024 only in case the target level is not reached) enhances transparency in light of the principle of good administration and with a view to upholding an effective dialogue.	Voluntary	01/05/24 – 25/05/24 (in case the target level is not reached)

List of SRB requests and EfB deliverables in 2024

Topic	Title of Request	Description	Scope	Timeline
MREL	EBA MREL-TLAC report	On a quarterly basis, the SRB collects the MREL-TLAC report from banks under its remit. This template, which has been developed by the EBA and is submitted in line with CIR 2021/763, covers basic data points allowing for the verification of compliance with MREL requirements.	Resolution Groups	Q4 2023: 19/02/24 Q1 2024: 20/05/24 Q2 2024: 19/08/24 Q3 2024: 18/11/24
MREL	MREL quarterly monitoring	The SRB regularly requests banks to fill in a template, which provides an overview of additional MREL data points, which are not included in the EBA CIR 2021/763 MREL-TLAC report, primarily the quarterly MREL issuances and forecasts. These additional data points feed into the SRB MREL dashboards published on a quarterly basis on the SRB's website.	Resolution Groups	Q4 2023: 19/02/24 Q1 2024: 20/05/24 Q2 2024: 19/08/24 Q3 2024: 18/11/24
MREL	Additional Liability Reporting	The SRB requests some banks to complete the additional liability report (ALR) on an annual basis to collect specific MREL data points, which are not captured in the EBA CIR 2021/763 MREL TLAC report, mostly for groups under a multiple point of entry (MPE) strategy.	Limited	01/03/24 – 31/03/24
MREL	MREL ad-hoc daisy chain report	The SRB will request ad-hoc data on daisy chain to monitor the banks' application of the daisy chain framework until the revised MREL-TLAC report becomes applicable.	Limited	Q1 2024: 20/05/24
Expectations for Banks [4.1]	Additional OCIR information	On the basis of the Expectations for Banks and the operational guidance on operational continuity in resolution (2021), the SRB has set the requirement for banks to provide it with some additional information on an annual basis, which is not	Resolution Groups	01/03/24 – 30/04/24

		included in the CIR template. The information relates to banks' operational dependencies supporting core business lines that are necessary for the resolution strategy (essential dependencies) as well as data on intra entity dependencies. It includes quantitative and qualitative information which is needed to demonstrate resolvability, including banks' self-assessments on OCIR capabilities. ⁴		
Expectations for Banks [4.4]	Financial Market Infrastructures Reporting (FMIR)	Since 2017, banks have been requested to complete the Financial Market Infrastructures Report (FMIR) and submit it to the SRB on a yearly basis. In the FMIR, banks provide information on participation in or membership of FMIs and use of FMI intermediaries for payment, clearing, settlement and custody services. Institutions do not need to complete CIR 2018/1624 Template Z.09.00 FMI, which is completed through the FMIR, as the FMIR contains all information required under the CIR.	All	01/03/24 – 30/04/24
Expectations for Banks [7.1-7.3]	Solvent Wind Down plans	Introduced via the operational guidance on the solvent wind-down of trading books in 2021, banks with material trading activities have been requested to deliver SWD plans describing their activities and strategies to exit their trading books in an orderly way and without jeopardizing financial stability. Following a full phase-in of the policy, banks in scope are expected to update their plans on an annual basis.	Limited	28/06/2024
Expectations for Banks [3.2]	Liquidity exercise 2024 – Joint Liquidity Template	Past crisis cases have shown the importance of receiving liquidity data in resolution, which is why the SRB expects banks to measure and report their liquidity and funding needs as well as sources as part of resolution planning. Leveraging on the SSM liquidity template, the SRB has developed the Joint Liquidity Template with the ECB to include additional data points relevant for resolution, exploiting synergies in order to reduce the reporting burden on banks. Banks are expected to complete this	Resolution Groups	Q3/Q4 2024

4 While for other Efb's dimensions banks may be requested to deliver a playbook or a report, since 2020 the way on how provide such information on OCIR was left to IRT's flexibility, which requested the information in different manners such as by means of working technical notes, questionnaires, reports, playbooks.

		template annually, as part of the liquidity exercise, in line with the instructions of the associated guidance .		
Expectations for Banks [7.1-7.3]	Solvent Wind Down playbooks	Introduced via the operational guidance on the solvent wind-down of trading books (2021), banks with material trading activities have been requested to deliver SWD playbooks that focus on the internal steps and actions a bank has to take to execute the wind down. Following a full phase-in of the policy, banks in scope are expected to update their plans on an annual basis.	Limited	31/12/2024
Expectations for Banks [1.4; 2.3; 5.3]	Continuation of bail-in dry-runs – Outcome report	In the context of the priorities for 2024 RPC, banks with a resolution strategy and for which the outcome of the 2023 dry run on bail-in revealed the need for further improvements should repeat the exercise in 2024. Upon finalisation of the dry run, banks are expected to submit an outcome report to the IRT, which will highlight whether shortcomings were successfully addressed.	Limited	31/12/2024
Expectations for Banks [1.4, 5.3]	Transfer playbook	Introduced via the operational guidance for banks on separability for transfer tools in 2021, banks for which the resolution strategy envisages a transfer tool have been requested to submit a transfer playbook. In this operational document, which builds on the SAR, banks outline the measures (e.g. governance, communications) it would take to implement a partial transfer. Following a full phase-in of the policy, banks are expected to update the playbook on an annual basis.	Limited	31/12/2024
Expectations for Banks [2.3]	Bail-in playbook	On the basis of the Expectations for Banks and the dedicated operational guidance on bail-in playbooks (2020, update in 2022), banks for which the resolution strategy foresees the bail-in tool have been requested to develop bail-in playbooks, which support the execution of the write-down and conversion of capital instruments and eligible liabilities as well as the execution of the bail-in tool in resolution. Following a full phase-in of the SRB guidance, banks in scope are expected to update their bail-in playbooks on an annual basis (SRB may however ask banks for interim progress updates around June each year).	Limited	31/12/2024
Expectations for Banks [4.6]	FMI contingency plans	On the basis of the Expectations for Banks and the operational guidance for FMI contingency plans (2020), all banks for which the strategy is resolution have been requested to submit contingency plans that outline the measures to support continued access to FMI services or a smooth transfer or wind-down of activities.	Resolution Groups	31/12/2024

		Following a full phase-in of the policy, banks are expected to review contingency plans at least once per year and to update them as necessary.		
Expectations for Banks [5.2]	Valuation testing 2024 – Outcome report	<p>In the context of priorities for 2024 RPC, banks are expected to test their MIS capabilities for valuation by the end of 2024, with the aim to demonstrate the effectiveness and operational readiness of the IT processes and solutions implemented by banks in previous resolution planning cycles to collect and aggregate the SRB Valuation Data Sets. Upon finalisation of the test, banks are expected to submit to the IRTs an outcome report covering process steps and governance, outcomes, data quality assurance process' results, challenges and actions as well as timing to remediate potential shortcomings identified during the test, etc.</p> <p>Further guidance on the technical aspects of the 2024 valuation testing, including guidance on the structure and content of the outcome report, will be provided to banks in Q4 2023/Q1 2024. It will provide a template for the outcome report and a non-exhaustive list of integrity, consistency and reconciliation checks to be implemented by banks. This follows the same process as the self testing guidance done in the previous cycle.</p>	Resolution Groups	31/12/2024 ⁵
Expectations for Banks [6.1]	Communication plan	The Expectations for Banks (2020) introduce the requirement for banks to develop communication plans to ensure timely, robust and consistent communication to stakeholders as well as governance arrangements to ensure an effective execution of these plans. Banks are expected to review communication plans at least once per year and to update them as necessary.	Resolution Groups	31/12/2024

⁵ Indicative timeline as for some banks the delivery of the report could extend into early 2025.

Expectations for Banks [7.2]	Separability Analysis Report	<p>On the basis of the operational guidance for banks on separability for transfer tools in 2021, banks for which the resolution strategy envisages a transfer tool have been requested to submit a separability analysis report (SAR). In this analytical document, banks assess how they would prepare for a partial transfer of their activities at short notice. Following a full phase-in of the policy, banks are expected to update the SAR on an annual basis (SRB may however ask banks for interim progress updates mid-year).</p>	Limited	31/12/2024
Expectations for Banks [7.3]	Business Reorganisation Plan analysis reports	<p>The BRRD requires that within one month after the application of the bail-in tool, banks prepare and submit to the resolution authority a Business Reorganisation Plan (BRP) comprising the measures aiming to restore the long-term viability of the institution. The SRB expects banks (see Expectations for Banks (2020) principle 7.3) for which the foreseen resolution strategy is bail-in to draft and submit a BRP analysis report to demonstrate their capabilities to identify the measures available to restore their long-term viability post resolution (please note that SRB may also ask banks for interim progress update around June).</p>	Limited	31/12/2024
Expectations for Banks [general]	Resolvability work programme for 2025	<p>The Expectations for Banks (2020) introduce the expectation from the SRB to banks to draft a resolvability work programme endorsed by banks' management bodies, which outlines how they intend to address potential impediments through different deliverables, timelines and milestones. This proposal by banks is prepared on an annual basis and outlines measures for the following calendar year.</p>	Resolution Groups	31/12/2024
Expectations for Banks [general]	2024 Resolvability self-assessment report	<p>The Expectations for Banks (2020) introduce the expectation for banks to submit to the SRB a resolvability progress report endorsed by the bank's management body that documents the progress made, remaining gaps and priorities for the upcoming resolution cycle. Unless indicated otherwise, the SRB expects banks to submit this report at least annually, (i.e. SRB may ask banks for interim progress updates around June each year). In line with the EBA GL on resolvability testing</p>	Resolution Groups	31/12/2024

		(EBA/GL/2023/05), the banks' self-assessment report will need to cover the additional requests set out in paragraphs 124 and 125 of the EBA GL.		
Single Resolution Fund	Ex-ante contributions	By EU law, the SRB levies annual fees on institutions, also known as ex-ante contributions, to pay into Single Resolution Fund (SRF) every year. In order to allow the SRB to calculate the individual contribution, banks are required to report data to the SRB and deliver an additional assurance document from the their auditor related to certain SRF-specific data points.	All	01/11/23 – 31/01/24
Other	Liability Data Report	The SRB collects the Liability Data Report (LDR) from institutions under its scope on a yearly basis. This report provides the SRB with critical information regarding the structure of banks' liabilities, facilitating the calculation of MREL and the assessment of the loss absorbing capacity. It is also crucial to prepare the operationalisation of bail-in.	All	01/03/24 – 31/03/24
Other	Critical Functions Report	Critical functions are functions that are essential for the smooth running of the economy in one or several Member States. Since 2017, the SRB has been requesting banks to identify and self-assess their critical functions in line with the associated guidance . Reporting is required from entities identified by the resolution authority and incorporates part of the requirements under CIR 2018/1624 as well as some additional data points supporting the criticality assessment.	All	01/03/24 – 30/04/24
Other	EBA Resolution Reporting standard templates	The SRB collects resolution-reporting templates under CIR 2018/1624 (developed by the EBA) from all entities under its remit that are not already covered by specific and/or extended reporting (e.g. LDR or CFR). This data is necessary for resolution planning purposes.	All	30/04/24