

## Upcoming consultations and requests to the industry<sup>1</sup>

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 on envisaged policy changes (table 1), the 2025 data requests and deliverables stemming from the Expectations for Banks (EfB) and requested as common priorities (table 2), as well as requests related to the calculation of administrative and SRF contributions (table 3). Their purpose is to allow banks and other stakeholders to better allocate resources and to anticipate workload throughout the year. Right to be Heard (RTBH) processes and other individual exchanges due to their special and non-public character are not listed in table 1. In a similar vein, bank-specific or ad hoc requests by Internal Resolution Teams (IRTs) are excluded from table 2, given they are not relevant to all banks under the SRB's remit. The timeline for updating the deliverables may be adjusted by the IRTs depending on their level of maturity and/or their successful testing.

The SRB reserves the right to announce additional policy consultations and 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.

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.

<sup>&</sup>lt;sup>1</sup> 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.



Table 1: List of SRB Consultations in 2025<sup>2</sup>

Topic	Title of Request	Description	Scope	Timeline
Expectations for Banks [5.2]	Consultation on SRB expectations on valuation capabilities	The SRB will run a public consultation on the SRB's expectations on valuation capabilities, which includes expectations on setting up permanent valuation data repositories, valuation data and playbooks.	Open/Voluntary	H1 2025
Expectations for Banks [7]	Consultation on SRB expectations on separability and operationalisation of transfer strategies	The SRB will run a public consultation on the review of the operational guidance on separability for transfer tools and transfer playbook operational guidance. The review will aim at ensuring consistency between the guidance documents and alignment with the revised heatmap.	Open/Voluntary	H1 2025
Expectations for Banks [6]	Consultation on SRB expectations on Communication in resolution	The SRB will run a public consultation on a new	Open/Voluntary	H1 2025

<sup>&</sup>lt;sup>2</sup> **Guidance on scope**: i) open/voluntary – open to all stakeholders, e.g. public consultations; or on a voluntary basis (e.g. as part of a right to be heard processes) ii) all – concerns all banking groups <u>under the SRB's remit</u>; iii) resolution groups – all banking groups under the SRB's remit, which are earmarked for resolution (both SPE and MPE); 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.



		operational guidance on Communication in resolution, covering EfB principles 6.1 (Communication Plan) and 6.2 (Communication Governance).		
Expectations for Banks [general]	Consultation on the resolvability self-assessment template	The SRB will run a public consultation on the envisaged changes to its resolvability self-assessment template directed at banks.	Open/Voluntary	Q4 2024/Q1 2025
Expectations for Banks [general]	Consultation on SRB expectations on bank resolvability testing	The SRB will run a public consultation on its expectations for banks on resolvability testing <sup>3</sup> . This will include expectations on governance, test environments, testing methods, performing tests and deliverables.	Open/Voluntary	Q1 – Q2 2025

<sup>&</sup>lt;sup>3</sup> Resolvability testing includes dry-runs, desktop exercises and walkthroughs when performed by banks.



Table 2: List of SRB requests and EfB deliverables in 2025

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 2024: 18/02/25 Q1 2025: 19/05/25 Q2 2025: 18/08/25 Q3 2025: 18/11/25
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 2024: 18/02/25 Q1 2025: 19/05/25 Q2 2025: 18/08/25 Q3 2025: 18/11/25
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	01/03/25 – 31/03/25
MREL	Sign-off form on MREL eligibility of reported liabilities	The SRB requests to complete a sign-off form with the submission of each quarterly reporting, in order to provide additional assurance on liabilities reported as eligible for MREL.	Resolution Groups	Q4 2023: 18/02/25 Q1 2024: 19/05/25 Q2 2024: 18/08/25 Q3 2024: 18/11/24



MREL	Self-assessment template on eligible liabilities	The SRB requests to complete a self-assessment template against the requirements for eligible liabilities set out in the relevant provisions of the CRR and the DR (EU) No 241/2014 as amended by DR (EU) 2023/827, on specific issuances identified and communicated periodically by the SRB. For further details please refer to para 110 of the <a href="MREL policy">MREL policy</a> .	Resolution Groups	31/12/2025
Expectations for Banks [4.2]	Results of Digital Operational Resilience Tests and information on preparatory measures for DORA	Starting from 17 January 2025, the new requirements stemming from the Regulation (EU) 2022/2554 (DORA) will apply. Institutions under the SRB's remit may be requested to submit to the SRB the results of the testing done in accordance with the requirements laid down in Chapter IV of Regulation (EU) 2022/2554, in order to allow for the assessment required under point 4a Section C of Annex to the Directive 2014/59/EU (BRRD) as amended by Article 5 of Directive 2022/2556.	All	Q1 2025
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 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. <sup>4</sup>	Resolution Groups	01/03/25 – 30/04/25

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



Expectations for Banks [7.1- 7.3]	Solvent Wind Down plans	Introduced via the <u>operational guidance on the solvent wind-down of trading books</u> 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 jeopardising financial stability. Following a full phase-in of the policy, banks in scope are expected to update their plans on an annual basis. In the future, the frequency of updates may decrease.	Limited	28/06/2025
Expectations for Banks [7.1- 7.3]	Solvent Wind Down playbooks	Introduced via the <u>operational guidance on the solvent wind-down of trading books</u> (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. In the future, the frequency of updates may decrease.	Limited	31/12/2025
Expectations for Banks [3.2, 3.3]	Joint Liquidity Template: bank- led testing deliverables	On the basis of the SRB annual priority letters to banks' CEOs, banks are expected to test their capabilities to report the JLT as part of a horizontal liquidity exercise. In this context, they are requested to submit an updated version of the Joint Liquidity Template as well as an outcome report and independent observer report. These deliverables are submitted to the ECB and the SRB.	Resolution Groups	Q4 2025
Expectations for Banks [1.4, 5.3, 7.2]	Transfer playbook	Introduced via the <u>operational guidance for banks on separability for transfer tools</u> in 2021, banks for which the resolution strategy envisages a transfer tool are requested to submit a transfer playbook. In this operational document, which builds on the separability analysis report (SAR), banks outline the measures (e.g. governance, communications) they would take to implement a (partial) transfer. Following a full phase-in of the policy, banks in scope are expected to update their plans on an annual basis. In the future, the frequency of updates may decrease.	Limited	31/12/2025
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 (on a standalone basis or in combination with other resolution tool(s)) 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 policy, banks in scope are expected to update their plans on an annual basis. In the future, the frequency of updates may decrease.	Limited	31/12/2025



Expectations for Banks [2.3]	MBDT pilot dry- runs reports	On the basis of the minimum bail-in data template (MBDT) guidance (2024), some banks (ca. 10-15) have been requested to take part in pilot exercises to test the MBDT. These banks have been notified via their priority letters of their inclusion in MBDT dry-runs.	Limited	31/12/2025
Expectations for banks [4]	Access to FMIs: bank-led testing deliverables	On the basis of the SRB annual priority letters to banks' CEOs, banks are expected to perform i) a dry-run on the identification of FMI service providers and ii) a walkthrough of FMI contingency plans to demonstrate the effectiveness and operational readiness of their capabilities. Expected deliverables include for testing: i) an up-to-date list of FMI service providers (incl. contact details), mapping of FMIs linked to RLEs, critical functions and core business lines, outcome report and independent observer report and ii) an outcome report with relevant comments from stakeholders on operational steps as well as an independent observer report.	Resolution Groups	31/12/2025
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. Following a full phase-in of the policy, banks in scope are expected to update their plans on an annual basis. In the future, the frequency of updates may decrease.	Resolution Groups	31/12/2025
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. In the future, the frequency of updates may decrease.	Resolution Groups	31/12/2025
Expectations for Banks [7.2]	Separability Analysis Report	On the basis of the <u>operational guidance for banks on separability for transfer tools</u> in 2021, banks for which the resolution strategy envisages a transfer tool have been requested to submit a separability analysis report (SAR). Following a full phase-in of the policy, banks in scope are expected to update their plans on an annual basis. In the future, the frequency of updates may decrease.	Limited	31/12/2025



Expectations for Banks [7.3]	Business Reorganisation Plan analysis reports	The SRB expects banks (see <u>Expectations for Banks</u> (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.	Limited	31/12/2025
Expectations for Banks [general]	Resolvability work programme for 2026	On the basis of the SRB annual priority letters to banks' CEOs, and in line with the <a href="Expectations for Banks">Expectations for Banks</a> (2020), banks are expected to draft a resolvability work programme endorsed by banks' management bodies, which outlines how they intend to address expectations and concrete resolvability priorities through different deliverables, timelines, milestones and budget. This proposal by banks is prepared on an annual basis and outlines measures for the calendar year and any follow-up on the banks' progress towards resolvability.	Resolution Groups	31/01/2026 <sup>5</sup>
Expectations for Banks [general]	2025 Resolvability self-assessment report	On the basis of the updated SRB Policy on resolvability assessment and self-assessment template, banks are expected to submit the report using the format and template requested by the SRB. The report should cover the resolution activities carried out during the preceding calendar year.	Resolution Groups	31/01/2026 <sup>6</sup>
Resolution Planning Reporting	Liability Data Report	The SRB collects the Liability Data Report (LDR) from institutions within 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	01/03/25 – 31/03/25

<sup>&</sup>lt;sup>5</sup> The timeline has been moved from 31/12/2025 to 31/01/2026.

<sup>&</sup>lt;sup>6</sup> The timeline has been moved from 31/12/2025 to 31/01/2026.



Resolution Planning Reporting	Critical Functions Report	The SRB requests banks to identify and self-assess their critical functions in line with the <u>associated guidance</u> . 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	01/03/25 – 30/04/25
Resolution Planning Reporting	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	01/03/25 – 30/04/25
Resolution Planning Reporting	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	30/04/25



Table 3: List of SRB requests related to administrative and SRF contributions

Topic	Title of Request	Description	Scope	Timeline
Single Resolution Fund	Collection of data for SRF contributions calculation/ corrections of provided data for SRF	The SRB levies fees on institutions, also known as contributions, to be paid into the Single Resolution Fund (SRF) in case the SRF target level <sup>7</sup> no longer meets a certain threshold prescribed by EU law. In order to calculate those contributions, when necessary, banks are required to report data to the SRB every year. Under EU law, banks can correct their data for the previous contribution cycles. The banks are required to report the corrected data to the SRB every year.	All	01/11/24 – 31/01/25 01/11/24 – 15/01/25
Single Resolution Fund	Consultation on (1) the preliminary amounts of contributions (only in case SRF contributions	The SRB provides institutions with the possibility to comment on the main elements of the banks' contributions calculations/ recalculations. This procedure enhances transparency in light of the principle of good administration and promotes an effective dialogue with the banks concerned.	Voluntary	1st half of March 2025

<sup>&</sup>lt;sup>7</sup>In February 2025, the SRB will perform a target level verification exercise to determine whether the SRF target level meets the necessary threshold (at least 1% of the total amount of covered deposits held by the concerned institutions in all of the participating Member States as required by Article 69(1) SRMR).



	are collected in 2025) and (2) the preliminary settlements of differences due to restatements (when applicable).			
Administrative contributions	Consultation on the preliminary amounts of administrative contributions	The SRB runs consultations in relation to the determination of the individual annual contributions to the administrative expenditure of the Board on an annual basis, for the advance instalments to the contributions in Q1 (only for SRB entities) and for the (final) contributions in Q3 (all entities). These consultations allow the SRB to better structure its dialogue with institutions in scope and facilitate the decision-making process.	Voluntary	For advance instalments: January – February 2025
				For annual contributions: June – July 2025