DIGITAL REPORTING IN EUROPE
(EUROFILING & XBRL EUROPE CONFERENCE
04 JUNE 2025
ECB, FRANKFURT, GERMANY

SRB DATA COLLECTIONS

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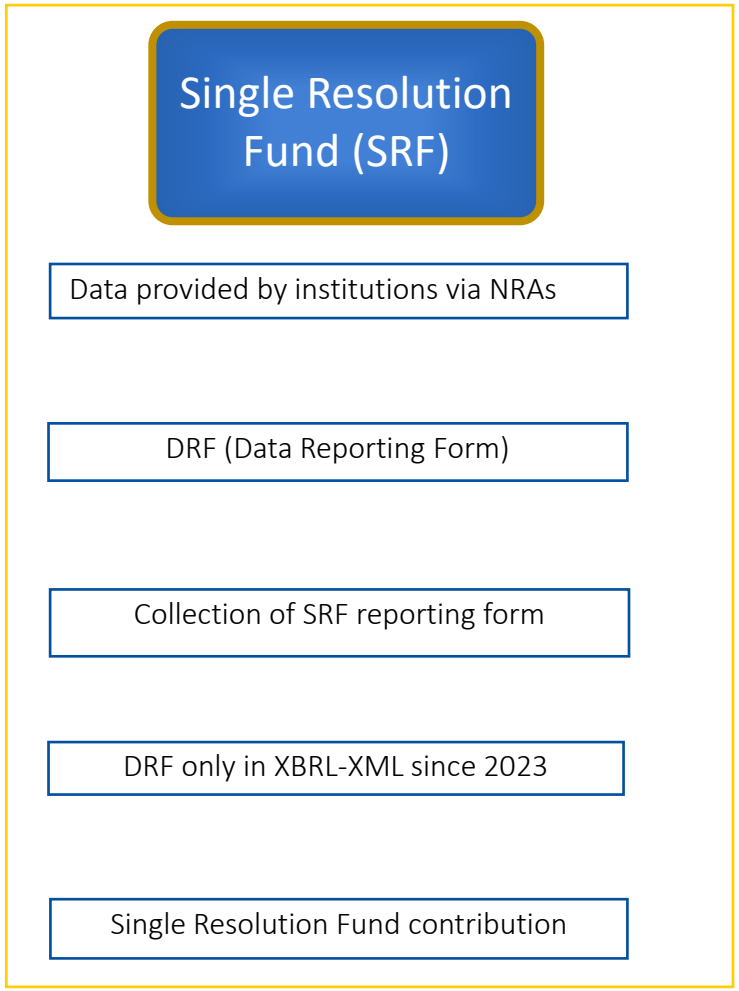
1	Single Resolution Fund Data Collection

SRF data collection



- The SRF at 31 December 2024 represented EUR 80 billion and therefore reached the target level of at least 1% of covered deposits held in the Member States participating in the SRM (the required target was EUR 75 billion). More information could be found under the dedicated SRB press release website.
- No regular annual contributions will be collected in 2025 from the institutions falling in scope of the SRF, and contributions would only be collected in the event of specific circumstances or resolution actions involving the use of the SRF.
- Under normal circumstances, the target level verification exercise will be performed each year to confirm that the available financial means at the SRF are at least 1% of the amount of covered deposits of all credit institutions authorised in the Participating Member States. If the result of such exercise should prescribe so, the SRB will restart the regular collection of contributions to SRF. The industry will be informed accordingly.
- For the above mentioned reason, the data will be collected in 2026 (even if the SRF is not used) to perform the target level verification exercise. Therefore, the taxonomy for the 2026 cycle will be ready by July 2025.
- For SRF Data collection we will continue to collect the data in XBRL-XML (i.e. no adaptation to XBRL-CSV at the moment) with the current glossary.

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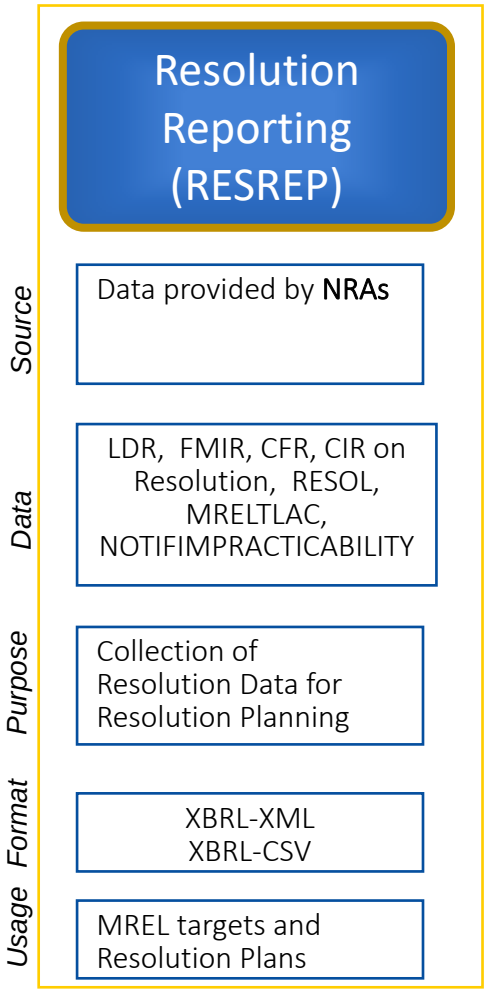
2	Resolution Reporting Data Collection and XBRL-CSV adoption approach

Resolution Reporting data collection



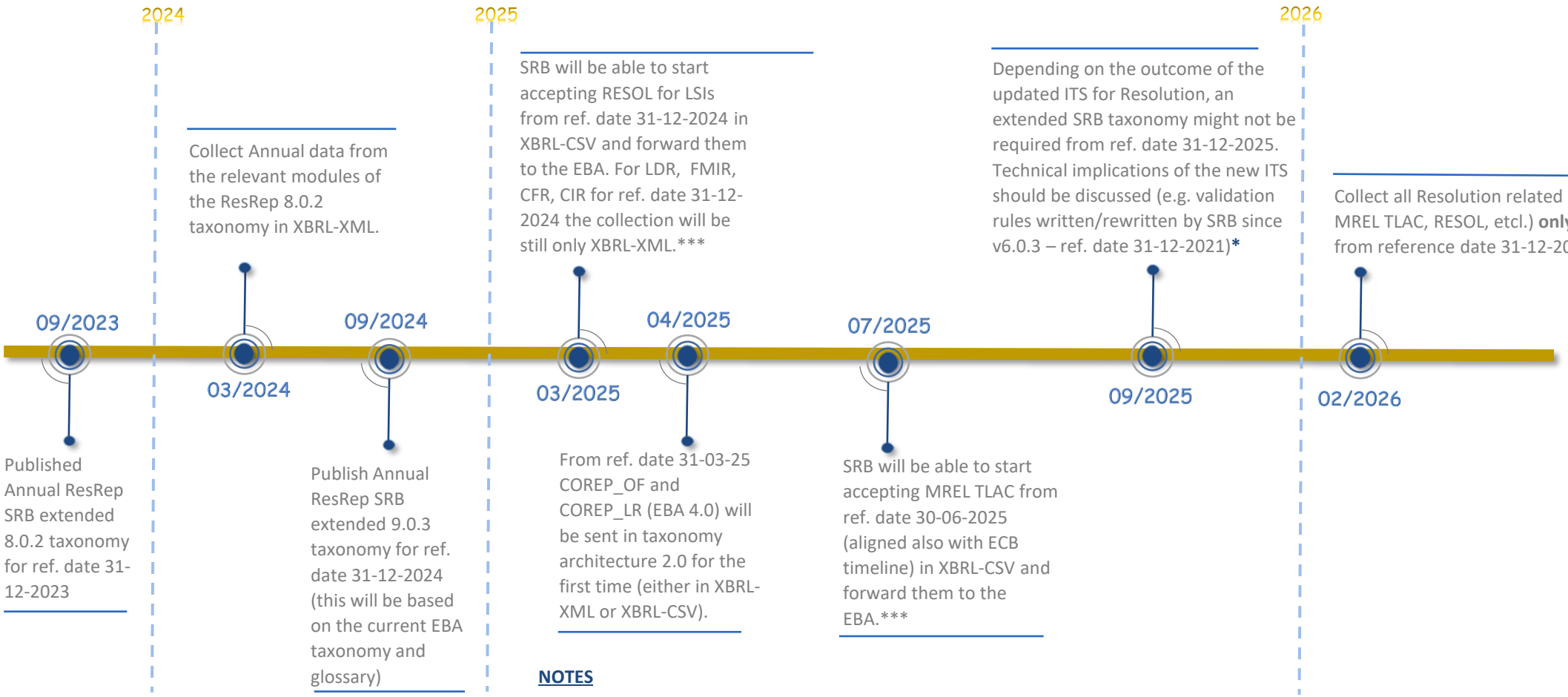
Current Resolution Reporting summary

	MREL TLAC reporting & disclosures	Art 55 Notifications	Resolution Reporting 2025 (EBA RESOL & SRB Extended taxonomy)
Format	Exclusively in XBRL	Exclusively in XBRL	Exclusively in XBRL
Frequency	Quarterly	Monthly	Annually
Sequential Reporting	Yes	No	Yes
Reporting Framework	EBA 3.5 from ref. date 30-09-2024	EBA 3.2 for reference date 31-12-2021 onwards	**SIs**: EBA 3.2 for RESOL + SRB extension RES 9.0.3 **LSIs**: EBA 3.2 for RESOL
Guidance	Commission Implementing Regulation 2021/763	Draft EBA RTS/ITS	Commission Implementing Regulation 2018/1624

Current MREL Decisions

	MREL Decisions (Reported by the SRB for banks under its remit)
Format	XBRL (to the EBA)
Frequency	Annually EBA deadline : 31/05/2024 for RPC
Sequential Reporting	No
Reporting Framework	EBA 3.2
Guidance	Commission Implementing Regulation 2021/622

XBRL-CSV Adoption at the SRB - Timeline



NOTES

* The changes under the proposed updated ITS on resolution planning will be covered in EBA taxonomy version 4.2 (Tentative Timeline communicated by the EBA. Taxonomy should be available in March 2025).

** Only re-submissions from ref. date 30-11-2025 for NOTIFIMPRACTICABILITY or/and ref. date 30-09-2025 for MREL TLAC or/and from ref. date 31-12-2024 for the annual modules (e.g. RESOL, LDR, etc.) will be accepted in XBRL-XML.

*** This is on voluntarily basis. Our systems will be capable of accepting the XBRL-CSV format for the specific reference dates and periods mentioned above, but there is no obligation for NRAs to send us the data in this format already as of this date. The reporting in this format only becomes mandatory from reference date 31-12-2025.

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New Resolution ITS from ref. date 31-12-2025 (2026 cycle)

- A new ITS for Resolution will be in effect from ref. date 31-12-2025. The aim of the new ITS for Resolution is to merge the SRB's ResRep extended taxonomy and EBA's RESOL as part of the EBA 4.2 Reporting Framework.

- SRB currently collaborates with EBA in order to work on the following tasks together:
  - Done actions
    - SRB co-drafted the new ITS for Resolution in collaboration with EBA and key NRAs. The final draft ITS on resolution planning was sent to the European Commission on 08 May 2025 and published on the EBA ITS webpage
  - Current actions
    - As part of the EBA 4.2 Technical package related to RESOL module(s), SRB reviewed all the current SRB and EBA validation rules related to the data points in the current Z and T templates, aligned them with DPM 2.0 and then mapped them with the new data points as described in the new Z templates.
    - Supporting EBA on reviewing and updating the current Template Categorization and Reporting Obligations for the new RESOL 4.2 modules.
  - Future actions
    - Review the existing Master Data and Master Data rules related to the annual Resolution Reporting

XBRL-CSV - Multiple facts per row assessment

- Following a technical meeting with the EBA (end of February 2025) and based on our discussions and the constructive exchange of views , the conclusion is that we are unable to proceed at this stage with the adoption of the updated RESOL module (EBA 4.2 Reporting Framework) using the XBRL-CSV format with multiple facts per row.

- Therefore, the updated RESOL module(s) for ref. date 31-12-2025 will be submitted in the established XBRL-CSV format, with one fact per row, as defined by the EBA.

- All parties recognised some of the advantages that the XBRL-CSV format with multiple facts per row could bring, particularly for addressing open tables and table constraints. However, the EBA believes that table constraints could be managed within the existing one fact per row structure. Nonetheless, the potential benefits for open tables remain an area worth exploring further in the future.

- Table Constraints link: https://www.xbrl.org/Specification/table-constraints/PWD-2024-05-21/table-constraints-PWD-2024-05-21.html

Ensuring fact integrity in XBRL-CSV: Aligning CSV and JSON file

(presented also in a joint SRB/EBA presentation during the EBA IT Technical Group on 12 March 2025)

Key issue

- When Key dimension is reported with an empty value in the csv file, the key dimension is completely omitted by XBRL-CSV processor when validating this fact.

- Because of the above, when a datapoint is reported in the csv with empty key dimension value, no errors are raised by XBRL-CSV processor, and this data point is rendered into another template under another data point (which has the same context as the data point reported but without key dimension). See COREP example in next slide.

- Validator & Processing Differences: Depending on whether the data is processed using an OIM-compliant engine or a custom parser, the final output may differ, leading to inconsistencies.

- The issue was identified during SRB's general assessment of XBRL-CSV, where tests were conducted across multiple modules, including COREP. However, the concern extends beyond COREP, highlighting broader challenges across various regulatory frameworks.

Example Case: COREP (But Not Limited to COREP)

- A fact in c_10.02.csv is reported with empty key dimension, since C_10.01 uses a subset of C_10.02's dimensions, XBRL-CSV processor valid this fact, and rendered it into table C_10.02 under another data point without that key dimension.

== c_10.02.csv ==

c_10.02.csv

```
1  datapoint,factValue,OGR
2  dp109078,54462,
3
```

- OGR is left empty in the csv file, in the OIM, the validator treated this fact omitting completely the key dimension OGR

```
<xbrldi:explicitMember dimension="eba_dim: APR ">eba_AP:x27</xbrldi:explicitMember>
```

and not treated this fact with the key dimension having the empty value

```
<xbrldi:explicitMember dimension="eba_dim: APR ">eba_AP:x27</xbrldi:explicitMember>
   <xbrldi:typedMember dimension="eba_dim:OGR">
    <eba_typ:ID></eba_typ:ID>
  </xbrldi:typedMember>
```

Important Note:
The XBRL-CSV test case, used by the SRB, is an artificially constructed scenario that should not occur under normal EBA reporting conditions. Logically, this case should be rejected, yet it is currently accepted because it remains technically valid under the existing xBRL-CSV standards.

Consequences and next step

- Incorrect Fact Assignments:
  - An ‘intended’ business fact may be rendered into a different business fact depending on the processing engine/parser used.
  - This could lead to misinterpretation and inconsistencies in data validation.
- Next step:
  - Following a meeting held after the EBA IT Technical Group meeting on 12 March 2025, attended by representatives from the EBA, SRB, XBRL International, and some NCAs/NRAs, we believe that the best approach to address the specific issue would be to use Table Constraints once they are formally endorsed.

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3	AI & XBRL at SRB: Current Reality

AI & XBRL at the SRB: Current Reality

- SRB actively monitors AI XBRL developments via the different XBRL related conferences (including XBRL International Data Amplified event).

- Early experiments show that AI can "read" XBRL (if transformed in xBRL-JSON as per the practical guide published by XBRL International). However, the business use cases/questions on how this could be beneficial are not yet mature and require exploration at the SRB.

- Although AI makes sense for unstructured data, at the SRB we tend to be fairly cautious when it comes to apply it to structured data. The real challenge is not just improving performance and efficiency but also adding business value (e.g. combining data from various sources, including XBRL related files source data, to derive new insights beyond what existing analytical tools provide).

THANK YOU!

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