

XBRL EUROPE - Bank & Insurance Working Group

BCBS Machine-readable Pillar 3 disclosure

Issued for comment by 5 March 2026

PREPARATION DOCUMENT – January 2026 – V00

(...) the BCBS is proposing to move towards Pillar 3 disclosures in machine-readable standardised formats across its member jurisdictions. The proposed standard would introduce a requirement and technical specifications to produce machine-readable quantitative Pillar 3 disclosures, without changing the material disclosure requirements for banks. However, the proposed standard would require additional technical templates for furnishing metadata such as the identity of the bank, the reporting currency and unit that were previously included in the qualitative part of the Pillar 3 disclosure report in a formal way, as well as a uniform resource locator (URL) of the human-readable disclosure report(s). Banks publishing Pillar 3 disclosures on their own websites would be required to provide their supervisor with the base URL of the webpage hosting the disclosure data. In jurisdictions where the supervisor opts for Pillar 3 disclosure via a centralised repository, the proposed changes and additions to the standard would be applicable to the centralised repository rather than to banks. It is also envisaged that the proposed standard would not increase the burden on banks in jurisdictions where machine-readable Pillar 3 disclosures are already required. Rather, existing approaches would be integrated into the proposed global standard.

CONSULTATION DOCUMENT : [Consultative document - Machine-readable Pillar 3 disclosure](#)

As decided during the Bank & Insurance WG meeting on 13th January 2026, XBRL Europe will **not** be submitting a response to the BCBS consultation on the Pillar 3 centralised portal. The EU context is already addressed through the EBA's **P3DH initiative**, and we are coordinating with **XBRL International** to ensure that this position can be reflected in any potential broader international discussion.

Q1. What are your views on the scope of the requirement for machine-readable Pillar 3 disclosure, in particular the proposed initial focus on quantitative disclosure regarding the templates marked as “Maybe” in Table 4?

Table 4 is in Annex 2 page 31 (and following) in the consultative document. Maybe templates are:

CC2 Reconciliation of regulatory capital to balance sheet

LI1 Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories

LI2 Main sources of differences between regulatory exposure amounts and carrying values in financial statements

CRB Additional disclosure related to the credit quality of assets

CRB-A Additional disclosure related to prudential treatment of problem assets

Q2. Do you have any comments on the technical data formats and standards, the API structure and the general concept of the taxonomy proposed for quantitative machine-readable Pillar 3 disclosure? Are there other formats and solutions that should be considered?

Q3. Are there formats other than PDF that should be considered for human-readable disclosure?

Q4. In your view, which are the main operational benefits and challenges that this project would bring to banks? Would you see any other positive or negative impacts on your current disclosure process?

Q5. Do you believe the proposed effective date would provide sufficient time for implementation of machine-readable Pillar 3 disclosure? Would smaller internationally active banks need additional time?

Q6. How useful would data users consider a global database on the BCBS’s website? Would visualisation tools and industry aggregates make a global repository meaningfully more useful?