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EBA Work Programme 2027

November 2026



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Executive Summary

- The EBA's **Work Programme 2027** sets out the EBA's priorities, activities, deliverables and resource allocation for 2027. The programme marks a gradual evolution of the EBA in **three complementary directions**. First, the Authority aims to become a **next-generation regulator**, characterised by more modern, data-driven and forward-looking approaches. Second, it is developing its role as a **supervisor at new frontiers**, particularly where digital innovation creates new operational dependencies. Third, it intends to expand its role as a **service provider to the supervisory and resolution community**, supplying data, analytical tools, coordination mechanisms and capacity-building.

- The three cross-cutting drivers provide the conceptual framework for the programme. **Resilience** concerns the stability of the European financial system against macroeconomic, geopolitical, cyber, technological, environmental and consumer-related risks. **Efficiency** concerns simplification of rules and processes, proportionality, integrated reporting, data sharing and better coordination. **Transformation** captures technological developments in financial services and supervision, together with the new responsibilities arising from those developments.

- The programme is also closely linked to the Commission's banking competitiveness agenda and to the recommendations of the EBA's **Task Force on Efficiency (TFE)**. Simplification is therefore not treated as an isolated initiative but incorporated across regulatory development, reporting, stress testing, governance and supervisory convergence.

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At a Glance

01	2027 Priorities and Areas of Focus	4
02	Supervisory Convergence and Enforcement	8
03	Risk and Financial Stability Analysis	11
04	Oversight and Supervision	14
05	Data and Integrated Reporting	16
06	Conclusions & Take-aways	18

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01

2027 Priorities and Areas of Focus

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2027 Priorities and Areas of Focus 1/3

Policy Development

Policy development remains a substantial component of the EBA's activities, although the Authority signals a gradual rebalancing towards implementation and supervisory convergence. The main objective is to maintain an effective, proportionate and increasingly simple **Single Rulebook**.



Banking competitiveness and simplification

- A major external driver is the European Commission's July 2026 communication on the competitiveness of the EU banking sector, with a legislative proposal expected in the first quarter of 2027. The Commission's report contains **38 proposals organised around four themes**.
  According to the EBA, almost 80% of these proposals relate to work already underway or planned by the Authority. Twenty-one measures correspond directly to recommendations of the EBA Task Force on Efficiency, while another eleven relate to previous EBA analytical or policy work.
- **Proportionality** will receive particular attention. The EBA's Advisory Committee on Proportionality has recommended that proportionality considerations be articulated more systematically throughout reports, guidelines, technical standards, impact assessments and consultation documents. The ACP also advocates considering dimensions of proportionality beyond institution size.



Completion of the 2024 banking package

- The EBA expects to complete the bulk of its work implementing the **2024 banking package** during 2027. Most previous mandates have been delivered according to the roadmap, although some adjustments have resulted from developments such as the delayed implementation of the Fundamental Review of the Trading Book.
- **Credit risk** will be a particularly important area. Work will include completing the RTS on the methodology for assessing compliance with IRB requirements, guidelines concerning permanent partial use and reviewing existing ECAI mappings. The EBA will also follow up its work on simplifying the credit-risk framework.

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2027 Priorities and Areas of Focus 2/3

Policy Development



Completion of the 2024 banking package

- Additional work includes an assessment of whether CRR prudential requirements affect financing of agricultural activities and the transition towards more sustainable farming, as well as a separate assessment of the functioning of the **IRB shortfall**.
- For **own funds** and **eligible liabilities**, the EBA intends to revise the relevant RTS to make the prior-permission framework for reducing own funds and eligible liabilities more efficient.
- The Authority will also examine the expanding role of **non-bank financial institutions** in financing the real economy and the potential financial-stability implications arising from stronger interconnections between banks and non-banks.
- Internal governance work includes completion of joint guidelines on suitability assessments, while seeking a proportionate and streamlined approach. The EBA will additionally continue the overhaul of the **Interactive Single Rulebook**, with the objective of improving accessibility, completeness and usability.



Payments

- The revised Payment Services Directive and Regulation — **PSD3/PSR** — are expected to create approximately 18 EBA mandates. Assuming adoption at the end of 2026, the EBA expects in 2027 to deliver a **first batch of five mandates** and consultation papers covering another four.
- Areas expected to be addressed include safeguarding, own-funds calculations, limited-network and commercial-agent exclusions, and strong customer authentication. The overall objective is to contribute to a more **integrated EU payments market** with greater **transaction security** and more **innovative payment solutions**.



Crisis management and deposit insurance

- Implementation of the **Crisis Management and Deposit Insurance (CMDI)** reform will generate significant work.
- On **resolution**, the EBA will address early-intervention measures, MREL requirements and the role of deposit guarantee schemes in resolution. It will also monitor resolvability assessments, retail-investor protection and implementation of resolution tools and powers.

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2027 Priorities and Areas of Focus 3/3

Policy Development



Crisis management and deposit insurance

- Under the revised **Deposit Guarantee Schemes Directive**, the first package of deliverables includes technical standards concerning client funds, harmonised depositor information sheets, information exchanges between national DGSs in bank-failure situations and guidelines governing DGS investment policies.
  A subsequent group will address available financial means and fund targets, cross-border cooperation and conditions for lifting the cap on DGS contributions to resolution.



Savings and Investments Union and securitization

- The EBA expects further responsibilities following completion of the securitisation legislative review. Potential mandates include **revisions of disclosure templates**, **risk-retention requirements** and **supervisory-convergence measures**.
- Beyond these legislative mandates, the Authority will continue addressing interpretative aspects of the securitisation framework and securitisation-related ECAI mappings.

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02

Supervisory Convergence and Enforcement

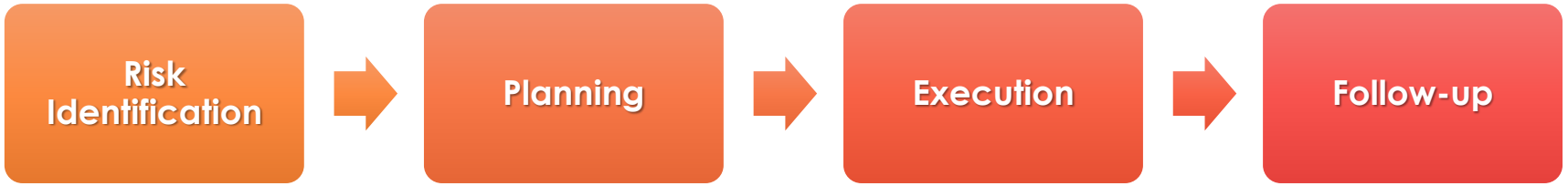
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Supervisory Convergence and Enforcement 1/2

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One of the most significant strategic developments is the EBA's move towards a **new supervisory convergence framework**.
The Authority describes this as a rebalancing from developing ex-ante requirements towards assessing ex-post implementation.

*The new framework establishes a **four-stage supervisory convergence cycle**:*



*It is intended to be increasingly **risk-based, data-driven and outcome-oriented**.*
Structured evidence gathering from internal and external sources and stakeholders will help identify and prioritise areas where supervisory differences have the greatest potential impact.

The EBA will deploy different convergence tools according to the issue concerned:



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Supervisory Convergence and Enforcement 2/2

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SREP and Pillar 2

- Implementation of the revised SREP Guidelines will receive substantial attention. The EBA intends to assess consistency in supervisory approaches to **Pillar 2 Requirements (P2R)** and **Pillar 2 Guidance (P2G)**, including application of the output floor and communication of SREP outcomes to institutions.
- **Proportionality** is another central issue. The Authority intends to examine how proportionality actually affects the scope, depth and intensity of supervisory assessments rather than treating it merely as a formal principle.
- The EBA will also monitor IRRBB practices, including modelling assumptions and areas where adherence to existing requirements remains weaker. Liquidity supervision will cover implementation of the **LCR and NSFR**, including emerging developments such as deposits sourced through online deposit brokers.

AI, DLT and changing financial value chains

- Technological capacity is becoming an important supervisory-convergence issue. The EBA will continue work supporting implementation of the **AI Act** in banking and payments, in cooperation with the European Commission, its AI Office and the other ESAs. Particular attention will be paid to general-purpose AI and to dependencies created when banks and payment institutions obtain AI systems from external suppliers. A thematic report on third-party AI providers is expected during 2027.
- The EBA will also analyse tokenised investment products offered by EU banks and monitor the use of asset-referenced tokens and e-money tokens in centralised and decentralised applications.
- An especially forward-looking area is the proposed analysis of **Agentic AI in payments**, including potential implications for strong customer authentication under PSD3/PSR. Embedded finance and the distribution of credit through platforms will also be analysed.

Consumer protection

- Consumer-protection work focuses particularly on **over-indebtedness, de-risking and technological innovation**.
- Following risks identified in its Consumer Trends work, the EBA intends to assess lenders' compliance with creditworthiness-assessment requirements under the revised Consumer Credit Directive. Together with **AMLA**, it will develop Guidelines on de-risking.
- The Authority will also continue examining supervision of **retail banking products** offered cross-border and the implications for consumers of **accessing financial products through digital interfaces**, embedded finance and AI-enabled services.

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03

Risk and Financial Stability Analysis

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Risk and Financial Stability Analysis 1/2

The EBA will maintain and expand its capacity to identify risks and vulnerabilities and evaluate the resilience of individual institutions and the EU banking sector.

EU-wide stress test

- A central deliverable is the **2027 EU-wide stress test**, with results expected around summer/Q3.
- The EBA has significantly simplified the exercise: the number of requested data points has been reduced by approximately **55% compared with the 2025 stress test**. The reduction is intended to align stress-testing data more closely with ordinary supervisory reporting while maintaining or increasing risk sensitivity.
- The 2027 exercise will contain an additional **climate-risk module**, covering transition risk and physical risk associated with river flooding. The Authority intends to consider further integration of climate risks in subsequent exercises.
- The EBA also intends to source more starting-point information directly from ordinary supervisory reporting. This should reduce duplication and enable authorities to perform additional desktop stress and sensitivity analyses.

Crisis simulations

- CMDI gives the EBA a new responsibility to coordinate **EU-wide crisis simulation exercises**. During 2027, the Authority will develop the methodology and organisational structures for these exercises, map market structures and interconnections, identify relevant vulnerabilities and develop a multiannual exercise cycle.
- The work is preparatory: the **first exercise is planned for 2028**.
- The simulations are intended to test cooperation between supervisory and resolution authorities during deterioration in institutions' financial conditions and to assess the functioning of recovery and resolution frameworks in an integrated manner.

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Risk and Financial Stability Analysis 2/2

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Risk Monitoring

- **Geopolitical risks** will remain central to the EBA's risk analysis. Their potential transmission through credit, market, liquidity, profitability and operational-risk channels will be monitored.
- **Credit risks** for vulnerable households and corporates remain an area of attention, alongside banks' funding and liquidity positions and relationships with market developments.
- The Authority will further develop its **Early Warning Indicator dashboard**, providing harmonised analysis of capital, leverage, resolution and liquidity headroom and incorporating scenario and sensitivity analyses.
- Interconnections between banks and **non-bank financial intermediaries**, including private credit and private equity, will receive continuing attention.

Cyber, AI and quantum computing

- The EBA intends to deepen its assessment of technological threats, including **cyber risks** associated with advanced AI, DLT and tokenisation.
- A notable emerging priority is **quantum computing**. The Authority plans to examine preparedness among banks and payment institutions, particularly identification of critical data assets and migration towards **post-quantum cryptography**.
- Major ICT incidents reported to national authorities will support the ESAs' joint assessment of the ICT threat landscape. The EBA will also contribute to operationalising the pan-European systemic cyber incident coordination framework, **EU-SCICF**.

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Oversight and Supervision

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Oversight and Supervision

The programme confirms that direct oversight and supervisory responsibilities are becoming a structural component of the EBA's role.

DORA

Under DORA, the EBA, ESMA and EIOPA will continue joint oversight of **critical ICT third-party providers (CTPPs)**. Activities include thematic deep dives and onsite inspections, particularly in high-risk areas such as cybersecurity and frontier AI; recommendations following previous examinations; and continuous information gathering and engagement with providers.

Horizontal work will include risk assessments, preparation of the 2028 oversight programme and annual updating of the CTPP list.

MiCA

Under MiCA, the EBA will conduct the annual significance assessment of **asset-referenced tokens (ARTs)** and **e-money tokens (EMTs)**. Where relevant, direct supervisory activities over significant tokens will be carried out according to the supervisory plans developed previously.

The programme anticipates deeper cooperation with EU competent authorities and third-country supervisors as crypto-asset markets develop.

EMIR

For **initial margin model validation**, the EBA will expand analytical capabilities after establishing the function during 2026. Planned work includes replicating backtesting of ISDA SIMM using reported information, developing supervisory tools and reviewing documentation concerning the ISDA SIMM model.

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Data and Integrated Reporting

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Data and Integrated Reporting

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Data constitutes a **strategic component** of both the efficiency and transformation agendas.

The EBA intends to reduce the cost of regulatory reporting through **integrated reporting, improved change-management processes, coordinated data requests and greater reuse of existing information.**

The Authority will continue developing **DPM 2.0 and DPM Studio**, working alongside EIOPA and the ECB through the DPM Alliance. A major objective is to establish the foundations of a common data dictionary.

Together with the ECB and national authorities, the EBA will continue development of an integrated reporting system encompassing **prudential, resolution and statistical reporting**. The Joint Bank Reporting Committee will work towards a common semantically integrated glossary and common data dictionary. The expected benefits include reduced duplication, harmonised definitions and greater reuse of information.

Under the **EBA Data Strategy 2026–2028**, the Authority also intends to strengthen its position as an EU banking-data hub. EUCLID will support expanding analytical and data-sharing services.

The EBA data hub, **EDAP**, will increase its coverage of publicly available regulatory data, including **Pillar 3 information** for small and non-complex institutions. Data services will also support ESRB systemic-risk analysis, MiCA supervision and the EU-wide stress test.

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06

Conclusions & Take-aways

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Conclusions & Take-aways 1/3

2027 marks a further evolution of the EBA from rule-maker towards a broader regulatory, supervisory and data-driven authority

While completion of the regulatory framework remains important, greater emphasis is being placed on supervisory convergence, implementation monitoring, direct oversight and analytical services.

Resilience, efficiency and transformation are the three cross-cutting drivers of the 2027 programme

These dimensions are intended to ensure that regulatory simplification and competitiveness develop alongside financial stability, effective supervision and consumer protection.

Simplification becomes a structural component of the EBA agenda rather than a standalone initiative

The TFE recommendations are reflected across prudential regulation, governance, reporting, stress testing, supervisory processes and the EBA's own internal organisation.

The shift from rule-making to implementation will increase the relevance of supervisory convergence

The new convergence framework introduces a risk-based and data-driven cycle covering risk identification, planning, execution and follow-up, supported by peer reviews, supervisory assessments, training and enforcement tools.

The 2027 EU-wide stress test illustrates the EBA's efficiency agenda in practice

Data requirements will be reduced by approximately **55% compared with the 2025 exercise**, while maintaining risk sensitivity and introducing an additional climate-risk module covering transition and physical risks.

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Conclusions & Take-aways 2/3

Digital and technological risks are moving into the core prudential and supervisory agenda

AI, Agentic AI, DLT, tokenisation, embedded finance, crypto-assets, cyber threats and quantum computing are addressed across policy development, supervisory convergence, risk assessment and direct oversight.

Third-party dependencies are becoming a major supervisory consideration

DORA oversight of critical ICT third-party providers will increasingly focus on cybersecurity, concentration risks and frontier AI models, alongside broader attention to digital sovereignty and dependencies on non-EU providers.

The EBA's direct supervisory footprint continues to expand

DORA oversight, supervision of significant ARTs and EMTs under MiCA and initial-margin-model validation under EMIR are becoming established components of the Authority's activities.

Data will increasingly function as shared supervisory infrastructure

Integrated reporting, EUCLID, EDAP, DPM 2.0, the common data dictionary and enhanced data-sharing arrangements are intended simultaneously to reduce reporting burdens and strengthen supervisory and financial-stability analysis.

Crisis preparedness is becoming more operational and simulation-based

During 2027, the EBA will prepare the methodology and multiannual framework for EU-wide crisis simulation exercises, with the first exercise expected in 2028, while resolution authorities will continue testing practical resolution capabilities.

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Conclusions & Take-aways 3/3

Geopolitical risk is explicitly integrated into banking supervision

Supervisory and risk-analysis activities will consider its transmission through credit, market, liquidity, profitability, operational and cyber risks, as well as through dependencies on third countries and critical service providers.

Consumer protection is increasingly connected with digital transformation

Over-indebtedness, de-risking, payment fraud, digital interfaces, embedded finance and AI-enabled financial services will be important areas of monitoring and supervisory attention.

The interaction between banks and non-bank financial institutions is gaining prominence

The EBA will continue assessing NBFI interconnections and their potential implications for banking-sector resilience and financial stability.

Proportionality is expected to become more explicit across the regulatory and supervisory lifecycle

The programme points towards greater consideration of proportionality in technical standards, guidelines, impact assessments, reporting requirements and supervisory practices, including dimensions beyond institution size.

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