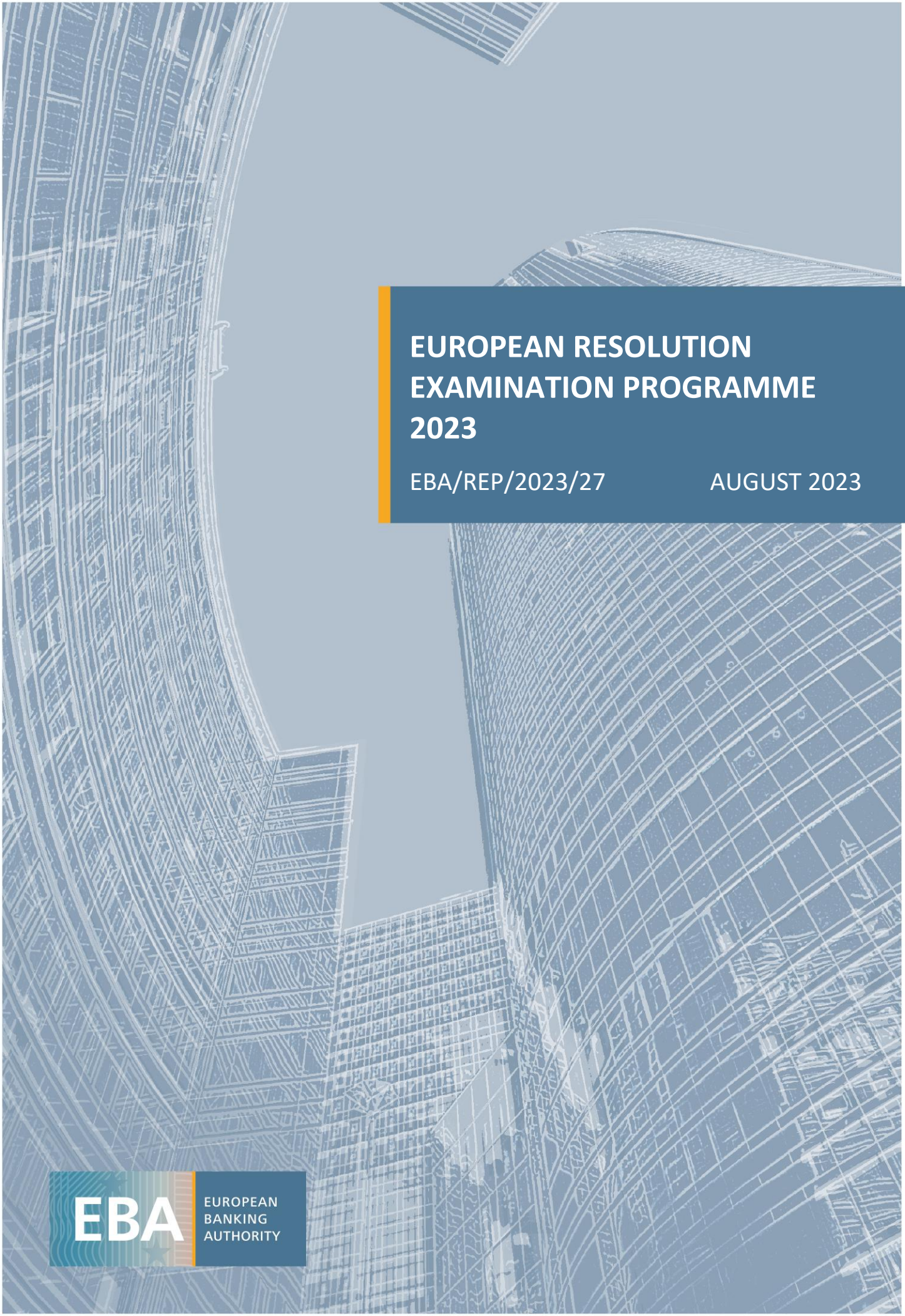

EUROPEAN RESOLUTION EXAMINATION PROGRAMME 2023

EBA/REP/2023/27 AUGUST 2023

EBA EUROPEAN BANKING AUTHORITY

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List of abbreviations

AMC	Asset Management Company
BI	Bridge Institution
BRRD	Bank Recovery and Resolution Directive
BU	Banking Union
CA	Competent Authority
DGS	Deposit Guarantee Scheme
EBA	European Banking Authority
EEA	European Economic Area
EfB	Expectations for Banks
ESEP	European Supervisory Examination Programme
EREP	European Resolution Examination Programme
ERC	European Resolution College
EU	European Union
GL	Guidelines
GLRA	Group Level Resolution Authority
ILAAP	Internal Liquidity Adequacy Assessment Process
iMREL	internal MREL
ITS	Implementing Technical Standards
JD	Joint Decision
KLE	Key Liquidity Entities
KLD	Key Liquidity Drivers
LSI	Less Significant Institution
M&A	Mergers and Acquisitions
MIS	Management Information System
MDA	Maximum Distributable Amount (as defined in Article 141 of Directive No 2013/36)
M-MDA	Maximum Distributable Amount related to MREL
MPE	Multiple Point of Entry
MREL	Minimum Requirement for Own Funds and Eligible Liabilities
MoF	Ministry of Finance
PIA	Public Interest Assessment (as per Article 32(5) BRRD)
PoE	Point of Entry
P2R	Pillar 2 requirement
Q&As	Questions and Answers (EBA Single Rulebook Q&A)
RA	Resolution authority
RTS	Regulatory Technical Standards
SPE	Single Point of Entry
RWA	Risk Weighted Assets
SRMR	Single Resolution Mechanism Regulation
SRB	Single Resolution Board
TREA	Total Risk Exposure Amount
VDR	Virtual Data Rooms

Executive Summary

According to its founding regulation, the EBA shall contribute to enhancing convergence across the internal market and it shall play an active role in building a common culture and consistent practices of authorities throughout the European Union.

With a view to foster greater convergence of resolution practices, for the first time, the EBA is publishing a report on resolution convergence, which (i) monitors how the key topics identified in the EBA's 2022 EREP[1] were embedded in RAs' work priorities for 2022, as well as in the work of resolution colleges and their operational functioning; and (ii) sets key topics that all RAs are requested to incorporate into their priorities for next year (EREP 2024).

For 2022, the EBA had set three key priorities for resolution authorities to follow: (1) addressing MREL shortfalls; (2) MIS for valuation; and (3) liquidity needs in resolution.

The main findings on monitoring their implementation during 2022 are the following:

- MREL monitoring was a key activity of focus for all RAs reflecting the criticality of this element to ensure feasibility of resolution actions. RAs used multiple data sources to monitor MREL build-up and implemented heightened monitoring activities when banks appeared slow in meeting their target.

- As of December 2022, overall, RAs were confident that most banks would reach their final requirements within the required deadline, with only a few banks, mostly LSIs, signalling potential difficulties. Only some RAs needed to use powers conferred on them to address MREL breaches in a few banks, in most of those cases limiting distributions (M-MDA). MREL deadline extensions were limited to a few cases and mainly applied to small LSIs.

- 2022 was generally the first year when the MIS for valuation was considered a high priority area with most activities focused on initial preparatory tasks, such as setting out detailed expectations for banks. Although RAs expect that most banks will have adequate capabilities in place by 2024 in line with the requirements under the EBA GL on resolvability, this may require specific IT system improvements and identification and/or recruitment of staff with appropriate experience.

- In 2022, banks were required to produce a first set of specific deliverables for liquidity in resolution, focusing on identification and mobilisation of collateral. Strategies and actions suggested by institutions to support liquidity in resolution remained limited and mostly focused on accessing central bank facilities.

[1] The EBA sets first examination programme for resolution authorities

Overall, the EBA found a higher level of interactions in resolution colleges' discussions also helped by the fact that in person meetings became possible again. While college discussions positively evolved towards more practical aspects aimed at improving the ability to deal with a crisis event, the EBA believes that there is still space for improving the depth and quality of college interactions, especially in terms of involvement of other members of the college besides the RAs. In addition, while the EBA notes progress in certain areas, including in the development of alternative strategies, work should be intensified in terms of operationalisation of variant resolution strategies.

The EREP priorities for 2024 mainly confirmed the areas of focus set for 2023, given their relevance and the fact that work on those complex topics will extend over multiple years. The 2024 priorities, which were informed and discussed with RAs, also reflect policy developments, progress and expertise gained by RAs and draw on more recent market developments.

On this basis, three of the 2023 EREP priorities – (i) MREL; (ii) MIS for valuation and (iii) liquidity needs in resolution – will continue for 2024, albeit with updated elements. In particular, the EREP 2024 will also promote a stronger focus on RAs' assessment of bank's considerations and testing for liquidity in resolution to ensure that the potential speed of deposit withdrawals, a crucial element that emerged in the context of the recent crisis event in the US and Switzerland, is appropriately embedded in the relevant scenario. The fourth 2023 EREP priority – the operationalisation of the bail-in tool – is extended to cover the operationalisation of the resolution strategy more generally, reflecting the importance of flexibility and adequate preparedness of alternative resolution strategy arrangements.

1. The EREP and the resolution convergence report

1.1 The EREP and convergence in resolution practices

1. According to its founding regulation, the EBA shall contribute to enhancing convergence across the internal market and it shall play an active role in building a common culture and consistent practices of authorities throughout the European Union. Following full implementation of the BRRD, the time is appropriate for the EBA to focus greater attention on monitoring implementation, with a view to fostering greater convergence of resolution practices.

2. The EREP is an EBA programme introduced in 2021 aimed at fostering convergence of resolution practices in the EU. It:

    a) focuses the attention of RAs, setting as priorities topics assessed as being of importance to the planning and execution processes and where traction at EU level is considered necessary;

    b) facilitates an objective assessment of progress achieved at the end of the year by the EBA and, through the identification of good practices, promotes convergence across the EU.

3. A complete EREP cycle comprises three main stages (setting priorities, RAs implementing and EBA monitoring, and articulating the monitoring convergence report), each of them performed in a different year and as shown in Figure 1.

4. The annual resolution convergence report therefore includes:

    a) the summary points of the previous year's monitoring activity, performed through a specific survey addressed to RAs and direct observation of closely monitored colleges focusing on how key topics put forward by the EREP are i) embedded in RAs' priorities for each year; as well as ii) reflected in RAs' activities throughout the year in review;

    b) setting the priorities for the following year.

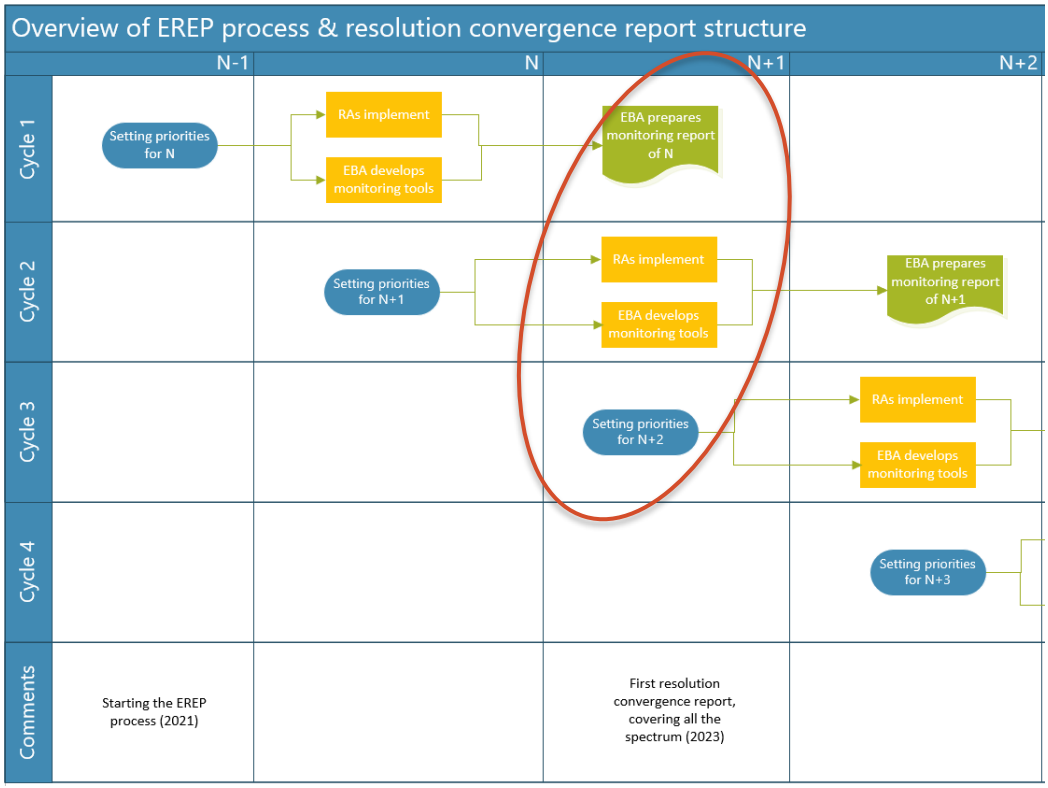

Figure 1: Overview of EREP cycles overlap and resulting resolution convergence report structure

5. The EBA follows a consistent approach in driving convergence in prudential supervision as well as in resolution. Therefore, in parallel to the annual EREP, the EBA sets the ESEP which aims to enhance convergence across the prudential supervisory cycle.

1.2 Considerations and limitations

6. When considering the findings of this report, the following considerations should be taken into account for a correct understanding of the outcomes of the exercise.

7. The report summarises information on the EBA monitoring during 2022 with the reference date for answering the survey set at end of December 2022. Various events may have affected market conditions between the reference date of the survey and the report publication date, however, such developments were not included in the main findings of the report, unless specific reference is provided.

8. The report includes work on resolvability performed by RA and institutions during the 2022 calendar year. Work on resolvability is continually progressing and at the time of publication of the report, there may be more advancements in various areas. Such progress will be covered in the following iterations of the resolution convergence report.

9. The resolution planning cycles may differ between authorities and between different resolution colleges. A resolution college planning cycle could last longer than 12 months, also considering the procedures for reaching the joint decisions. In this regard, it is noted that some authorities indicated the progress for 2022 by referring to the end of a resolution college cycle (September/October), while there was still further progress in the planning until the end of the calendar year.

10. Certain findings related to MIS and liquidity are influenced by the fact that the regulatory requirements to reaching a standardised level, the EBA GLs on resolvability, while published in January 2022 [2] will require banks to be fully compliant by 1 January 2024.

11. While all the banks in the scope of the EREP are those designated for resolution, they vary in size from global systemically important institutions (GSII) and other systemically important institutions (OSII) to LSI. In addition, resolution plans for some banks have been identifying resolution strategies only recently with the compliance with the full resolvability framework being gradually addressed by authorities, as envisaged by the above-mentioned EBA GLs on resolvability[3]. As a result, progress in terms of resolution planning on the key topics varies across the sample and therefore possible comparisons should be treated with caution, taking into account the different phase-in periods for achieving the full resolvability.

[2] Guidelines on improving resolvability for institutions and resolution authorities under Articles 15 and 16 BRRD (Resolvability Guidelines).

[3] Paragraph 7 (Scope of application) of the EBA GL on resolvability.

2. Implementation and results of the 2022 EREP

The EBA collected structured information on the follow-up of the key topics from RAs and from its observations in the closely monitored colleges

12. In the first iteration of EREP, published in November 2021[4], the EBA set the priorities for 2022: (1) addressing MREL shortfalls; (2) MIS for valuation and (3) liquidity needs in resolution. At the end of 2022, the EBA followed up with the RAs on whether and how the key 2022 topics were reflected in their work.

13. The EBA collected information on the level of application of EREP key topics from all 27 EU national resolution authorities, the SRB and the three EEA resolution authorities.

14. The scope of the EREP 2022 key priorities and the follow-up survey was limited to entities designated as resolution entities.

15. While MREL and MIS were included fully as work priorities by most RAs, the liquidity in resolution topic was followed in its entirety by a lower number of RAs. An RA partially following an EREP key topic means that only some of the focus areas or objective elements were followed, or that the topic was only partially relevant to the RA considering the relative number of institutions under the scope of the survey.

16. Reasons for not having followed an EREP priority related mostly to the fact that the RA did not have in its jurisdiction entities designated for resolution or that the BRRD provisions are not yet part of the EEA agreement.

17. The next sections will cover each of the three EREP key priorities – MREL monitoring, MIS for valuation and liquidity in resolution – and summarise key findings of the EBA monitoring activity.

2.1 Monitoring MREL

18. The analysis of this section covers the focus areas and objective elements as set in the EREP for 2022. Additional analysis of qualitative or quantitative information on MREL is included in the EBA MREL Dashboard[5] published every quarter and in the EBA report on the monitoring of TLAC/MREL-eligible liabilities instruments of EU Institutions[6].

[4] The EBA sets first examination programme for resolution authorities

[5] EBA MREL Dashboard

[6] Report on the monitoring of Additional Tier 1, Tier 2 and TLAC/MREL eligible liabilities instruments of European Union institutions

19. The EREP for 2022 indicated that the most prominent resolution tool expected to be deployed in European Union (EU) banking failures remains the bail-in tool. Since the introduction of the BRRD in 2015, the development and implementation of policies for MREL has consistently featured among the main priorities of European resolution authorities.

MREL monitoring is a key activity of focus for all RAs

20. Monitoring MREL is a core task of RAs given that an adequate level of MREL is a critical element to ensure feasibility of resolution actions. RAs indicated that they developed internal processes to monitor banks' MREL resources and breaches as part of their core activities. In the monitoring processes, RAs make use of the EBA ITS on disclosure and reporting of MREL and TLAC[7].

21. Some RAs indicated that their focus on the MREL priority, as described in the EREP 2022, was only partial considering that either they had only liquidation banks in their direct remit or the banks in their direct remit were in a good position vis-a-vis their shortfalls, including already meeting their MREL target.

At the time of the survey, overall, RAs were confident that most banks would reach their targets within the required deadline with only a few banks, mostly LSIs, signalling potential difficulties

22. Out of the 299 banks with external MREL decisions[8], seven RAs identified concerns for a limited number (16) of banks for potentially not meeting their final MREL targets. The concerns were, in general, in relation to LSIs and bank-specific, as opposed to reflecting systemic issues. In an update conducted by the EBA in Q2 2023 on this matter, several RAs indicated a softening of their concerns reflecting the fact that the banks had revised their funding plans for meeting the targets and provided credible strategies for meeting the requirements.

23. For the banks that forecasted a shortfall or did not convince the RAs that they will meet the target by the final deadline, respondents indicated a mix of bank-specific elements and external factors as causes:

    a. a lack of adequate market to place the debt, i.e. a combination between small-ticket issuances and limited liquidity depth of national markets;
    b. a strong increase in RWA requiring significant new issuance;
    c. deteriorating market conditions (war in Ukraine, concerns on rising inflation);
    d. some RAs also identified additional conditions like recent M&A activity, lack of rating or lack of expertise in issuing to markets.

[7] Implementing Technical Standards on disclosure and reporting of MREL and TLAC

[8] EBA MREL Dashboard Q3 2022

24. Several RAs noted, however, that for smaller banks it is very challenging to issue instruments outside of their home markets due to small-size tickets and lack of rating. In addition, depending on the banks' situation, a few RAs pointed out that actions such RWA reduction or securitisation have limited benefits while also being challenging to implement, especially for medium and small banks that may lack the technical capability, experience, and expertise to effectively and timely implement such strategies.

Five RAs indicated they used powers under Article 45k BRRD against a total of six banks in order to address shortfalls

25. Article 45k BRRD refers to the powers to be used by authorities if there are breaches of the minimum requirement for own funds and eligible liabilities. There are five powers cross-referenced in this article, ranging from the powers to address or remove impediments to resolvability to administrative penalties and other administrative measures.

26. In the 2022 cycle, RAs used the powers to prohibit distributions (M-MDA) (power under point b)[9] of Article 45k BRRD) and in one instance to address impediments to resolvability (power under point a) of Article 45k BRRD). Three RAs indicated that the use of these powers was considered successful, while two RAs were still assessing the results of applying these powers at the time of the survey.

27. The circumstances for deciding to use these powers under Article 45k BRRD stem from the assessment on the reasons, magnitude and duration of the breach. The general considerations included:

- the overall financial situation of the bank in relation to reaching a failing or likely to fail situation in the foreseeable future;
- whether the bank will be able to ensure compliance with the requirement in a reasonable timeframe;
- whether the exercise of this power is the most adequate and proportionate tool for addressing the situation of the bank, taking into account its potential impact on both the financing conditions and resolvability of the entity concerned.

28. Some other specific actions taken by the RAs to ensure banks meet the MREL requirements included a request to banks to consider accelerating the issuances planned originally for Q4 2022 and a general recommendation to banks not to distribute dividends.

[9] i.e. the power conferred in Article 16a BRRD (the power to prohibit certain distributions).

Cooperation between RAs and CAs was good for MREL monitoring and more intense consultation occurred when applying powers to prohibit certain distributions

29. All RAs indicated good cooperation with supervisors for MREL monitoring, both in terms of depth and frequency. Specific consultations took place where Article 45k BRRD powers were applied or considered.

30. Article 45k(2) BRRD indicates that resolution and competent authorities shall consult each other when they exercise their respective powers referred to in paragraph 1 of Article 45k BRRD. Generally, in all consultations in 2022, the RAs queried the CA to indicate if any prudential MDA was in place (which would inhibit the RA from applying the same restriction) and if the CA had any other observation to be considered. The results, in all cases, were that the CA did not object to the RA imposing the M-MDA.

MREL deadline extension is limited overall and mainly applied to small LSIs

31. Seven RAs indicated that they set different compliance dates for a total of 19 entities. These entities are different than the ones where concerns for meeting the MREL target were expressed. In all cases, the RAs indicated that the relevant BRRD elements[10], (i.e. entity's financial situation, prospect on ensuring compliance in a reasonable timeframe, replacing instruments that no longer meet the current criteria of eligibility, the prevalence of deposits in the funding model, the access to capital markets, the reliance on CET1 for MREL), have been duly taken into account. Examples of specific reasons for the deadline extension are: deteriorating market funding conditions in 2022, higher funding costs compared to peers, unavailability of access to wholesale funding markets, change of strategy from insolvency to resolution. The new deadlines for compliance are 1 or 2 years after the January 2024 legal deadline. Most of these banks are LSIs ranking outside of the top five in their country in terms of market share. The EBA will keep monitoring the exercise of the RAs' powers to extend the MREL deadlines and its potential impact on a convergent implementation of the framework.

Issuing qualifying instruments and retaining profits are the options most used by banks to meet their MREL target

32. The most frequent actions identified by RAs in their discussions with the banks in shortfall to meet their MREL requirements are issuing qualifying instruments and retaining profits. Figure 2 provides an overview of these actions.

[10] Articles 45m(1) and 45m(7) BRRD

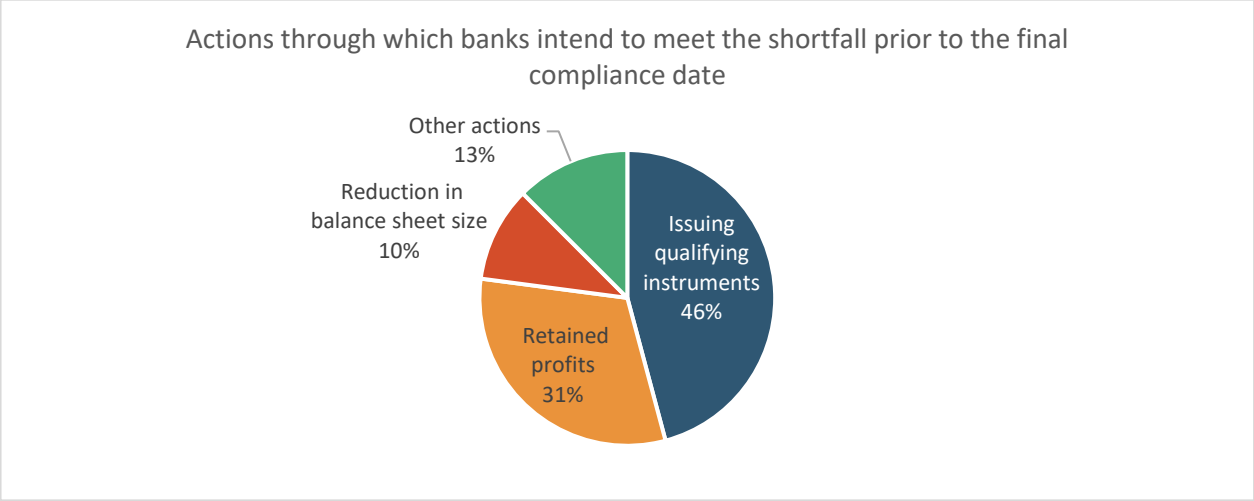

Figure 2: Most frequent actions on how banks intend to close the shortfall prior to the compliance date. In most cases, several actions are used complementarily.

33. Examples of actions indicated by banks to be used to close the shortfalls before the compliance date are:

- shareholders' support, including an increase in share capital;
- optimisation of risk-weighted assets / reduction in RWAs / TREA optimisation by synthetic securitisation on existing exposures with guarantees provided by supranational entities;
- interbank subordinated loans;
- loans from supranational financial institutions.

RAs use various data sources to monitor MREL build-up and implemented heightened monitoring activities when banks seemed to be lagging behind in meeting their target

34. In the context of MREL assessment and monitoring, RAs use data and information from several sources, adding ad hoc and specific requests in addition to the supervisory and resolution regular reporting (such as reports estimating evolution of TREA/RWA, P2R reports, MREL capacity/issuances and related ratios, and the actual content of the MREL contracts and documentation).

35. In general, where banks were lagging behind in meeting their MREL targets, the RAs intensified the process of monitoring and communication with the concerned banks. The contact with the banks occurred at different levels, for example shareholders/parent level and senior management of the banks. In practice, the enhanced monitoring meant regular correspondence and requests for frequent status updates and funding plans updates.

36. Where RAs were not satisfied with the banks' plans, the RA requested banks to update the MREL funding plans and more frequent checking against deadlines and milestones was implemented.

Most respondents indicate also requiring updated forecasts in addition to reporting of current positions. In some cases, the RAs requested a specific action plan to ensure the implementation of the funding plan for meeting the MREL targets.

2.2 MIS for valuation

37. The analysis of this section summarises the results of the RAs' assessments of banks' progress on their capabilities to have in place satisfactory MIS for valuation and for other specific resolution needs.

38. The EREP key topic of MIS for valuation for 2022 was referring to the EBA's MIS component of the 'Handbook on Valuation for Resolution Purposes'[11]. This chapter of the resolution handbook deals with the institutions' capabilities to swiftly provide data and information to support a robust valuation in the event of resolution.

For most RAs, 2022 was the first year when the MIS was considered a high priority area with most activities focused on initial preparatory tasks

39. For most RAs, 2022 was the first year in which MIS had been identified as a main priority for resolution readiness and resolvability. Therefore, MIS activities in 2022 were generally dedicated to initial tasks, such as setting out specific expectations for banks and requiring assessment of own capabilities. In some cases, however, these initial requirements had been set prior to 2022 and therefore, during the period under review, new requirements were introduced in terms of setting out more detailed plans for banks to achieve satisfactory capabilities and assurance of performance by means of testing.

RAs expect that most banks will have adequate capabilities in place by 2024, in line with the requirements under the EBA GL on resolvability

40. While, in general, RAs communicated their expectations in 2022, banks are expected to achieve operational capabilities during 2023. This is also in line with the EBA GL on resolvability that set the deadline to having satisfactory MIS capabilities in place for 1 January 2024. As shown in Figure 3, most RAs were unable to identify reliable timelines for institutions to develop appropriate MIS mainly because the RAs were still waiting for banks' input or were still assessing banks' capabilities. Overall, RAs are expecting banks to have in place satisfactory systems between 2023 and 2024.

[11] Valuation Handbook for Purposes of Resolution, Chapter 10, Management Information Systems

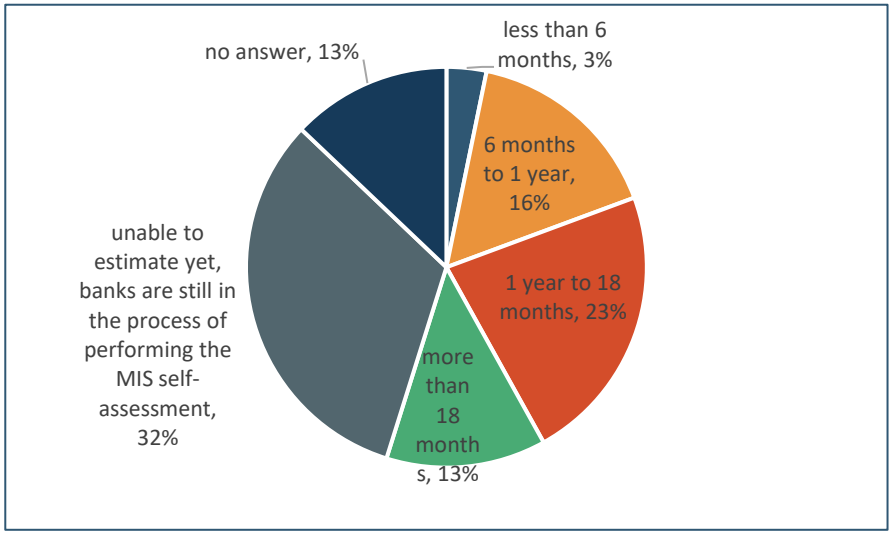

Figure 3: RAs estimation of the time necessary for banks to have satisfactory management information systems in place (reference date January 2023)

41. To ensure that banks develop adequate MIS capabilities, the RAs either establish upfront the milestones and priority areas and monitor the follow-up to this or identify shortcomings and ask banks to draw up a plan to address them.

42. Some RAs pointed out that, in some cases, progress for the MIS capabilities might seem low if looking only at valuation capabilities. However, the MIS for valuation is only one part of the MIS capabilities that banks have to put in place. For example, banks are required set up several other capabilities in addition to the EREP, such as to have MIS capabilities for resolution reporting, for quick reporting for supporting operationalisation of the resolution (e.g. bail-in or transfer tool) and for setting up VDRs.

RAs used constant and frequent communication with the banks to ensure progress. Specific IT developments and recruiting (or assigning) specialised staff dedicated to the MIS project are the main elements required to ensure satisfactory MIS capabilities

43. RAs consider that specific IT system improvements and identification and/or recruitment of staff with appropriate experience are needed to ensure adequate MIS capabilities will be in place. RAs indicated that more clarity on the priority areas to have adequate MIS capabilities in place is expected during 2023 as the assessment of valuation capabilities is expected to be finalised in early 2023. Figure 4 provides an overview of the areas considered essential by RAs to ensure progress by banks in their MIS capabilities.

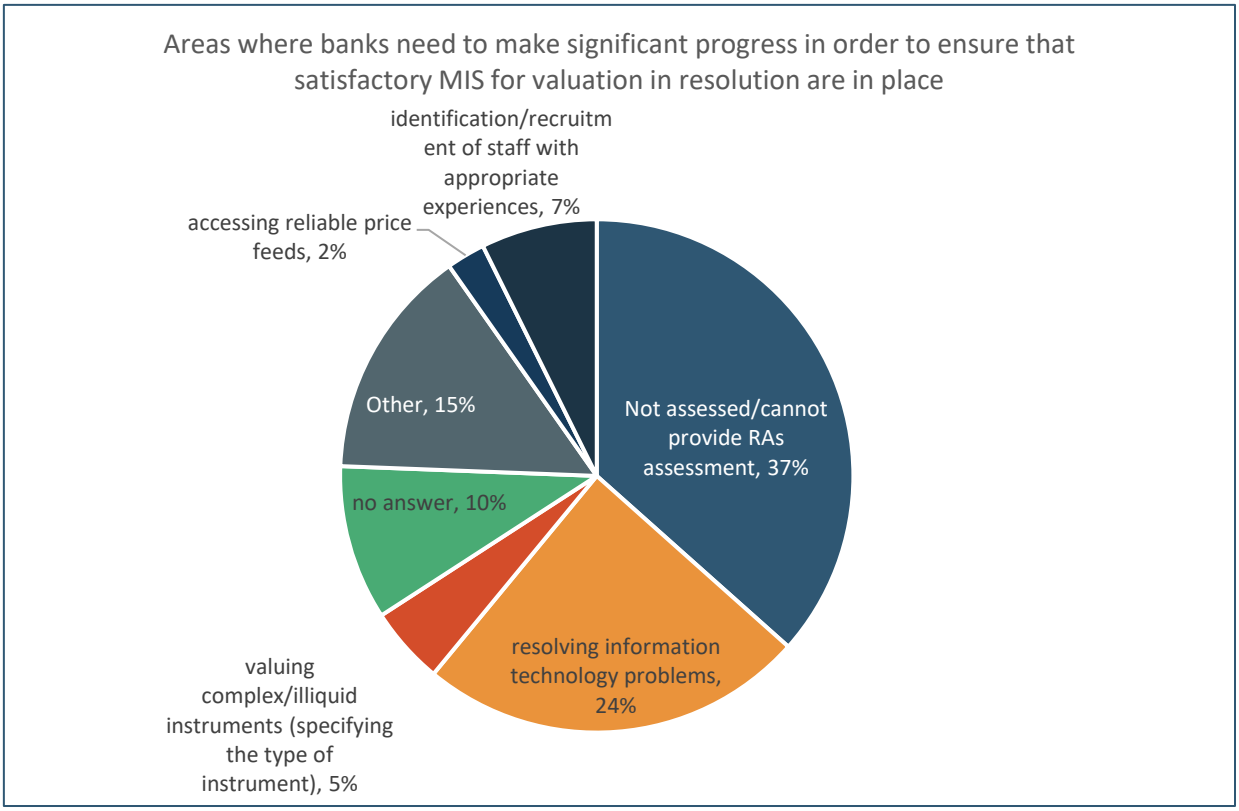

Figure 4: Areas where RAs consider banks need to make significant progress in order to ensure that satisfactory MIS for valuation in resolution are in place.

44. Most common actions taken by RAs to ensure progress in the MIS for valuation were: (i) asking the banks to prioritise the EREP objective elements; (ii) setting and agreeing with banks' deadlines and milestones for the specific objectives; (iii) requesting the banks to set up dedicated teams for this project; and (iv) setting up regular meetings with the banks.

For the most advanced banks, RAs asked for testing exercises to be conducted or set out the requirements for testing for 2023. The testing required, most frequently, production of specific data points within given timeframes

45. Twelve authorities requested MIS testing during 2022 or set out testing requirements for banks with the testing to be conducted in 2023. Nine RAs indicated they asked 139 banks to perform MIS testing in 2022. The MIS testing requests were, in general, directed to the large EU banks.

46. Within the MIS tests, RAs indicated they checked for the existence of specific data points, respecting report formats and submissions within short deadlines.

47. Considering the types of banks where testing was conducted, OSIIs are the most advanced institutions in terms of MIS for valuation adequacy and capabilities, both in the BU and non-BU.

48. Some RAs engaged with external consultants to lay down priorities and milestones in developing the MIS capabilities. In some cases, consultants that would be potentially used for valuation services in the context of a resolution action contributed to the RA assessment of the adequacy level of reports generated by banks in these tests.

49. A specific test, as indicated by one RA, was to require the bank to populate a VDR with a specific dataset that will then be assessed by an external audit firm in its role as a potential valuer in a resolution event.

50. Some of the lessons learned by RAs after testing banks' MIS capabilities are:

- There is potential to increase automation in terms of data production and generation.
- Q&A / FAQ-type documents and protocols are very useful for running testing processes across several institutions.
- Identifying specific data points requirements based on the type of resolution tools to be used is very relevant in the development of the MIS capabilities.

Where no tests were performed, banks were requested to conduct assessments of their own capabilities. MIS for valuation will be a focal point of work for the resolution area in 2023

51. Where no tests were performed, banks had to generally assess their own capabilities. This round of assessments had to cover a combination of the following areas: data availability, quality assurance processes and data update frequencies. The assessment report had to describe the findings, the main takeaways and conclusions from the exercise.

52. RAs indicated that MIS for valuation will be a focal point of work for them in 2023. Banks are in the process of ensuring resolution valuation capabilities within their systems. This includes analysis and gap identification, system development and testing. Banks will be asked to demonstrate their capabilities, including through testing methods, when sufficient progress is achieved in this area.

2.3 Liquidity needs in resolution

53. The availability of sufficient liquidity to support resolution is a key topic of the EREP for 2022. This area has been chosen given its importance in resolution planning and the need to monitor progress in the EU on how advanced banks are in putting appropriate structures in place to

ensure liquidity in a resolution scenario. When deciding on this key priority, it was considered that gaining a good understanding of how these elements are being addressed will provide valuable insight into the state of play in the EU and a basis for additional work in this area in the context of future iterations of the EREP.

54. For 2022, the EREP liquidity in resolution focus areas were: (i) the overall strategies that banking groups have used for seeking to ensure that there will be adequate liquidity in resolution; (ii) the methodologies that have been developed to estimate funding needs in resolution, with particular focus on the assumptions and scenarios considered; and iii) the capability of institutions to provide accurate data at short notice for liquidity needs and outflows, and assets which would be expected to qualify as collateral.

Most RAs have started work in the area of liquidity in resolution in 2022 by asking banks for a first set of specific deliverables, in particular focusing on identification and mobilisation of collateral

55. In general, RAs have phased in the work on liquidity in resolution by dividing it into smaller areas of attention spread over several years. In most cases, the areas of focus followed the EBA GL on resolvability. The prioritised part of the work on liquidity regarded identification and mobilisation of collateral to access central bank facilities and of assets that are non-eligible for normal monetary policy operations and which would be of importance for liquidity in resolution.

56. A few RAs consider that there is a further need for guidance, policies and examples of practices on liquidity in resolution to ensure more consistent progress. The EBA Resolvability Guidelines[12] lays out expectations for ensuring resolvability of institutions from a funding and liquidity perspective.

57. In terms of the work performed on liquidity in resolution during 2022, banks were required to conduct and deliver a detailed assessment on their capabilities for the identification and mobilisation of collateral including an action plan on mitigating potential shortcomings. In some cases, RAs asked banks to conduct testing to further assess those capabilities and identify gaps.

Strategies and actions suggested by institutions to support liquidity in resolution remain limited and mostly focus on accessing central bank facilities

58. RAs identified that accessing ordinary central bank facilities is the most common strategy proposed by banks for ensuring liquidity in resolution. Asset disposal is the second most frequent option followed by debt issuance, guaranteed lines of credit and funding via private placements. The strategies of institutions for accessing liquidity in resolution mainly derive from options included in different documents, such as recovery plans, ILAAP, Contingency Funding Plans.

[12] Guidelines on improving resolvability for institutions and resolution authorities under Articles 15 and 16 BRRD (Resolvability Guidelines)

59. Most RAs plan to perform their own critical assessment of the banks' strategies of liquidity in resolution during 2023, 2022 being dedicated to the collection of information. However, those RAs that performed the assessment in 2022 indicated that more work is needed, in particular deep dives, testing and on-site inspections to inform the RA's critical assessment.

60. Most RAs indicated that the options for providing liquidity in resolution remain limited. Of the strategies proposed by banks, RAs' are sometimes concerned about their viability in a resolution scenario noting that:

- Tapping into private markets might be difficult since private parties might be reluctant to provide liquidity to a stressed entity.
- Accessing central bank liquidity is dependent on holding adequate collateral. In addition, a specific process to access central bank liquidity or emergency liquidity assistance (ELA) in resolution should be in place in order for the option to be effective.

RAs consider that the scenarios used by banks for estimating their liquidity needs in resolution were not severe enough

61. The main scenario used for estimating liquidity needs in resolution envisages a substantial deterioration of a bank's liquidity position. Variations of the scenario included slow or fast burning events. RAs evaluated, in general, that the scenarios used by banks are not severe enough.

62. Well-developed scenarios for testing liquidity in resolution by banks included the identification of KLE and KLD as well as an assessment of developments of KLDs in different stress scenarios (idiosyncratic and systemic), separate consideration of different phases of the resolution process (run-up, resolution weekend, stabilisation phase) and at least two different crisis scenario dynamics (slow-moving scenario and fast-moving scenario).

RAs consider that the most advanced area of the liquidity in resolution is the collateral identification and mobilisation, although significant work still needs to be performed

63. A specific component of the area covering liquidity in resolution is the identification and mobilisation of collateral eligible for monetary policy operations, which is considered by RAs, in general, to be the most advanced area of liquidity in resolution. In addition, some RAs indicated that while banks have in place systems on collateral identification and for measuring liquidity needs, those systems need to be tested and adequately adapted to consider resolution specificities.

64. RAs indicated that banks' systems to measure and report on the evolution of available collateral in resolution (collateral management) are either well advanced and nearing completion (63%) or they are in progress (32%[13]).

Obstacles remain for banks to have satisfactory IT systems in place. Authorities consider that banks will have in place satisfactory systems necessary to mobilise assets and other private resources in resolution by the end of 2024

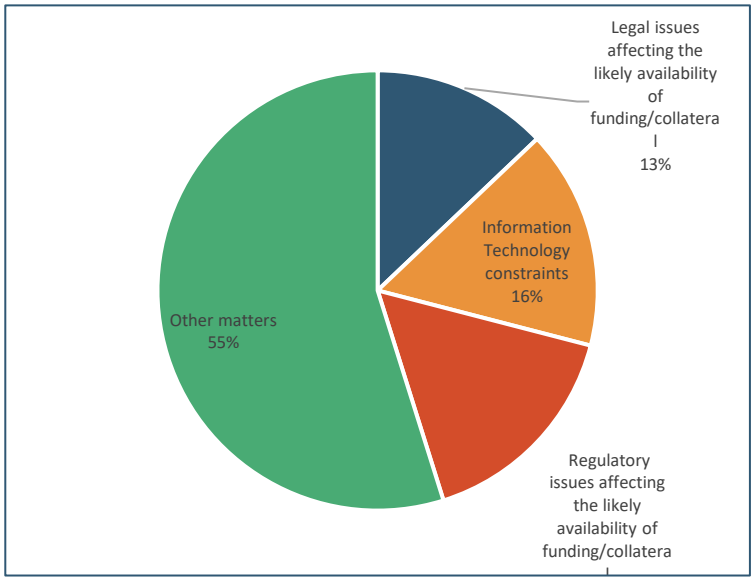

Figure 5: RAs indication of key obstacles for banks to have satisfactory systems and strategies for liquidity in resolution

65. On a preliminary basis, the main obstacles (Figure 5) to having satisfactory systems and strategies for providing liquidity and funding in resolution are: (i) legal and regulatory issues affecting the likely availability of funding/collateral; and (ii) information technology constraints.

66. Frequent communication with the banks is used by the RAs to assess and address gaps and shortcomings on the topic of liquidity in resolution. In particular, RAs are conducting thematic workshops, but also setting working priorities for the banks and monitoring banks' overall progress and activities in this area.

67. While some RAs consider that progress has been satisfactory during 2022 in the area of liquidity in resolution, based on the initial findings, most RAs believe that there is still room for improvement.

[13] Percentages refer to number of institutions and also cover subsidiaries for resolution under SPE and PoE (including for MPE).

3. Convergence in resolution colleges

3.1 Monitoring of resolution colleges in 2022

The EBA is a member of and actively participates in resolution colleges to promote and monitor their efficient, effective and consistent functioning

68. Resolution colleges are required under the BRRD to provide a framework for the GLRA, other relevant resolution authorities, supervisory authorities, competent ministries and authorities responsible for deposit guarantee schemes, to collectively plan for and coordinate the resolution of cross-border banking groups[14].

69. The EBA, in fulfilment of its responsibilities under the BRRD of promoting and monitoring the efficient, effective and consistent functioning of resolution colleges, provides regular reports on its monitoring from attending a selection of such colleges.

70. This report covers only closely monitored resolution colleges that took place during 2022[15]. According to the EBA 2021-2023 college monitoring approach[16], the EBA continued to closely monitor a limited group of colleges[17]. The closely monitored colleges are the same for supervisory and resolution colleges. The information and conclusions drawn in this section are mainly from those closely monitored resolution colleges. The full list of EU resolution colleges can be consulted in Annex I.

71. The EBA's observations are supplemented by views expressed by the EU resolution authorities. The EBA report on resolution colleges was published for the first time in 2020, covering colleges that took place in 2019. The EBA will include its findings from the monitoring of resolution colleges in the convergence report rather than publishing a separate report.

3.2 College interactions and organisational aspects

Most resolution colleges were held in a hybrid format vs only virtual fostering a higher level of interactions despite persistent late circulation of documents. While discussions focused more on practical aspects of action in case of a crisis, there is still space for improvement, especially in terms of involvement of other members of the college (e.g. DGS, MoF)

[14] Third country authorities may also be invited to attend colleges as observers.

[15] This involved meetings that took place between end 2021 and early 2022.

[16] The monitoring of resolution colleges follows a similar approach as for supervisory ones. The EBA 2021-2023 college-monitoring approach for supervisory colleges is described in more detail in the Report on Convergence of Supervisory Practices in 2022 – EBA/REP/2023/11.

[17] The other EEA resolution colleges are labelled as 'indirectly monitored colleges' and the EBA interacts with them on a thematic and targeted manner.

72. In general, the interactions of closely monitored colleges were well organised in 2022 and, compared to 2021, improvements were observed in the level of attendance and interactions. Nevertheless, the EBA believes the level and depth of interactions in resolution colleges could be higher.

73. In 2022, and in the context of its college monitoring activity, the EBA continued to:

- promote good college interactions;
- facilitate the resolution convergence work, including the implementation of the EREP and addressing several Q&As[18] related to work and cooperation in resolution colleges;
- observe college practices, collect and spread good practices and ensure a feedback loop for policy developments;
- enhance cooperation with the supervisory colleges.

74. Most meetings were conducted in a hybrid mode while only few colleges remained in virtual-only mode. The EBA welcomes the transition to hybrid meetings and the fact that the GLRA encouraged members to attend in person if possible. The physical format generally results in more intense discussions and interactions fostering stronger cooperation.

75. The time between document circulation and the meeting remained short, as highlighted by the EBA in previous years. The late circulation of relevant documents is probably linked to updates requested by various members and as a reflection of intense and continuous bilateral discussions. However, late circulation of documents allows only limited time for participants to familiarise themselves with the documents and therefore likely decreases the interaction level in the meeting.

76. Further, the use of secure platforms for document and information dissemination is increasing but remained limited. The EBA would like to encourage authorities to use dedicated platforms as a way to increase security and facilitate exchanges of information and documents between the college members. In this respect, the EBA provided training to resolution authorities on using the EBA college platform to exchange information in colleges.

77. While the level of interaction during the college increased slightly compared to previous years, in general, only resolution authorities were actively involved, with most exchanges taking place between home and host authorities and between RAs and the bank. The other members, e.g. MoF and DGS, remained mostly silent, even if the chairs encouraged exchanges and offered time for members to take the floor. The late circulation of documents ahead of the meeting, as pointed out above, can be a different factor contributing to the lower-than-ideal interaction in the college meeting.

78. Having the bank present its achievements and plans to the resolution college is a good practice. The senior management of the bank engaging with the resolution college members is an even better practice. The EBA would like to highlight that the interactions with the bank worked best

[18] EBA Single Rulebook Q&A – https://www.eba.europa.eu/single-rule-book-qa

where the GLRA set clear objectives and areas to be covered by the bank, focusing on resolvability and resolution-specific items and where college members asked questions and interacted with the bank's representatives.

3.3 Key deliverables of resolution colleges

The EBA notes progress in certain areas, including development of alternative strategies, however progress should be intensified in terms of operationalisation of various resolution strategy aspects

79. The 4-month period for reaching JD has been respected by all colleges. Specifically, for resolution matters, the JDs refer to MREL decisions and to the resolution plan, including the resolvability assessment. No material impediments to resolvability were recorded, so no JDs were needed in this respect.

80. The EBA notes, as a good practice, that resolution colleges advanced the planning by providing initial thinking of potential alternative strategies. Still, more work needs to be conducted to reach satisfactory levels in this respect, specifically assessing the credibility and feasibility of the alternative resolution strategies. To encourage and monitor progress in developing alternative resolution strategies, the EBA proposes that the EREP key topic of operationalising the bail-in tool is enlarged to address the resolution strategies for the next planning cycle[19], in general.

81. The EBA welcomes the advancement of discussions, in most colleges, to more operational aspects of enacting the strategy. Moving to operational and concrete aspects of the plan indicates a new level in the maturity of the plans, signalling that the more theoretical areas and the legal requirements have been covered to satisfactory degrees. Examples of operational aspects included in the plans are mechanics of interactions between authorities, sharing of decision-making processes of involved authorities and disclosure of specific actions to be taken by relevant players for the operationalisation of the resolution tools. Still, such operational details mostly only started in 2022 and members proposed them as priorities to be followed with more emphasis for the 2023 cycle. In addition, several colleges signalled they would include testing and simulation exercises in the coming planning cycles.

While the EBA acknowledges the transition to hybrid meetings, it recommends that authorities increase the level of interaction and follow international good practices

82. College reports since 2019 have documented a gradual decline in the level of engagement taking place in resolution colleges. The slight increase in the level of interaction for 2022 demonstrates ample recovery of the previous decline noted. The EBA has stressed the importance of protecting against complacency or a view that colleges are simply fulfilling a regulatory

[19] More details are in the dedicated chapter of setting EREP priorities for 2024.

requirement, rather than fulfilling their functions as vehicles for ongoing and effective cooperation.

83. This trend is of concern as it may be signalling a diminution in the role of resolution colleges. Interestingly, this scenario contrasts sharply when compared to the role that resolution colleges perform when a crisis emerges. Highly intensive dialogue and rigorous analysis of events/options in the college are integral to management of the banking failures. While it is not envisaged that this level of intensity can be maintained outside of 'real' events, the contrast between the two scenarios suggests planning in 'regular' colleges can improve and aid in preparatory work.

3.4 EREP in resolution colleges

Overall, the EBA-monitored resolution colleges implemented the 2022 EREP key topics in their workplan, adapting them to the specificities of each banking group. MREL monitoring and MIS for valuation were a key part of the college discussions and also played a central role in their planning and work priorities, with liquidity items discussions intensifying

84. The EBA, through its participation in resolution colleges, monitors the implementation of the EREP key topics in the work of colleges. This section summarises the main observations of this monitoring process.

85. The EREP 2022 priorities were discussed during the college meetings and were addressed in the resolution plans and work priorities in an adequate manner. Depending on the resolvability level of each group, each of the three key topics was addressed in a tailored manner to address the progress and specificities of each group.

86. MREL monitoring was a core area of focus of the resolution colleges. The MREL level for end of 2022 and bank's forecasts for the final target – including estimations of new issuances overtime and rollover of existing ones – together with the RAs' critical assessment of this component represented an important and central part of the resolution college meeting. This considers not only the importance of MREL in this build-up phase but also reflects the crucial importance of this component in resolution also based on the need to reach a specific JD for MREL. Often banks' presentations during the colleges were specifically dedicated to MREL and recent issuances and plans for meeting those requirements.

87. In line with the survey results, the MIS for valuation topic showed different levels of progress among colleges. However, in all colleges, the MIS topic was considered of high priority in the work of RAs and institutions. The RAs' requests to banks varied, reflecting the different stages of progress as noted in the MIS-dedicated section of this report and mainly included: (i) setting out specific expectations for banks; (ii) requiring self-assessments and testing requirements from the banks on meeting adequate capabilities; and (iii) setting out plans for banks for achieving satisfactory capabilities.

88. The MIS topic, in general, and not only for valuation, remained a strong focus in all closely monitored colleges. The elements included in the plan and considered in the college discussions indicate a high level of attention was placed on this key topic, recognising the importance of ensuring availability of data in case of resolution execution. To date, the progress in the area of MIS capabilities varies across the banks, and the colleges' discussions reflected those variations accordingly. In general, all colleges indicated this key topic would remain a priority for 2023, in line with the EREP 2023 priorities. In most cases, future work plans include testing of MIS capabilities, recognising such an element as being the most adequate tool to identify potential gaps and enhance preparedness.

89. The discussions on liquidity in colleges reflected the same findings from the surveys. In most colleges, the most advanced area of work in liquidity related to collateral identification and mobilisation. The options for accessing liquidity in resolution identified by institutions mostly related to central bank funding.

90. While being addressed in the resolution plans, the liquidity in resolution EREP topic generated shorter discussions, as opposed to other topics, often being referred to an area that would be addressed in more detail in the next planning cycle. The main elements of the liquidity present in the resolution plans include the bank's methodologies for estimation of the liquidity and funding needs in resolution, and the policies and governance arrangements for the identification and mobilisation of collateral during and after resolution. The resolution plans on options and strategies to ensure liquidity mostly present the banks' considerations. In some cases, there is also a critical assessment from the RA.

4. 2024 EREP priorities

4.1 Process of identification of 2024 EREP key priorities and focus areas

91. In selecting the key topics for the EREP, the EBA has identified issues that are considered material to advancing EU resolution planning, readiness and capability, based on the information gathered from the EBA also in the context of its regular monitoring of implementation of the regulatory framework and its participation in resolution colleges. Each of the selected key topics is broadly consistent and has been informed by the priorities that resolution authorities are pursuing and, where relevant, the issues are aligned to tasks being pursued under the ESEP, although the perspective informing the two documents are intrinsically different.

92. The identification of the key topics for 2024, like in previous cycles, has followed a process of engagement and consultation with the EU resolution authorities.

93. Given the importance of each of these topics to successful resolution and the fact that work on those complex topics will extend over multiple years, most 2024 EREP priorities will remain unchanged compared to 2023 to ensure a continuum in this work, although in most cases the criteria for monitoring are adjusted to consider the progress in the work.

94. As a reminder, the key topics in the 2023 programme[20] focus on (i) the process of addressing MREL shortfalls; (ii) the development of MIS for valuation; (iii) preparations for banks to be able to meet their liquidity needs in resolution; and (iv) operationalisation of the bail-in tool.

95. Three key priority areas will continue from 2023 unaltered while the operationalisation of the bail-in tool is extended to cover the operationalisation of the resolution strategy. This development reflects the fact that in some cases the preferred resolution tool is not the bail-in and, further, in several resolution plans, the RAs started to include alternative resolution strategies.

96. The table below provides the evolution of the focus areas and objective elements of each EREP key topic, including explanations for the changes. Generally, the evolutions are triggered by the MREL compliance date set for January 2024, the entry into force of the EBA GL on resolvability, GL on testing, GL on transfer strategies and GL on disclosure of bail-in mechanics. Annex II provides a list of EBA policy work supporting resolution convergence that also influenced the update of focus areas and objective elements.

[20] 2023 European Resolution Examination Programme (EREP) For Resolution Authorities

97. The EBA is aware that RAs could have additional, specific priorities at national level or targeted to specific institutions. The EREP should foster an EU traction around main resolution topics without decreasing the importance of this additional parallel action.

4.2 EREP 2024 priorities

98. The 2024 EREP key priorities, focus areas and objective elements are presented in the table below compared to the 2023 priorities. The table also explains the rationale for the changes implemented.

4.2.1 MREL monitoring

Ongoing for 2023	**Proposal for 2024**	
Key topic 1 **Addressing MREL shortfalls**	**Key topic 1** **MREL monitoring**	The topic remains central for resolution preparedness.
Focus area 1.1: **Addressing MREL shortfalls against the deadline** *with the following objective elements*	*Focus area 1.1:* **Addressing MREL breaches** *with the following objective elements*	Considering that institutions will need to be compliant with MREL requirement by 1 January 2024, focus shifts on breaches.
• The level of MREL shortfalls and expectations	• Processes of the resolution authorities for monitoring breaches	Transitioning from monitoring shortfalls to monitoring breaches.
• The approaches that banks are deploying to address shortfalls	• Approaches of banks to address breaches (and shortfalls, if still applicable, e.g. if there are extended deadlines)	
• The approaches authorities are using to ensure institutions' ability to address MREL shortfalls (use of powers 45k)	• Approaches of RA to enforce compliance (e.g. use substantive impediments procedure) and measures to address non-compliance	
• The nature of any engagement that may have been held with competent authorities	• The nature of any engagement that may have been held with competent authorities for addressing all MREL-related matters	
• The use of RAs' power to extend the deadline to meet the MREL beyond 1 January 2024	• Use of RAs' power to extend compliance deadline and transition periods and identification of underlying causes and rationale for such decisions	While expected to apply to a small number of banks, this remains an important element to be monitored.

Focus area 1.2 **Monitoring MREL quality** *with the following objective elements*	*Focus area 1.2* **Monitoring MREL quality** *with the following objective elements*	
• The procedure and processes used by resolution authorities to monitor the quality of MREL	• The procedure and processes used by resolution authorities to monitor the quality of MREL, in particular: ➢ RA work on policy for discretionary exclusions; ➢ Inclusion of deposits in MREL; ➢ proportion of subordinated instruments; ➢ MREL positioning within the group; ➢ RA work on legal review of MREL instrument compliance	This focus area evolves and increases in detail in terms of objective elements to reflect the emphasis RAs will put on MREL quality monitoring and also the expertise gained by RAs in this space over 2022 and 2023.

4.2.2 Management information systems for valuation

Ongoing for 2023 **Proposal for 2024**

Key topic 2 **Management Information Systems for Valuation**	**Key topic 2** **Management Information Systems for Valuation**	
Focus area 2.1: Addressing the main challenges encountered by institutions in developing satisfactory IT systems *with the following objective elements*	*Focus area 2.1:* Main challenges encountered by institutions in developing satisfactory IT systems *with the following objective elements*	*In line with the EBA GL, the focus will now shift on testing of banks capabilities in terms of MIS.*
• Timeline resolution authorities have set for institutions to introduce appropriate MIS	• Timeline resolution authorities have set for institutions to introduce appropriate MIS	This objective element is kept to monitor if there will be changes of the deadlines or new projects (with new deadlines) introduced to meet the RAs' requirements in terms of banks' MIS capabilities.
• Main challenges faced by banks in delivering	• Main challenges faced by banks in delivering	Following advancements in developing the IT

satisfactory systems and the measures they are taking to overcome such challenges	satisfactory systems and the measures RAs and institutions are taking to overcome such challenges	capabilities, new challenges can arise and will need to be monitored.
• The nature of the scenarios that have been defined by resolution authorities for banks to test their capabilities and/or the intentions with respect to testing		
	• Focus on approaches to testing of valuation capabilities (programme, nature of scenarios, scope, etc.) in line with the EBA GL on resolvability requirements set out in Chapter 4.3[21].	The focus will be on how the banks provide assurance of their capabilities and demonstrate it to the RAs and the processes used by RAs to detect gaps and good practices.
Focus area 2.2: Ability of authorities to perform valuations in rapidly evolving environment *with the following objective elements*	*Focus area 2.2:* Ability of authorities to perform valuations in rapidly evolving environment *with the following objective elements*	*Unchanged*
• Continuous improvement of authorities' capabilities and preparedness to obtain valuation services from professional valuers or to perform valuations (when urgently needed) in rapidly evolving situations	• Continuous improvement of authorities' capabilities and preparedness to obtain valuation services from professional valuers or to perform valuations (when urgently needed) in rapidly evolving situations	

4.2.3 Liquidity needs in resolution

Ongoing for 2023	Proposal for 2024	
Key topic 3: **Liquidity needs in resolution**	**Key topic 3:** **Liquidity needs in resolution**	
Focus area 3.1: Strategies, arrangements and possible impediments	*Focus area 3.1:* Strategies, arrangements and addressing possible impediments to ensure liquidity in resolution	

[21] Minimum requirements relating to information systems as per Article 29 of Commission Delegated Regulation (EU) 2016/1075

considered by institutions to ensure liquidity in resolution *with the following objective elements*	*with the following objective elements*	
• The core strategies that institutions intend to adopt to meet their liquidity needs in resolution	• The core strategies that institutions intend to adopt to meet their liquidity needs in resolution	The 2024 focus will be on RAs' critical assessment of the banks' proposals to ensure liquidity in resolution, including testing conducted by banks. The RAs should focus on their processes for critical assessment and their learnings in this respect.
• The modelling and testing that institutions have carried out on their capacity to meet their liquidity needs in resolution	• The modelling and testing that institutions have carried out on their capacity to meet their liquidity needs in resolution	In line with the general shift towards testing, RAs should develop processes to critically assess tests and capture lessons learned. As part of this element, the credibility and severity of the scenarios for estimating liquidity needs is expected to be assessed by the RAs.
• The arrangements put in place by institutions to ensure that they can measure and report their funding needs in resolution	• The arrangements put in place by institutions to ensure that they can measure and report their funding needs in resolution, including outcome of testing exercises	These objective elements remain relevant, with the focus shifting towards ensuring compliance with EBA GL on resolvability, specifically to the provisions of Chapter 4.2.1., which includes sections for mobilisation of assets and other private resources, identification and mobilisation of collateral. The focus for 2024 will also include processes that RAs put in place to critically assess banks' deliverables, including from the testing
• Key impediments identified in the development of robust systems and the actions taken by institutions and resolution authorities to address those impediments	• Key impediments identified in the development of robust systems through testing exercises and the actions taken by institutions and resolution authorities to address those impediments	
• Preparatory arrangements that institutions have put in place to support the delivery of their strategy	• Preparatory arrangements that institutions have put in place to support the delivery of their strategy and related testing exercises	

		exercises, and to capture lessons learned.
Focus area 3.2: Challenges in the use of moratoria powers *with the following objective elements*	*Focus area 3.2:* RAs work on ensuring liquidity in resolution *with the following objective elements*	This focus area shifts to a more generic focus that aims to capture the work conducted by RAs to complement banks' work for ensuring liquidity in resolution.
• the powers of resolution authorities to use moratorium powers	• RAs' approaches to ensure liquidity in resolution, complementing the strategies proposed by banks.	

4.2.4 Operationalisation of the resolution strategy

Ongoing for 2023	Proposal for 2024	Explanation of changes
Key topic 4: Operationalisation of the Bail-in Strategy	**Key topic 4: Operationalisation of the resolution strategy**	The wider nature of this key priority reflects RAs' plan for preferred and alternative resolution strategy.
Focus area 4.1: Potential impediments to smooth execution of bail-in in a cross-border environment *with the following objective elements*	*Focus area 4.1:* Potential impediments to smooth execution of bail-in in a cross-border environment *with the following objective elements*	
• Potential hindrances to the smooth execution of the bail-in process when dealing with a cross-border bank and where significant quantities of bank debt are issued or traded on foreign markets	• Potential hindrances to the smooth execution of the bail-in process when dealing with a cross-border bank and where significant quantities of bank debt are issued or traded on foreign markets	
• Potential hindrances to the effective functioning of internal loss transfer and recapitalisation mechanisms, in an EU and cross-border context	• Potential hindrances to the effective functioning of internal loss transfer and recapitalisation mechanisms, in an EU and cross-border context	
	• Disclosure of bail-in mechanics by RAs	RAs are required to disclose their approaches to bail-in mechanics. The EBA

		would encourage the RAs to share their lessons learned and the feedback received from this process.
	Focus area 4.2: Potential impediments to the execution of a transfer strategy *with the following objective elements*	The RAs will have to focus on operationalising the transfer perimeters if implementation of transfer strategies is envisaged. In addition, RAs are expected to set up specific procedures and processes for banks where transfer strategies are envisaged.
	• RAs are expected to develop guidance to define the transfer perimeter, as provided for in Chapter 4 of the EBA Transferability guidelines[22]	
	• RAs should develop procedures for the operationalisation of the transfer as provided for in Chapter 5 of the EBA Transferability guidelines	
	• Potential hinderances to the smooth execution of the transfer process when dealing with a cross-border banks	

[22] Guidelines for institutions and resolution authorities to complement the resolvability assessment for transfer strategies

5. Annexes

Annex I – *List of resolution colleges (reference date: December 2022)*

MS parent	EEA Banking Group / College name
AT	Porsche Bank Group
AT	Erste Group Bank AG
AT	Raiffeisen Bank International AG
BE	FinAx NV
BE	The Bank of New York Mellon SA
BE	KBC Group NV
CZ	JTFG SE Group
DE	Clearstream Holding AG Group
DE	ProCredit Group
DE	Commerzbank Aktiengesellschaft
DE	Deutsche Bank Aktiengesellschaft
DE	DZ Bank AG Deutsche Zentral-Genossenschaftsbank
DE/FR ERC	Goldman Sachs Bank Europe SE
DK	Danske Bank
DK	Saxo Bank Group
EL	ALPHA SERVICES AND HOLDINGS S.A.
ES	Banco Bilbao Vizcaya Argentaria, S.A.
ES	Banco Santander, S.A.
FI	Nordea Bank Abp
FR	BNP Paribas S.A.
FR	Crédit Agricole S.A.
FR	Société Générale S.A.
HU	OTP Bank Nyrt
IE/FR ERC	Bank of America Europe Designated Activity Company
IE/NL/LU ERC	Ulster Bank Ireland Designated Activity Company
IT	Intesa Sanpaolo S.p.A.
IT	UniCredit S.p.A.
LI	Liechtensteinische Landesbank AG (Group)
LI	VP Bank Group
NL	ING Groep N.V.
NO	DNB Bank ASA
PL	X-Trade Brokers Dom Maklerski S.A. Group
PT	Banco Comercial Português, SA
SE	Skandinaviska Enskilda Banken Group (SEB)
SE	Swedbank Group

FR	ODDO ET CIE
FR	RCI Banque SA
FR	Dexia Group
IE	Allied Irish Banks plc
IE	Bank of Ireland Group plc
LU	Havilland Group S.A.
LU	EFG Investment (Luxembourg) S.A.
LU	Quilvest Wealth Management S.A.
SE	Handelsbanken (not active)
SI	Nova Ljubljanska Banka (NLB)
Third-country ERC	Citibank
Third-country ERC	EFG Bank
Third-country ERC	Bank of China (Europe) S.A.
ES	Banco de Sabadell, S.A.

Annex II – *EBA policy work supporting resolution convergence*

No.	Title*	Publication date	Implementation date
1	Amended Implementing technical standards on resolution planning reporting	August 2021	January 2022
2	Release of phase 2 of EBA 3.2 reporting framework	June 2022	December 2022
3	Guidelines on improving resolvability for institutions and resolution authorities under Articles 15 and 16 BRRD (Resolvability Guidelines)[23]	January 2022	January 2024
4	Guidelines for institutions and resolution authorities to complement the resolvability assessment for transfer strategies (Transferability guidelines)[24]	September 2022	January 2024
5	Guidelines to resolution authorities on the publication of the write-down and conversion and bail-in exchange mechanic[25]	February 2023	January 2024
6	EBA monitoring report of total loss-absorbing capacity and minimum requirement for own funds and eligible liabilities instruments[26]	October 2022	
7	Guidelines to institutions and resolution authorities on resolvability testing[27]	June 2023	

[23] https://www.eba.europa.eu/sites/default/documents/files/document_library/Publications/Guidelines/2022/EBA-GL-2022-01%20Guidelines%20on%20resolvability/1025905/Final%20Report%20on%20Guidelines%20on%20improving%20resolvability%20for%20institutions%20and%20resolution%20authorities%20%282%29.pdf

[24] https://www.eba.europa.eu/sites/default/documents/files/document_library/Publications/Guidelines/2022/EBA-GL-2022-11%20GL%20on%20transferability/1039809/Final%20report%20on%20Guidelines%20on%20transferability.pdf

[25] https://www.eba.europa.eu/sites/default/documents/files/document_library/Publications/Guidelines/2023/1051851/Final%20Report%20on%20Guidelines%20on%20the%20publication%20of%20the%20write-down%20and%20conversion%20and%20bail-in%20exchange%20mechanic.pdf

[26] Report on the monitoring of TLAC-/MREL-eligible liabilities instruments of EU Institutions

[27] EBA published its final resolvability testing Guidelines

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