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EBA SIMPLIFICATION

COREP Own Funds, template by template

Module 6 of EBA/CP/2026/07 covers COREP Own Funds. This document covers the templates of that module one by one. I produced this analysis in the spring of 2026 for a bank that only uses the standardised approach. I checked it against the source text and supported it with references to the CRR articles. A colleague submitted it as a contribution to the consultation.

THE DATES

30 September 2027	Intended first reference date under the revised ITS.
Package 4.4.1	Module 6 falls in technical package 4.4.1, phase 2. That package also holds the DORA changes, with December 2027 as their reference date. Phase 1 of package 4.4 covers Pillar 3, the FINREP templates for IFRS 18, the FRTB disclosures, resolution, MREL and AMLA (eligibility and risk assessment, from 31 December 2026).
End of 2026	The EBA delivers the final ITS to the Commission. Until the Commission adopts it, the templates may still change.

WHAT IS ADDED

New rows or columns in five templates, and for IRB in C 10.00

C 01.00	New rows for prior permissions to reduce CET1, AT1 or T2. A new CET1 row for the predetermined amount for redemptions at mutuals, cooperatives and savings banks. New rows for retained earnings not yet permitted. Row 0472 is deleted and row 0473 is added for CIUs at 1250%. Transitional rows 0220, 0240, 0520, 0660, 0680, 0730, 0880, 0900 and 0960 are deleted.
C 02.00	New row 0037 for transitional adjustments in unfloored TREA and new row 0756 for additional credit risk RWEA imposed by the supervisor. Rows 0305, 0306 and 0411 to 0416 are ungreyed. Settlement rows 0490 to 0510 remain.
C 03.00	Three new memorandum rows give the CET1, T1 and total capital ratio on a fully loaded basis, that is, without CRR transitional arrangements. The labels of rows 0330 to 0350 are clarified for the output floor.
C 04.00	New row 0895 for the fully loaded floor adjustment. New rows 0910 and 0920 ask for TREA for credit risk and counterparty credit risk separately and align with Pillar 3 OV1.
C 07.00	New row 0085 is for off-balance sheet items under Art. 111(8)(c) CRR. Those items are allocated to buckets 1 to 5 of Annex I CRR in line with EBA/RTS/2025/06. New column 0218 is for RWEA from FX mismatch under Art. 123a CRR. For column 0220 only the instruction is extended with that FX mismatch factor.
C 10.00	New column 0130 for IRB RWEA, aligning with Pillar 3 CMS2.

WHAT IS DROPPED

C 05.01 and C 05.02	Deleted and fully replaced by C 05.03.
C 11.00	Settlement and delivery risk is dropped as a template. Settlement RWEA remains only in C 02.00.

In my reading C 07.00 needs the most work. The new row and the new column both need data from the source. The other changes are new rows on existing sources.

NEW TEMPLATES

C 05.03	Reports the aggregate and individual impact of the CRR3 transitional arrangements on RWEA. The standardised RWEA columns apply only to institutions subject to the output floor.
C 09.05	Geographical breakdown for the credit risk starting data of the EU-wide stress test. Only for IRB banks above EUR 30 billion, annually. The ad hoc templates remain for the projections.

A BANK ON THE STANDARDISED APPROACH ONLY

What remains without IRB, output floor, securitisations or transitional arrangements

For an institution without internal models, only a limited part of the package applies. Such an institution has no output floor and no securitisation positions and applies no CRR3 transitional arrangement at all.

- Five templates remain, namely C 01.00, C 02.00, C 03.00, C 07.00 and C 09.01. C 04.00 and C 09.04 need confirming with the supervisor.
- C 05.03 does not apply, because the transitional arrangements it monitors are all IRB or floor driven. Establishing that needs the full list of CRR3 transitional arrangements. The subset in C 05.03 is too narrow for that.
- The IRB, output floor, securitisation and stress test templates do not apply. They are C 08.01, C 08.02, C 09.02, C 09.05, C 10.00, C 13.01 and C 14.01. Nothing has to be built for any of them.
- The three new fully loaded memorandum rows in C 03.00 equal the regular rows, because there are no transitional arrangements. For such an institution they add no new information.

In my reading, much of the work at such an institution lies in showing why a template does not apply. That evidence has to be checked again every quarter.

FRTB AND MODULE 5

Market risk outside COREP Own Funds

Module 5 covers FRTB and the rest of market risk. It also covers prudent valuation, counterparty credit risk and CVA. That module has its own consultation submission and its own timeline.

In Module 5 the consultation confirms the template codes for the alternative standardised approach. C 91.01 is the summary and C 92.01 to C 94.03 give the detail. C 96.01.2 and C 96.05.2 are dropped. C 25.01 (CVA) gets small corrections. The revised rules on the boundary between the trading and non-trading book and on structural foreign exchange positions already apply from 1 January 2027, nine months ahead of the rest of the package.

On 3 August 2026, in EBA/Op/2026/08, the EBA asked competent authorities not to prioritise enforcement of the FRTB boundary framework until 31 December 2029 at the latest. It also covers the reporting on the composition of the trading book and on reclassifications (Implementing Regulation (EU) 2024/3117). Institutions applying the multiplier under Article 495v stay on the CRR2 boundary. Structural foreign exchange positions are not covered by the no-action letter.

WHAT IS NOT SETTLED YET

RTS 2025/06	Row 0085 in C 07.00 is based on the bucket classification in Annex I. The EBA delivered the final draft in August 2025. As at September 2026 it has not been adopted by the Commission and not published in the Official Journal. The build can already start from the final draft. The bucket classification is fixed once the Commission has adopted the RTS.
The threshold in C 09.01	The consultation asked about the materiality threshold for the geographical breakdown. The threshold is not yet in the template. The outcome follows with the final ITS.
The scope of C 04.00	The draft instructions for rows 0910 and 0920 carry no output floor condition, unlike those for rows 0890 and 0895. Unless the final ITS narrows them, rows 0910 and 0920 then apply to all institutions.