



EU RegCORE Client Alert

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The Joint Committee of the ESAs publish their 2027 priorities

QuickTake

On 13 October 2026, the Joint Committee (**JC**) of the European Supervisory Authorities (**ESAs**) published its Annual Work Programme (**AWP**) for 2027.¹ The European Banking Authority (**EBA**), European Insurance and Occupational Pensions Authority (**EIOPA**) and European Securities and Markets Authority (**ESMA**) will continue coordinating work on digital operational resilience, consumer protection, sustainable finance, cross-sectoral risks, securitisation, financial conglomerates and innovation. The programme places that work within the European Union (**EU**) agenda for simplification and burden reduction.

For firms, the principal change is the specificity of the work ahead. Under the Digital Operational Resilience Act (**DORA**), oversight of critical technology providers continues through examinations and explicitly scheduled follow-up of any recommendations issued in 2026. Conglomerate capital reporting acquires consultation and finalisation targets. Innovation work explicitly focuses on artificial intelligence (**AI**) and tokenisation. Several substantial reforms remain dependent on legislation.

¹ Available [here](#).

Boards should fund current compliance and evidence of effective controls while preserving flexibility for measures whose final content and application dates remain unsettled.

Our central reading is that firms should use the JC agenda to connect risks that they often manage in separate programmes. A technology provider may support product distribution, portfolio management and transaction reporting across a banking and insurance group. A securitisation investment may connect capital treatment, non-bank financing and sustainability disclosures. The practical issue is whether entity-level controls and group-wide explanations remain consistent when supervisors examine those connections.

This Client Alert builds on our analysis of the 2026 programme² and should be read alongside our separate alerts on ESMA's and EIOPA's 2027 agendas. It examines the changes that matter for implementation, distinguishes planned supervisory outputs from binding obligations and identifies decisions that firms can take now. The programme itself does not introduce new firm-level obligations or replace the legal timetables of the measures it discusses.

Key takeaways from the 2027 programme

Before turning to individual workstreams, it helps to recall the JC's role. The JC supplies a coordination layer across banking, insurance and securities supervision. National competent authorities (**NCA**s) participate through its sub-structures, alongside the European Commission (**Commission**) and the European Systemic Risk Board (**ESRB**). Firms should read the joint programme together with their sectoral supervisor's programme and the requirements applicable to each legal entity.

Supervisory follow-up increases the value of clear remediation evidence. Common reporting and cross-sectoral analysis place greater weight on consistent data and explanations. Simplification remains a programme objective whose legal effect depends on the measure concerned.

What changes from 2026 to 2027

The comparison below separates continuity from the more specific 2027 outputs. The 2026 column records the earlier programme's intentions rather than certifying that every planned output was completed.

Workstream	2026 programme priorities	2027 development
Technology provider oversight	First complete oversight cycle and initial examinations.	Examinations continue; follow-up of potential 2026 recommendations and reporting on 2026 oversight.
Provider data and review	Incident analysis and convergence work.	New master-data feasibility study and support for a potential DORA-review proposal.
Cyber coordination	Operationalisation and testing of the framework.	Testing, exercises and member capacity-building; formal links with complementary frameworks.
Retail disclosures	Conditional work on retail product disclosure technical standards.	Technical standards drafting, consumer testing and consultation; regulatory standards deadline may fall in 2028.

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

Workstream	2026 programme priorities	2027 development
Financial education	Workshops and sectoral initiatives.	Assessment of earlier factsheets, leaflets and the repository to shape subsequent initiatives.
Sustainable finance	Review preparation and guidance on existing sustainability disclosures.	Conditional revised-framework work continues; existing obligations remain under convergence work.
Risk assessment	Annual joint risks report envisaged.	Twice-yearly published risk updates specified.
Securitisation	Review follow-up and possible reform mandates.	Transparency-template preparation, reform mandates and preparation for green-bond market data collection.
Financial conglomerates	Development of capital adequacy templates.	Consultation targeted for Q1 2027; technical standard finalisation by end 2027.
Innovation facilitation	BigTech mapping and sandbox coordination.	Third data exercise; dedicated AI and tokenisation focus and innovation factsheet.

PwC Legal comparison of the two programmes. The 2027 entries are planned activities and delivery targets, subject to the qualifications discussed below.

Digital operational resilience

Provider oversight and remediation

Digital operational resilience is the workstream where the 2027 programme is most specific. Under DORA, the ESAs will update the list of information and communication technology (ICT) third-party service providers designated as critical (**CTPPs**), conduct risk assessments, maintain annual and multi-annual oversight planning and undertake the planned examinations for designated providers. The 2027 programme expressly provides for follow-up of any potential recommendations issued in 2026. It also schedules an annual report on oversight activities in 2026; the reporting year should not be confused with the year of publication.

An ESA acts as Lead Overseer for each designated provider, while the financial entity's competent authority is responsible for supervisory follow-up of the entity's exposure to risks identified in recommendations. Article 42(3) DORA requires financial entities to take account of those risks when communicated by their competent authorities. The response should address the affected service and exposure, including any necessary remedial controls or contractual changes. Under the conditions in Article 42(6), competent authorities may, as a last resort, require temporary suspension of the relevant service or, where necessary, termination of the relevant arrangements. Article 6 of Commission Delegated Regulation (EU) 2025/295 also requires competent authorities to assess the adequacy and coherence of financial entities' remedial measures. This makes the connection between provider oversight and customer risk management a present legal issue.

DORA preserves the financial entity's responsibility when it uses ICT services. Its existing requirements on registers of information, third-party risk and contractual arrangements remain the starting point. For services supporting critical or important functions, firms should verify that the applicable audit and access rights, subcontracting conditions and exit arrangements are documented and workable. Provider designation should therefore sit within the firm's risk assessment rather than serve as a substitute for it.

A useful management review follows one material service through the contract, provider and subcontractor records, continuity plan, incident history and remediation log. Unexplained inconsistencies in ownership, provider identity or recovery assumptions for the same service should be reconciled before the firm relies on those records in a supervisory explanation. We recommend this service-level review.

Incident intelligence and reporting data

Oversight of providers is complemented by the ESAs' use of incident data. The ESAs will continue collecting ICT-related incident information reported by competent authorities, use it to inform supervision and provider oversight, and develop an annual report on major ICT-related incidents. The planned analysis of the cyber-threat landscape links incident experience to areas where DORA supervisory practices need greater convergence.

A separate expected output is a feasibility study on collecting master data for registers of information. That is a study, not an adopted replacement reporting architecture or a new submission requirement. Firms can nevertheless prepare by resolving inconsistent provider identifiers, contractual references and entity mappings. Better source data can reduce current reporting friction and would make future data reuse more reliable.

Crisis coordination and the DORA review

Where incidents escalate into crises, coordination among authorities becomes the focus. The pan-European Systemic Cyber Incident Coordination Framework (**EU-SCICF**) will prioritise connectivity tests, exercises and member capacity-building. The programme also envisages formalising links with complementary frameworks, including EU-CyCLONe and the G7 Cyber Expert Group. These are primarily arrangements among participating authorities. The AWP does not impose a general requirement for every financial entity to join an EU-SCICF exercise or create a separate direct reporting channel for all firms.

Firms should check their existing incident escalation and crisis communication arrangements against the authorities and jurisdictions relevant to their business. Group crisis exercises can usefully test who communicates which facts, how conflicting assessments are resolved and whether an affected service can continue while a shared provider is unavailable.

The ESAs will also support the Commission with technical advice for a potential legislative proposal arising from the DORA review. Firms should progress current remediation against the rules in force and track potential changes through their change-management process.

Consumer protection and retail disclosures

The same distinction between current rules and pending legislation runs through the consumer protection agenda, which remains linked to delivery of the Savings and Investments Union (**SIU**). For the Packaged Retail and Insurance-based Investment Products Regulation (**PRIPs**), the ESAs expect to draft regulatory technical standards (**RTS**) and implementing technical standards (**ITS**) based on proposed amendments under the Retail Investment Strategy (**RIS**). Consumer testing and public consultation are envisaged, with

particular attention to simplifying performance and cost sections of the key information document (**KID**). The programme expressly notes that the RTS deadline may be in 2028, depending on the legislative process.

Manufacturers and distributors should avoid hard-coding an assumed 2027 replacement KID into their implementation plans. A more useful preparation is to map current performance and cost data, identify ownership of calculation and presentation changes, and agree how revised information would pass through approval, translation and distributor systems. This work supports a later change without prejudging its final methodology or legal commencement.

The ESAs will continue practical guidance and supervisory convergence where needed, and report on PRIIPs administrative sanctions or measures imposed during 2026. Financial education work will assess the impact of earlier consumer factsheets, leaflets and a repository of national initiatives, informing targeted additional initiatives in subsequent years.

The practical conduct question remains whether the information used in the actual sales journey is accurate, consistent and understandable. Firms can review how a product's costs and performance are presented across its KID, digital interface and distributor materials, while maintaining a clear distinction between present requirements and the possible RIS redesign.

Sustainable finance during the SFDR review

Sustainable finance presents a similar planning challenge. For the Sustainable Finance Disclosure Regulation (**SFDR**), the JC will monitor the legislative review and, if required, deliver technical standards or advice, potentially including consumer testing. It will also continue monitoring existing obligations and providing guidance to promote convergence. The immediate planning issue is therefore how to maintain current disclosure controls while preparing for a framework whose revised content remains conditional.

Firms should retain ownership of the data, methodologies and approvals supporting existing disclosures, while keeping prospective changes separate. Where a proposed reform would alter categorisation, templates or customer communications, the implementation plan should identify the trigger for changing each document and the information required from third parties. An anticipated simplification is not a sound basis for reducing current disclosure quality.

Our 2026 alert also discussed environmental, social and governance (**ESG**) ratings disclosures and joint ESG stress-testing guidelines. Those topics are not repeated as standalone deliverables in the 2027 JC sustainable-finance section. Nor does the 2027 text repeat the express decision in the earlier programme not to deliver the annual report on principal adverse impact (**PAI**) disclosures in 2026. These omissions do not establish repeal of the relevant obligations or confirm whether a particular report will resume. Firms should track the underlying measures and sectoral programmes separately.

Cross sectoral risk assessment

Beyond individual frameworks, the JC will continue targeted analysis of risks and vulnerabilities across sectors, with regular presentations to the Council through the Economic and Financial Committee (**EFC**) and Financial Stability Table (**FST**). The programme specifies twice-yearly published risk updates. These outputs can help firms identify the questions likely to feature in coordinated supervisory discussions, but are not additional regulatory returns or firm-specific findings.

Boards can use those updates to challenge whether their own risk view captures shared dependencies and correlated stress. For example, a banking and insurance group may rely on the same ICT provider while financing or investing in the same market exposures. Aggregate limits alone may not reveal which entity bears the loss, where liquidity can be transferred or how a disruption affects customer services. The analytical opportunity is to connect existing risk information across those channels.

Securitisation reform and supervisory convergence

Preparing for mandates without fixing an assumed application date

Securitisation illustrates how those cross-sectoral connections arise in a single market. The JC Securitisation Committee (**JCSC**) will continue technical work following its March 2025 review report and prepare for mandates stemming from the Commission's June 2025 reform proposals. The AWP describes implementation as currently expected in Q1 or Q2 2027. That is the programme's planning assumption. It should not be treated as a confirmed legal application date for the package or for each supporting technical standard.

The expected outputs include advancing a draft consultation paper on transparency-template revision as far as possible without prejudging the Level 1 negotiations. Firms should therefore retain current reporting controls while assessing the data, systems and contractual information rights that could be affected by the eventual reform. A staged plan can accommodate changes to the final mandate, adoption sequence and transition arrangements.

Cross border structures and non-bank financing

Supervisory convergence will continue through concrete NCA cases, common understandings, best practices and tools. Market monitoring expressly addresses involvement of non-bank financial institutions (**NBFIs**), including third-party risk financing for collateralised loan obligations (**CLOs**). The JCSC will also monitor developments in the United States (**US**) and United Kingdom (**UK**) for divergence that could materially affect cross-border investment and financing, and consider relevant data limitations.

Originators, sponsors, managers and institutional investors can usefully assess where a cross-border structure depends on different regulatory assumptions, information access or financing arrangements. Due diligence, reporting and transaction documents should identify who supplies the necessary evidence and

what happens if a dependency changes. The monitoring work signals an area for attention; it does not establish that a particular US or UK structure is non-compliant or subject to a new restriction.

The JCSC will begin preparing the data collection for the Joint Committee's report on the evolution of the securitisation-bond market. Article 71(7) of Regulation (EU) 2023/2631 requires that report to be published by 21 December 2028. It must assess, among other matters, whether taxonomy-aligned asset volumes have increased sufficiently to review the use-of-proceeds rules for securitisation bonds seeking the European Green Bond designation. The 2027 work prepares for that review. Relevant issuers and originators should identify the issuance, asset and sustainability information likely to support it.

Financial conglomerates and group reporting

Group-level interconnections are most directly addressed in the conglomerates workstream. Under the Financial Conglomerates Directive (**FICOD**), the ESAs will update the list of identified conglomerates and continue guidance on reporting intra-group transactions (**IGT**) and risk concentrations (**RC**). The clearest timed development is a public consultation on capital adequacy reporting templates targeted for Q1 2027, followed by finalisation of the technical standard by the end of 2027. Finalisation of an ESA draft standard is not, by itself, the date on which firms must submit a new return.

Groups should prepare to explain the reconciliation between sectoral capital positions and supplementary supervision at conglomerate level. Before a consultation template is fixed, the useful work is to identify the supplementary-supervision perimeter, applicable calculation method, source systems, intra-group items and adjustments, and to allocate responsibility for explaining differences. This can also improve the quality of existing IGT and RC reporting. Technical implementation should then be calibrated to the published consultation and final adopted measure.

The JC will continue assessing gaps in stress testing conducted on a sectoral basis, particularly interconnectivity risks, with an analytical note following the mapping exercise. The programme does not announce a new mandatory EU-wide conglomerate stress-test exercise. Nevertheless, groups can test whether separate banking and insurance scenarios make inconsistent assumptions about internal funding, asset sales, counterparties or management actions.

The commercial implication is that a group's ability to allocate capital or liquidity depends on the legal and operational constraints within its entities. A consolidated surplus is not sufficient evidence that resources can reach the entity under stress. Legal, finance and risk teams should agree a common account of transfer constraints and interdependencies before presenting group resilience to different supervisors.

Innovation facilitation with AI and tokenisation

Turning to new business models, the ESAs, through the European Forum for Innovation Facilitators (**EFIF**), will run a third data collection exercise on BigTechs and mixed activity groups (**MAGs**) providing financial

services in the EU. The exercise will use a streamlined monitoring matrix and NCA data-sharing templates and principles developed in 2026. Planned outputs include a mapping exercise and a short report or factsheet, subject to EFIF members' steer, alongside exchanges between home and host NCAs.

The programme adds cross-sectoral monitoring of technologies, use cases and operating models, examining successful innovation, supervisory issues, risks and unintended barriers to scaling. Its innovation factsheet will include a thematic section on AI and tokenisation. Deliverables and focus areas may be adjusted following discussions among EFIF members.

On tokenisation, the ESAs report increased innovation-hub enquiries about smart contracts, distributed ledger technology (**DLT**) and tokenisation in 2026 without a corresponding rise in crypto-asset issuance and offering activity. The AWP treats this as a possible shift to explore, rather than proof of widespread market adoption. Enquiries, pilot activity, issuance and live customer use are different measures and should remain distinct in business plans and supervisory submissions.

For firms, legal classification should precede a decision about the technology or route to market. Tokenisation does not determine which financial-services regime applies. Crypto-assets qualifying as financial instruments are excluded from the Markets in Crypto-Assets Regulation (**MiCAR**), as are those qualifying as deposits, including structured deposits, or securitisation positions within Article 2(4). A proposed service should therefore be assessed by reference to its underlying rights, participants and activities, with ownership, custody, transfer, settlement and failure arrangements documented for the relevant jurisdictions.

For AI, EFIF will continue exchanges on use cases and regulatory sandboxes established under the AI Act, complemented by industry and consumer or investor presentations. This is a cooperation and learning workstream. Participation does not, by itself, establish permission to scale a financial service. Firms should identify the approvals and controls needed for the intended activity, the entity accountable for the customer outcome and the technology dependencies that remain material after testing.

Credit assessment mappings and other joint work

Alongside these headline priorities, the ESAs will continue mapping assessments by external credit assessment institutions (**ECAIs**) to credit quality steps under Article 136 of the Capital Requirements Regulation (**CRR**) and Article 109a(1) of Solvency II. New registrations and existing mappings will be monitored, with draft ITS if necessary. Banks and insurers should assess an actual mapping change against their exposures and applicable capital rules; the programme does not prescribe a general capital recalibration.

Section 10 separately identifies work undertaken by the three ESAs outside the JC remit. It lists the 14th Joint Consumer Protection Day and support for ESMA's implementation of the European Single Access Point (**ESAP**), including issues linked to phases 1 and 2 and attention to phase 3. Firms should track their relevant ESAP obligations and publication processes against the governing measures; this JC entry does not establish one common submission deadline for every sector.

The earlier programme and our 2026 alert also covered bilateral margining under the European Market Infrastructure Regulation (**EMIR**), the fit-and-proper information database and supervisory independence.

Their omission from the 2027 other-joint-work table does not establish that ongoing implementation or supervisory activity has ended. The relevant ESA workstream and governing measures remain the appropriate sources for that assessment.

Further implications for firms

Drawing these workstreams together, the programme is most useful when translated into decisions about services, products and group dependencies. Financial entities with material ICT dependencies should link provider-risk communications to service owners and remediation. Identified financial conglomerates should prepare for the capital reporting consultation; product manufacturers and distributors should maintain flexible disclosure-change capacity; and securitisation participants should assess the data and information rights needed for template reform. The priorities below should be calibrated to each firm's activities and legal perimeter.

- **Reconcile the evidence for material dependencies.** Select the providers and services most important to the business and compare the register, contract, incident record, recovery assumptions and remediation status. Identify which entity owns each action and how a relevant provider oversight finding would reach that owner.
- **Separate current duties from conditional change.** Maintain a delivery register distinguishing existing legal requirements, supervisory requests, consultation opportunities and possible reforms. For PRIIPs, SFDR, DORA review work and securitisation, identify the event that would authorise a system or documentation change, together with the capacity needed to deliver it.
- **Prepare a group reporting reconciliation.** Where FICOD applies, establish ownership of the capital adequacy consultation and document the relationship between entity data, consolidation adjustments and the group calculation. Use the work to resolve existing inconsistencies rather than wait for a final template.
- **Test cross border financing and investment assumptions.** For relevant securitisation activity, record the applicable EU requirements, the information relied upon and dependencies on third-country counterparties or regimes. Assess the commercial effect of a reporting or financing change before committing to an assumed reform timetable.
- **Put the legal service model around innovation.** For an AI or tokenisation proposal, identify the customer service, legal classification, responsible entity, approvals, contractual chain and failure arrangements. A pilot should leave an evidence trail that can support a scaling decision, including unresolved issues and conditions for proceeding.
- **Use joint risk analysis in management challenge.** Revisit the group's shared exposures and operational dependencies when the risk updates are published. Test whether proposed management actions remain feasible if several entities or providers are stressed at once.

Milestones for 2027 planning

Timing in the AWP	Planned output	How firms should use it
Q1 2027	Conglomerate capital adequacy reporting consultation.	Allocate consultation ownership; prepare data and perimeter reconciliation.
Q1 or Q2 2027 expected	Securitisation implementation assumption in the programme.	Scenario-plan; confirm dates in final legal measures before implementation.
During 2027	CTPP oversight, follow-up, incident analysis and EU-SCICF testing.	Monitor relevant findings; test dependencies and escalation arrangements.
Twice yearly	Joint risk updates.	Refresh management challenge on shared exposures and risk channels.
By end 2027	Finalisation of conglomerate capital reporting technical standard.	Assess the final draft, adoption process and eventual application timetable.
Deadline may be in 2028	PRIIPs KID RTS, subject to the RIS legislative process.	Maintain flexible disclosure change plans and current controls.
2027 preparation; statutory report due by 21 December 2028	Data collection preparation for the Joint Committee securitisation-bond market report.	Identify relevant issuance, asset and sustainability information; monitor data collection arrangements.

The table distinguishes 2027 programme targets and planning assumptions from the statutory deadline for the later green-bond securitisation report. None of these entries establishes a new common firm-level compliance deadline.

Outlook

Taken together, the 2027 programme preserves the JC's broad agenda while making several delivery and follow-up processes more concrete. For financial entities, Article 42 DORA provides an existing legal route from provider recommendations into customer risk management. For identified conglomerates, the Q1 consultation creates an opportunity to influence reporting design while resolving their own data and calculation questions.

Product and securitisation teams should preserve the distinction between current controls and conditional reforms. Reliable source data, clear information rights and staged implementation plans will support a later change without committing firms to an assumed legislative outcome.

For boards, the immediate task is to assign owners and resources to the workstreams material to the business. The practical benefit of the joint programme is a clearer basis for deciding which dependencies require remediation, which data require reconciliation and which reform milestones warrant a funded change project.



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 multiple thousands of 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 in 2025".

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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