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EBA sets its 2027 supervisory agenda

QuickTake

On 30 September 2026, the European Banking Authority (**EBA**) published its Annual Work Programme 2027 (**AWP**).¹ It organises its work around three cross-cutting drivers: (i) fostering resilience, (ii) improving efficiency and (iii) supporting transformation. Across seven activities, the programme identifies 251 deliverables, of which 131 are ongoing and 120 have deadlines or delivery targets. These are the EBA's outputs, not 251 new obligations for firms operating in the EU.

Our Client Alert on the 2026 AWP² examined simplification of the Single Rulebook, stronger risk-assessment capacity and technological innovation, alongside the expansion of the EBA's operational responsibilities. The 2027 programme takes those themes forward, but its most consequential development is a more explicit shift from designing requirements in advance to assessing how they are implemented in practice.

That shift is clearest in Annex IV, which combines the EBA's supervisory-convergence priorities, the Union Strategic Supervisory Priorities (**USSPs**) applicable in 2027 and the European Resolution Examination Programme (**EREP**). Read with the activity tables and the simplification mapping in Annex III, it explains both what the EBA intends to produce and where supervisory and resolution authorities are expected to concentrate their attention.

¹ Available [here](#).

² See our earlier Client Alert [here](#).

Annex IV also places geopolitical risk within prudential supervisory judgement. Supervisors are expected to connect stress assumptions, expected-credit-loss overlays, sectoral concentrations, business-model resilience and executable recovery arrangements, rather than assess those issues in isolation. A standalone geopolitical-risk assessment offers limited assurance if it cannot be reconciled with capital and liquidity planning or the institution's proposed management actions.³

For firms, the resulting decisions are concrete: how to substantiate capital and liquidity treatment across jurisdictions; whether payments and intermediary-account arrangements can support both safeguarding and depositor identification; how to control artificial intelligence (AI) providers and changing financial-service value chains; and which data investments will serve reporting, stress testing and supervisory challenge together. The opportunity is not merely to anticipate more scrutiny. It is to use evidence of sound controls and unnecessary duplication to support a defensible case for proportionate treatment.

This Client Alert follows the programme's seven activities, then examines its supervisory annex, the changes from our 2026 analysis and the decisions relevant to 2027 planning. Programme delivery dates, legislative assumptions and bank-specific requirements must be kept separate. Where a later official publication updates the September programme, or the programme contains a material qualification, that distinction is identified expressly.

Three actions for Q1 2027

1. **Check which January 2027 dates apply to you.** Several rules start in January 2027, separately from the EBA's work programme: the 60% output-floor step for banks (1 January), the new rules for non-EU banks serving EU clients through branches (11 January), updated guidelines on retail product design and sale (11 January) and ESG-risk guidelines for smaller banks (by 11 January). Ask each business line to confirm in writing whether it is affected and who owns the work.
2. **Start preparing for the 2027 EU-wide stress test now.** The exercise runs around mid-2027 and includes a new climate element. Make sure finance, risk and treasury can explain how their starting figures, climate exposures and planned management actions fit together. Fewer data fields does not mean less preparation.
3. **Keep one simple tracker of what is planned versus what is binding.** Many Q1 2027 items, such as the new suitability guidelines, reporting changes and the Commission's expected banking proposal, are plans or drafts, not rules you must follow yet. List each item, the entity affected, its current status and an owner, and update it as items are finalised. Do not cut budgets or controls on the strength of promised simplification until it is actually in force.

From a work programme to supervisory execution

Before turning to the individual activities, the AWP should be placed within the EBA's wider institutional trajectory. The EBA describes three complementary directions for its development: (i) a next-generation regulator; (ii) a body developing supervision at new frontiers; and (iii) a provider of services to the supervisory and resolution community. The AWP follows the draft Single Programming Document (SPD)

³ AWP 2027, Annex IV pp 38–42, especially pp 39–40 (geopolitical risks, ECL models, recovery dry-runs and business models).

2027–2029 approved in January 2026 and anticipates further strategic development in the SPD 2028–2030. Its expanded functions under the Digital Operational Resilience Act (**DORA**), the Markets in Crypto-Assets Regulation (**MiCAR**, termed “MiCA” in the AWP) and the European Market Infrastructure Regulation (**EMIR**) sit alongside its core banking and payments work. This is an evolving institutional model, rather than a completed transfer of banking supervision to the EBA.

The AWP does not itself amend legislation, grant a waiver or decide an individual firm’s capital requirement. EBA consultation drafts and final draft technical standards (**RTS** and **ITS**) are not themselves binding EU legislation. RTS and ITS become binding through the applicable Commission adoption procedure and entry into force of the resulting EU act. EBA guidelines operate within Article 16 of the EBA Regulation, including the obligation to make every effort to comply and the competent-authority notification framework. The legal route and addressee of an output therefore matter as much as its scheduled quarter.⁴

Key takeaway	What it means for firms
Convergence becomes more systematic	Prepare evidence of implementation, national differences and remediation, rather than treating policy publication as the end of the project.
Simplification has specific delivery routes	Connect prospective benefits to the particular standards, reporting changes or supervisory practices that would deliver them.
Payment and deposit reforms intersect	Review safeguarding, intermediary-account records and customer information together, without assuming identical legal protection.
Technology is a business-model issue	Connect AI procurement, payment authority, credit distribution and recovery arrangements to the service actually delivered.
Data reuse changes the control challenge	Make differences in definitions, adjustments and ownership explainable before the same information is reused for another purpose.
Timetables and funding remain conditional	Distinguish firm-facing legal dates from consultations, authority outputs, workload-dependent items and requested resources.

PwC Legal analysis of AWP 2027. These are planning implications, not additional duties imposed by the programme.

The seven activities: a practical map

AWP activity	2027 emphasis	Immediate decision
1. Policy development	Banking-package completion; payments and crisis-management/deposit-insurance mandates; conditional securitisation work.	Which design choices require current-law implementation, and which depend on a future instrument?
2. Supervisory convergence and enforcement	Four-pillar convergence cycle, SREP, national liquidity measures, consumer and technology reviews.	Which differences or weaknesses need an evidence-based supervisory response?
3. Risk and financial stability analysis	EU-wide stress test, climate module, crisis-simulation preparation and risk analytics.	Can the bank reconcile data and management actions across scenarios?
4. Oversight and supervision	DORA examinations; MiCAR significance assessments and supervision if warranted; margin-model validation.	Which authority acts on which provider, token or model?
5. Data	Reporting simplification, common definitions, shared infrastructure and Pillar 3 expansion.	What can be reused without losing the meaning required for each reporting purpose?
6. Governance	Strategic steering, internal structures and international cooperation.	Which engagement route addresses the actual EU or cross-border issue?

⁴ Regulation (EU) No 1093/2010 establishing the EBA, as amended.

AWP activity	2027 emphasis	Immediate decision
7. Operations	The EBA's own IT resilience, digital sovereignty, platforms and premises.	Which authority delivery dependencies matter to the firm's change plan?

Source: AWP 2027, pp 6 and 19–29. Governance and operations principally concern the EBA itself; they are not a new compliance programme for banks.

Activity 1: policy development

Policy development remains the EBA's largest activity by planned staff allocation in Annex II, although that allocation includes resources not yet secured through the budgetary process. The emphasis in 2027 is increasingly on completing the 2024 banking package, reviewing existing requirements and identifying simplifications that preserve supervisory effectiveness. For firms, the consequential distinction is between proposed changes to substantive prudential requirements and changes to the processes through which compliance is demonstrated.

Banking-package completion and targeted simplification

The programme connects the EBA's work to the Commission's July 2026 banking-competitiveness agenda, for which it anticipates a legislative proposal in Q1 2027. Annex III maps specific outputs to the Task Force on Efficiency (**TFE**) recommendations. The Advisory Committee on Proportionality also calls for proportionality to be articulated systematically and through dimensions beyond size. Its suggested priorities include consistent DORA implementation for smaller entities and calibration of MiCAR supervisory intensity by size and complexity.⁵

The EBA plans to complete the bulk of its remaining work on the 2024 banking package while reviewing existing requirements. In credit risk, priorities include the internal ratings-based (**IRB**) assessment methodology, permanent partial use and external credit assessment institution (**ECAI**) mappings. The deliverable tables schedule the IRB assessment-methodology RTS for Q2 and exposure-class assignment RTS for Q3; further simplification work continues into Q4. Market-risk outputs remain expressly dependent on implementation of the Fundamental Review of the Trading Book (**FRTB**).

A commercially important Q4 output is the review of RTS on own funds and eligible liabilities, intended to improve the efficiency of prior permissions for their reduction. A bank considering calls, redemptions, repurchases or other capital restructuring should identify any applicable prior-permission requirement and build it into the transaction timetable. A planned review is not permission to execute before the applicable approval has been obtained. Equally, a procedural simplification should not be booked as a reduction in substantive capital requirements.

Governance work includes updated suitability guidelines jointly with the European Securities and Markets Authority (**ESMA**) and RTS on information for suitability assessments, scheduled for Q1. For investment firms, three RTS concerning authorisation waivers, reclassification as credit institutions and monitoring of the EUR 30 billion threshold are scheduled for Q2, explicitly carried over from Q4 2026. Remuneration and diversity work may fall in Q4 2027 or Q1 2028. These are distinct projects with different maturity and timing, not a common January implementation deadline.

For acquisitions and reorganisations, our recommendation is to assess the prudential perimeter, management appointments and approval timetable before relying on an anticipated simplified process. The value lies in resolving the classification and information requirements that could affect execution, rather than postponing necessary diligence until the final technical output appears.

⁵. The Q1 2027 legislative proposal is the programme's stated expectation, not an enacted measure.

Payments: an identifiable but conditional mandate pipeline

For the third Payment Services Directive and Payment Services Regulation (**PSD3/PSR**), the AWP anticipates 18 EBA mandates. It plans delivery of the first five and consultation papers on a further four in Q4 2027, conditional on the Level 1 texts being published in the Official Journal in Q4 2026. Likely topics include safeguarding, own-funds calculations, the limited-network and commercial-agent exclusions, and strong customer authentication. The narrative's expectation of adoption at the end of 2026 must be read with that more precise publication condition in the table.

These figures should not be compared mechanically with the broader estimate in our 2026 alert: that estimate covered PSD3, PSR and financial-data-access legislation together. The 2027 figure concerns PSD3/PSR. It does not establish that the EBA's expected mandates have been reduced on a like-for-like basis.

Payments firms, sponsor banks and platform operators should identify which products depend on an exclusion, how customer money is held, who can initiate a transaction and how consent and authentication are evidenced. Our practical recommendation is a configurable implementation design: preserve the ability to change authorisation, safeguarding and authentication arrangements without reconstructing the entire customer journey.

CMDI: connect intermediary accounts with depositor data

The crisis management and deposit insurance (**CMDI**) workstream has a particularly tangible Q2 batch under the revised Deposit Guarantee Schemes Directive (**DGSD**): technical standards on client funds, depositor information sheets and information exchange, together with guidelines on deposit guarantee scheme (**DGS**) investments. The client-funds standards are intended to ensure that DGSs receive the information needed to identify and reimburse clients whose money is held in intermediary accounts. Q4 consultations concern, among other matters, available financial means and cross-border cooperation.

The EBA's 2027 CMDI deliverables build on Directive (EU) 2026/804 (deposit guarantee schemes), Directive (EU) 2026/806 (bank recovery and resolution) and Regulation (EU) 2026/808 (Single Resolution Mechanism), all adopted on 30 March 2026. The measures have staged transposition and application provisions, including significant milestones in 2028; the EBA's intended technical outputs do not create a common 2027 commencement. Firms should distinguish draft standards and guidelines from the applicable legal requirements and their implementation dates.

This creates a useful connection with the payments workstream. An intermediary may have a safeguarding arrangement while the account-holding bank lacks reliable information about underlying clients. Firms should test who maintains the client-level record, who can deliver it during failure and how contractual access survives the intermediary's disruption. Safeguarding and deposit protection are separate legal questions: the planned information standards do not establish that every safeguarded balance is covered or that every underlying client has an identical entitlement.

On the resolution side, the EBA schedules revised RTS on the estimation of own funds and the combined buffer requirement for Q2, and consultation on early intervention and on conditions for lifting the 62.5% bridge-mechanism cap for Q4. Those entries concern the EBA's technical implementation work. They neither announce an immediate change in a particular bank's minimum requirement for own funds and eligible liabilities (**MREL**) nor substitute for its resolution authority's decisions.

SIU, securitisation and bank–non-bank connections

The EBA expects further securitisation mandates in support of the Savings and Investments Union (**SIU**) agenda, but those mandates depend on finalisation of the securitisation legislative package. The EBA anticipates mandates on disclosure templates, risk retention and supervisory convergence, alongside continuing clarification and ECAI-mapping work. It also lists a joint call for advice on private credit and a Q4 report on banks' exposures to shadow banking entities and their contribution to capital-market integration.

For originators, investors and financing banks, the commercial question is which aspects of a proposed structure depend on a reform benefit. Transaction documents, reporting arrangements and pricing assumptions should remain defensible under applicable rules, with future changes treated as identified contingencies. A bank's exposure to a private-credit structure also warrants analysis beyond the individual facility: concentration, liquidity dependencies and the group's prudential perimeter can affect the wider supervisory assessment.

Activity 2: supervisory convergence and enforcement

If Activity 1 sets out what the EBA will write, Activity 2 addresses how those rules are applied, and it is here that the shift towards implementation is most visible.

An evidence-based convergence cycle

The new framework has four pillars: (i) risk identification, (ii) planning, (iii) execution and (iv) follow-up. The EBA plans structured collection of internal and external evidence and stakeholder input in early 2027, followed by its first supervisory-convergence heatmap in Q2. Annex IV is careful about sequencing: the 2027 priorities were identified through top-down feedback from the Board of Supervisors and EBA management; the newly structured evidence base is intended to inform later cycles, including 2028. It would be inaccurate to describe the 2027 priorities as already produced by that future exercise.

Firms facing divergent national supervisory practices can use the convergence cycle to make an evidence-based case for proportionate treatment. For comparable SREP decisions, national liquidity measures or prudential-consolidation outcomes, identify the applicable legal basis, the practical difference, measurable costs and the safeguards supporting an alternative. National differences are not automatically unlawful: a useful submission explains why a particular divergence lacks a sufficient risk justification, while ensuring the group's own supervisory information is consistent.

SREP and liquidity: scrutinising decisions as well as inputs

The Supervisory Review and Evaluation Process (**SREP**) work covers Pillar 2 requirements (**P2R**) and guidance (**P2G**), the output floor, proportionality, monitoring indicators and internal governance. Annex IV also targets the clarity, comparability and proportionality of communications explaining SREP outcomes. Some case and thematic reviews remain possible 2027–2028 work, rather than fixed 2027 deliverables. Firms should retain the evidence connecting their business and risk profile to the supervisory rationale, particularly where they seek clarification of a capital decision.

The planned 2027 peer review of national prudential liquidity measures is more specific than a general liquidity-risk review. It examines measures that overlap with the EU framework or produce requirements stricter than the Liquidity Coverage Ratio (**LCR**) or Net Stable Funding Ratio (**NSFR**). Separately, the EBA will monitor interest-rate risk and credit-spread risk in the banking book (**IRRBB** and **CSRBB**), liquidity implementation and deposits sourced through online brokers. The programme does not itself invalidate a national measure or relax a bank's liquidity requirement.

A useful legal work product is a jurisdiction-by-jurisdiction comparison of the legal basis, scope and effect of significant liquidity measures, supported by evidence of funding behaviour and proportionality. Treasury should reconcile it with liquidity and concentration assumptions, including deposits sourced through online platforms, before using the comparison in a supervisory discussion.

Consolidation, consumer outcomes and technology capacity

Prudential consolidation receives explicit follow-up to the EBA's 2026 report and monitoring of the guidelines on ancillary services undertakings. The activity table places a further consolidation report in 2028, not 2027. Groups acquiring technology, servicing or platform businesses should test the actual activities and integration of the target against the prudential perimeter; a “technology company” label is not a substitute for that analysis.

The consumer workstream covers creditworthiness assessments under the revised Consumer Credit Directive (**CCD2**), cross-border retail banking and de-risking. Annex IV is explicit that the CCD2 thematic review will assess how firms themselves comply with the new conduct requirements, normally through questionnaires to a sample selected by national competent authorities (**NCA**s) and is not a review of how NCAs supervise those firms. The CCD2 report is scheduled for Q4; the stocktake of cross-border retail supervision for Q3. Firms should prepare actual lending decisions, records and customer outcomes, not only descriptions of their supervisory relationships.

Separately, revised EBA Guidelines on product oversight and governance for retail banking products apply from 11 January 2027. They clarify expectations for products with ESG characteristics, including target-market identification, distribution and controls against greenwashing. Those product-governance expectations should not be confused with the EBA's planned 2027 CCD2 thematic review or with any subsequent PSD3/PSR technical mandates.

Technology capacity is equally specific. The EBA plans a thematic report on third-party AI systems, new analysis of agentic AI in payments and embedded-finance credit distribution, and a further BigTech monitoring exercise. It will extend earlier work on tokenised settlement assets to tokenised investment products offered by banks. The AI-provider report is described as expected around mid-year in the narrative and scheduled for Q3 in the activity table; that is an indicative delivery window, not a firm-facing deadline.

Activity 3: risk and financial stability analysis

The same emphasis on evidence carries into the EBA's risk analysis. The AWP commits to the 2027 EU-wide stress test and describes a 55% reduction in data points compared with the 2025 exercise, alongside an additional climate module covering transition risk and physical risk from river floods. The EBA's 11 June 2026 draft methodology identified an initial sample of 63 banks from the EU and Norway, including 47 from the euro area, covering around 75% of the EU banking sector. The final sample and exercise methodology remain subject to confirmation. Results are envisaged around summer in the AWP narrative, with the exercise scheduled for Q3 in its delivery table. The 55% figure describes data points, not bank-specific compliance-cost savings.

The integration of stress-test starting-point data into regular reporting has a different timetable. The EBA's April 2026 consultation envisaged fuller integration for the 2029 exercise onwards; the proposed 2027 templates anticipate that architecture, while projection data remain exercise-specific. The data-point reduction does not retire current stress-testing and reconciliation processes.

The practical focus should be reconciliation: starting-point data, model assumptions, climate exposures, reported balances and management actions must be explainable on their respective bases. A bank should not infer the detailed treatment of the climate module in its supervisory assessment from the AWP alone; the exercise methodology and applicable supervisory framework remain necessary for that purpose.

The crisis-simulation work has a different timetable. The EBA plans in 2027 to develop the methodology, coordination arrangements, multiannual cycle, scope and scenarios for a first EU-wide exercise in 2028. That preparation is distinct from the continuing recovery and resolution tests addressed in Annex IV. The

AWP's early-warning tools and risk analysis also connect capital, leverage, resolution and liquidity headroom, supporting comparison across several constraints rather than assessment of one ratio in isolation.

For boards, a useful response is to test how an adverse event moves through the business: deterioration of asset quality, collateral requirements, funding outflows, service disruption and the feasibility of recovery actions. Where the same collateral or liquidity source supports several plans, its availability should not be assumed independently in each. That is our implementation recommendation, not a new reporting template imposed by the AWP.

The risk work also extends to advanced AI models with cyber capabilities and quantum-computing preparedness. The EBA identifies critical data assets and migration to post-quantum cryptography as subjects for analysis, alongside use of major-ICT-incident reports and systemic cyber coordination. For firms, an inventory of vulnerable data, cryptographic dependencies and replacement constraints would support that engagement; the AWP does not prescribe a universal migration deadline.

Activity 4: oversight and supervision

Activities 1 to 3 principally concern policy development, supervisory convergence and risk analysis. Activity 4 brings together three legally distinct functions: the EBA's participation in the joint ESA oversight framework for critical ICT third-party providers under DORA; its direct supervisory responsibilities for significant crypto-asset tokens under MiCAR; and its central validation functions for pro forma initial-margin models under EMIR. These functions involve different powers, addressees and supervisory relationships and should not be treated as a single category of direct supervision.

DORA: joint provider oversight and firm-level responsibility

Under DORA, the EBA, ESMA and the European Insurance and Occupational Pensions Authority (**EIOPA**) will continue joint oversight of designated critical information and communication technology (**ICT**) third-party providers (**CTPPs**). The 2027 work includes thematic deep-dives or on-site inspections, with particular attention to cybersecurity and frontier AI, recommendations and follow-up from 2026 examinations, and ongoing information gathering. The programme expressly allows examination timing and intensity to differ by provider.

As explored in our separate Client Alert, the Joint Committee's separate Annual Work Programme for 2027, published on 13 October 2026 as JC 2026 21, confirms that DORA, technological innovation, sustainable finance, securitisation and cross-sectoral risk monitoring will also be pursued through joint ESA coordination. The Joint Committee programme complements the EBA's sectoral AWP; it neither merges the authorities' statutory powers nor removes financial entities' own obligations.

The AWP's reference to 19 providers must be read within that joint European Supervisory Authorities (**ESAs**) framework; it should not be used to imply that the EBA alone exercises every Lead Overseer function. Nor does oversight replace financial entities' own third-party risk management. DORA retains their responsibility, and Annex IV expects supervisors to assess how Lead Overseer findings are addressed in customer firms' frameworks. The practical task is to connect the relevant finding to an actual dependency, contractual right, remediation decision and tested contingency.

MiCAR: significance and supervisory responsibility

Under MiCAR, the EBA plans annual significance assessments of asset-referenced tokens (**ARTs**) and e-money tokens (**EMTs**). The narrative refers to potential direct supervision and the activity table adds "if warranted". The AWP therefore does not establish that any particular issuer is already directly supervised, or how many significant issuers exist.

The legal allocation remains activity-specific. Significant ART issuers fall within the EBA's direct supervisory remit; for significant EMTs issued by electronic money institutions, Article 117(4) gives the EBA responsibility for supervising compliance with Articles 55 and 58, while the remaining supervisory perimeter continues to involve the competent home authority. A group combining issuance, custody and payment services should map those functions separately. Authorisation of one activity or the significance assessment of a token does not answer every question about the group's other regulated services.⁶

EMIR: model validation and counterparty implementation

Under EMIR, the EBA plans to expand its capacity to replicate backtesting of the ISDA Standard Initial Margin Model (**SIMM**), review model documentation and support competent authorities. Its validation-platform delivery is scheduled for Q4. Central validation concerns the general elements of pro forma initial-margin models; it is distinct from competent authorities' authorisation and supervision of their use by individual counterparties. The EBA's central function became operational on 1 March 2026.⁷

Users should maintain a record of model versions, portfolio coverage, data mappings, implementation changes and exceptions. Agreements with model and calculation-service providers should support timely information and change implementation. A central decision cannot replace the counterparty's evidence that its own process uses the relevant model correctly.

Activity 5: data, reporting and public access

Each of the preceding activities depends on reliable data, which Activity 5 seeks to integrate.

Integration means common definitions, not interchangeable obligations

The EBA plans a public EU-wide repository of data requests, better coordination and change management, further development of the Data Point Model (**DPM**) 2.0 and DPM Studio, and a common glossary and data dictionary through the Joint Bank Reporting Committee. The intended integrated system covers prudential, resolution and statistical reporting. EUCLID infrastructure, the EBA data hub (**EDAP**) and data-sharing arrangements are intended to make information and analytical tools more reusable.

Integrated reporting requires accountable ownership of source data, versioned definitions, documented transformations and reconciliation to the destination return. Firms should retain access to the underlying evidence, including where a service provider creates or transforms submissions, so an error can be traced across prudential, resolution and Pillar 3 datasets. Reuse is commercially valuable only where it removes duplication without obscuring differences in regulatory scope and meaning.

The September programme gives a conditional Q1 2027 target for the comprehensive final draft ITS amending FINREP, own funds, operational losses and liquidity if not completed in 2026. It separately lists the data-request repository and coordination work, also if not completed in 2026, without an express Q1 target. The AWP separately anticipated a draft technical package for reporting framework 4.4 in December 2026; it did not assign that package a Q1 2027 delivery date. These are authority delivery targets. Reporting reference dates, submission dates and the retirement of existing templates require separate confirmation under the applicable instruments. The Pillar 3 data-hub extension to small and non-complex institutions

⁶ MiCAR, Regulation (EU) 2023/1114, Article 117; EBA, "The EBA's supervisory role under MiCA", sections on significance and supervisory responsibilities.

⁷ AWP 2027, pp 14, 25 and 29; EBA, "Validation of pro forma-initial margin models"; EMIR, Regulation (EU) No 648/2012, Article 11(12a), as amended by Regulation (EU) 2024/2987.

(**SNICIs**) is expressly staged: first implementation by end-2026, expansion during 2027 and full implementation only by 2028.

Subsequent update: the 12 October technical release

A later official publication qualifies the September schedule. On 12 October 2026, the EBA released Phase 1 of the final 4.4 technical package, covering IFRS 18-related reporting, Pillar 3 environmental, social and governance (**ESG**) disclosures and other technical changes. Its announcement distinguishes a second phase, expected in early 2027, for the remaining supervisory-reporting simplification package. Firms should therefore work from the applicable release and legal instrument rather than infer a single future 4.4 delivery from the AWP. Technical availability, legal application, reference dates and submission deadlines remain separate concepts.⁸

Commercially, firms should secure change-support obligations, portable exports, correction rights and migration assistance in reporting-provider contracts before committing to shared infrastructure. Savings should be assessed net of transition and validation costs and recognised only when a process or obligation can actually be retired. The AWP's output totals and stress-test data reduction do not establish a firm-specific compliance-cost saving.

Activities 6 and 7: governance and operations

The final two activities turn inwards, to the EBA's own steering and capacity.

The governance workstream introduces more top-down steering of selected policy developments and reviews the EBA's substructures, mandates and dialogue with its Board. It also covers third-country assessments of prudential frameworks and confidentiality arrangements, international cooperation, and a planned memorandum involving the Anti-Money Laundering Authority (**AMLA**), prudential supervisors, MiCAR authorities and the ESAs, with timing to be confirmed. Confidentiality assessment, prudential equivalence and the legal basis for a firm's market access are different questions and should not be treated as interchangeable approvals.

Operational priorities include the EBA's own IT resilience, cybersecurity, cloud and digital-sovereignty risk assessment, new platforms and preparation for premises after its current lease expires in 2028. These are relevant dependencies for the Authority's delivery. Its internal cloud-sovereignty assessment is not a new general localisation requirement for banks, and a planned supervisory platform is not itself a new data-submission obligation for firms.

Annex IV: how the programme reaches firms

Annex IV translates the EBA's convergence framework into the supervisory and resolution priorities against which implementation and preparedness are expected to be assessed during 2027.

⁸ EBA, "The EBA releases the final technical package for release 4.4 of its reporting and Pillar 3 disclosure framework", 12 October 2026. This post-dates and updates the planning position in AWP 2027, p 26.

The USSPs and the difference between priorities and powers

The two USSPs applicable to the 2027 cycle concern, first, Single Market efficiency, financial stability and sustainability amid geopolitical and other external shocks and increasing use of innovative technologies or products; and, second, deeper DORA and MiCAR oversight and supervisory capacity. Competent authorities must take Union priorities into account in their programmes, while national circumstances and institution-specific risks continue to matter. Annex IV identifies supervisory tools for assessment and follow-up; the priorities do not independently create new enforcement powers.⁹

The first focus topic concerns geopolitical, economic and financial uncertainty. Supervisors are directed towards calibrated scenarios, usable contingency and recovery plans, dry-runs, expected-credit-loss models and overlays, sectoral concentration and business-model sustainability. Firms should be able to show how a severe scenario changes decisions, rather than produce an adverse narrative that leaves funding, operating arrangements and management actions unchanged.

The second concerns technology integration and resilience. Attention points include cyber preparedness, frontier-AI risks, management-body engagement, third-party concentration, exit planning, supply-chain monitoring, fraud prevention and preparation for PSD3/PSR. AI-related explainability, fairness, human oversight and model robustness sit alongside prudential and conduct coordination. The useful unit of review is the affected service: who acts for the customer, which provider or system enables the action and what happens when that dependency fails.

Further considerations preserve attention to IRRBB, exposures to non-bank financial intermediaries (**NBFIs**), including private credit and private equity, white-labelling, platform models, crypto-asset business and online deposit platforms. ESG financial risks also remain within banking-package implementation, with particular attention to SNCI transition planning and ESG stress testing. Separately from the AWP, the EBA's ESG-risk guidelines apply to SNCIs at the latest from 11 January 2027; that guideline date should not be confused with an AWP publication target.

EREP: executable resolution strategies

The EREP retains three core topics: operationalising resolution tools; operationalising liquidity and funding strategies; and testing resolution readiness. Annex IV says that the key topics remain unchanged from 2026 while monitoring criteria evolve. It highlights third-country liabilities, obstacles to transfer tools, financial-market-infrastructure engagement, collateral mobilisation and consistency with recovery planning. Testing is presented as a standalone priority, but not as evidence that resolution testing begins for the first time in 2027.

The tables add an important execution point: resolution scenarios should consider the position after recovery options have been used unsuccessfully, including depletion of central-bank-eligible collateral or loss of market funding. Tests should cover governance and communication as well as operational capability and may, where appropriate, include an extreme novel event such as a cyber incident or war. These are EU convergence priorities; the Single Resolution Board's (**SRB**) own requests, testing programme and bank-specific priorities remain a separate layer addressed in our standalone SRB analysis.

Related guidelines have distinct dates and addressees

The EBA's environmental scenario-analysis guidelines apply from 1 January 2027 to institutions within scope, and the joint ESA guidelines on integrating ESG risks into supervisory stress testing apply from that date to the relevant supervisory authorities. Neither should be characterised as the EBA's separate 2027 EU-wide stress-test climate module, whose exercise-specific methodology must be considered on its own terms.

⁹ See AWP 2027, Annex IV, pp 35–38; Regulation (EU) No 1093/2010, Article 29a. The AWP describes two continuing supervisory focus topics with updated attention points for 2027.

What changes from 2026 to 2027?

The following comparison uses our published 2026 alert as the baseline and the full 2027 AWP as the new source. It distinguishes continuity from a more specific delivery step, rather than treating every recurring topic as new.

Theme	2026 baseline	2027 development
Organisation	Three priorities; seven activities.	Three cross-cutting drivers operate through the seven activities; further medium-term strategy follows.
Convergence	Peer reviews, common approaches and coordination.	Four-pillar cycle; early evidence collection; Q2 heatmap; later priorities become more data-driven.
Banking package	Implementation and selected simplification.	More review of existing frameworks; targeted IRB, own-funds, suitability and investment-firm outputs.
Stress testing	Preparation for the next EU-wide exercise.	Q3 exercise; 55% fewer data points against 2025; additional climate module.
Payments	Broader anticipated mandate pipeline.	PSD3/PSR-specific estimate of 18; five deliveries and four consultations conditional on legislation.
Operational roles	Building DORA, MiCAR and EMIR capabilities.	Provider examinations and follow-up; token significance assessment; deeper model-validation capability.
Data	Integration, reuse and repository development.	Conditional Q1 deliverables; staged SNCI data-hub expansion; full implementation extends to 2028.
Innovation	AI, DLT and changing value chains.	Third-party AI report; agentic payments; embedded credit; tokenised investment products and BigTech monitoring.

This is a directional comparison, not a statement that all 2026 plans were completed or that all 2027 outputs are legally operative.

2027 deliverables to place on the watchlist

The selected dates below are the programme's authority-output targets, with the later 4.4 update identified separately. They are not a comprehensive list of firm-facing deadlines. "Consultation" and "final draft technical standards" remain distinct from adoption and application.

Timing	Selected output	Stage or qualification
Q1	Joint suitability guidelines; suitability-information RTS; SREP joint-decision ITS.	Q1 is the EBA delivery target; it is not itself a common application date for firms.
Q1, conditional	Comprehensive final draft ITS amending FINREP, own funds, operational losses and liquidity.	Q1 target applies only if not completed in 2026.
2027, conditional	Data-request repository and coordination guidance.	If not completed in 2026; no specific quarter stated in the AWP.
Early 2027	Remaining 4.4 reporting-simplification technical package.	Later 12 October announcement: Phase 1 already released.
Q2	First supervisory-convergence heatmap and annual convergence report.	Planned authority analyses.
Q2	IRB assessment-methodology RTS; investment-firm classification and threshold RTS.	The latter were moved from Q4 2026.

Timing	Selected output	Stage or qualification
Q2	Client-funds RTS, depositor-information and information-exchange ITS, DGS-investment guidelines.	First DGSD batch; application follows the relevant instruments.
Q2	Revised own-funds/combined-buffer estimation RTS; major-ICT-incident annual report.	Technical work and report, respectively.
Q3	EU-wide stress test; third-party AI thematic report.	Narrative also says around summer / mid-year; precise exercise requirements are separate.
Q3	Cross-border retail-supervision stocktake; USSPs for 2028.	The latter concern the following supervisory cycle.
Q4	Own-funds/eligible-liabilities RTS review; CCD2 supervision report.	No automatic transaction permission or change in consumer duties.
Q4, conditional	Five PSD3/PSR mandate deliveries and four consultation papers.	Assumes Level 1 publication in the OJ in Q4 2026.
Q4, qualified	Joint AMLA–EBA de-risking consultation.	AWP date is subject to change and appears internally inconsistent with the statutory timetable discussed below; clarification should be monitored.
2027, timing not specified	Review of ITS on resolution-planning reporting; review of MREL/TLAC reporting and disclosure.	Review outputs; the AWP does not assign a quarter.
Q4	RTS on open-banking data reporting.	Consultation paper under the planned PSR framework.
Q4 / Q1 2028	Remuneration and diversity reviews; possible MiCAR handbook slippage.	Timing and workload qualifications expressly retained.
2027 into 2028	SNCI Pillar 3 data hub; EU-wide crisis-simulation preparation.	Full SNCI hub implementation and first EU-wide simulation are envisaged for 2028.

Selected legal and supervisory application dates

The AWP dates above concern EBA outputs. The following separate dates arise from enacted legislation or published guidelines relevant to banks and other affected firms. They are not new obligations created by the AWP; scope, national implementation and any transitional arrangements require firm-specific analysis.

- **20 Nov 2026 – Revised Consumer Credit Directive (CCD2):** National implementing measures apply from this date, subject to transitional rules, including existing credit agreements.
- **1 Jan 2027 – CRR output-floor transition:** 60% transitional factor for 2027 under Article 465, subject to the applicable CRR framework.
- **1 Jan 2027 – Revised EBA SREP guidelines:** Guidelines apply to relevant competent authorities; not an additional standalone firm capital requirement.
- **1 Jan 2027 – EBA environmental scenario-analysis guidelines:** Guidelines for institutions in scope, addressing financial and business-model resilience to environmental risks.
- **1 Jan 2027 – Joint ESA guidelines on ESG supervisory stress testing:** Guidelines addressed to competent supervisory authorities, not a new mandatory institution-level stress test.

- **11 Jan 2027 – CRD VI third-country branch framework and EBA authorisation guidelines:** Scope-dependent statutory commencement and guideline application; check national implementation and exceptions.
- **By 11 Jan 2027 – EBA ESG-risk management guidelines for SNCIs:** Latest guideline application date for small and non-complex institutions.
- **11 Jan 2027 – Revised EBA retail product-governance guidelines:** Guidelines for relevant manufacturers and distributors, including ESG-related retail products.

A legal-timetable exception: de-risking

The AWP's de-risking timetable requires separate qualification. Its narrative refers to joint EBA–AMLA guidelines under the Anti-Money Laundering Regulation (**AMLR**), whereas the deliverables table refers to “Art 21 AMLD” and schedules a consultation for Q4 2027, expressly subject to change. Article 21(4) AMLR requires the Anti-Money Laundering Authority (**AMLA**), jointly with the EBA, to issue guidelines by 10 July 2027 on measures credit and financial institutions may take to ensure AML/CFT compliance when implementing the Payment Accounts Directive, including relationships affected by de-risking. The consultation target and statutory issuance deadline are not readily reconcilable on the published information. The AWP cannot amend the statutory deadline; clarification of the intended product and timetable should be monitored. Firms should keep their currently applicable customer-due-diligence and access-to-account obligations separate from this proposed guideline timetable.¹⁰

Resource constraints and the limits of deprioritisation

Whether these deliverables arrive on time depends partly on resources.

Annex II presents a total allocation of 276 staff and EUR 70.27 million, but expressly states that it includes requested additional funding and resources. It then records that the Commission excluded the additional elements from its 2027 draft budget forecast. These figures should therefore not be described as an unconditionally approved budget or as proof that every planned role is filled. The EBA also warns that simplification itself requires substantial resources, even where it removes or postpones other work.¹¹

The implication is not that supervision must intensify uniformly. Better prioritisation may genuinely reduce low-value work, while some outputs may slip. The programme expressly retains deprioritisation for data support to supervisory benchmarking and training of authority users on data tools, yet lists data support for regulatory work and Commission advice as ongoing. The prior year's deprioritisation list cannot simply be carried forward. Firms should identify the particular output and qualification, rather than infer lighter supervision from the absence of a new publication.

¹⁰See AWP 2027, pp 12 and 21; Regulation (EU) 2024/1624, Article 21(4). The AWP narrative refers to the AMLR, while the activity table labels the item “Art 21 AMLD” and schedules a Q4 consultation subject to change. Article 21(4) AMLR requires AMLA, jointly with the EBA, to issue the guidelines by 10 July 2027.

¹¹ See AWP 2027, Annex II, pp 31–32. The table gives EUR 70,271,232. Its allocation includes requests for three temporary and four permanent FTEs; the narrative also discusses nine additional fee-funded DORA posts requested jointly by the ESAs.

Practical considerations for firms

Against that background of conditional timetables and finite resources, the recommendations below translate the programme into legal and management decisions. They are proposed work products, not additional EBA deliverables or universal compliance deadlines. Priority should depend on the firm's business, existing findings, live transactions and applicable obligations.

Affected business	Decision to resolve	Concrete legal or governance output
Bank treasury and capital planning	Which supervisory requirement or permission constrains the proposed transaction or portfolio?	Capital/permission analysis; record of national liquidity measures; evidence supporting supervisory clarification.
Payments firm, intermediary and sponsor bank	Can safeguarding, client identification and failure-time information delivery operate together?	Account and entitlement analysis; responsibility map; data-access and continuity terms; change plan for final PSD3/PSR measures.
Bank or investment-firm acquisition	Does the acquired activity change consolidation, classification or suitability requirements?	Prudential-perimeter memorandum; approval sequencing; management-role and information schedule.
AI, embedded-finance or tokenisation sponsor	Who has authority to act, which rules apply and which dependencies can interrupt the service?	Activity classification; delegation and consent analysis; vendor controls; failure and exit provisions.
Reporting and stress-test owner	Which data can be reused and which differences must be retained?	Source-to-output mapping; adjustment approvals; reconciliation controls; migration and vendor-change terms.
Recovery and resolution team	Will the strategy work after unsuccessful recovery actions?	Scenario-consistent collateral and liquidity analysis; executable playbooks; stakeholder and communication tests.

The above is likely to have a number of impacts on firms' documentation:

Contractual documentation

- **Capital and financing.** Review permission dependencies, instrument terms and information requirements against the actual transaction timetable. For securitisation and private-credit arrangements, separate rights and economics supported by current rules from benefits dependent on reform. Proposed simplification should not become an unqualified contractual assumption.
- **Payments and intermediary accounts.** Allocate responsibility for client-level records, updates, reconciliation, disclosure and information delivery during disruption. Test the bank's access to data held by a platform or intermediary and the continuity of that access after termination or failure. Do not describe a safeguarding structure as DGS-covered without a separate entitlement analysis.
- **Technology and models.** Connect information, audit, model-change, incident-cooperation, subcontracting and exit provisions to the specific service. AI and margin-model agreements should support the evidence and implementation controls the firm must retain, rather than leave it dependent on a provider's general assurance.
- **Cross-border business.** The absence of a prominent third-country branch deliverable in the 2027 AWP should not obscure the commencement of the CRD VI third-country banking framework in January

2027.¹² Affected groups should complete or revalidate their service-by-service analysis under Article 21c, including the activities and entities in scope, statutory exceptions, existing contractual rights, national implementation and authorisation requirements. The EBA's final Guidelines on third-country branch authorisation apply from 11 January 2027; related reporting measures have separate timetables. A defensible EU operating model must align the chosen entity and permissions with booking, capital, governance, source-data ownership and the contractual terms of continuing business.

Policies, governance and supervisory engagement

- **Connect the control frameworks.** Capital, liquidity, expected-credit-loss, stress-test and recovery policies should identify their respective assumptions and explain material differences. Documentation should reveal double-counted resources or inconsistent management actions before those assumptions are tested externally.
- **Review actual outcomes.** For consumer credit, de-risking and fraud, retain the reasoning and records supporting individual decisions and escalation. For AI-assisted processes, identify accountable owners, limitations, human intervention and monitoring. These controls should be tested against the product and distribution model, not only the technology inventory.
- **Use proportionality constructively.** Assemble a focused record of the risk, the existing control, the burden imposed and a credible alternative. Route it through the relevant supervisory or consultation process. A persuasive case for simplification preserves the regulatory outcome while demonstrating which duplication can safely be removed.
- **Maintain one implementation register.** Record the affected entity, legal basis, source date, publication stage, dependency, owner and firm-specific action. The register should distinguish the AWP's planned output, a subsequently adopted instrument and an individual supervisory request. That distinction is particularly important for PSD3/PSR, reporting, de-risking and workload-dependent deliverables.

Outlook

The 2027 programme is more consequential than a rulemaking calendar. Its activity tables identify potential simplifications in permissions, reporting and supervisory processes; Annex IV identifies the implementation, dependencies and crisis capabilities to be assessed. The EBA is not abandoning policy development or acquiring every firm-level supervisory function. It is connecting policy, comparative evidence and follow-up more systematically across the European supervisory network.

For firms, the response is to link planned business decisions to their legal basis and operating evidence: capital permissions and group structure, intermediary-account safeguards, controlled AI-enabled services and data investment that eliminates avoidable duplication. The value lies in identifying those choices early, while distinguishing relief already available from reform that still depends on legislative or supervisory action.

¹² EBA, "The EBA publishes final Guidelines on the authorisation of third-country branches under the Capital Requirements Directive", 7 July 2026; Directive (EU) 2024/1619. Final EBA Guidelines [available here](#).



About us

PwC Legal is assisting a number of financial services firms and market participants in forward planning for changes stemming from relevant related developments. We have assembled a multi-disciplinary and multijurisdictional team of sector experts to support clients navigate challenges and seize opportunities as well as to proactively engage with their market stakeholders and regulators.

Moreover, we have developed a number of RegTech and SupTech tools for supervised firms, including PwC Legal's Rule Scanner tool, backed by a trusted set of managed solutions from PwC Legal Business Solutions, allowing for horizon scanning and risk mapping of all legislative and regulatory developments as well as sanctions and fines from more than 2,500 legislative and regulatory policymakers and other industry voices in over 170 jurisdictions impacting financial services firms and their business.

Equally, in leveraging our Rule Scanner technology, we offer a further solution for clients to digitise financial services firms' relevant internal policies and procedures, create a comprehensive documentation inventory with an established documentation hierarchy and embedded glossary that has version control over a defined backward plus forward looking timeline to be able to ensure changes in one policy are carried through over to other policy and procedure documents, critical path dependencies are mapped and legislative and regulatory developments are flagged where these may require actions to be taken in such policies and procedures.

The PwC Legal Team behind Rule Scanner are proud recipients of ALM Law.com's coveted "2024 Disruptive Technology of the Year Award" and the "2025 Regulatory, Governance and Compliance Technology Award".

If you would like to discuss any of the developments mentioned above, or how they may affect your business more generally, please contact any of our key contacts or PwC Legal's RegCORE Team via de_regcore@pwc.com or our [website](#).



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