Banking 11 Jan 2027

CRD6, branches of third-country banks

On 11 January 2027, a new regime applies to branches in France of banks established outside the European Union. It sets capital, liquidity, governance and reporting requirements. The rest of the CRD6 Directive has applied since 11 January 2026.

APPLICATION DATE	WHO REQUIRES IT	WHO YOU ANSWER TO	NATURE OF THE REQUIREMENT
11 Jan 2027	CRD6 Directive, transposed by ordinance	ACPR	Prudential supervision

INSTITUTIONS CONCERNED **Branches of non-EU banks**

Solid: concerned. Dashed: depending on status or activity.

MILESTONES

The timeline of the text.

31 May 2024 — Directive (EU) 2024/1619, known as CRD6

8 Apr 2026 — Transposing Ordinance No 2026-255

24 Apr 2026 — Decree No 2026-309

11 Jan 2027 — Application of the branch regime

IN DETAIL

What is changing.

Four requirements for the branch

ACPR PRESENTATION, OCTOBER 2025

11 JAN 2027

CAPITAL
- Minimum capital endowment, ring-fenced in France
- For class 1 branches: 2.5% of liabilities

LIQUIDITY
- Liquidity coverage ratio, or its simplified version

GOVERNANCE
- Two effective managers
- Policy for booking transactions in the branch

SUPERVISION
- Dedicated reporting to the ACPR
- The ACPR may require a subsidiary to be set up

The CRD6 Directive harmonises the regime for branches of third-country banks. In France, it is transposed by Ordinance No 2026-255 of 8 April 2026, Decree No 2026-309 of 24 April 2026 and an order of 29 July 2026. The provisions on the provision of banking services by third-country undertakings follow a deferred timetable and apply on 11 January 2027.

The ACPR presented the regime as early as October 2025: ring-fenced capital endowment, liquidity ratio, policy for booking transactions, power to require a subsidiary. From 11 January 2027 it also applies the EBA

guidelines on the instruments that cover the risks or losses of the branch.

OUR VIEW

A branch has no legal balance sheet of its own: its accounts are a view of the head office. The new regime requires knowing, transaction by transaction, what is booked in the branch, and producing capital, liquidity and reporting figures at that level.

WHAT WE DO

Gap analysis, rules for booking transactions in the branch, production of accounting and prudential reports, reconciliations with head-office accounts.

CRD6 Branches ACPR

BANKING→

FURTHER READING

Official sources.

Légifrance, Decree No 2026-309 of 24 April 2026	https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000053957207
Légifrance, report on Ordinance No 2026-255	https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000053777233
ACPR, EBA guidelines on third-country branches	https://acpr.banque-france.fr/fr/publications-et-statistiques/publications/mise-en-conformite-de-lacpr-aux-orientations-de-la-utorite-bancaire-europeenne-abe-relatives-aux
ACPR, meeting with the industry, 9 October 2025	https://acpr.banque-france.fr/system/files/2025-10/20251010_OCBF_2025_support_presentation.pdf

Links checked on 23 November 2026.