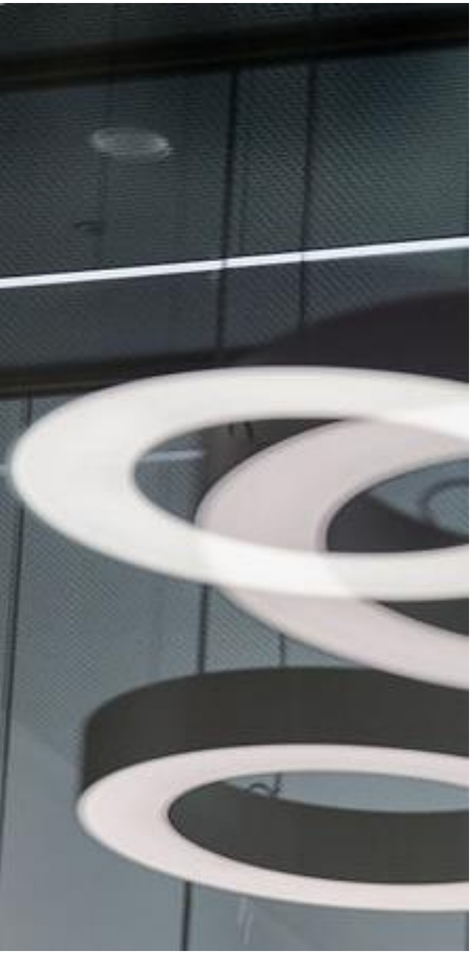
Operational Guidance for banks on Liquidity and Funding in Resolution

Hybrid meeting, 12 June 2026

Single Resolution Board

https://srb.europa.eu

Objectives and rules



OBJECTIVES

- Allow interested parties to ask for clarifications before the closing of the consultation period.

The technical meeting **does not replace written responses to the consultation.**

Only the formal views from stakeholders submitted via written response will be considered.

RULES

- The meeting **will not be recorded.**
- Ensure microphones stay muted during the presentation.
- To intervene during the Q&A session:

➡ **Raise your hand in WebEx and state your name and organisation**;

➡ **Write your question** in the chat ("SRB chat").

Disclaimer

- This presentation 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 applicable legal frameworks.

- **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 information provided **does not limit any future decision of the SRB**.

- The above shall **apply to any other information provided for informative purposes only**.

Table of contents

1

Background

Why an update?

- This update is closely linked to the development of the three *SRB Operational Guidance on Liquidity and Funding in Resolution*, for which targeted amendments are needed to reflect
  i. lessons learnt from past banking crises;
  ii. best practices; and
  iii. policy gaps identified by the SRB.

Problem driver → Liquidity management is a dynamic risk task.

Objectives →
- ✓ Foster consistency of the guidance based on IRT experience.
- ✓ Enhance resolvability capabilities for crisis readiness.

1 Background

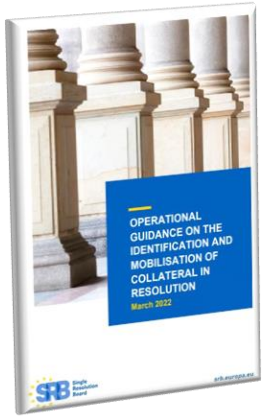
What to update?

Objectives Estimation of liquidity and funding needs needed for the PRS.

Expectations Identification and assessment of KLEs & KLDs as well as the methodological assumptions for estimating liquidity needs.

Objectives Measurement and reporting of the liquidity situation in resolution at the level of resolution group and material entities.

Expectations Concept clarifications and enhanced guidance on reporting scope and governance arrangements.

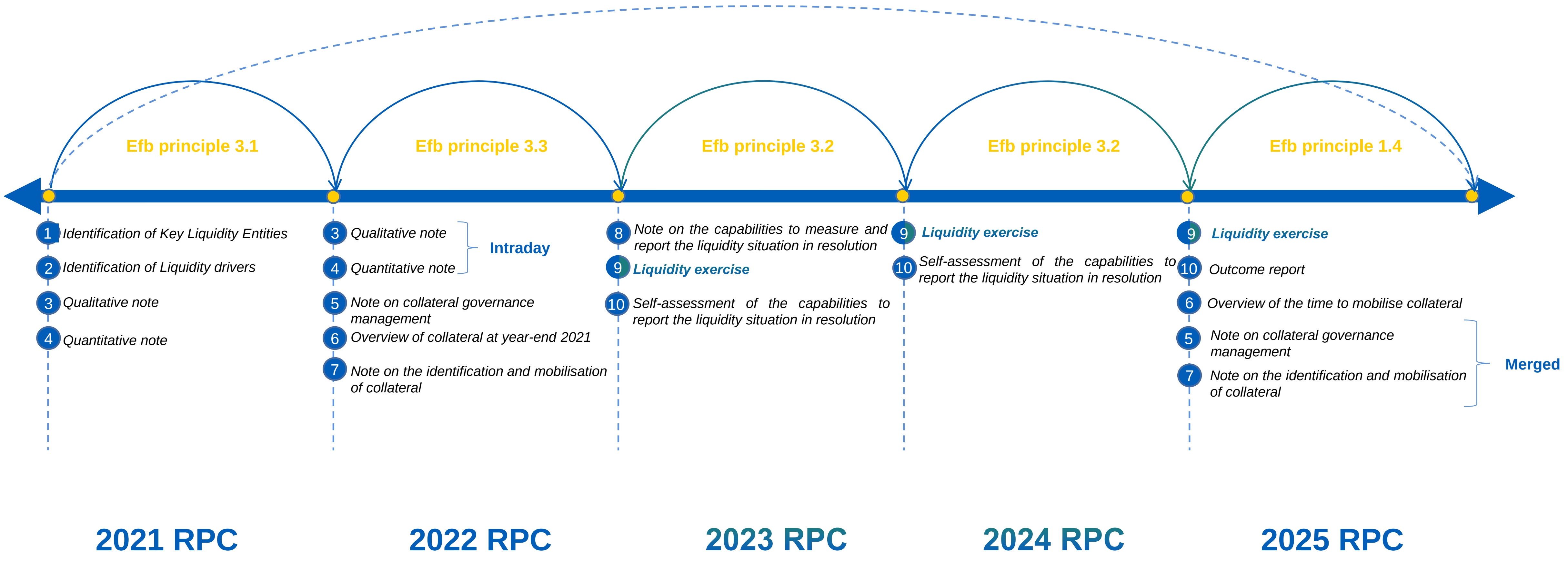


Objectives Identification and mobilisation of collateral in resolution and estimation of the time needed to mobilise.

Expectations Concept clarifications and operationalisation of some expectations.

1 Background

Overview of expectations for the three liquidity principles



Single Resolution Board

1

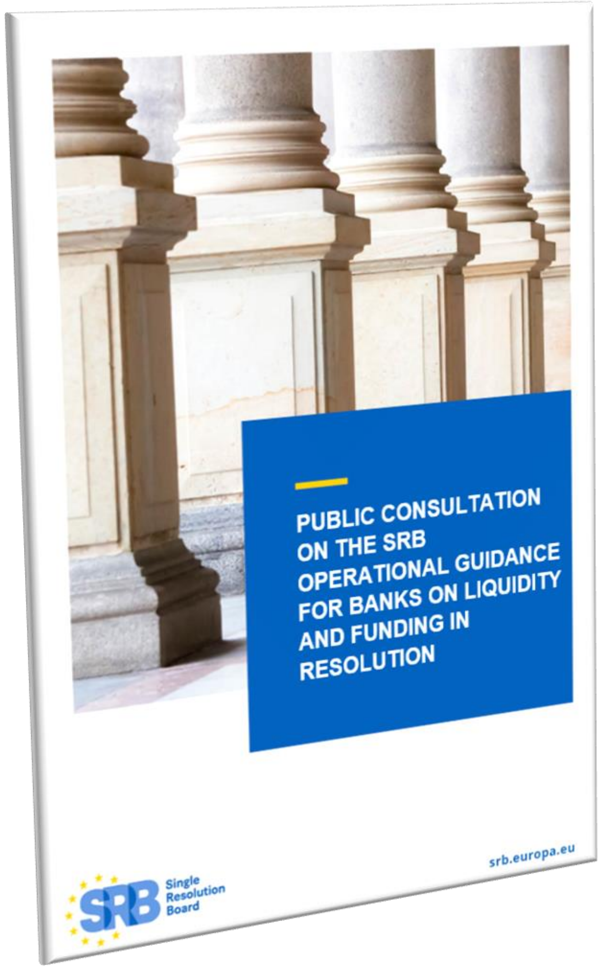
Background

How to update?

- The proposal for the SRB Operational Guidance benefitted from a comprehensive policy design process in the SRM:
  - The proposal was designed with focus on the impact of targeted amendments on resolvability, proportionality and simplification.
  - Targeted amendments aim at finding a balance between operational readiness, proportionality and flexibility.

2 Operational Guidance

Introduction



- The Operational Guidance provides updates on targeted areas where developments occurred since its publication.

- **Key elements**:

  - Consolidated version.
  - Proportionate approach to KLEs & MPE.
  - Most changes introduced in EfB 3.1.
  - Clarifications and updates in EfB 3.2. & 3.3.
  - Optionality in the use of Annexes.

2 Operational Guidance

EfB 3.1 ‘*Estimation of liquidity and funding needs in resolution*’

- **Targets specific expectations** to address resolvability and policy gaps as well as to account for lessons learnt from past crises.

- Introduce **proportionality-based expectations**:
  - Exclusion or grouping of KLEs.
  - Tailored for MPE strategies.
  - Frequency of analyses.

- Enhanced expectations related to **Key Liquidity Entities**.
  - ✓ Type of entities that could be identified as KLEs.
  - ✓ Identification conditions.
  - ✓ Standardised identification criteria [optional].

- Enhanced expectations related to **Key Liquidity Drivers**.
  - ✓ Scenario dynamics.
  - ✓ Standardised template [optional].

2 Operational Guidance

EfB 3.1 ‘*Estimation of liquidity and funding needs in resolution*’

Optional

➢ To ease KLE identification, an optional template is annexed to the SRB Operational Guidance.

Institution							Funding structure								Collateral			Exposures	
Name	Identifier	Country location	Business model	RLE / MLE	Liquidity role	Liquidity transfer agreements	Contribution to TREA	Contribution to total net cash flows	Retail funding (%)	Wholesale funding (%)	Deposits to total funding (%)	Intragroup funding	Material currencies	Concentration of currencies	Contribution to CBC (%)	Unencumbered collateral (%)	Liquid assets to short term liabilities (%)	Non-domestic assets	Share of risk exposures amounts of foreign exchange to risk exposures amounts
				RLE	Liquidity receiver	Yes													
					Liquidity provider	No													
					Group liquidity manager	Yes													
					Various														

KLE tab	Name	Formula	Description	Range of values	Data Point A			
					Template	Sheet	Row	Column
Funding structure	Contribution to Group TREA	Entity TREA / Group TREA	Provides for a view on the contribution of the entity to the solvency of the group	[0,1]	C 06.02			250
Funding structure	Retail funding [%]	Retail funding / Retail funding + [Unsecured wholesale funding+ Secured wholesale funding]	Approximate of the proportion of retail funding by analyzing the concentration of funding by product type.	[0,1]	C.68.00		0010	0010
Funding structure	Wholesale funding [%]	[Unsecured wholesale funding+ Secured wholesale funding] / Retail funding + [Unsecured wholesale funding+ Secured wholesale funding]	Approximate of the proportion of wholesale funding by analysing the concentration of funding by product type.	[0,1]	C.68.00		0110	0010
Funding structure	Deposits to total funding [%]	Total deposits / [Derivatives + deposits + debt securities issued + other financial liabilities]	Proportion of deposits to financial liabilities.	[0,1]	F.08.01		0050	0030

Use of **EBA DRATS** to allow for institutional synergies and a standardised identification process.

Optional

2 Operational Guidance

EfB 3.1 ‘*Estimation of liquidity and funding needs in resolution*’

➢ To ease KLD identification and assessment, an optional template is provided to banks.

Driver Number	Driver	Specification	Description of each driver (SRB/NRA)	Driver Relevance -if "no" only column F otherwise all colums to fill in-	Desciption about the relevance of the driver / or why not relevant - Descriptive descirption -	12 months ahead resolution Amount of specification (column c) -absolute amount-
(I)	Deposit outflows	Deposit from households and SME (general)				
		Deposit from corporates (general)				
		Deposit from institutions (general) without banks of the own assosciation				
		Deposits from own sector/association				
		Intragroup deposits				
		…				
(II)	Drawdowns on committed facilities	Credit lines to households (irrevocable and revocable)				
		Credit lines to corporates (irrevocable and revocable)				
		Credit lines to institutions (irrevocable and revocable)				
		Termination of own credit lines				
		Credit card				
		…				

Flexibility given on the (i) the use of the template and (ii) on the identification of the KLD to reflect their specific risk profile.

2 Operational Guidance

EfB 3.1 ‘*Estimation of liquidity and funding needs in resolution*’

- Enhanced **methodological assumptions and scenarios** to estimate liquidity and funding needs.
  - Assumptions (e.g., intraday, operational continuity).
  - Parameters and FOLTF triggers.
  - Scenario length.
  - Variant strategy.

- Structured discussions with IRTs on the outcome of the estimations.
  - ✓ FOLTF trigger.
  - ✓ Use of the JLT [optional].
  - ✓ Liquidity strategies and funding plan.

2 Operational Guidance

EfB 3.2 ‘*Measurement and reporting of the liquidity situation in resolution*’

- Enhanced **governance arrangements and internal framework expectations**.
  - Proportionate compliance with BCBS standard 239.
  - Governance arrangements and internal framework expectations.
  - Variant strategy.
- Clarifications on data collection exercises.
  - Use of proxies.
  - Flexibility in KLE selection.

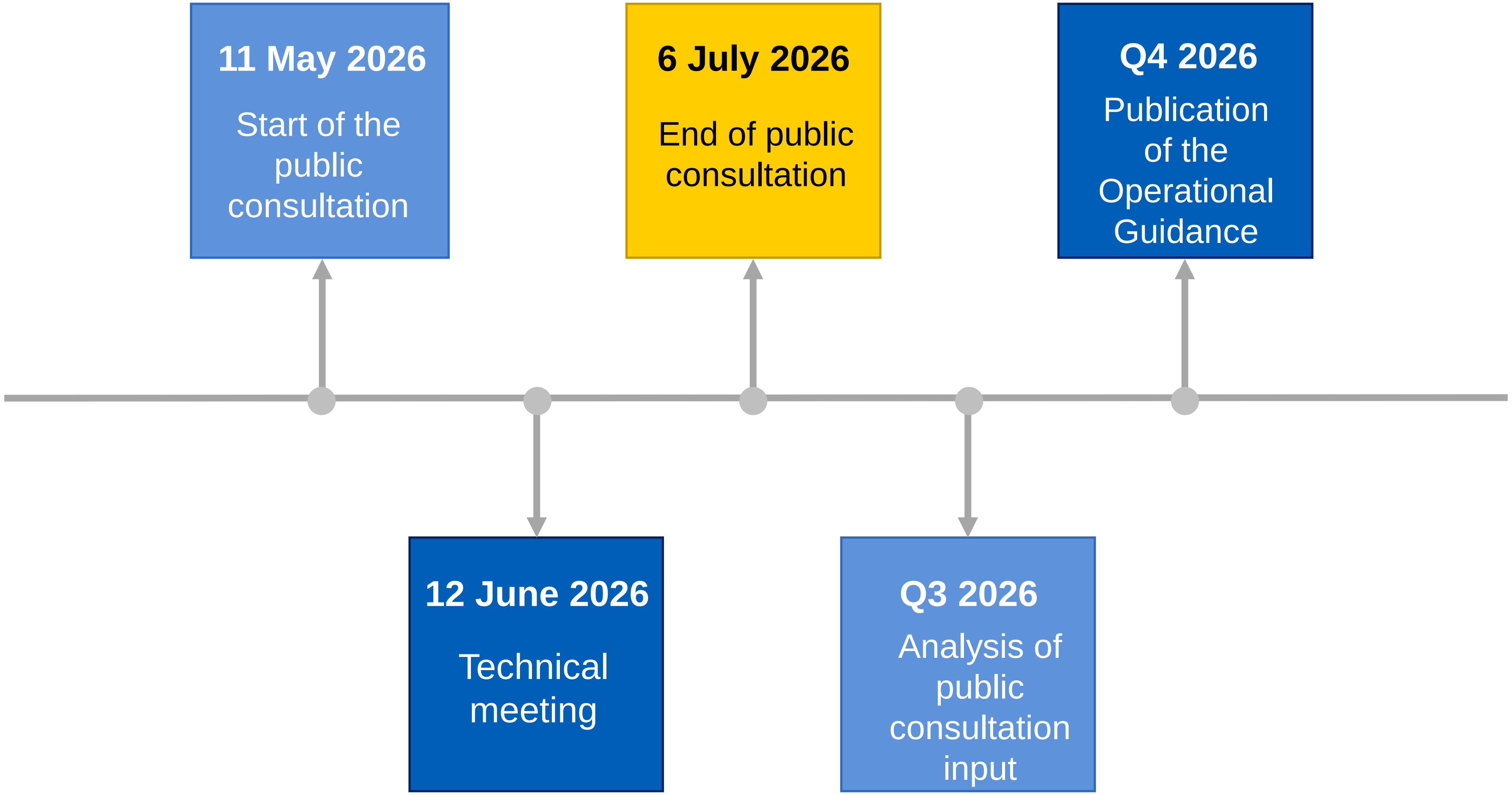
2 Operational Guidance

EfB 3.3 ‘*Identification and mobilisation of collateral in resolution*’

- Limited targeted amendments on collateral identification and mobilisation.
  - Additional granularity on collateral information.
  - Update and clarification of certain expectations.
  - Variant strategy.

- Annexes the Excel file on the time to mobilise collateral used for the 2025 RPC.
  - Clarifies which value might be reported (market / nominal / value after haircut).

3 Timeline



11 May 2026
Start of the public consultation
12 June 2026
Technical meeting
6 July 2026
End of public consultation
Q3 2026
Analysis of public consultation input
Q4 2026
Publication of the Operational Guidance

Q&A

4 Q&A

Topic	Questions
General	**Question 1:** *Why is the SRB having (again) so granular expectations (including the new proposed templates) while liquidity in resolution should be in our view more principle based and tailored to specificities of each bank? Has a cost / benefit analysis in terms of resolvability been conducted?* **Question 2:** *By when do you expect the new Guidance will come into force effectively, after the closing of the Public Consultation?* **Question 3:** *What is the point to introduce the variant strategy in the draft guidance?* **Question 4:** *Basically, many assessments have to be repeated (methodology for fast/slow scenarios, collateral management) when updating the resolution plan or making a fundamental change in the structure of the institution. First question is, who is responsible for such repeating assessments – the institutions (e.g., within the self-assessment procedure) or the resolution authorities within updating the resolution plan or both?* **Question 5:** *What the "assessment" exactly means? It means only the review of the entities taken into scope or does it mean that e.g., fast/slow scenarios should be run each year (updating resolution plan) and delivering new calculations? The liquidity scenarios and estimation of liquidity needs in resolution are maybe more crucial than MREL which is in detail part of the resolution plan but the estimations of liquidity needs in resolution are not so well developed in the resolution plans.* **Question 6:** *Could the SRB clarify how the liquidity deliverables interact with other resolution planning outputs, such as the Business Reorganisation Plan (BRP)? In particular, which scenarios should be consistently applied across deliverables, and how should banks avoid overlap or inconsistency in assumptions between them?*

4 Q&A

Topic	Questions
Introduction	**Question 7:** *Not clear when the run-up to resolution phase starts*. **Question 8:** *Definition liquidity position: why only the counterbalancing capacity is taken into account? Because in the estimate liquidity position we also have to take into account the other regulatory ratios as LCR, NSFR…?* **Question 9:** *Could the SRB clarify how the NLP (net liquidity position) shall be calculated?*
EfB 3.1. (KLE & KLD)	**Question 10:** *Please elaborate on the need of at least annual calibration of relevant parameters and on new KLEs / KLDs criteria*. **Question 11:** *What is the difference between provide liquidity to and bring financial support?* **Question 12:** *To what extent will KLDs derived from existing frameworks (e.g., ILAAP, recovery plans) be accepted without requiring recalibration specifically for resolution purposes?* **Question 13:** *How does the proportionality principle apply to the modelling of Key Liquidity Drivers (KLDs)? For institutions with simpler funding profiles, extensive KLD disaggregation may add operational complexity without materially improving liquidity estimates. Would the SRB consider explicitly allowing institutions to define a limited, materiality-based set of KLDs, provided the approach is conservative and sufficient to support decision-making during resolution?*
EfB 3.1. (Scenarios)	**Question 14:** *Could the SRB clarify whether institutions can rely on existing stress-testing methodologies (developed for supervisory purposes) for liquidity estimation in resolution?* **Question 15:** *How does the SRB intend to avoid unnecessary duplication or re-engineering of stress-testing models already validated for other regulatory purposes, in order to demonstrate resolution-related capabilities?*

4 Q&A

Topic	Questions
EfB 3.1. (Scenarios)	**Question 16:** *While acknowledging the importance of reflecting the preferred resolution strategy, the guidance should avoid overly prescriptive modelling of resolution tools. Would the SRB consider allowing institutions to focus primarily on liquidity inflows/outflows dynamics rather than granular modelling of resolution tool execution?* **Question 17:** *What is the SRB rationale for requiring liquidity projections covering up to 18 months (12 months pre-resolution + 6 months post-resolution in the slow-moving scenario)? Would the SRB consider reducing the overall scenario horizon (e.g. to a maximum of 12 months) to better reflect realistic liquidity dynamics and reduce operational burden, particularly given historical evidence of faster liquidity stress materialisation in crises?* **Question 18:** *Should all scenarios a mix of solvency and liquidity depletion? An idiosyncratic scenario on liquidity (for example reputational scenario with outflow of deposits) does have an impact on solvency (P&L), but is not considered as a mix scenario.* **Question 19:** *Could expectations on liquidity scenarios be clarified and tempered?* **Question 20:** *Length of the crisis = period between activation of recovery plan and declaration FOLTF? In that case 1 month is very short*. **Question 21:** *Fast/slow scenarios. Newly the fast/slow calculations should take into account also the applications of variant strategies – is it mandatory and also does it mean repeating the calculations minimally 1x per year also for variant strategies?* **Question 22:** *Results from calculations/estimations – not specified if the estimation of liquidity needs in resolution must be done each year by institutions (and than taken into account within updating the res. plan)*.

4 Q&A

Topic	Questions
EfB 3.1. (Scenarios)	**Question 23:** *The results of the liquidity scenario analyses can vary significantly depending on the underlying assumptions and simulation design. Attempting to fit these complex scenario results into the JLT format or similar standardized templates could therefore lead to a loss of relevant information. Could you please provide further insights or guidance regarding this expectation?* **Question 24:** *Please elaborate on results estimates expectations with at a minimum a stylized balance sheet leveraging on COREP ?*
EfB 3.1. (Strategy)	**Question 25:** *Could the SRB clarify/consider whether, under SPE, liquidity analysis focused on the resolution entity and the consolidated resolution group, with underlying estimates for each KLE, would be considered sufficient?*
EfB 3.1. (Annexes)	**Question 26:** *Could the SRB confirm that the use of Annex II (KLE and KLD identification template) will remain fully optional and left to institutions' discretion (as stated in the Read Me/General Information), without implicit SRB or IRT expectations to adopt it?* **Question 27:** *Template Annex II: no guidelines how to fill in the template.* **Question 28:** *Template Annex II tab KLD: how should we interpret the black cells? Reference to FMI report is not correct (Z09.03 instead of T33.00)* **Question 29:** *Template Annex II tab KLE: not clear which data point (defined in annex to KLE file) in which column. A one-to-one allocation of the data points defined in the annex to the columns in the table itself would improve the understanding.*

4 Q&A

Topic	Questions
EfB 3.1. (Annexes)	**Question 30:** *(KLE) We would welcome a full alignment between the Annex table and columns 080 to 200.* **Question 31:** *(KLE) Focus should be on pure liquidity metrices rather than Solvency and Credit ones.* **Question 32:** *(KLD) The deposit outflows section is too general given its significance. We would welcome an alignment with C66 which provides more granularity (different counterparty classes)* **Question 33**: *(KLD) Other sections are too detailed for rather 1-off flows.* **Question 34:** *(KLD) Double counting of certain drivers (row 140 vs 560).* **Question 35:** *(KLD) We understood the risk driver "Deterioration of the overall counterbalancing capacity" to be linked with haircuts and losses, not IFRS accounting rules.* **Question 36:** *(KLD) Including both absolute and relative outflows seem like excessive.* **Question 37:** *Could the SRB confirm the intended status of the "KLE and KLD Identification Template"? Could the SRB confirm, as stated in paragraph 80 of the guidance, that the template is an example? In addition, given the current consultation on the ITS on supervisory reporting, does the SRB envisage adjusting the Annexes to align with the EBA requirements?*
EfB 3.2.	**Question 38:** *It seems there is a confusion/ slippage between intraday liquidity management and reporting of liquidity metrics several times a day, with the introduction of 'high frequency' in addition to 'intraday'. Please clarify. What are the expected data points precisely?* **Question 39:** *To what extent can institutions leverage existing intraday liquidity monitoring frameworks (e.g., BCBS 248, payment systems requirements, internal treasury practices) for resolution purposes?* **Question 40:** *Could the SRB confirm that institutions already using stress-based intraday buffers will not be required to develop separate resolution-specific intraday models?*

4 Q&A

Topic	Questions
EfB 3.2.	**Question 41:** *What level of adaptation of existing intraday frameworks would the SRB consider sufficient to meet resolution expectations?* **Question 42:** *Capabilities to measure and report liquidity situation – again what concerns the identification assessment referred to in Section 3.1. during updating of resolution plan? The reporting capacity is better to be tested.* **Question 43:** *Does „standardised set of data specified by the SRB“ mean JLT? Are there planned any changes regarding the JLT (asset encumbrance and maturity ladder parts) taking into account changes in the regulatory report (C66, F32.01) planned by EBA?* **Question 44:** *The Guidance does not sufficiently specify which standard reports are to be covered by the requirements of BCBS Standard 239. For consistent interpretation and implementation, we kindly request clarification on whether the Guidance will include a clear definition of the affected reports and a corresponding list.* **Question 45:** *Regarding Intraday Liquidity Reporting, what is the expected timeline for implementation? Should the guidance be published in Q4 2026 and become applicable in 2027, institutions would only have a limited period of several months. The technical implementation of an entirely new automated data and reporting infrastructure for intraday liquidity cannot realistically be achieved within two years.*
EfB 3.3.	**Question 46:** *Could you please clarify under which circumstances the 'Emergency Liquidity Assistance' from Central Banks is an acceptable form of liquidity option?*

4 Q&A

Topic	Questions
EfB 3.3.	**Question 47:** *Collateral identification and eligibility While we support the broader collateral identification approach proposed by the SRB, the guidance should provide greater flexibility regarding:* i. *the treatment of assets with uncertain eligibility.* ii. *assumptions on legal enforceability in extreme stress situations.* iii. *proportional treatment of non-material non-marketable assets.* iv. *Certain assets may be theoretically valuable but practically unsuitable as collateral due to legal, operational, timing or valuation constraints. The final guidance should allow banks to exclude or deprioritise these assets where duly justified. In particular, certain asset classes (e.g., DTAs, operational assets or low-liquidity tangible assets) may reasonably be excluded where practical mobilisation feasibility is extremely limited.* **Question 48:** *Identification and mobilisation of collateral during and after resolution – again should be repeated each year when updating resolution plan?* **Question 49:** *On mobilisation timelines, Annex III should remain a planning and comparability tool rather than a binding standard…..Mobilisation capacity and timing are also dependent on external factors outside institutions' control, including central bank operational frameworks, market-wide collateral conditions, counterparty acceptance criteria and jurisdiction-specific legal formalities. Accordingly, mobilisation assumptions should be assessed on a best-efforts and capability basis rather than against rigid standardised timing benchmarks.* **Question 50:** *The guidance anticipates that banks may need to identify and potentially use assets not eligible for standard Eurosystem monetary policy operations. Could the SRB clarify what banks should assume qualifies as ELA- and SRF-eligible collateral for planning purposes? Specifically, could the SRB acknowledge that exact eligibility criteria and applicable haircuts for ELA/SRF will only be determined in situ, and provide guidance on what conservative planning assumptions institutions should apply in the interim?*

Floor open for further questions

THANK YOU

Single Resolution Board

https://srb.europa.eu