

POSITION PAPER



ESBG response to the EBA consultation on Implementing Technical Standards on public disclosures by institutions of the information on operational risk

ESBG (European Savings and Retail Banking Group)

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Questions

Question 1: Are the amended/new templates EU ORA, EU OR1, EU OR2 and EU OR3 and the related instructions clear to the respondents? If no, please motivate your response.

We need clarification on whether the new operational risk disclosure templates apply only to the consolidated Group level or also require individual data reporting. Additionally, we seek clarity on whether these templates should be submitted simultaneously with the solvency templates (C16) or at a later date.

Question 2: Do the respondents identify any discrepancies between these templates and related instructions and the calculation of the requirements set out in the underlying regulation?

No.

Question 3: Do the respondents agree that the amended draft ITS fits the purpose of the underlying regulation?

Yes.

Question 4: Do the respondents consider that the “mapping tool” appropriately reflects the mapping of the quantitative disclosure templates with supervisory reporting templates?

Yes.



ESBG is an association that represents the locally focused European banking sector, helping savings and retail banks in 17 European countries strengthen their unique approach that focuses on providing service to local communities and boosting SMEs. An advocate for a proportionate approach to banking rules, ESBG unites at EU level some 871 banks, which together employ 610,000 people driven to innovate at 41,000 outlets. ESBG members have total assets of €6.38 trillion, provide €3.6 trillion loans to non-banks, and serve 163 million Europeans seeking retail banking services.

Our transparency ID is 8765978796-80.



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