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The EBA's Pillar 3 Data Hub for SNCIs: Proportionality, Transparency and the Next Phase of Prudential Disclosure

On 8 June 2026, the European Banking Authority published its Discussion Paper on the extension of the Pillar 3 Data Hub process to Small and Non-Complex Institutions (SNCIs). This is a technically detailed consultation, but its direction is important and commercially relevant: Pillar 3 disclosure for smaller banks is moving further towards centralisation, standardisation and supervisory-data-driven publication. The proposal reflects a broader trend in EU banking regulation: reducing duplicative compliance work for institutions, while improving transparency, comparability and accessibility for the market.



What is changing?

The Pillar 3 Data Hub is the EBA's centralised platform for publishing prudential disclosure information. For large and other institutions, the EBA already publishes Pillar 3 information submitted by the institutions themselves. For SNCIs, the proposed model is different. The EBA will prepare and publish the relevant Pillar 3 disclosures on behalf of those institutions, using supervisory reporting data submitted to competent authorities. This significant procedural shift means that the quality, completeness and stability of supervisory reporting data will become even more important, because that data will directly feed public disclosure.

Why it matters

For SNCIs, the proposal is framed around proportionality. Non-listed SNCIs currently have a significantly lighter Pillar 3 disclosure burden, limited to the EU KM1 key metrics template. The EBA's position is that a centralised process should reduce operational costs and remove the need for institutions to maintain separate disclosure channels. For users of prudential information, investors, analysts, counterparties, supervisors and the institutions themselves, the benefit is: a single access point, more comparable data, and easier access to prudential metrics across the sector.



The proposed implementation path

The EBA proposes a staggered approach. The first publication for SNCIs is planned for Q4 2026, using December 2025 as the reference date. At this stage, the scope would be limited to the EU KM1 key metrics template. For non-listed SNCIs, this would effectively cover their current Pillar 3 obligations. For listed SNCIs, however, the position is more complex, as they remain subject to wider disclosure obligations and may need to continue publishing through their own channels during the transition period. A fuller publication is expected in 2028, with reference to December 2027, once the required supervisory reporting amendments and data points are in place.

The key legal and operational point: responsibility for data

One of the more important aspects of the Discussion Paper is the proposed approach to sign-off. The EBA indicates that the submission of supervisory reporting data through regular channels will constitute the institution's formal sign-off of the information to be disclosed. The EBA's role is presented as limited to applying transparent and straightforward calculations to the submitted data. This means that institutions will retain responsibility and ownership for the underlying data, even where the final disclosure is centrally published by the EBA.

Publication timing and data stability

The EBA also raises a practical but important question: when should the information be published? For non-listed SNCIs, end-September is proposed as an appropriate steady-state publication date, allowing time for audit procedures and supervisory data stabilisation. For listed SNCIs, the timing is more difficult. End-April would align more closely with financial reporting timelines under the Transparency Directive, but may be challenging if updated supervisory data is not available in time. The EBA therefore invites views on whether end-June or another date would be more appropriate.

Resubmissions and republication

The EBA also proposes that, where supervisory reporting data is resubmitted, the Pillar 3 information published through the Data Hub would be recalculated and updated automatically and on an ongoing basis. This is sensible from a data accuracy perspective, but institutions will need to consider how republication, restatements and discrepancies with previous disclosures should be explained, especially during the transition period.

The consultation deadline is 20 July 2026.



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