



EU RegCORE Client Alert

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The SRB's 2027 requests and continuing resolution readiness

QuickTake

On 7 October 2026, the Single Resolution Board (**SRB**) published its consultations and requests to the banking industry for 2027.¹ The publication is a bank-facing schedule combining resolution-planning and contribution-related requests, rather than its Annual Work Programme or an amendment to the binding resolution framework. It is expressly informational and creates no new requirements or obligations.

From 2027, specified bank-specific deliverables will follow a conditional three-year submission cycle where no material resolvability concerns exist. Separately, the SRB has discontinued, with immediate effect, the

¹ See SRB announcement of 7 October 2026 available [here](#) and SRB, Upcoming Consultations and Requests to the Industry for 2027 available [here](#).

quarterly sign-off form on the eligibility of liabilities reported towards the minimum requirement for own funds and eligible liabilities (**MREL**). Continuing regulatory returns, substantive eligibility requirements and individual information requests remain relevant.

Our reading is that the SRB is reducing repetitive resubmission where capabilities are satisfactory, while continuing to use assessment and testing to identify matters requiring closer attention. Banks should reconcile their own instructions and continuing duties before adjusting submission workflows. The practical benefit depends on reliable evidence of resolvability, rather than simply on producing fewer documents.

Main developments

1. Scope and the conditional submission cycle

The schedule separates public consultations and industry engagements in Table 1, continuing horizontal requests in Table 2.1, potential bank-specific deliverables in Table 2.2, and administrative and Single Resolution Fund contributions in Table 3. It excludes additional requests made on behalf of national resolution authorities and confidential individual exchanges, including right-to-be-heard processes. For Table 2.2 deliverables, priority letters identify applicable submissions and timing. Banks should read those letters alongside statutory reporting, applicable decisions, subsequent SRB or Internal Resolution Team (**IRT**) instructions and separate national resolution authority requests.

Where the resolvability heatmap identifies no material issues or only limited enhancements, the IRT will explicitly identify the year in which an update is required. Current materials that remain fit for purpose may instead be reconfirmed when due. Assigned bank-specific requests otherwise have a default deadline of 31 December 2027 unless a different date is specified. A scope label such as “All” does not itself establish entitlement to the new cycle. Relevant materials include governance evidence, bail-in playbooks and data tests, liquidity and collateral analyses, operational continuity, information systems, valuation, communications, transfer, solvent wind-down and business-reorganisation documents.

Over the medium term, assuming legal stability, the SRB estimates that consistently satisfactory banks could see annual requests for affected bank-specific deliverables reduced by up to one-third against the current baseline. This is the SRB’s conditional estimate, rather than a compounded annual reduction or quantified saving in total resolution-related compliance expenditure.

Table 2.2 also contains the Additional Liability Report (**ALR**), whose row continues to describe annual submissions, principally for groups using a multiple-point-of-entry resolution strategy. Its placement under the conditional three-year-cycle heading should not alone be treated as evidence that annual reporting has ceased. Relevant banks should confirm the report’s applicable timing through their priority letters and IRT instructions.

2. MREL and the surviving eligibility processes

The discontinued quarterly form was a particular management-level assurance accompanying eligibility reporting. Its withdrawal should be distinguished from the European Banking Authority (**EBA**) MREL and total loss-absorbing capacity (**TLAC**) reporting framework, the SRB’s additional quarterly monitoring, applicable disclosure requirements and the bank’s underlying eligibility controls. Documented procedures, supporting instrument analysis and relevant maturity, deduction and monitoring checks remain part of an effective

control framework. The announcement does not create a universal requirement for fresh legal opinions or new instrument documentation.²

Table 2.2 separately retains an issuance-specific eligibility self-assessment for samples periodically identified by the SRB. That review remains distinct from the withdrawn quarterly form; it does not imply a submission outside the sample communicated by the authority. The bank retains primary responsibility for eligibility, and SRB review does not constitute advance approval. Banks should therefore identify the precise discontinued workflow and record how their continuing reporting and assurance processes address the relevant control objectives.

3. Continuing deadlines and the existing testing framework

The 2027 announcement reinforces an existing strategy. The SRB published its operational testing guidance in September 2025, and its July 2026 resolvability assessment already identified multi-annual testing programmes (**MATPs**) for 2026–2028. Testing informs resolution-authority requests alongside assessment outcomes, on-site inspections and evolving resolution priorities; it is not the sole determinant of engagement.³

The following continuing requests sit outside the conditional Table 2.2 submission cycle. “Resolution groups” may include individual subsidiary reporting where instructed; the resolution-planning reporting row has a separate scope.

Deliverable	Submission deadline	Reference period and scope
EBA MREL/TLAC return and SRB quarterly monitoring	18 February, 19 May, 18 August and 18 November 2027	Respectively Q4 2026 and Q1–Q3 2027; resolution groups.
Resolvability work programme	1 February 2027	Annual and endorsed by the management body; resolution groups.
Funding plan	31 December 2027	At least annual; resolution groups.
Resolution-planning reports RESOL1 and RESOL2	31 March and 30 April 2027 respectively	Previous year-end reference date; all banks under SRB remit, subject to the applicable reporting rules.
Testing outcome reports	Bank-specific MATP deadlines	One report for each test; several reports may arise during a year.
Next biennial resolvability self-assessment	31 January 2028	Assessment as at 31 December 2027; resolution groups.

Three timelines should remain distinct: the conditional three-year cycle for specified submissions; each bank’s three-year testing programme, reviewed annually; and the biennial self-assessment. Less frequent resubmission does not determine how often a capability must be maintained or tested.

Depending on its strategy, a bank should be able to distinguish liabilities within the scope of bail-in, applicable exclusions and instruments counted towards MREL, and demonstrate the data, governance decisions and operational interfaces needed for execution. Current entity mappings, service inventories and instrument records can support several capabilities simultaneously. Inconsistencies can therefore affect valuation, continuity of services, financial-market-infrastructure access, liquidity analysis and crisis

² See Commission Implementing Regulation (EU) 2021/763, as amended available [here](#) and SRB, MREL Policy (May 2024) available [here](#). The specific quarterly sign-off process described in para 109 has been superseded by the SRB’s 7 October 2026 announcement; the underlying eligibility and documentation processes must be distinguished from that withdrawn form.

³ SRB, Operational guidance on resolvability testing for banks available [here](#) and “SRB focuses its resolvability assessment on operational readiness and testing” available [here](#). The latter identifies multi-annual testing programmes for 2026–2028.

communications. This is an operational implication of the framework, rather than a new duty created by the announcement.

4. Policy engagement and communication planning

The SRB schedules an open, voluntary Q2 2027 engagement on an MREL policy update implementing crisis management and deposit insurance (**CMDI**) legislative changes and other clarifications. The CMDI amendments have already been adopted, while their principal substantive application dates fall in May 2028, with earlier and later exceptions. Banks should distinguish those legislative timelines from the prospective content of SRB policy and continue applying requirements already applicable. The consultation is an opportunity to raise execution and proportionality issues; it does not itself make future policy operative.

A separate voluntary Q2 2027 workshop will address the operational guidance on bail-in playbooks, aligning the June 2022 version with subsequent publications. Banks can use that engagement to identify inconsistencies between playbooks, instrument terms, governing-law analyses, applicable recognition clauses, governance decisions, central securities depository or custodian interfaces and communications arrangements. The workshop itself changes neither binding law nor the terms of outstanding instruments.

The communication guidance and testing supplement published on 17 September 2026 provide separate operational context. The schedule published on 7 October 2026 identifies communication-plan updating and submission by April 2028. The guidance expects banks within scope to meet its full expectations by 30 April 2028, subject to specific transitional arrangements; it does not specify that date as a universal submission deadline. Subsequent plan updates and operational maintenance should reflect material changes and relevant deficiencies. These guidance expectations must remain distinct from underlying statutory duties and individual binding measures.

5. SRF contributions and continuing data duties

A new Single Resolution Fund (**SRF**) contribution levy in 2027 remains conditional. Annual data reporting and corrections to previously submitted data continue independently of that decision, with corrections required without undue delay. Table 3 lists collection from 1 November 2026 to 1 February 2027 and a correction-related window ending on 15 January 2027. These cycle-specific dates do not permit a bank to postpone correcting a known error.

The SRB envisages target-level verification in February 2027 and, in principle, consultation in the first half of March on preliminary contribution amounts if contributions are collected, and on settlements from restated data where applicable. Administrative contributions have separate consultation windows: January–February for advance instalments and June–July for annual contributions. A data request should therefore be tracked separately from a decision to levy new contributions.

Practical considerations for firms

We recommend one register linking each relevant entity or resolution group to the legal or policy basis, applicable instruction, scope, reference period, submission date, responsible owner, current evidence version and material-change trigger. This is a management tool, rather than a new SRB obligation. It should support four decisions:

1. **Confirm the submission perimeter.** Reconcile mandatory returns, assigned bank-specific deliverables, later instructions and separate national requests; distinguish voluntary consultations from required submissions.
2. **Retire the precise withdrawn form.** Preserve continuing MREL reporting, eligibility analysis and sampled issuance assessments, and document any changes to assurance responsibilities.
3. **Maintain executable capabilities.** Assign document and data owners, update triggers, version histories, tested assumptions and escalation procedures to the resolution-planning function.
4. **Prioritise remediation.** Use testing findings and material changes to identify contractual, data or service-access gaps requiring action before the next submission date.

Contractual and policy documentation considerations

Legal teams should support the resolution-planning function by assessing whether instrument terms, applicable bail-in and stay-recognition clauses, intra-group service arrangements, outsourcing access and exit rights, and custody or clearing relationships support the assumed execution steps. Treasury, finance, operations and technology should work from a shared evidence base. Reviews should follow the actual resolution strategy and documented gaps; the schedule does not require universal repapering.

For example, changing an intra-group service provider may require the playbook's contractual assumptions and access arrangements to be reassessed before its next scheduled submission. A formally current document can otherwise describe rights or interfaces that no longer support execution. This is an illustrative risk, not an SRB finding about any particular institution.

Internal policies should align the resolution-planning framework, MREL monitoring, testing methodology, communications arrangements and data governance with the same material-change controls and remediation records. The practical objective is traceable evidence that supports the bank's representations to the resolution authority.

Outlook

The 2027 schedule offers conditional relief from repetitive submissions within the SRB's established assessment and testing framework. Its value depends on reconciling each deliverable's actual instructions and maintaining the capability it evidences. Banks can redirect effort towards gaps in execution, but should measure any savings against their own reporting perimeter and continuing controls. For legal and resolution-planning teams, the immediate task is to turn the published schedule into an accurate register of decisions, owners and next actions.



About us

PwC Legal supports financial services firms with resolution planning, MREL eligibility and instrument documentation, contractual continuity and regulatory change implementation through multidisciplinary teams across jurisdictions.

Rule Scanner supports horizon scanning and risk mapping across monitored legislative, regulatory and enforcement sources. Related documentation solutions support policy inventories, document hierarchies, version control and the identification of potential consequential updates, subject to legal and operational review.

The team received ALM Law.com's Disruptive Technology of the Year award in 2024 and the Regulatory, Governance and Compliance Technology award in the Private Practice category in 2025.

To discuss these developments or their implications for your business, please contact Dr. Michael Huertas or the EU RegCORE Team via de_regcore@pwc.com.



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