Banking · Dec 2028

EBA reporting: liquidity, asset encumbrance, ESG

Four areas of the EBA reporting overhaul apply one year after the others: liquidity, asset encumbrance, supervisory benchmarking and ESG. Their first reference date is December 2028.

APPLICATION DATE	WHO REQUIRES IT	WHO YOU ANSWER TO	NATURE OF THE REQUIREMENT
Dec 2028	EBA (reporting technical standards)	ACPR, through the Banque de France portal, and ECB for large groups	Prudential supervision

INSTITUTIONS CONCERNED

- Large banking group
- Mid-sized bank
- Private bank
- Specialised finance
- Public financial institution

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

MILESTONES

The timeline of the text.

6 Nov 2026 — The EBA extends the implementation timetable

Dec 2026 — Final technical standards

Dec 2027 — First wave of new requirements

Dec 2028 — Liquidity, asset encumbrance, ESG

IN DETAIL

What is changing.

An overhaul in two waves

REFERENCE DATES

DEC 2026 — Final standards
The EBA publishes its technical standards, then the technical package in early 2027.

DEC 2027 — First wave
New requirements: stress test, operational risk losses, IFRS 9.

DEC 2028 — Second wave
Liquidity, asset encumbrance, supervisory benchmarking, ESG.

AT LEAST ONE YEAR
This is the implementation period the EBA commits to leaving after publication.

FIRST QUARTER OF 2027
Announced opening of the European register of data requests.

In its press release of 6 November 2026, the EBA splits the overhaul into two waves. The new requirements start in December 2027; the areas of liquidity, asset encumbrance, supervisory benchmarking and ESG follow in December 2028.

The principle is the same for both waves: at least one year between publication of the final texts and the first submission.

OUR VIEW

Both waves affect the same data feeds. Treating them as two separate projects means opening the same flows twice. A common scoping phase, followed by two go-lives, costs less.

THE FIRST WAVE, IN DECEMBER 2027→

WHAT WE DO

Common scoping for both waves, adaptation of liquidity and asset encumbrance templates, consistency checks between templates and with accounting.

Liquidity | Asset encumbrance | ESG

FINANCE ADVISORY→

FURTHER READING

Official sources.

EBA, press release of 6 November 2026	https://www.eba.europa.eu/publications-and-media/press-releases/eba-outlines-next-steps-supervisory-reporting-simplification-and-extends-implementation-timelines

Links checked on 23 November 2026.