FEEDBACK STATEMENT TO THE PUBLIC CONSULTATION ON THE OPERATIONAL GUIDANCE FOR BANKS ON COMMUNICATION IN RESOLUTION, AND ON THE COMMUNICATION TESTING SUPPLEMENT[1]

[1] Supplement to SRB Operational Guidance on Resolvability Testing for Banks.

Single Resolution Board

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Table of contents

1. INTRODUCTION

The SRM Vision 2028 calls for an increased focus on banks' operational readiness to implement resolution strategies. An essential element of such readiness is the ability to communicate in a timely, accurate and consistent manner when a bank is failing or likely to fail, thereby supporting the effective implementation of resolution actions.

In a crisis situation, communication plays a critical role alongside actions taken by public authorities. Banks are expected to deploy robust communication strategies to inform the relevant stakeholders, with the aim of limiting contagion and avoiding uncertainty.

Banks' communication capabilities are set out in the SRB's Expectations for Banks (EfB), in particular in Principles 6.1 and 6.2. Based on these expectations, and drawing on experience gained during the EfB phase-in period and from real-life resolution cases, the SRB drafted the Operational guidance for banks on communication in resolution to clarify its expectations and support banks in strengthening their crisis communication readiness.

As a background, the SRB consulted industry stakeholders on the draft Operational guidance on banks' communication between 17 October and 12 December 2025. The SRB received six responses from banking associations. As part of the consultation process, the SRB held a public technical meeting via WebEx on 19 November 2025, which gathered around 200 participants from a broad range of stakeholders, made up of banks, banking associations, EU and non-EU resolution authorities. This document summarises the main comments raised by the stakeholders and explains how they have been addressed.

2. MAIN ISSUES RAISED IN RESPONSE TO THE CONSULTATION

Proportionality and scope of the communication plan

Several respondents expressed concerns that the draft guidance did not sufficiently reflect the principle of proportionality and could create unnecessary operational burden through overly granular expectations. The stakeholders therefore advocated for a more principles-based approach and noted a potential duplication of existing crisis and recovery communication arrangements. In particular, the respondents recommended that institutions be permitted to rely more extensively on established communication documents and focus primarily on resolution-specific elements, rather than developing fully standalone plans. In their view, the proposed structure risked duplicating arrangements already in place and would require significant revision of existing communication plans. A number of respondents also requested clarification on how proportionality would be applied in practice, including greater differentiation based on the size, business model, jurisdictional footprint and preferred resolution strategy.

In response, the SRB clarifies that the guidance does not introduce new requirements, but operationalises existing expectations in a proportionate manner. To further reflect the principles-based approach requested by the stakeholders, the guidance has been amended to include a dedicated section setting out overarching communication principles intended to frame and underpin the operational expectations. These principles are there to ensure that communication arrangements remain coordinated, timely, resilient and capable of supporting the implementation of the resolution strategy, allied with flexibility for institutions to organise and operationalise their communication plans.

To minimise duplication, institutions may leverage and cross-reference existing crisis and recovery communication documents, as well as other relevant resolution deliverables, including bail-in and other resolution-related playbooks. However, institutions are expected to maintain an operational resolution communication plan that is capable of being implemented under resolution conditions and of supporting effective communication throughout the relevant resolution phases. Where institutions choose to address elements of this guidance through other deliverables, they should ensure that those documents meet the expectations set out in this Operational guidance for banks on communication in resolution.

The guidance further clarifies that communication plans should reflect the institution's resolution strategy and group structure. Institutions are expected to have communication plans that apply at group level, and address, where relevant, entity-specific aspects such as local disclosure requirements, language considerations, and/or time-zone constraints. The guidance does not require duplicate communication plans for each legal entity. Institutions are nevertheless expected to demonstrate the capability to communicate effectively at each stage when heading into resolution, during resolution and, where relevant, after resolution.

How the guidance is applied will be assessed by the relevant Internal Resolution Teams (IRTs) on a case-by-case basis, taking into account institution-specific characteristics, including size, business model, organisational structure, cross-border footprint, and preferred and variant resolution strategies (PRS and VRS). For example, smaller institutions operating in a single jurisdiction may prepare a simplified communication plan with limited stakeholder segmentation, whereas large, cross-border or multi-point-of-entry (MPE) groups may require more differential and multilingual arrangements. Where a sale-of-business (SoB) share deal constitutes the preferred strategy, there is, in principle, no expectation that the communication plan covers the post-resolution phase, which falls under the responsibility of the purchaser. In cases where the preferred or variant resolution strategy envisages measures such as a business reorganisation plan (BRP), institutions should consider the related communication needs. For hosted banks, proportionality primarily entails the ability to support the parent entity's communication strategy and address local stakeholders as necessary.

Following stakeholder feedback, the expectation to analyse the communication implications of resolution tools not foreseen under the preferred or variant resolution strategies has been removed. Similarly, the reference to a minimum six-month post-resolution communication period has been deleted. Institutions are not expected to predefine detailed timelines for hypothetical scenarios, but rather to maintain sufficiently developed governance arrangements and communication blueprints capable of being adapted to the circumstances of a specific case. This does not reduce the expectation that institutions should continue strengthening their communication plans, including in relation to variant resolution strategies.

Alignment with the existing EU framework

Some stakeholders argued that aspects of the guidance appeared to go beyond the existing EU requirements (in particular the EBA Guidelines on improving resolvability[1]), suggesting that specific expectations — including those relating to pre-defined key messages, template documents and certain communication infrastructure — should be removed. The SRB considers that the final guidance is fully compliant and consistent with the applicable requirements established by the European Union regulatory framework as well as the SRB's EfB and Operational guidance for banks on resolvability self-assessment. More specifically, the EBA Guidelines on improving resolvability[2] require banks to have a communication strategy in place that includes, inter alia, template documents, FAQs, and other tools for use at key stages of the resolution period, as well as defined key messages for each identified stakeholder group. These expectations are included in both the EfB and in the Operational guidance for banks on resolvability self-assessment[3]. Banks have already developed such messages in line with the preferred resolution strategy.

1 EBA/GL/2023/05 amending EBA/GL/2022/01

2 Paragraph 117 - 120 of EBA/GL/2022/01

3 See https://www.srb.europa.eu/en/content/resolvability-self-assessment

This guidance clarifies that the expectation to have pre-defined key messages in place does not require banks to draft a range of communication messages covering every specific scenario in advance. Rather, they are expected to demonstrate (i) that their communication plan outlines the main points to be communicated to each stakeholder group, and (ii) their capability to prepare and adapt coherent messaging to promote confidence in the bank throughout resolution. Pre-defined key messages remain a core capability under capability 6.1.3.1, and communication plans are expected to include key messages for use during and after resolution that are accurate, consistent, clear and tailored.

Similarly, the guidance clarifies that institutions are expected to describe the infrastructure and resources that would enable effective communication in a resolution scenario. It provides non-exhaustive examples, consistent with the EBA Guidelines on improving resolvability, the EfB and the Operational guidance for banks on resolvability self-assessment. These examples, including Questions & Answers or other documents, may already form part of the business-as-usual arrangements or may be available for implementation in the lead-up to resolution.

The expectation that banks could ensure the mobilisation of an effective communication infrastructure, including the increase of the capacity of the call centre where relevant, does not introduce a new requirement to set up additional permanent structures. Rather, banks are expected to demonstrate that they could ensure adequate stakeholder communication capability in resolution, proportionate to their size, complexity and resolution strategy. The guidance does not expect banks to set up or permanently maintain a dedicated call centre where alternative arrangements can adequately support resolution communication needs.

With regard to the flashcard example included in Annex B, the SRB confirms that it is a non-binding, illustrative template provided solely for structural guidance and does not constitute a mandatory format.

The purpose of this guidance is to operationalise the existing EfB and EBA guidelines, in applying proportionality and focusing only on the core capabilities which banks should be able to demonstrate. Communication is a core capability in resolution, and recent experience has underscored its importance in maintaining confidence. The final version of the guidance seeks to balance effective preparedness, while ensuring that expectations remain proportionate to each institution's profile and resolution strategy.

Coordination between the bank and the resolution authorities

The respondents called for greater clarity regarding the respective roles and responsibilities of the SRB, national resolution authorities (NRAs), supervisory authorities and banks in relation to communication during resolution. Several respondents asked for a more structured description of coordination mechanisms that would include the sequencing of communication steps, communication with participants, and interaction between authorities and institutions during the various phases of resolution. They emphasised that, given the case-specific and idiosyncratic nature of resolution decisions, communication arrangements cannot be fully predefined in advance, and cautioned that requiring fully fledged standalone resolution communication plans may have limited practical value without a clearer delineation of responsibilities.

A number of respondents also raised concerns regarding the potential involvement of external consultants in resolution communication. They questioned the legal basis, proportionality and operational feasibility of consultants leading or joining banks' communication teams, noting potential risks related to delays, operational frictions, confidentiality and accountability. Most respondents argued that, where external consultants are envisaged, their role should be clearly defined and limited to advisory or supporting functions.

In addition, several respondents sought greater clarity on cross-border coordination, including how international communication aspects should be reflected in communication plans, how group-level coherence should be ensured in MPE strategies and how jurisdiction-specific disclosure regimes including those involving third-country authorities should be managed. Finally, some respondents requested clarification on operational aspects, such as the meaning of periodic submissions.

The SRB reiterates that effective crisis communication requires advance planning and preparation and cannot be left to improvisation at the moment of resolution. Banks' communication plans have been prepared in coordination with the IRTs and provide solid foundations for communication through a resolution scenario. Under the Union resolution framework[4], institutions are expected to communicate with their own stakeholders, including depositors, shareholders, bondholders, counterparties, financial market infrastructures, and other affected market participants. At the same time, the Single Resolution Mechanism (SRM) ensures close coordination and cooperation among the relevant authorities and manages public communication around the case.

In a resolution, the SRB Crisis Management Team (CMT) — comprising the IRT, communication experts and other relevant persons — ensures the consistency of public communication. The aim of this is to support clear, accurate and coherent communication, including on matters related to financial stability and depositor protection. Institutions remain responsible for their communication to internal and external stakeholders. While core elements of their communication planning, such as governance arrangements, target audiences and communication channels, are not expected to require fundamental changes, communication activities are expected to be carried out in close coordination with the SRB and the relevant NRAs. The SRB will consider making high-level information available regarding the sequencing of communication in resolution. For additional support, institutions may consult and draw on publicly available examples of past resolution communications (here).

With regard to external consultants, the SRB takes note of the concerns raised. The guidance does not imply that institutions must systematically rely on external consultants, nor that such parties would replace the banks' responsibilities. Banks remain fully accountable for the execution of their communication activities. Where consultants are engaged, their involvement is limited to the mandate and circumstances of the case, and confidentiality and governance safeguards must be maintained. The final version of the guidance clarifies that banks may engage external consultants on their own initiative to support the preparation and deployment of their communication plan in all stages of resolution.

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[4] Article 8(9)(n) Regulation 806/2014 (SRMR), Article 10(7)(n) Directive 2014/59/EU (BRRD) and Article 22(6) Delegated Regulation (EU) 2016/1075.

As regards cross-border coordination, the final guidance clarifies that communication arrangements should ensure group-level coherence while taking into account jurisdiction-specific legal and disclosure requirements. For institutions operating in multiple jurisdictions, this may entail different layers of messaging, appropriate allocation of responsibilities between group and entity levels and structured coordination mechanisms, including interactions with third-country authorities where relevant. The guidance does not prescribe a specific organisational model for this but expects institutions to demonstrate that cross-border communication arrangements have been clearly identified, with a view to being implemented, in their governance framework.

Finally, the SRB sets out its operational expectations concerning updates and submissions. Institutions are expected to update, where necessary, and submit their communication plan by 30 April 2028, in line with the timeline for achieving compliance with this guidance. Thereafter, updates should be made only in the event of material changes, such as to significant governance, business, and/or corporate actions, or where updates are deemed appropriate or necessary to enhance the bank's resolvability (i.e. based on deficiencies or gaps detected during testing exercises, and/or where the IRT takes the view that the communication plan does not fully meet the expectations), or in response to future updates to the Operational guidance. In all other respects, banks remain responsible for keeping their communication plans operational and up-to-date, also in relation to key factual information such as contact details.

Moratorium tool

Several respondents raised concerns about the communication challenges of a moratorium, in particular in light of the short timeframes and the risk of adverse market reactions. The stakeholders emphasised that communication in such circumstances requires a considerable level of care and clarity. In addition, the majority of respondents enquired about the sequencing, timing and content of communications, including communication by both banks and authorities, especially where a moratorium may precede the adoption of a resolution decision.

Further details were requested on the circumstances in which a moratorium may be considered, the potential scope of the measure, and timing of notifications to the institutions concerned. Clarification was also sought on whether past experience informs the current approach. Some respondents considered that the guidance lacked sufficient operational detail on how moratorium-related communication should be prepared and whether such communication should form part of the institutions' communication plans. One respondent cautioned that communication on a moratorium under Article 33a BRRD should not be distinct from communication on the subsequent resolution action to avoid uncertainty and effects of contagion.

The respondents also pointed out that, in the case of a moratorium under Article 33a BRRD, a simultaneous suspension of trading across relevant marketplaces is necessary to mitigate market disruption. Other comments focused on challenges posed by the potential exclusion of certain parties from the scope of a moratorium, which could raise concerns about equal treatment and increase communication complexity.

In response, the SRB acknowledges the sensitive nature of communication during a moratorium. A moratorium can be applied only where certain conditions are met and for a defined period of time, as specified in the legal framework. Decisions on any moratorium have been and will be taken on a case-by-case basis, in compliance with the legal requirements. While experience from previous cases has provided useful insights, the SRB adds that the aim of the present guidance is not to cover those aspects but is limited to setting expectations for sound communication, including in situations where moratorium powers may be exercised.

With regard to operational preparation, institutions are expected to cooperate closely with the SRB and the NRAs in all phases of a crisis. The intensity and frequency of this interaction will depend on the specific circumstances of the case. While the SRB and the NRAs are tasked with coordinating public communication, the institution is in charge of the direct communication with customers and other stakeholders.

In principle, and without prejudice to specific circumstances that trigger the need for deviating from the considerations below, the SRB anticipates the following in the sequencing of a moratorium under Article 33a BRRD that precedes an SRB resolution action. The FOLTF determination and a subsequent moratorium decision under Article 33a BRRD may be adopted in close proximity. Following an SRB moratorium decision, the national authorities implement the measure under national law. The national implementing acts and accompanying public communication should provide details on the scope, duration and other details of the moratorium. Confidentiality regarding potential resolution actions is to be maintained throughout the phase preceding the SRB (non-) resolution decision. The SRB notes that the applicable framework provides for distinct decisions regarding the Article 33a BRRD moratorium powers and the resolution action. Separate communication steps are envisaged to ensure the effectiveness of each decision. For illustrative purposes, the guidance contains graphs with the main communication milestones for when an Article 33a BRRD moratorium is adopted, or not.

As regards trading suspensions, the SRB clarifies that its moratorium powers do not cover the suspension or resumption of listing or trading shares. Trading suspensions proceed in accordance with the applicable legal framework, either at the initiative of the competent market authorities or at the request of the resolution authorities, where the relevant conditions are met.

Infrastructure and resources / spokesperson

The respondents acknowledged the importance of having clear communication arrangements in resolution. At the same time, they argued that the designation of a spokesperson should build on existing press and communication functions and should not introduce rigid or disproportionate organisational requirements. Several stakeholders considered the expectations to identify operational assets, services and staff members in advance, including named spokespersons, to be overly prescriptive and burdensome.

A number of respondents expressed reservations about the requirement to pre-identify named spokespersons or lists of executives. They referred to potential data protection considerations and questioned the legal basis for sharing such information. Other respondents underlined that the designation of a spokesperson should remain flexible and depend on the specific circumstances of a crisis. They requested clearer differentiation between SPE and MPE structures. It was also noted that, in practice, communication is often led by the Group Head of Communication, particularly in SPE groups, and that reliance on a single spokesperson may not be operationally feasible given the volume and complexity of media interactions in resolution.

In response, the SRB confirms that communication arrangements in resolution should build on existing communication and press functions. The aim of the guidance is to ensure that institutions are able to mobilise effective resolution communications as needed, while granting flexibility around how these responsibilities are organised. Institutions may designate a spokesperson(s) to engage with the media during resolution and the implementation of resolution actions. This may include individuals already responsible for communication within the institution. The guidance has been amended accordingly to allow for more than one spokesperson to be designated, thereby providing flexibility around how media interactions are managed while guaranteeing consistency in messaging. The SRB also confirms that, where lists of spokespersons are shared with the SRB for resolution planning purposes, any related personal data will be processed in accordance with the applicable legal basis set out in the SRMR and subject to the appropriate confidentiality and data protection safeguards.

The paragraph outlining the expectation to identify operational assets, services and staff members in advance has been deleted following stakeholder feedback. Nevertheless, institutions are expected to ensure continuity of communication functions by setting out clear succession arrangements to address situations in which the designated spokesperson(s) or other responsible individuals are unable to perform their duties at the time of resolution.

To reflect the feedback received, the guidance has been further clarified by adding an explanatory note distinguishing between SPE and MPE structures. In SPE cases, the designated spokesperson may be the Group Head of Communication. In MPE cases, spokespersons may be designated at the level of each resolution entity, such as the relevant Head of Communication or another competent senior executive, with coordination at group level to ensure consistency. The guidance does not seek to replace effective existing governance arrangements, but to ensure that they are operational also under resolution conditions.

Annex A

Many respondents emphasised that Annex A should be illustrative. They highlighted that communication plan structures and processes cannot be standardised across institutions, given the differences in size, business models, jurisdictions and resolution strategies. The stakeholders called for explicit clarification that institutions are not required to realign their existing communication plans to mirror the structure set out in the Annex.

In response, the SRB clarifies that Annex A is retained as a simplified illustrative example intended to provide high-level guidance on the expected content of a communication plan. It is not intended to constitute a mandatory template or a detailed table of contents. Institutions are therefore not expected to amend or restructure their existing communication plans, provided that their arrangements meet the expectations set out in the guidance.

Impact analysis

A broad range of respondents expressed concerns regarding the potential impact of the guidance, in particular the requirement to design, maintain and test a dedicated resolution communication plan. The stakeholders considered that these expectations could result in the duplication of existing crisis-preparedness arrangements with limited additional benefit.

Several respondents highlighted the implications for ongoing resources in maintaining a standalone resolution communication plan, including the need for regular updates and extensive documentation. Some stakeholders identified additional implementation costs beyond plan drafting, such as legal costs linked to confidentiality and disclosure considerations, and training and operational expenses, for example in relation to call centre staff. It was argued that reinforcing such functions rapidly with resolution-specific expertise could be challenging. One respondent provided an estimate of the related potential annual costs of this for a medium-sized institution.

In response, the SRB clarifies that the objective of the guidance is to ensure that institutions possess operational communication capabilities that can be implemented in resolution, rather than to create unnecessary parallel structures. Institutions may leverage and cross-reference existing crisis and recovery communication documents, provided that resolution-specific requirements are clearly addressed and can be implemented to optimal effect under resolution conditions.

The SRB takes note of the operational and legal cost considerations identified by respondents. However, the guidance does not introduce new disclosure or confidentiality requirements beyond those already provided for in the applicable legal framework or expectations set in the EfB, nor does it require any dedicated resolution-specific communication structures to be set up. Institutions are expected to describe the infrastructure and resources available for in-crisis communication, including existing tools, channels and staff arrangements. Where appropriate, arrangements already in place in business-as-usual may be relied upon, supplemented by scalable solutions that can be mobilised in the lead-up to resolution, such as contractual arrangements with external public relations firms or service providers capable of providing additional call-handling capacity. The guidance does not require institutions to establish or permanently maintain a dedicated call centre where alternative arrangements can adequately support communication needs. Demonstrating communication capability should be proportionate to the institution's size, complexity and existing governance framework.

Finally, the SRB reiterates that communication channels used in resolution are expected, to the extent possible, to mirror the channels used in business-as-usual and provided that they are operational also under stressed conditions.

Disclosure and confidentiality requirements

The respondents requested greater clarity about confidentiality and disclosure expectations, in particular through explicit reference to obligations under the EU Market Abuse Regulation (MAR) and a clearer indication of the timeline for disclosure in the context of resolution preparation. It was also noted that premature disclosures ahead of resolution may trigger market instability and negatively affect franchise value, particularly for sale-of-business strategies.

The SRB has updated this section of the guidance to align it with the latest legislative developments, and to reflect amendments introduced by the EU Listing Act to the MAR and the CMDI package to the Bank Recovery and Resolution Directive (BRRD3) aimed at avoiding early disclosure in resolution. The guidance clarifies that actions taken in preparation for resolution may be recognised as intermediate steps in a 'protracted process', in which case immediate disclosure is not expected but only after publication of the final resolution decision. In other circumstances not falling under the protracted process exemption, banks retain the right to formally delay market disclosure, provided that the specific conditions under Article 17(4) or (5) MAR are met. The guidance is updated to incorporate the new power under Article 84b of BRRD, as introduced by Directive 2026/806. This provision empowers the resolution authorities to issue a binding requirement on banks to maintain the strict confidentiality of inside information during resolution preparation, which remains in effect until the authorities deem that confidentiality is no longer necessary to achieve the resolution objectives. These clarifications address the concerns raised by the stakeholders regarding the timing and scope of disclosure obligations under the MAR.

Regarding the content of the communication plans, the stakeholders asked how to manage jurisdiction-specific disclosure regimes, especially the interaction with third-country authorities, and noted the related legal complexities and costs. The guidance states that banks should be aware of, and operationally prepared to comply with, the disclosure rules across all the relevant jurisdictions in which they operate (both EU and third-countries). Consequently, the communication plan is expected to map out the internal arrangements, systems, and procedures for identifying, handling, and disclosing inside information during a crisis. Banks are not expected to include in the communication plan information on disclosure requirements already included in other resolution playbooks, for example in the bail-in or the transfer playbooks.

Finally, banks asked for more flexibility and proportionality concerning confidentiality and operational costs. The SRB has clarified that banks are expected to demonstrate how they would maintain the confidentiality of inside information (including in the event of a confidentiality order under Article 84b of BRRD). However, the guidance does not stipulate specific procedures for handling inside information or for maintaining insider lists in coordination with compliance functions. Instead, the SRB leaves it to banks to decide how best to meet these expectations and how to cover them in the communication plan, thus allowing for a flexible approach that respects the different organisational needs of each institution.

Other comments

Some respondents questioned the categorisation of stakeholders by their anticipated degree of negative reaction. One respondent suggested introducing additional expectations around communication disruptions, linked to the digital operational resilience framework.

In response to the stakeholder feedback, the guidance has been amended in several respects to streamline the requirements and enhance clarity. The expectation to formally categorise stakeholders according to their anticipated degree of negative reaction has been removed. The focus is instead put on ensuring that institutions can identify relevant stakeholder groups and prepare appropriate communication arrangements, without requiring a formal stakeholder risk-rating framework in the communication plan.

With regard to additional expectations related to communication disruptions and digital resilience, the SRB reiterates that the guidance is focused on resolution communication. It is pointed out that aspects related to ICT disruptions causing potential communication disruptions, and the need to ensure digital-channel resilience, are addressed in the digital operational resilience act (DORA) and related supervisory processes.

Communication testing supplement

Several respondents questioned the proportionality and practicality of the deliverables envisaged under the communication testing supplement, notably the adapted communication plan, evidence book and related logs. They considered that these requirements are resource-intensive and overly focused on documentation. They suggested instead that greater emphasis might be put on joint authority–bank crisis communication simulations centred on decision-making, coordination and timing. The stakeholders also highlighted feasibility concerns about the 2026 testing cycle, in particular about the submission formats and the administrative burden related to track-changes versions and consolidated evidence materials. Some respondents requested clarification on the expectations for 2026, while others argued that more comprehensive testing should happen only after the Operational Guidance for Banks on Communication in Resolution is fully implemented.

The SRB has taken due account of the feedback received and has amended the relevant paragraph on the ‘Evidence Book on communication’ to clarify that the method for providing the relevant evidence — including the format and supporting documentation — may be agreed on with the relevant IRT, together with the expected content, taking into account the specificities of the test. This clarification is intended to enable flexibility while ensuring that the necessary evidence is made available to support the assessment. At the same time, the SRB maintains the expectation that the adapted communication plan be submitted in track-changes format. This requirement is in place to facilitate the assessment of modifications and ensure transparency in the review process.

The SRB reiterates that, as a general rule, the communication dimension is tested in conjunction with other relevant dimensions, depending on the institution’s preferred or variant resolution strategy, in a manner comparable to governance-related testing.

With regard to the proposal for joint authority–bank crisis communication simulations, the SRB does not exclude that joint exercises of this nature may be considered in the future, subject to lessons learned.

Finally, the SRB confirms that, until the Operational guidance for banks on communication in resolution formally comes into force, institutions remain subject to the existing expectations. Accordingly, any testing done in 2026 is expected to comply with the current expectations.

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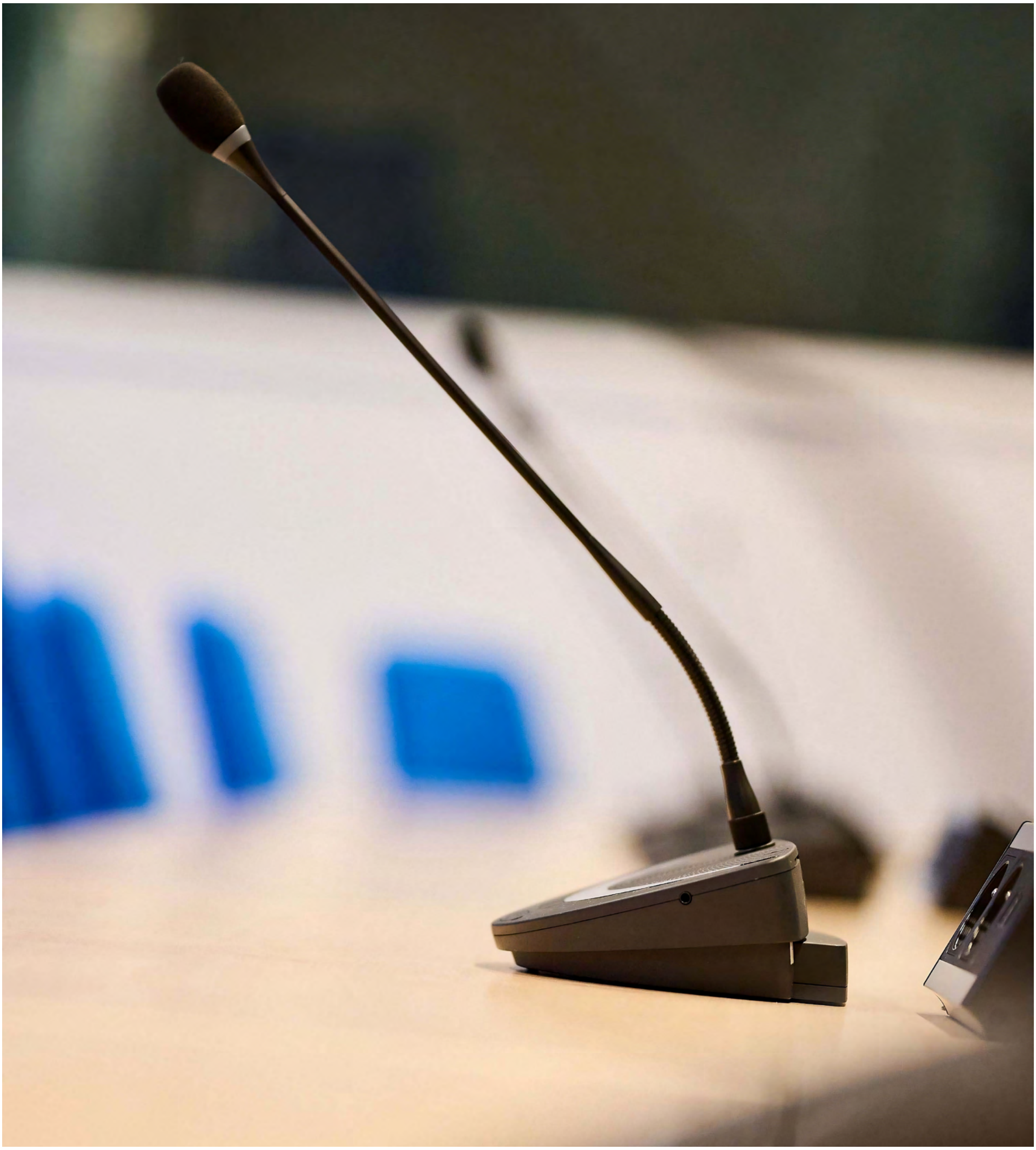

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