

Basel Committee on Banking Supervision

Bank for International Settlements

CH-4002 Basel

Switzerland

March 4th, 2026

China Banking Association comments on the BCBS Consultative Document “Machine-readable Pillar 3 disclosure”

Secretariat of the Basel Committee,

China Banking Association (CBA) appreciates the efforts and progress made by the BCBS in enhancing the accessibility and usability of Pillar 3 disclosure. Taking into account the conditions of China’s banking sector, we would like to propose the following suggestions on “Machine-readable Pillar 3 disclosure (Consultative Document)”.

Scope. It is recommended to limit the application scope of

machine-readable formats to quantitative templates only, excluding mixed templates and the seven templates for which the standard does not prescribe an explicit form, allowing national discretion over the application scope.

Implementation. It is recommended to postpone the implementation date by 1-2 years, allowing sufficient time for banks to carry out IT system upgrades, data architecture adjustments, staff training, data validation and other preparatory work.

We appreciate the opportunity to comment on the Consultative Document and hope our suggestions will be considered favorably.

Yours sincerely,

China Banking Association