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Regulatory Blog

By PwC Deutschland | 11. Dezember 2025

Catalyzing Transparency: EBA Workshop Prepares Institutions for Pillar 3 Data Hub Launch

EBA comprehensive preparation workshop on the Pillar 3 Data Hub implementation and go-live for large and other institutions

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To support the implementation of the Pillar 3 Data Hub (P3DH), the European Banking Authority (EBA) invited the institutions to join a **comprehensive preparation workshop** on 25 November 2025. We already informed about the EBA's published onboarding plan in our **last blog post on P3DH on 2 June 2025**.

Background

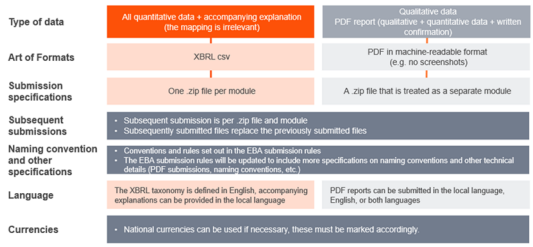
According to Article 434 CRR, the P3DH was created to serve as the platform for the publication of disclosure reports from the institutions by EBA.

The P3DH will centralise all disclosures reports and hence be the primary source of information. It is designed to enhance the accessibility and transparency of prudential data across all institutions in the EEA.

As part of the EU strategy to advance transparency, the P3DH aligns with other strategic projects like the European Single Access Point (ESAP). By centralising the disclosure of public information within the EU single market, the P3DH plays a key role in the transparency agenda of the EU.

The **EBA ITS** (**EBA/ITS/2025/01**) published in February 2025 introduced detailed requirements for data submissions by **large and other institutions**. It distinguishes between **quantitative** and **qualitative data**: quantitative data must be accompanied by explanatory notes, while qualitative data requires additional written confirmation. Submission formats vary because quantitative data should be provided in XBRL-csv, and qualitative data in machine-readable PDF files. Each information must be submitted as a single ZIP file, with resubmissions replacing previous versions. Strict naming conventions and specifications apply, and XBRL taxonomies are defined in English. Please see below the key requirements for large and other institutions.

Only for small, non-complex institutions (SNCI) will EBA take over the preparation of the disclosure templates. These institutions will then only have to submit qualitative information. However, the consultation paper on this is still pending, and the information refers to the descriptions in the documents already published.



During the workshop, EBA presented further details on key topics such as the **onboarding process and current status**, P3DH processes, and **requirements for submission**. It also addressed the steps for submission and publication, the purpose and use of the **EUCLID Regulatory Reporting Platform (ERRP)**, technical aspects of file submission and validation, and the execution of **User Acceptance Testing**.

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Additional content included **P3DH dashboard visualizations**, integrated access via the EBA Data Access Portal, and **next steps**, including details on the go-live and the development of ITS for resubmissions.

Onboarding Process and Status Quo

As EBA now clarified during the workshop, the onboarding process for other institutions and large subsidiaries (Groups C and D) has been completed, with activity taking place from October to December 2025. This follows earlier stages, which included the publication of the final technical package in May/June 2025, the collection of contact information, and onboarding of large institutions (Groups A and B) from June to September 2025, along with the test phase conducted in October and November 2025.

Within the workshop EBA shared the current onboarding status: among the 814 institutions that provided information for onboarding, 99% were included in the submission process. Of these, 58.1% submitted without errors, and 35.5% had minor errors but were considered correct. Meanwhile, 5.2% experienced errors that did not halt the onboarding process, and 0.2% had errors that stopped onboarding due to missing templates.

Currently, the ITS for the SNCI is still pending, which is intended to regulate the creation of disclosure templates by the EBA and the disclosure process. This will be accompanied by the potential onboarding of these institutions.

Process of Submission and Publication

The submission and publication process for Pillar 3 reports begins for large and other institutions with the submission of the reports to the EBA via the P3DH. In accordance with Article 434 (1) CRR, this shall take place on the same day on which they publish their annual financial statements or financial reports for the relevant period, where applicable, or as soon as possible thereafter. Once received by the EBA, reports are promptly published on the P3DH website without undue delay. The process allows for resubmissions. In the workshop EBA announced that **a draft of ITS on resubmissions will be developed in 2026**.

With the so-called **signposting tool**, a guide to Pillar 3 requirements will be provided without replacing legal acts, listing templates and tables per institution type, legal references, and disclosure frequency. The technical package (DPM) **for reporting framework 4.1**, published in June 2025, includes new and amended requirements for Pillar 3 templates.

As a result, institutions must now also ensure that their technical solutions for converting templates into XBRL-csv files are able to cover the validation rules from DPM 4.1 to identify errors during the test phase and before submission.

EUCLID Regulatory Reporting Platform (ERRP)

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In addition, the EBA gave an update on technical specifications around the EUCLID platform. The EUCLID Regulatory Reporting Platform (ERRP) is an EBA application that has been extended to accept direct submissions from institutions for Pillar 3 and MICA purposes, with technical validations. It is designed to collect reports, serving as the entry point for reporting data to the EBA data warehouse. Since 2020, competent authorities have used it to submit various frameworks like COREP, FINREP, Resolution, and Remuneration.

To submit reports, it is essential for institutions to identify the disclosure requirements in accordance with the CRR and the EBA Pillar 3 ITS. Additionally, the EBA signposting tool should be utilized for further guidance. Subsequently, the files should be uploaded to the ERRP platform. Upon submission, ERRP will provide validation feedback. If the files are accepted, no further action is necessary. However, if the files are rejected, an investigation into the reasons for the rejection must be conducted.

The workshop also addressed the requirements for filename structures, XBRL-CSV file format, PDF file format, and technical validations regarding the ERRP uploads. However, the EBA will not verify the accuracy of the data submitted, but institutions should use the EBA mapping tool. Institutions must upload two zip files to the portal in order to submit their pillar 3 information. One file contains qualitative information in PDF format, and the other contains quantitative information in XBRL-CSV format.

This section has outlined the points that institutions must fulfill to successfully submit their disclosure information. It is now important to consider whether the current solution fulfills these points and whether the technical submission will therefore be successful.

User Acceptance Test

The User Acceptance Test (UAT) for P3DH aimed to evaluate connectivity, file upload processes, and identify system issues to ensure readiness for production. The results of the UAT were now presented during the workshop. Conducted from October 27th to November 25th, 2025, the UAT concluded with 92% participating institutions (46 of 50 Institutions) achieving connectivity and 76% (38 of 50 Institutions) successfully submitted at least one accepted file. The UAT’s purpose was to validate the P3DH solution's fitness, address filing errors, and provide confidence for steady-state operations.

P3DH Dashboard visualization via EBA Data Access Portal (EDAP)

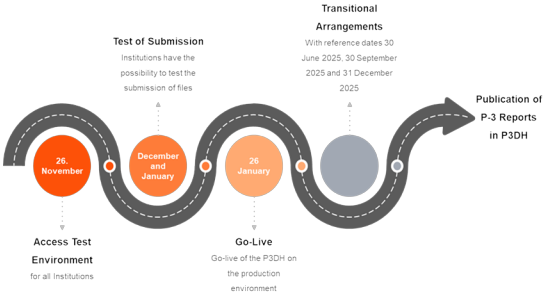
Furthermore, the EBA outlines the options for visualizing the disclosure information submitted. The P3DH Dashboard visualization aims to enhance data presentation by standardizing report visualization and centralizing access regarding P3DH. The platform for integrated access is the EBA Data Access Portal (EDAP), serving as a central access point for EBA registers, statistical data and data disclosures. The dashboard will feature bank key metrics, including directly reported figures and ratios for each institution. The EBA has already published **dashboards** based on Pillar 3 reports from large, listed institutions as part of its ad hoc reporting of ESG risks.

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If you would like to get a first impression of the visualization capabilities, you can already look at the ESG risk disclosure dashboard. This information is based on ad hoc reporting by large, listed institutions, which have been required to submit this information in technical XBRL format for some time now.

Next Steps

Finally, the EBA presented the next steps for the final go-live of the P3DH for large and other institutions. Starting November 26, 2025, all institutions received access to the test environment, allowing the testing of file submissions during December and January. In preparation for the official P3DH go-live on **January 26, 2026**, the EBA announced to release a detailed User Guide in early January to assist institutions with overall processes related to onboarding, offboarding, submission, and publication, as well as specifics on EIAM, ERRP, and EDAP. Additionally, the EBA helpdesk will be available to address any questions, ensuring a smooth transition towards centralized and timely disclosures of Pillar 3 reports.



The timeline as illustrated above, once again highlights the urgency of having the process and technology for submitting disclosure reports in P3DH in place now, so that they can be tested appropriately, and timely, accurate disclosure can be ensured.

Do you have questions about the new requirements for the Pillar 3 Data Hubor specific challenges facing your institute? Do you need help with XBRL conversion or testing the EBA mapping with xbrl conversion from your current solution? Contact us! We leverage our in-depth expertise to support you through the implementation process. Please do not hesitate to reach out!

Get ongoing updates on the topic via regulatory horizon scanning in our research application, PwC Plus. Read more in our "**Services and Offerings**" section.

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Schlagwörter

Bankenaufsicht (Europäische und Internationale Organisationen), Basel III, Capital Requirements Directive (CRD VI), Capital Requirements Regulation (CRR III), ESG, Meldewesen - Banken, Regulatory Reporting, Sustainability Risk

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