



---

# FEEDBACK STATEMENT ON THE OPERATIONAL GUIDANCE ON RESOLVABILITY TESTING FOR BANKS

## Disclaimer

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.


Publication date: September 2025

Neither the Single Resolution Board nor any person acting on behalf of the Single Resolution Board is responsible for the use that might be made of the following information.

© Single Resolution Board, 2025

Reproduction is authorised provided the source is acknowledged. For any use or reproduction of photos or other material that is not under the copyright of the Single Resolution Board, permission must be sought directly from the copyright holders.

Cover, © Lobet - Rostovikova · PRYZM



# **FEEDBACK STATEMENT ON THE OPERATIONAL GUIDANCE ON RESOLVABILITY TESTING FOR BANKS**

# Content

---

<b>Abbreviations</b>	<b>3</b>
<b>1. Introduction</b>	<b>4</b>
<b>2. Main issues raised in response to the consultation</b>	<b>5</b>
2.1. Guidance for setting-up test environments and deadline for their development	5
2.2. Definition of the test methods	6
2.3. Format of the multi-annual testing programme	7
2.4. Testing exercise template	9
2.5. Outcome report template	9
2.6. Daily summary	10
2.7. Independent observer	10
2.8. Independent observer report template	11
2.9. External consultants	11
2.10. Governance expectations	11
2.11. Other comments	12
2.12. Specific testing areas	13

# Abbreviations

---

<b>BAU</b>	Business-as-Usual
<b>BRP</b>	Business Reorganisation Plan
<b>BRRD</b>	Bank Recovery and Resolution Directive
<b>BU</b>	Banking Union
<b>COREP</b>	Common Reporting Standards
<b>DORA</b>	Digital Operational Resilience Act
<b>EBA</b>	European Banking Authority
<b>ECB</b>	European Central Bank
<b>EfB</b>	Expectations for Banks
<b>FINREP</b>	Financial Reporting Standards
<b>FMI</b>	Financial Market Infrastructure
<b>ICSDs</b>	International Central Securities Depositories
<b>ILTRM</b>	Internal Loss Transfer and Recapitalisation Mechanism
<b>IRT</b>	Internal Resolution Team
<b>JLT</b>	Joint Liquidity Template
<b>JSTs</b>	Joint Supervisory Teams
<b>MATP</b>	Multi-Annual Testing Programme
<b>MBDT</b>	Minimum Bail-in Data Template
<b>MFI</b>	Maximum Financial Impact
<b>MRC</b>	Maximum Reorganisation Capacity
<b>NRA</b> s	National Resolution Authorities
<b>OCIR</b>	Operational Continuity in Resolution
<b>PRS</b>	Preferred Resolution Strategies
<b>RPC</b>	Resolution Planning Cycle
<b>RSA</b>	Resolvability Self-Assessment
<b>SRB</b>	Single Resolution Board
<b>SREP</b>	Supervisory Review and Evaluation Process
<b>SRMR</b>	Single Resolution Mechanism Regulation
<b>SWD</b>	Solvent Wind-Down
<b>VRS</b>	Variant Resolution Strategies

# 1. Introduction

The SRM Vision 2028 calls for an increased focus on banks' operational readiness to implement resolution strategies. A key component of the SRM Vision 2028 is resolvability testing. The Single Resolution Board (SRB) consulted stakeholders on the [Operational Guidance on Resolvability Testing for Banks](#) (the guidance) between 17 March and 7 May 2025. The guidance provides clear expectations for banks on: (i) the goals of resolvability testing, (ii) the multi-annual testing programme (MATP), (iii) test methods, (iv) internal governance, (v) test environments, (vi) preparing, performing and following up on tests, (vii) use of external consultants and (viii) templates.

The SRB received 20 responses to the consultation paper from banking associations and individual banks. This document summarises the main comments raised in the public consultation and sets out how they have been addressed.

## 2. Main issues raised in response to the consultation

### 2.1. Guidance for setting-up test environments and deadline for their development

Many respondents expressed concerns about the expectations surrounding test environments and their associated costs, most notably that the SRB may require banks to replicate their entire systems for testing purposes. To address these concerns, respondents requested clarity regarding the systems they are expected to develop test environments for and suggested that banks should be able to use production environments for testing purposes, provided adequate safeguards are in place. Respondents also raised concerns about setting up test environments that interface with third-parties, as well as about maintenance of test environments on a permanent basis. Additionally, respondents proposed that banks should be able to leverage existing test environments developed for business-as-usual (BAU) purposes for resolvability testing.

To address these concerns, the guidance clarifies that banks do not need to replicate their entire IT infrastructure for testing purposes. The SRB also clarifies that banks may rely on production environments for resolvability testing, provided adequate safeguards are in place, and that test environments are only expected where expressly outlined in the guidance. Furthermore, the SRB emphasises that test environments do not need to be maintained and updated on a permanent basis, and that there is no expectation that they will interact with third-party test environments.

In the guidance, testing environments are only expected for tests involving bail-in operationalisation. In this context, the SRB expects banks to have in place testing environments to test sub-steps of the internal and external execution modules, as described in the bail-in playbook. If the guidance is expanded in the future, additional testing environments expectations may be added. The SRB provides examples of testing environments that may be used, such as testing the cancellation of debt instruments or the creation of new securities' accounts, and emphasises the importance of discussing and agreeing on the preferred option with the relevant IRT before the dry-run.

In areas such as data provision, the production environment is expected to be used, as the testing would not represent an operational risk. However, the SRB expects banks to have in place a testing environment to adequately test the recalibrations of risk-weighted assets under the assumed bail-in scenario, and to demonstrate the processes and 'know-how' to recalibrate their risk-weighting of assets under stressed conditions and within a short timeframe.

Finally, the SRB has removed its expectation that all banks develop test environments by December 2026. The new expectation is for banks to develop test environments in line with the timing of the relevant tests identified in the MATP. Banks need only to develop test environments for areas for which

a test is planned and for which test environment expectations have been set by the SRB or the bank, itself.

## 2.2. Definition of the test methods

In response to feedback on the apparent overlap and ambiguity between testing methods, the SRB reaffirms that the methods outlined in its guidance are aligned with the testing categories defined by the EBA in its Guidelines ([EBA/GL/2023/05](#)). However, the SRB clarifies that a desktop exercise involves a critical review of a procedure or set of procedures without operational execution, whereas a walkthrough includes a practical, though not real-time, operationalisation of the procedure under review. This practical component makes the walkthrough a more interactive form of assessment. While the SRB acknowledges the suggestion to introduce a hybrid form of training and testing (e.g., an “information session”), it has decided to maintain consistency with the EBA-defined categories for the moment to preserve methodological alignment and comparability across institutions.

Several respondents highlighted that drill tests notified with short notice could disrupt normal banking operations and require significant resources. The SRB confirms that drills need to be conducted with limited forewarning, as they serve the important purpose of testing operational readiness including an element of surprise. Drills are, however, expected to be used in a limited number of cases, and not systematically. In this context, it is important to note that drills are narrowly targeted at mature procedural elements, and will be phased into the testing programme gradually. Institutions will be informed of the quarter during which a drill may occur, allowing for internal planning. Moreover, IRTs will take into account ongoing priorities and supervisory activities at the bank to minimise disruptions before deciding when to schedule a drill.

While stakeholders raised concerns regarding the level of senior management engagement in management simulations, the SRB stresses that governance is a cornerstone of effective crisis management. Management simulations are, therefore, crucial to evaluate the effectiveness of the decision-making processes related to senior leadership under realistic conditions. Nonetheless, the SRB clarifies that the use of such tests will not be conducted in a way that creates material disruptions in the bank’s day-to-day operations.

Respondents emphasised the need for testing to be proportional to the size and significance of the institution. The SRB reiterates its commitment to proportionality and confirms that IRTs will tailor the MATPs based on a combination of relevant criteria, including the institution’s size, complexity, resolvability assessment outcomes and SREP scores. These parameters will inform a balanced and proportionate approach to testing. The guidance has been amended to include a more comprehensive description of the application of proportionality in respect of testing.

To address concerns about potential overlap or scheduling conflicts with other regulatory activities, such as ECB stress tests or major internal projects, the SRB emphasises its commitment to coordination. It confirms that IRTs will liaise with the ECB, and in particular the Joint Supervisory Teams (JSTs) to ensure alignment between resolution planning and prudential supervision. This coordinated



planning approach aims to optimise resource use, avoid excessive burden on institutions and ensure coherent and consistent regulatory expectations.

The SRB clarifies that its testing expectations are not intended to prevent banks from complying with national labour laws. Where it is duly justified that real-time testing, i.e., dry-runs, would hinder the bank's ability to comply with its legal obligations, flexibility is permitted. For example, operational and management simulations may be adapted by pausing and resuming the simulation over (a reasonable number of) sessions in order to comply with working time regulations. These adaptations should be discussed and agreed in advance between the institution and its IRT.

## 2.3. Format of the multi-annual testing programme

### Structure and format of the template

Respondents generally considered the template for the MATP to be a good starting point to trigger a discussion with IRTs on the upcoming three-year testing priorities. Notwithstanding this, it was emphasised that the level of detail provided in the template could be enhanced, with some respondents suggesting the addition of new fields. Respondents also expressed a preference for receiving the MATP in Excel format as it is more user-friendly and easier to integrate into internal systems.

With respect to the level of detail provided in the template, the SRB reiterates that the MATP template is designed to provide both detailed and high-level information: specific details for the first year and a more general outline for the following two years. To enhance the clarity and structure of the MATP, two new fields have been introduced: (i) *Reasoning for the Test*, providing high-level justification for the selection of the relevant Expectation for Banks (EfB) principle(s) and (ii) *Description of the Test*, outlining the nature of the test and the expectations to be met. Concerning the format of the MATP, the SRB confirms that the template will be provided in Excel format.

### Streamlining of templates and the internal resolvability testing plan

Respondents remarked that there appeared to be significant overlap regarding the information requested in Template A (MATP template), Template B (testing exercise template) and the internal resolvability testing plan. There was a call for streamlining these templates. Respondents also asked about the connection between these templates and the internal resolvability testing plan that the banks need to approve.

In this context, the SRB has reviewed these templates, and connected expectations, to streamline the process and reduce the level of administrative burden. Template A and Template B, from the public consultation, have been merged into a single Excel template. This template contains: (i) the MATP, (ii) how the bank plans to perform each individual test contained in the MATP and (iii) how the bank plans to perform additional tests proposed by the bank, itself. On an annual basis, the IRT will populate the MATP template with the three-year planned tests and provide it to banks. Banks will fill in the tabs for all tests, including those the bank may decide to add. The management body member responsible for

resolution planning must approve the completed template, which will then serve as the internal resolvability testing plan. This completed template must be returned to the IRT by the 31 January of each year.

### Dialogue with banks regarding the MATP

Respondents generally agreed that communicating the MATP with banks as early as possible would be essential to allow for effective planning and integration of the MATP into banks' internal processes. In addition, several respondents advocated for greater flexibility in defining the testing schedule to allow banks to align the timing of tests with internal schedules. As previously communicated with the industry, the SRB confirms that IRTs will endeavour to hold a workshop in Q2 or early Q3 to present a draft version of the MATP to the bank. This workshop serves to facilitate dialogue on the proposed test timeline and methods. The IRT will consider bank feedback before finalising the plan. The final version of the MATP will be shared alongside the annual priorities letter. While input from institutions will be duly taken into consideration in the MATP, the SRB stresses that methods for common tests will be determined at horizontal level to ensure consistency.

Concerns were raised about testing burden and respondents requested further clarity on the number of tests banks will be expected to carry out each year. Further, respondents called for stronger coordination among the SRB, the ECB, and the EBA to prevent conflicting requirements. The SRB clarifies that the number of tests to be included in the MATP will take into account the bank's size, systemic relevance, past testing outcomes and the complexity of relevant processes. For example, in a particular year, a bank may be asked to carry out one common and two bank-specific tests. The SRB confirms that IRTs will engage with the JSTs prior to finalising MATPs, ensuring alignment across resolution and prudential planning

### Testing approach for host cases

Clarification was requested on the scope of application of the guidance, particularly with respect to the Banking Union (BU) subsidiaries where the SRB is the host authority. The SRB clarifies that the guidance applies to all bank resolution groups under the SRB's direct remit and earmarked for resolution.<sup>1</sup> In respect of subsidiaries of banking groups established outside the BU, the SRB will coordinate with home authorities to agree on the best approach for the case at hand. For example, for hosted non-EU banks with an SPE group strategy, the SRB will align with third-country authorities on the timelines and priorities on testing, with subsidiaries contributing to the group-wide testing and assurance activities. Hosted banks are expected to adequately document their testing plans, as well as the preparation, execution and follow-up actions of each test in line with the expectations and standards of the home authority.

---

<sup>1</sup> In line with paragraph 26 of the EBA Guidelines on resolvability testing, the SRB may decide to place certain liquidation institutions under the SRB testing framework.

## 2.4. Testing exercise template

Several respondents requested clarity on the timing for submitting the testing exercise template and questioned its dual function as both a planning and reporting tool. As outlined earlier in this statement, the SRB has revised its approach and has consolidated the testing exercise template into the MATP template. Following receipt of the MATP from the IRT, banks are now expected to complete an additional column in the test-specific worksheet of the template. This additional column captures much of the information that would have been required in the initial testing exercise template, though certain information fields have been removed to simplify. Fields relating to the set-up and execution of the test have been retained in a simplified form while requirements for exact session times and participant lists have been removed. In addition, the revised template includes open fields in the test-specific worksheets to allow IRTs and banks to tailor fields according to the type and scope of each test. As explained earlier in this statement, this updated version of the template must be approved by the member of the management body responsible for the work on resolution planning and the implementation of the resolvability work programme, and returned to the IRT by 31 January of each year via IRIS.

It was queried whether banks are allowed to adapt scenarios set by the IRT. The SRB confirms that banks may adapt testing scenarios provided in the template, subject to prior agreement with the IRT and appropriate justification. This flexibility allows institutions to reflect their specific circumstances while ensuring comparability.

Respondents requested that, in addition to all other test types, the guidance be amended to permit the use of facilitators in dry-run tests. Respondents emphasised the importance of the facilitator in ensuring tests are properly coordinated and well-structured. The SRB acknowledges this point of feedback and confirms that facilitators may be used across all types of tests. The guidance has been updated accordingly.

## 2.5. Outcome report template

Generally, respondents considered the templates for resolvability testing to be overly prescriptive and detailed. The SRB has taken these comments on board and has streamlined the template for the [outcome report](#) which now focuses on key aspects, such as whether critical capabilities were demonstrated, material gaps were identified and whether remediation plans were put in place.

In response to the feedback received, a number of language inconsistencies have been resolved in all relevant templates and the guidance. For example, the SRB has replaced the term "finding" with "observation" in all templates to avoid confusion with "findings" in the audit context. Additionally, the use of the term "session" has also been clarified. Tests may be organised over one or multiple sessions, provided the number of sessions is reasonable.

Respondents noted that the structure of the outcome report is not suitable for all testing methods and testing areas, while certain respondents suggested that alternative formats for the template, such as

PowerPoint or Excel, be considered. The SRB has adapted the report structure to accommodate different testing methods or areas, and has removed redundant fields to reduce complexity and duplication. With regard to the template format, the SRB maintains its position that Word is the most appropriate format for the outcome report. The SRB also reiterates that all deliverables must be submitted via IRIS to ensure a complete audit trail and facilitate the consolidation of relevant documentation. Additionally, the SRB acknowledges the suggestion to reassess the templates after a period of implementation and intends to revisit them after gaining sufficient experience of their use.

## 2.6. Daily summary

Many respondents expressed strong concerns about the burden of providing daily summaries of actions performed during testing, noting that it could impact test execution. The SRB clarifies that daily summaries may only be requested by IRTs in specific cases, such as when timely input is required for resolution planning or if a mid-test intervention is expected. The guidance has been updated to reflect this more clearly.

Respondents requested further guidance on the format and delivery time of the daily summary. The SRB confirms that no fixed format is required for the summary; it can be agreed between the IRT and the bank (e.g., brief email or minutes), with the timing also to be adapted to the situation (same day or next day).

## 2.7. Independent observer

Respondents requested greater clarity on the role of the independent observer. Additionally, it was requested that banks be afforded the flexibility to determine which function performs this role. The SRB has updated the guidance to better define the role of the independent observer. Moreover, the guidance now outlines the SRB's recommendation on banks' use of internal audit for this role, but also clarifies that, generally, banks may decide on the function to perform this role as long as the competence and independence required are ensured.

Clarity was also sought on internal audit's role when acting as independent observer. The SRB confirms that the internal audit function, when acting as an independent observer, should act in the performance of its duties as third line of defence.

Certain respondents highlighted that it may not be relevant for an independent observer to be present for each test performed and requested clarity regarding this requirement. The SRB has amended the wording in the guidance to make it clearer that banks are encouraged to involve an independent observer in the test, but that this is not a set requirement for all tests.

## 2.8. Independent observer report template

Respondents expressed concerns about the requirement for the independent observer to provide an overall assessment of the outcome report, especially when the internal audit function is serving as the independent observer. In response, the SRB has amended the [independent observer report](#) to remove this requirement. As a result of this change, the outcome report and the independent observer report can now be submitted to the SRB simultaneously, within the four-week timeframe.

It was noted that there appeared to be some duplication between the outcome report and independent observer report. The SRB clarifies that the independent observer report provides a unique perspective on the testing exercise. While the outcome report is written by counterparts with active roles during the test, the independent observer report is written by the independent observer, and may highlight different deviations or issues that arose during the test.

## 2.9. External consultants

Additional clarity was sought by respondents on the circumstances in which external consultants can be used by the bank for resolvability testing. External consultants can be used by the bank to: (i) assist in the preparation of internal documents related to resolvability testing, (ii) act as facilitator during desktop exercises and walkthrough exercise, (iii) ensure that the test is being run in accordance with expectations; (iv) perform the role of independent observer and (iv) contribute to the outcome report. In addition to these four roles, the external consultant may also be used for other activities considered relevant by the bank and for which IRT approval has been granted. The guidance has been updated to reflect these clarifications.

A number of respondents raised concerns about the use of external consultants for the role of independent observer noting that it would be costly and could give rise to conflict of interest issues for future work. Additionally, it was queried by several respondents whether there are any restrictions regarding the use of external consultants as independent observer in instances where the consultant was previously involved in the implementation of the resolution capabilities being tested. Firstly, the SRB confirms that banks are not compelled to hire an external consultant to fulfil the role of independent observer. Rather, it is permissible to do so, should the bank lack the capacity/resources to perform this role where it was deemed important to have an independent observer. Secondly, in instances where the external consultant was previously involved in the implementation of the resolution capabilities being tested, the bank should confirm that there are adequate safeguards in place to ensure their independence in performing the role of independent observer.

## 2.10. Governance expectations

Following respondents' feedback, the guidance has been updated to address a number of language inconsistencies. For example, the term "Board of Directors" has been replaced with "management

body” to align with the language per the relevant Union law.<sup>2</sup> Additionally, in response to industry feedback, the SRB confirms that the legal basis of the governance expectations as set out in this guidance derives – among other things<sup>3</sup> – from Article 15(1)(d) of Regulation (EU) No 806/2014 ([SRMR](#)) and Article 34(1)(d) of Directive 2014/59/EU ([BRRD](#)), as transposed into national law.

Respondents requested that the approval of the internal resolvability testing framework and testing plan be delegated to a level of management lower than the management body. In line with the EfB on governance and the operational guidance for banks on resolvability self-assessment, the SRB clarifies that the internal resolvability testing framework and internal resolvability testing plan are to be approved by the member of the management body responsible for resolution planning.

Several respondents requested reducing the frequency and extent of reporting on resolvability testing, and reporting to a level of management lower than the management body. Although it is expected that the entire management body is informed on testing to ensure that the body as whole is adequately briefed on tests performed, the frequency of reporting has been reduced to once per year, at a minimum, assuming there are no resolvability concerns.<sup>4</sup> Generally, flexibility on the extent of reporting to the management body is left to banks.

Several queries were raised in respect of incorporating resolvability testing into the internal audit plan. The guidance provides the internal audit function with sufficient flexibility on how it incorporates resolvability testing into its audit plan. The expectation is that resolvability testing issues should be audited regularly (e.g., once every three years) and that when performing the audit, the internal auditor takes note of the observations reported in the outcome and independent observer reports.

## 2.11. Other comments

Multiple respondents sought further information on the use of ‘injects’ by IRTs during tests. The SRB clarifies that injects, which involve introducing new elements or changing assumptions during a test, will be used sparingly and only when necessary to increase realism and add complexity to the test. They will not be standard practice and will only be deployed to test mature testing areas.

Finally, respondents queried the requirement to include resolvability testing within resolution training plans and sought clarity on the number of training sessions required. While it is necessary that training plans include sessions on resolvability testing, there is no prescribed specific frequency for such sessions. Overall, the SRB has sought to balance the need for effective resolvability testing with the need for proportionality and simplicity, and to minimise disruption to institutions' operations. The guidance has been updated to reflect these considerations.

---

<sup>2</sup> Article 3, point 7, Directive 2013/36/EU.

<sup>3</sup> See also, for example, points (17) and (18) of Section B of the Annex to the BRRD.

<sup>4</sup> In cases where there are resolvability concerns, the management body must be informed after the test.

## 2.12. Specific testing areas

Respondents have highlighted the need for clearer guidance as regards principles to be covered in different testing areas and how priorities should be set, with some noting inconsistencies between Part I and Part II of the guidance and the capabilities in the Resolvability Self-Assessment (RSA). The SRB clarifies that the MATP will be tailored to each bank's Preferred and Variant Resolution Strategies (PRS and VRS), and that testing of areas not relevant to either strategy will not be requested. In addition, the SRB has introduced further clarity as regards testing areas and ensured alignment with the RSA.

Additionally, respondents have called for a proportional approach based on resolution strategy, with some arguing that testing for certain areas, such as Business Reorganisation Plans (BRPs) or Solvent Wind-Down (SWD), should only be required when these elements are part of a bank's PRS. The SRB acknowledges these concerns and, in line with the above, reiterates that such areas will only be included in the testing programme if relevant to the PRS and/or VRS. Furthermore, the SRB stresses that the testing programme will gradually expand in complexity, with sufficient time given to banks to adapt to new guidance before it is tested. The SRB also commits to consulting the industry on changes to the guidance related to additional new testing areas.

### A. Bail-in

The SRB acknowledges concerns raised by respondents regarding the Minimum Bail-in Data Template (MBDT) guidance, which requires banks to deliver data within 24 hours. While this timeline is strict in the event of resolution, some respondents noted that it may not be realistic during testing exercises, citing potential conflicts with labour laws and the need for advance notice in real-life scenarios. The SRB's guidance already provides flexibility, allowing IRTs to extend the timeline up to three business days during testing (i.e., 24 hours divided over three days of eight working hours).

Respondents also raised concerns about the requirement for multiple submissions of MBDT data at various reference dates, citing additional burden and limited added value. The SRB clarifies that this requirement is necessary to align with the expectations outlined in the MBDT guidance. However, the SRB acknowledges these concerns and, thus, for testing purposes, this requirement is discretionary and will be discussed on a case-by-case basis with the IRT, taking into account the specific needs and circumstances of each bank.

Furthermore, some respondents questioned the value of a separate report on the estimated tax impact of bail-in and Internal loss transfer and recapitalisation mechanism (ILTRM) activation, arguing that this information is already captured in accounting records and would create unnecessary administrative burden. The SRB acknowledges these concerns and proposes to remove this requirement, instead suggesting that IRTs may request additional clarifications from banks on the tax assumptions used in the *pro forma* balance sheet delivered as part of the exercise, if needed.

Some respondents sought clarification on the reasoning behind the request for *pro forma* financial information and updated own funds estimations in a short timeframe, which they perceived as a new requirement. Concerns were also raised about the level of granularity requested and the interplay with



expectations on testing environments. It should be noted that the Operational Guidance on Bail-in Playbooks requires banks to develop a process to update an adjusted accounting balance sheet and own funds estimation post-resolution. While this process may extend beyond the resolution weekend, it is essential that banks can provide updated *pro forma* figures in a very short timeframe, relying on proxies, if necessary.

The SRB acknowledges the concern that a short timeframe is not compatible with a precise update of all FINREP and COREP tabs and does not expect banks to run all systems linked to the production of accounting financial statements or prudential reports in 24 hours. To address this, the SRB limits its request to specific tabs (FINREP F01.01, F01.02, F01.03, F02.00 and COREP C01.00) and allows the use of proxies, particularly when simulating the impact of the loss absorption phase. The SRB emphasises that the level of granularity should allow IRTs to clearly understand the fields impacted by bail-in or the loss recognition phase, but does not expect the full level of granularity envisaged in these tabs.

Moreover, the SRB clarifies that reference to FINREP and COREP is intended to ensure a minimum standardisation in the format and content of the deliverable, making it easier for institutions familiar with these table structures. The SRB acknowledges that, in an actual crisis, this process would need to take into account several inputs not available in a testing scenario. However, the delivery expected in testing exercises should be consistent with the level of detail defined for the assumptions of the exercise. The SRB also clarifies that testing environments are not relevant for the update of these statements, given the short timeframe and the delivery format.

Regarding the timeline for delivering the relevant FINREP and COREP information, the SRB has increased the timelines for delivery from 24 hours, to three days. IRTs will also be able to extend this timeline further if the complexity of the assumptions defined in the testing requires it. Additionally, the SRB provides clarification on the creation of supporting documents for International Central Securities Depositories (ICSDs), stating that its guidance provides a template with common elements applicable in the EU, serving as a foundation for consistent implementation. However, the SRB acknowledges that national resolution authorities (NRAs) may require additional elements to reflect national-specific aspects, which banks should incorporate as mandated by the relevant NRAs.

## **B. Business reorganisation plan (BRP)**

Several respondents expressed concerns about the feasibility and practicality of certain aspects of the BRP testing, including the distinction between a "fully fledged BRP", a "BRP Analysis Report", and a "simplified BRP". The SRB confirms that the "Simplified BRP" is intended to demonstrate a bank's ability to restore long-term viability under certain scenarios, and its requirements are different from those of a "fully fledged BRP" and a "BRP Analysis Report". The guidance has been updated to provide a clearer distinction between these three documents.

Respondents also expressed preferences for alternative testing approaches, such as walkthroughs and desktop exercises, due to concerns about the disruptiveness of dry-runs and drills related to BRP. The SRB clarifies that the governance for testing BRP is expected to follow predefined operational steps



and timelines, and that dry-runs and drills are, therefore, necessary to assess the bank's governance set-up.

Some respondents highlighted the importance of defining a credible and feasible crisis scenario as a prerequisite for meaningful BRP dry-run testing, advocating for clearer guidance from IRTs on the nature of the scenario to be used. In response, the SRB notes that the scenario for testing a "simplified BRP" remains open for discussion with the IRT, but is expected to simulate the bank's situation after undergoing resolution post application of bail-in, with a focus on reorganising business lines to ensure long-term viability.

Furthermore, some respondents sought clarification on the concept of "Maximum Financial Impact (MFI)" introduced in the guidance, noting its difference from the previously known "Maximum Reorganisation Capacity (MRC)". The SRB will exclude the concept of MFI from the elements of a "simplified BRP" to avoid potential confusion. Instead, banks are expected to provide the financial impact of implementing reorganisation measures throughout the reorganisation period to demonstrate long-term viability. The MRC is not expected to be in the scope of the testing of the "simplified BRP".

### C. FMI access

The issue of involving FMI service providers in tests was a point of contention among respondents, with several arguing that it would be impractical and burdensome for both banks and FMIs. In response, the SRB has removed the paragraphs referring to FMI involvement in tests from the guidance, exempting banks from involving FMIs in bank-led testing. Nevertheless, the SRB encourages banks to engage with FMI service providers to improve their understanding of contractual terms as part of their resolution planning efforts.

Additionally, some respondents noted inconsistencies between the testing guidance and the 2024 priority letters, which outlined testing expectations for the 2025 Resolution Planning Cycle (RPC). The SRB clarifies that 2025 is a transitional year and, therefore, banks should follow the specific instructions in the 2024 priority letters and any additional instructions received from the IRTs for this year. However, for future RPCs, the finalised resolvability testing guidance will prevail and should be followed, superseding any previous instructions. Finally, in response to requests for further granularity, the SRB has aligned the wording of the resolvability testing guidance with the EfB and has provided more information on specific deliverables, e.g., the summary table with all maximum liquidity needs to maintain access to each critical and essential FMI service provider.

### D. Liquidity

The consultation on tests related to liquidity and funding in resolution received several comments or requests for clarification related to the difficulty of producing and submitting the Joint Liquidity Template (JLT) upon request in a short time span (i.e., within two hours). Some respondents argued that this would require maintaining real-time data and could pose challenges. In response, the SRB clarifies that it is essential for a distressed institution to have the capability to submit liquidity-related information to the resolution authority in crisis times upon request, and that this high-frequency expectation is laid

down in the [SRB Operational Guidance on the Measurement and Reporting of the Liquidity Situation in Resolution](#). The SRB also notes that testing of liquidity and funding in resolution has been a common priority since the 2021 RPC and that excluding it from the testing scope would not be sensible. Additionally, the SRB provides clarification on the use of resolution scenarios in testing, noting that the JLT has been designed to reflect both supervisory and resolution needs, and that the specific severity of the scenario to be referred in the test will be provided by the SRB ahead of the exercise. In case of an update of the underlying guidance, the SRB will take this into consideration with respect to the timing, content and deliverables expectation when setting the multi-annual testing programme.

#### **E. Operational Continuity in Resolution (OCIR)**

Several respondents asked the SRB to leverage on testing already performed by other regulators (e.g., on operational resilience or business continuity) and leverage on the most recent resolution reports (e.g., Commission Implementing Regulation). The SRB acknowledges that there may be potential synergies between OCIR testing and other forms of testing (e.g., business continuity or Digital Operational Resilience Act<sup>5</sup>). However, the objective of OCIR testing guidance is to test the measures taken under OCIR expectations to avoid, mitigate or overcome operational disruption due to the resolution. This dimension is not sufficiently captured under tests conducted in a business-as-usual situation.

Other comments focused on more specific aspects, such as non-feasibility of the deadline to generate and provide OCIR-related data within 4 hours – which the SRB has clarified as being only indicative – and the need for reconciliation tables for every test with the golden source systems as being unfeasible. On the latter point, guidance has been modified to ensure a staggered approach to be agreed with the IRT. Greater clarity on how to bundle tests was also added to address some concerns from the industry.

#### **F. Solvent wind-down of trading book (SWD)**

Several respondents favoured desktop and walkthrough exercises due to concerns that dry-runs and drills could be disruptive and disproportionate given the SWD's complexity and timing constraints. The SRB clarifies that banks falling within the SWD scope may be asked to conduct tailored dry-runs and drills on specific desks or trades and that the SRB will ensure a proportionate approach to support resolvability assessments. Regarding data requirements, the initial expectation for data reference (i.e., the day before the test) was deemed unfeasible by several respondents. Consequently, the SRB has taken note of concerns and clarifies that banks can use the latest available quarterly data, aligning with SWD guidance.

---

<sup>5</sup> Regulation (EU) 2022/2554 ("DORA")



**SINGLE RESOLUTION BOARD**

Treurenberg 22, 1049 Brussels  
<https://srb.europa.eu>

