Banking · 31 Dec 2026

Pillar 3 ESG extended to all institutions

At the 31 December 2026 reference date, disclosure of environmental, social and governance risks is due to extend to institutions that are not large, subject to the Commission adopting the technical standards. Small and non-complex institutions have one more year. Equity exposures and exposures to shadow banking entities are also covered.

APPLICATION DATE	WHO REQUIRES IT	WHO YOU ANSWER TO	NATURE OF THE REQUIREMENT
31 Dec 2026	EBA (technical standards, CRR3)	Disclosure by the institution, supervised by the ECB or the ACPR	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.

1 Jan 2025 — The CRR3 Regulation applies

24 Jul 2026 — The EBA consults on technical package 4.4

31 Dec 2026 — First reference date

31 Dec 2027 — Small and non-complex institutions

IN DETAIL

What is changing.

Who discloses, and when

ALREADY IN PLACE
Large listed institutions
They already disclose their ESG risks under Pillar 3.

31 DEC 2026
Other institutions
First disclosure at the end-2026 reference date.

31 DEC 2027
Small and non-complex institutions
One more year to prepare.

The CRR3 Regulation extends to all institutions the obligation to disclose environmental, social and governance risks, so far limited to large listed institutions. The EBA's technical package 4.4, published in its final version on 12 October 2026, carries the disclosure standards on ESG risks, equity exposures and exposures to shadow banking entities.

The EBA submitted its final draft technical standards to the Commission on 22 June 2026; at the end of October 2026, the Commission had not yet adopted them. The reference dates expected by the EBA are 31 December 2026, and 31 December 2027 for small and non-complex institutions.

OUR VIEW

These disclosures combine data that prudential chains do not always carry: the sector of counterparties, the energy performance of financed property, location. The difficulty lies less in the disclosure format than in collecting these data and keeping their audit trail.

WHAT WE DO

Scoping of the data required, reconciliation with the exposures reported in prudential templates, production and control of the disclosure templates.

Pillar 3 · ESG · CRR3

FINANCE ADVISORY→

FURTHER READING

Official sources.

EBA, consultation on technical package 4.4, 24 July 2026	https://www.eba.europa.eu/publications-and-media/press-releases/eba-seeks-feedback-44-draft-technical-package-its-reporting-and-disclosure-framework
EUR-Lex, Regulation (EU) 2024/1623 (CRR3)	https://eur-lex.europa.eu/eli/reg/2024/1623/oj

Links checked on 23 November 2026.