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Key findings from the 2024 ESAs Dry Run exercise

Reporting of the financial entities‘ registers of information on their contractual arrangements with ICT third-party service providers

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List of abbreviations

CTPP	Critical ICT third-party service provider
DORA	Regulation (EU) 2022/2554 – Digital Operational Resilence Act
DPM	Data point model
EMC	Entity making use of contract
GLEIF	Global legal entity identifier foundation
ICT	Information and computer technolodgy
ITS	Implementing Technical Standards
LEI	Legal entity identifier
RoI	Register of information
TPP	(ICT) Third-party service provider

Executive summary

With DORA becoming applicable on 17 January 2025, financial entities in its scope need to have a comprehensive register of their contractual arrangements with ICT third-party service providers (Registers of information – RoI) available at entity, sub-consolidated and consolidated levels (Article 28(3) of DORA).

According to DORA, these RoI will serve various purposes, including: (1) for financial entities as an internal tool to monitor their ICT third-party risk, (2) for EU competent authorities as a source of information to supervise the management by the financial entities of their ICT third-party risk and (3) for the ESAs as a source of information for the designation of critical ICT third-party service providers (CTPP) which will be subject to their oversight. To facilitate the latter two purposes, financial entities would need to report their RoI to the respective competent authorities, who will, in turn, provide those to the ESAs.

To help financial entities develop their RoI in accordance with the requirements set out in the ITS on the Registers of Information and be ready to report these registers from 2025, the ESAs and the competent authorities have carried out a dry run exercise in 2024. It allowed for the testing of the reporting processes in an environment as close as possible to the official reporting process. Furthermore, the ESAs aimed at facilitating the early preparation of the competent authorities by onboarding them to the reporting channels that will be used for the official reporting from 2025 onwards. The exercise was carried out on a voluntary and 'best effort' basis.

The dry run was launched in April 2024 using the January 2024 ESAs Final Report of the draft ITS on the Registers of Information[1] as the basis. It was supported by numerous tools provided by the ESAs, such as templates for the registers, draft data point model, draft reporting taxonomy, examples and instructions for filling data fields, and a tool for converting *Excel* files into *plain-csv* files which is the format used by the ESAs for the RoI reporting. Furthermore, the ESAs supported financial entities through a series of workshops, maintained and updated 'frequently asked questions' document and responded to the individual queries through the dedicated email channel.

The dry run exercise has elicited the interest of a large number of financial entities from the 27 EU Member States with 1,039 financial entities participating in the exercise and providing their registers by the reporting deadline of 30 August 2024. They represented a wide range of financial entity types subject to DORA. The majority of the financial entities participating were credit institutions, insurance and reinsurance undertakings and investment firms. Most of the registers have been submitted on the consolidated basis leading to the total number of financial entities covered by the dry run exercise being 3,447.

The ESAs performed a two-step data quality assessment process. This process covered (1) technical integration checks, such as the use of correct file formats, naming conventions etc., and (2) data quality and validations checks that focused on the use of data point model, unique identifiers, content of

[1] See: Implementing Technical Standards to establish the templates for the register of information | European Banking Authority

mandatory data fields etc. Altogether each register that passed the technical integration checks were subject to 116 data quality checks run on all applicable data points. The ESAs shared individual feedback on the data quality issues with the competent authorities which authorities shared further with the participating financial entities.

Out of the 947 registers that passed the data integration checks and were analysed, 6.5% successfully passed all data quality checks, while 50% of the remaining registers failed less than five data quality checks.

The relatively high degree of data quality issues observed in the dry run was expected and is in line with the 'best effort' nature of the exercise. The most frequent failed data quality check was related to missing mandatory information (86% of all data errors). Another frequent failed check was related to the use of unique identifiers for the financial entities and ICT third-party service providers (for the purposes of the exercise, the LEI was the mandatory identifier for the financial entities, whereas for their third-party service providers financial entities could also use other identifiers).

From the financial entities with most submissions, credit institutions had the lowest proportion of data quality errors in relation to the data points submitted (1.9%), followed by investment firms (2.4%) and insurance and reinsurance undertakings (3.3%).

The dry run exercise allowed financial entities to progress with building and populating their registers of information with the required data. The exercise also allowed all parties to test the reporting channels and make improvements to better facilitate the official reporting that will start from 2025. The ESAs took advantage of the exercise and introduced clarifications and simplifications into the reporting instructions, also leveraging on all interactions with the industry over the course of the exercise.

The preparatory efforts should not stop with the completion of the dry run. The individual data quality feedback provided to the financial entities should help them to continue improving the quality of their data and ensure that the registers to be submitted in 2025 meet the regulatory requirements, are complete and provide all the information necessary for the CTPP designation by the ESAs.

The key findings presented in this report as well as all supporting materials provided by the ESAs should be carefully considered by all industry stakeholders including those financial entities that did not participate in the dry run exercise. With additional efforts from the industry, the ESAs are confident that the data submitted will be of sufficient quality.

1. Background and introduction

1.1 Registers of information

1. Regulation (EU) 2022/2554 (Digital Operational Resilience Act – DORA) requires financial entities in its scope to maintain a RoI in relation to all contractual arrangements on the use of ICT services provided by the ICT third-party service providers (Article 28(3) of DORA). These RoI are required to be maintained at entity, sub-consolidated and consolidated levels with the structure and content of the registers set out in the implementing technical standards to establish the standard templates for the purposes of the register of information referred to in Article 28(3) of DORA and adopted pursuant to Article 28(9) of DORA (ITS on the Registers of information).
2. Given the comprehensive nature of the RoI and their importance for the ICT and third-party risk management purposes, the RoI will serve for different purposes in practice: (1) for financial entities to monitor their ICT third-party risk, (2) for the EU competent authorities to supervise the ICT and third-party risk management of the financial entities and (3) for the ESAs to designate the critical CTPPs which will be subject to an EU-level oversight.
3. The latter two purposes of the RoI also introduce a reporting dimension, where (1) the competent authorities have the power to request the full register of information in accordance with Article 28(3), fourth subparagraph of DORA, and (2) the ESAs require the competent authorities to submit the received RoI as part of the information necessary for the designation of the CTTPs in accordance with Article 31(1)(a) of DORA[2].

1.2 Dry run exercise

4. The primary objective of the exercise was to help financial entities with the preparation of the RoI and their reporting to the competent authorities and the ESAs. The exercise aimed at helping the industry with improving data quality for the formal reporting that will begin from 2025. The dry run exercise also allowed for testing the reporting processes in an environment as close as possible to the official reporting. Furthermore, the ESAs aimed at facilitating the early preparation of the competent authorities by onboarding them to the reporting channels that will be used for the official reporting.
5. The voluntary dry run exercise was launched in April 2024, when the financial entities were invited to complete and report on the 'best efforts' basis RoI using the ESAs Final Report on the draft ITS on the Registers of information published in January 2024[3] as the basis for the content of the registers. The participating financial entities were requested to provide their full RoI following the reporting specifications provided by the ESAs in accordance with the calendar set by the relevant

[2] See: ESA decision of 8 November concerning the reporting by competent authorities to the ESAs of information necessary for the designation of critical ICT third-party service providers in accordance with Article 31(1)(a) of Regulation (EU) 2022/2554 (ESA 2024 22 Decision on reporting of information for CTPP designation.pdf)

[3] See: ESAs Final Report on draft ITS on Registers of Information

competent authorities. The competent authorities were expected to provide the registers to the ESAs by 31 August (see Annex 1 for the overview of the timeline for the exercise).

6. Whilst preparing for the official reporting of the RoI, the ESAs designed the dry run exercise as close as possible to the official reporting and introduced as many common elements as possible. In particular, in the dry run exercise, financial entities were requested to report their RoI to their respective competent authorities, who in turn provided the registers to the ESAs using the same channels that will be used for the reporting from 2025 onwards.

7. Having in mind the need to minimise the reporting of data whilst recognising the requirement to maintain the RoI at the individual, sub-consolidated and consolidated levels, financial entities were asked to report their RoI at the highest possible level of consolidation considering also the supervisory responsibilities of the competent authorities under DORA.

8. The ESAs have introduced common reporting format for the reporting of the registers (*plain-csv*) that will be also used for the official reporting.

9. Similar to the official reporting coming in place from 2025, the dry run was run by the EBA on behalf of the three ESAs using the EBA data and reporting infrastructure and, to the extent possible, similar tools as in the official reporting.

10. To support the financial entities and the competent authorities in the dry run, the ESAs have developed and provided an unprecedented amount of support materials, including a draft data point model, reporting taxonomy, and specification of reporting format and files to be used for the reporting. The ESAs also provided instructions, working templates and the tool to help the financial entities to convert their registers into *.csv* files. Over the active phase of the exercise from May to early-September, the ESAs have been also actively supported the financial entities and the competent authorities through workshops, frequently asked questions (FAQ) [4] and a dedicated email channel, where the ESAs answered over 500 emails during the course of the exercise[5].

11. Following the analysis of the received registers, in September 2024 the ESAs have shared the outcomes of the data quality checks that have been applied to the registers included in the sample for the analysis with the competent authorities [6]. The competent authorities have shared the individual feedback with the relevant financial entities. Similar to the earlier phases of the dry run, the feedback process was supported by the dedicated email channel where participating financial entities and their competent authorities have received answers to their questions regarding the feedback.

[4] 336 emails from financial entities and 186 from competent authorities not including technical questions regarding onboarding to the EBA reporting infrastructure

[5] All dry run materials are available here: Preparation for DORA application | European Banking Authority

[6] The data quality feedback was shared using the sftp channels in EBA reporting infrastructure that was used by the most competent authorities taking part in the dry run. There were some delays in sharing feedback with the competent authorities who chose not to use other reporting channels.

1.3 The summary report

12. The objective of this report is to provide the overview of the dry run exercise and its key findings focusing on the quality of data found in the RoI submitted to the ESAs. The report draws conclusions and highlights lessons learnt that should be considered by the financial entities, competent authorities and the ESA to ensure that the financial sector is generally better prepared for the start of the application of DORA in 2025 and the RoI to be reported by the financial entities are of better quality and meet the requirements of the applicable legislation.
13. The report is structured in three main sections:
    a. Section 2 provides an overview of the participating financial entities;
    b. Section 3 deals with the key points observed in the dry run submissions from a data quality perspective, and
    c. Section 4 focuses on the key lessons learnt for financial entities, competent authorities and the ESAs for the finalisation of their preparations for the official reporting of RoI to start from 2025.
14. The report is built on the analysis of 947 RoI that have been included into the sample for the analysis by the ESAs following the data integration checks. The report has also been informed by the interaction with the industry stakeholders through the 'frequently asked questions' mechanism set up for the purpose of the exercise.

2. Overview of the participating financial entities

15. As part of the preparation for the launch of the dry run exercise, 1,139 financial entities expressed their interest in participating. By the submission deadline, the RoI were received from 1,039 financial entities from 27 Member States and 40 competent authorities. Following the integration and validation checks (see also Section 3) registers from 947 entities were included into the data set for further analysis following the data integration checks.

Type of entity	Number of financial entities	Share in total
Credit institutions	260	27.46%
Insurance and reinsurance undertakings	225	23.76%
Investment firms	122	12.88%
Asset management companies	86	9.08%
Payment institution	50	5.28%

Managers of alternative investment funds	40	4.22%
Institutions for occupational retirement provision	36	3.80%
Electronic money institutions	30	3.17%
Other financial entity[7]	21	2.22%
Trading venues	18	1.90%
Insurance intermediaries, reinsurance intermediaries and ancillary insurance intermediaries	17	1.80%
Central security depository	7	0.74%
Central counterparties	6	0.63%
Crowdfunding service providers	5	0.53%
Account information service providers	4	0.42%
Administrator of critical benchmarks	3	0.32%
Credit rating agency	3	0.32%
Crypto-asset service providers[8]	3	0.32%
Non-financial entity: Other than ICT intra-group service provider	3	0.32%
Trade repositories	3	0.32%
Data reporting service providers	2	0.21%
Non-financial entity: ICT intra-group service provider	2	0.21%
Securitisation repository	1	0.11%
Total	**947**	**100.00%**

Figure 1. Submitted registers by financial entity type

16. Looking at the sectoral distribution (see Figure 1), credit institutions and insurance and reinsurance undertakings account for the highest share of submissions, with 27% and 23% of the total respectively, followed by investment firms (12%) and asset management companies (9%). In five cases the registers have been submitted by non-financial entities acting on behalf of the financial entities. Looking at the geographical distribution (see Figure 2), financial entities from Austria sent the highest number of submissions (137 files, accounting for 14% of the total) followed by Malta (72 submissions) and Hungary (67 submissions).

Country	FE count
AUSTRIA	137
MALTA	72
HUNGARY	67
ITALY	65
GERMANY	60
FRANCE	59
POLAND	57

[7] These type of financial entities are not subject to DORA requirements and have been included due to the voluntary nature of the exercise.

[8] Although CASP are yet to be authorised under MiCAR, some of such entities have submitted their registers on provisional basis considering the ongoing authorisation process.

LUXEMBOURG	57
NETHERLANDS	50
SPAIN	47
PORTUGAL	46
IRELAND	39
BELGIUM	38
LIECHTENSTEIN	31
GREECE	17
CROATIA	17
FINLAND	14
BULGARIA	13
CZECH REPUBLIC	11
SLOVAKIA	10
SWEDEN	10
SLOVENIA	9
ROMANIA	6
CYPRUS	6
LITHUANIA	3
LATVIA	3
ESTONIA	3

Figure 2. Submitted registers by country

17. Most of the registers were submitted at the consolidated level (over 58%), while the remaining 42% of the registers were reported by individual entities. Considering the entities belonging to the groups for which the registers were reported at the consolidated level, the total number of financial entities covered by the dry run increases to 3,447. The sectoral distribution slightly changes when considering the financial entities within the scope of the RoI. Among the 3,447 entities, credit institutions and insurance and reinsurance undertakings still account for the highest share (30% and 19.3% respectively). Non-financial entities (other than ICT intra-group service providers) represent the third largest group (19%), followed by investment firms (8%) and asset management companies (6%).

3. Data quality checks and observations

3.1 Data quality checks applied in the dry run

18. All RoI received by the ESAs went through a data quality assessment process that was designed as a two-step approach.

19. First, upon reception by the ESAs, each submission was assessed before being integrated in the EBA's system. A set of three integration checks was conducted, aimed at ensuring that the submission could be processed. The following was checked:
    a. submission file matching the required naming convention described in the technical package for the exercise;
    b. submission file is not a test submission, including dummy files with no content or exact copies of the examples files as published by the ESAs on the dry run exercise webpage;
    c. submission file included completed Template B_01.01 (Entity maintaining the register of information)[9].
20. Submissions failing one or more of the three above integration checks were discarded and not processed further.
21. Second, submissions passing the integration checks were subject to the second layer of the data quality assurance process, based on the list of 116 data quality checks that were published on the dry run exercise webpage. These checks can be divided into five main thematic areas (see Annex 2 for the detailed list of data quality checks):
    a. use of unique identifiers: the check focused on the use of keys of each template that should be unique and not repeated. This check ensured the possibility to link each template with its related templates. For example, column 0010 of template B_02.01 allowed this template to be linked with B_02.02;
    b. LEI code validity: the validity of each LEI code reported was checked against the GLEIF database[10];
    c. DPM content: the check focused on respecting the use of the draft DPM members;
    d. content of mandatory fields: the check focused on verifying that the information identified as crucial for designation of CTPPs was reported. Although the dry run exercise was run on a 'best effort' basis, a list of fields that will be necessary for the designation was identified. These types of checks were aimed to flag this missing information, in the spirit of helping the participating entities for the steady state of DORA;
    e. date validity: the check focused on that all the dates were reported in a valid date format.
22. Each data quality check was run on all applicable data points of the RoI admitted to the analytical data set – those that passed the first layer of the integration checks.
23. At the end of data quality assurance process, the ESAs shared feedback files with the competent authorities which comprised detailed data quality feedback for each financial entity analysed that included:
    a. a list of submissions that were not processed due to failing integration;

[9] All references to the templates and individual data fields made in this report are made using the template and data field codes of the exercise template and data point model published on the exercise webpage in May 2024.

[10] See: GLEIF: https://search.gleif.org/#/search/

b. for submissions that were accepted and processed, a detailed list of the data quality checks failing at datapoint level and for each entity was included.

3.2 Outcomes of the data quality checks

24. Out of 1,039 submissions received, 92 were discarded due to failing integration checks. The remaining 947 submissions were accepted and processed, and subsequently screened for the 116 data quality checks from the second layer of the data quality assurance process.

25. Overall, in 93.5% of the submissions (886 submission) there was at least one data quality failure. This was expected and in line with the best-effort nature of the exercise.

26. The highest number of checks failing for any participating entity was 43 out of 116. The highest number of data quality checks failing for a single entity was close to 50,000 (3.6% of the data points reported in this specific register).

27. Looking at the data quality by type of financial entity submitting the data, the volume of failed data quality checks is proportional to the number of data points submitted. This can be seen from Figure 3 below, which shows the ten types of entities with the highest rank in terms of number of data points submitted and of data quality checks failed.

Type of financial entity	Submissions received	Data quality checks failed	Data points submitted	Share of checks failed
Insurance and reinsurance undertakings	225	97,289	2,935,579	3.3%
Credit institutions	260	56,511	2,931,767	1.9%
Institutions for occupational retirement provision	36	10,434	344,283	3.0%
Investment firms	122	6,078	248,988	2.4%
Asset management companies	86	2,170	209,306	1.0%
Managers of alternative investment funds	40	1,124	90,016	1.2%
Payment institution	50	1,877	63,318	3.0%
Insurance intermediaries, reinsurance intermediaries and ancillary insurance intermediaries	17	1,417	49,906	2.8%
Electronic money institutions	30	1,073	42,320	2.5%
Central security depository	7	466	38,150	1.2%

Figure 3. Overview of the failed data quality checks compared to data points submitted

28. The total number of the failed data quality checks for all submissions received amounts to over 235,000[11]. That should be taken into account with total number of the received data points of over 9,275,000 which makes the overall ratio of 2.5%.

29. Figure 4 provides the distribution of the over 235,000 failed checks according to the five areas in which the data quality checks were split.

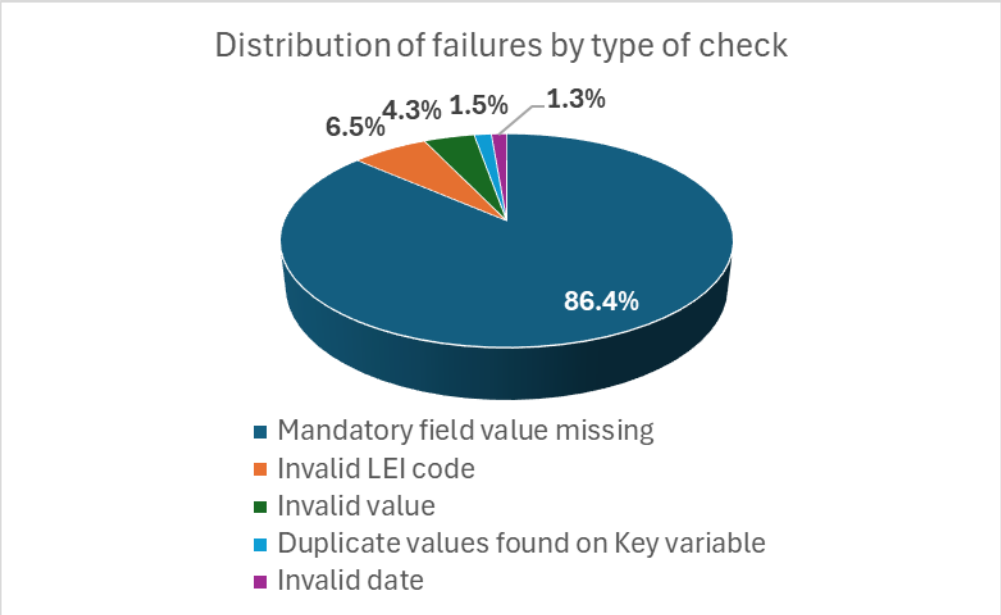

Figure 4. Breakdown of failed data quality checks by their type

Mandatory information missing

30. As seen from Figure 4, out of the five areas identified, the area with most failures is 'mandatory information missing', with 86% of the failures being due to this type of check. While this finding was expected since the dry run was conducted on a 'best effort' basis (i.e. partial or incomplete registers were accepted), this will be of particular importance for the official reporting, when all datapoints specified in the ITS on the Registers of information will have to be reported and missing values will trigger data quality feedback requiring resubmission.

31. The most encountered issue with the provision of mandatory information, was the provision of identification codes for the ICT third-party service providers and for their parent undertaking. This error is particularly problematic for the official reporting as the identification and grouping of ICT third-party service providers is essential for the CTPP designation process.

32. The highest share of missing information (60%) was found in template B_02.02 (Contractual arrangements – specific information). Two blocks of information were often missing there:

[11] The total number of data quality errors excludes errors for three data quality checks that have flaws in their designed (DOR_0021, DOR_0094, DOR_0117). These checks were applied and reported in the individual feedback to the financial entities, and they have been instructed to disregard them. The errors have been corrected in the validation rules for the official reporting of the registers from 2025 onwards.

a. information on the ICT third-party service provider, notably the type of code used for identification of the provider and the code itself (columns 0030 and 0040);

b. the function identifier (column 0050) the related type of ICT services (column 0060).

33. Over 17% of the missing information was from template B_05.01 (ICT third-party service provider). Information on the country of the ICT third-party service provider's headquarters was often missing (column 0050), together with information on the ultimate parent of the ICT third-party service provider: identification code and type of code (columns 0080 and 0090).

34. Template B_07.01 (Assessment of the ICT services) is the template for which the highest concentration and number of missing values were identified. Missing values in this template account for 20% of all missing values. For all fields except the key (column 0010, contractual arrangement reference number) a high number of missing values was observed. Missing information in this template can be divided in two blocks:

a. information on the ICT third-party service provider, notably the type of code used for identification of the provider, the code itself and the substitutability of the provider (columns 0020, 0030 and 0050) column 0040 (type of ICT services);

b. information on the contracted ICT service: the type of ICT service, the possibility of reintegration of the ICT service and information on the existence of alternative ICT third-party service providers (columns 0040, 0090 and 0110).

Invalid LEI codes

35. The second area for which more failures were observed is 'Invalid LEI codes', accounting for 6.5% of the failures. All LEI codes reported in the templates were checked against the GLEIF database for validity. The number of invalid LEI codes was actually lower than what was observed in similar previous exercises. This signals that, when an LEI code is reported, it is very often a valid one. An unexpected finding was that more invalid LEI codes were reported for financial entities (close to 9,000) rather than for TPPs (close to 6,000) – see also Section 4.3. In many of these instances, national codes or other types of codes were reported for financial entities instead of the requested LEI codes. Invalid LEI codes of parent undertakings of TPPs were observed in a very low number of cases, as in most cases the issue was that an LEI was not reported rather than an invalid LEI being reported.

36. Even though names of the TPPs and of their parent undertakings were not subject to the data quality assurance process, a high variability in the names was observed. The fields related to the name of the entities are one of the most difficult pieces of information to compare across TPPs. While this is not a big issue when identifiers are provided, it makes it very hard to compare names in the absence of an identifier or when different types of identifiers are provided.

Invalid DPM value

37. The third area with most common error was 'Invalid DPM value' (4% of the total failures). Failing this check signalled that the draft DPM was not used when producing the registers. For official reporting from 2025 onwards it will be important to make sure to follow the DPM that will be published as part of the ITS technical reporting package, as failures will trigger data quality feedback requiring resubmission.

38. Duplicate values on key variables and invalid dates together accounted for a small percentage of failures (2.8%).

4. Lessons learnt and recommendations

4.1 Lessons learnt for the ESAs and the competent authorities

39. The dry run exercise and interaction with the industry during the exercise through the workshops and questions to the dedicated email channel provided valuable information for the ESAs, in particular:

    a. leveraging on the delay in the adoption of the ITS on the Registers of information by the EU Commission and its rejection, the ESAs introduced numerous clarifications and simplifications in the reporting instructions. These changes were incorporated into the text of the ITS published together with the ESAs Opinion on the rejection of the ITS on 15 October 2024[12]. These changes have been reflected in the final text of the ITS as adopted by the EU Commission[13];

    b. the data quality checks applied in the dry run and the interaction with the industry through the dedicated email channel informed the ESAs work on finalising validation rules and data quality checks to be applied for the official reporting[14].

40. The application of the data quality checks in the dry run exercise also informed the ESAs about making improvements in the data validation process to be applied in the official reporting from 2025. Thus, the data quality assurance process will be also designed in two stages which is similar to the dry run, with the (1) technical layer, and (2) validation and quality check layer. The feedback to the submitters of the registers to the ESAs (competent authorities) will be provided also in two stages allowing for maximum efficiency for managing the correction of errors and resubmission of data:

    a. **Technical layer** (e.g. use of specified file formats, naming conventions, file structure etc.): upon reception each submission will be assessed before being integrated in the EBA's systems. Submission not respecting these technical checks included in this layer will be rejected with the feedback provided to the submitter. The submitters will be expected to resubmit the files after correcting the errors.

[12] See: ESAs respond to the European Commission's rejection of the technical standards on registers of information under the Digital Operational Resilience Act and call for swift adoption | European Banking Authority

[13] See: Commission Implementing Regulation (EU) 2024/2956 of 29 November 2024 (Implementing regulation - EU - 2024/2956 - EN - EUR-Lex)

[14] See: https://www.eba.europa.eu/sites/default/files/2024-11/2506bbcd-f8d6-4710-a273-46d812b154f3/Draft%20validation%20rules%20for%20DORA%20reporting%20of%20RoI.xlsx

b. **Validation layer**: Data quality checks will be applied to the data that is accepted and stored after passing the technical layer. These data quality checks include both DPM automatic checks, as well as business checks and data model checks, including checks against external sources, e.g. LEI checks against GLEIF. These checks will be applied to the data reported in the individual files of the RoI. Failing one of these checks will trigger an error that will be flagged to the submitter as part of data quality feedback. The submitter will be expected to resubmit the files after correcting the errors within the timelines indicated.

41. Considering the importance of the validation rules and data quality assurance process for ensuring the good quality of data submitted to the ESAs for the purposes of CTPP designation and to support the finalisation of the preparations for the reporting of the RoI the ESAs have published validation rules in November 2024[15]. These rules that reflect the experience from the dry run will be included in the updated reporting technical package (including updated data point model, taxonomy and validation rules), which is set to be published in December 2024.

42. Another important point for improvement of the processes for official reporting from 2025 onwards was identified in the use of the reporting channels between the EBA and the competent authorities. For the dry run exercise, the competent authorities have the possibility to use two distinct channels : (1) *sftp* for uploading multiple files and (2) user interface for uploading individual files. Although most of the authorities have been onboarded for the use of *sftp* channels, some authorities have chosen to rely only on user interface solution due to a limited number of participating financial entities from their jurisdictions and simplified onboarding procedures. Lack of established *sftp* channels have caused some delays later in the process of the dry run, when the ESAs have shared data quality feedback with the competent authorities. Authorities not onboarded to *sftp* channels were not able to access the feedback documents until workarounds were found. Considering the importance of the data quality feedback in the official reporting given the requirement for the resubmission of data (there were no resubmissions of data in the dry run) it is essential for all competent authorities under DORA to be onboarded to sftp channels to ensure smooth bi-directional exchange of information.

4.2 Lessons learnt and recommendations for financial entities

Completeness of the registers of information

43. Contrary to the dry run exercise that was run on a 'best efforts' basis and financial entities were able to submit partial registers with mandatory data fields missing, this would not be possible in the official reporting from 2025. Once DORA applies, the financial entities will have to maintain and update their RoI in relation to all contractual arrangements on the use of ICT services provided by TPPs, where those registers shall meet the requirements of DORA and the ITS on the Registers of information. Therefore, comprehensive registers will be expected during the data collection process. The RoI submitted to the ESAs from 2025, will be used for the purposes of CTPP designation and would need to contain all mandatory information as indicated in the ITS on the Registers of information and DPM.

[15] Ibid

44. It is important for the financial entities to continue identifying and integrating the missing data into their RoI, so they are able to submit full registers to their competent authorities and then the ESAs. Missing mandatory information will be flagged as data quality issues with the request to resubmit the registers within the short time frame provided.

Adherence to provided instructions and DPM

45. During the interactions with the financial entities the ESAs noted that in many cases the answers to the questions raised by the financial entities are clearly available from either general or data field-specific instructions available in the ITS on the Registers of information. In particular, the ESAs noted in the dry run that whilst financial entities followed data field-specific instructions, many have disregarded general instructions to templates provided in the ITS.

46. In the efforts to finalise preparations of the RoI, financial entities are encouraged to familiarise themselves as much as possible with and follow all instructions provided in the ITS[16] as well as practical clarifications provided in the FAQ for the dry run exercise[17]. As mentioned in Section 4.1, based on the experience from the dry run, the ESAs have also clarified and simplified the instructions that have been included into the text of the ITS annexed to the ESAs Opinion published on 15 October 2024 as also reflected in the final text of the ITS adopted by the EU Commission.

47. Going forward, as the ITS on the Registers of information have been adopted by the EU Commission and published in the EU Official Journal, if financial entities have questions regarding the interpretation of the ITS and its requirements they are encouraged to use the established 'Questions and Answers' mechanism (Q&A) set up by the ESAs for all regulatory products[18].

Adaptation of the registers to meet the latest regulatory requirements

48. Although the ITS on the Registers of information has been just recently adopted by the EU Commission[19], the ESAs note that the essential part of the requirements is publicly available since the publication of the ESAs Final Report in January 2024 that has been used as the basis for the dry run. The changes in the requirements for the registers in the final ITS following the rejection of the ITS by the EU Commission and the ESAs Opinion on the rejection are limited.

49. Therefore, financial entities are encouraged to continue as much as possible the preparation of their registers, especially for information which may not be immediately available (e.g. the relevant identifiers of their TPPs), where additional data collection/retrieval efforts may be necessary given that such information have not been used in the dry run.

Use of identifiers and their importance for CTPP designation process

50. To perform the designation of CTPPs, the ESAs need the information necessary for the assessment of the criticality criteria in relation to ICT services provided by the ICT third-party service providers referred to in Article 31(2) of DORA and that set out in Commission Delegated Regulation (EU)

[16] See: Commission Implementing Regulation (EU) 2024/2956 of 29 November 2024 (Implementing regulation - EU - 2024/2956 - EN - EUR-Lex)

[17] See: Preparation for DORA application | European Banking Authority

[18] See: Joint Q&As - EIOPA

[19] See: Commission Implementing Regulation (EU) 2024/2956 of 29 November 2024 (Implementing regulation - EU - 2024/2956 - EN - EUR-Lex)

2024/1502. Given that the assessment of TPPs for the purposes of the designation of CTPPs needs to consider groups of TPPs, the ESAs would have to aggregate and compare information about the financial entities' TPPs. Performing this task requires the ESAs to be able to uniquely identify and group the related ICT third-party service providers and their subcontractors.

51. To this end, all TPPs recorded in the RoI in template B_05.01, including their ultimate parent undertakings and suppliers, should be uniquely identified using identifiers specified in the ITS on the Registers of information. These identifiers should be unique, consistently used across all relevant templates of the registers, and be verifiable by the ESAs against available external sources, notably GLEIF for the verification of LEI. The identification, verification and grouping of TPPs using unique identifiers is of utmost importance for TPPs that are legal persons.

52. Another important area where unique identifiers are important in the RoI is the identification of the financial entities submitting the registers (Template B_01.01) and financial entities making part of the consolidated groups covered by the consolidated registers, where relevant (Template B_01.02). The only identifier that is allowed to be used for the identification of financial entities by the ITS on the Registers of information is the LEI. The experience of the dry run has shown that there are financial entities without LEI, which makes the submission and processing of the registers of information impossible by the ESAs given that in the absence of reliable master data for all financial entity types under DORA. LEI is the only means to identify and verify financial entities submitting the data and covered by the data.

53. To prepare for the official reporting of the registers starting from 2025, financial entities are encouraged to ensure that they have a valid LEI for themselves and for all financial entities belonging to their consolidated groups noting that where the registers are reported on the consolidated basis, all financial entities included in template B_01.02 should be identified with LEI. Financial entities are also encouraged to work with their TPP so that those are identified and recorded in the registers with identifiers specified in the ITS on the Registers of information.

54. RoI without identifiers will be rejected when the LEIs are missing for the financial entities, and flagged for the corrections and resubmissions in the case of missing identifiers for the TPPs.

Reporting formats and tools

55. The reporting formats used in the official reporting of the RoI will be the same as the formats used in the dry run. In particular, the financial entities will be expected to submit a similar reporting package included into the *.zip* file containing individual *.csv* files for all the templates included in their RoI, and *.json* file with meta data, as explained in the materials made available for the dry run exercise.

56. However, differently to the dry run exercise, the ESAs will not support financial entities with preparations of the *.csv* files and the report package and the *.xls* to *.csv* conversion tool used in the dry run will not be updated and provided for the official reporting.

57. To this end, financial entities are encouraged to choose the most appropriate technical solutions for maintaining the registers in accordance with the requirements of DORA and the ITS on the Registers of information. These solutions should ensure appropriate conversion of the registers

into the specified reporting formats for the purposes of the reporting to the ESAs, unless the competent authorities instruct the financial entities otherwise[20].

[20] The ESAs do not specify the reporting format to be used by the financial entities for reporting of the RoI to their competent authorities not they specify who should do the conversion of the RoI into *csv* files. This conversion can be done by the financial entity or any third party, or even by the competent authority, provided financial entities have reached such agreement with the relevant competent authorities.

Annexes

Annex 1. Timeline of the dry run exercise

Time	Action
11 April 2024	Announcement of the exercise
30 April 2024	Industry workshop – introduction of the exercise
31 May 2024	Publication of all materials and supporting documentation
10 June 2024	Industry workshop – explanation of the materials and tools provided
4 July 2024	Publication of the updated FAQ document
29 July 2024	Publication of the updated FAQ document
30 August 2024	Deadline for the submissions of the registers to the ESAs
6 September 2024	Freezing of the data set for analysis and data quality feedback
25 September 2024	Sharing the data quality feedback with the competent authorities (feedback uploaded to sftp channel used for receiving the by the EBA)
December 2024	Publication of the summary report
18 December 2024	Industry workshop – overall lessons learnt from the exercise

Annex 2. List of the data quality checks applied to the registers of information in the dry run[21]

ID	Type	Severity	Template	Columns	DPM content used	If value missing	Narrative explanation	Prerequisites
DOR_0001	Unique identifier	Warning	b_01_01	c0010		treat as zero/empty string	Key value: no duplicates should be reported.	
DOR_0002	Unique identifier	Warning	b_01_03	c0010 c0020		treat as zero/empty string	Key value: no duplicates should be reported.	
DOR_0003	LEI code validity	Warning	b_01_01	c0010		do not run rule	LEI code needs to be a valid one according to the GLEIF database	
DOR_0004	LEI code validity	Warning	b_01_02	c0010		do not run rule	LEI code needs to be a valid one according to the GLEIF database	
DOR_0005	LEI code validity	Warning	b_01_02	c0060		do not run rule	LEI code needs to be a valid one according to the GLEIF database	
DOR_0006	LEI code validity	Warning	b_01_03	c0020		do not run rule	LEI code needs to be a valid one according to the GLEIF database	
DOR_0007	LEI code validity	Warning	b_02_02	c0020		do not run rule	LEI code needs to be a valid one according to the GLEIF database	
DOR_0008	LEI code validity	Warning	b_03_01	c0020		do not run rule	LEI code needs to be a valid one according to the GLEIF database	
DOR_0009	LEI code validity	Warning	b_03_03	c0020		do not run rule	LEI code needs to be a valid one according to the GLEIF database	
DOR_0010	LEI code validity	Warning	b_04_01	c0020		do not run rule	LEI code needs to be a valid one according to the GLEIF database	
DOR_0011	LEI code validity	Warning	b_06_01	c0040		do not run rule	LEI code needs to be a valid one according to the GLEIF database	

[21] The list of data quality checks includes three data quality checks that have flaws in their designed (DOR_0021, DOR_0094, DOR_0117). These checks were applied and reported in the individual feedback to the financial entities, and they have been instructed to disregard them. The errors have been corrected in the validation rules for the official reporting of the registers from 2025 onwards.

DOR_0012	LEI code validity	Warning	b_02_02	c0030		treat as zero/empty string	LEI code needs to be a valid one according to the GLEIF database	b_02_02_c0040 = 'LEI'
DOR_0013	LEI code validity	Warning	b_03_02	c0020		treat as zero/empty string	LEI code needs to be a valid one according to the GLEIF database	b_03_02_c0030 = 'LEI'
DOR_0014	LEI code validity	Warning	b_05_01	c0010		treat as zero/empty string	LEI code needs to be a valid one according to the GLEIF database	b_05_01_c0020 = 'LEI'
DOR_0015	LEI code validity	Warning	b_05_01	c0080		treat as zero/empty string	LEI code needs to be a valid one according to the GLEIF database	b_05_01_c0090 = 'LEI'
DOR_0016	LEI code validity	Warning	b_05_02	c0030		treat as zero/empty string	LEI code needs to be a valid one according to the GLEIF database	b_05_02_c0040 = 'LEI'
DOR_0017	LEI code validity	Warning	b_05_02	c0060		treat as zero/empty string	LEI code needs to be a valid one according to the GLEIF database	b_05_02_c0070 = 'LEI'
DOR_0018	LEI code validity	Warning	b_07_01	c0020		treat as zero/empty string	LEI code needs to be a valid one according to the GLEIF database	b_07_01_c0030 = 'LEI'
DOR_0019	Unique identifier	Warning	b_01_02	c0010		treat as zero/empty string	Key value: no duplicates should be reported.	
DOR_0020	Unique identifier	Warning	b_02_01	c0010		treat as zero/empty string	Key value: no duplicates should be reported.	
DOR_0021	Unique identifier	Warning	b_02_02	c0010 c0020 c0030 c0040 c0050 c0060		treat as zero/empty string	Key value: no duplicates should be reported.	
DOR_0022	Unique identifier	Warning	b_02_03	c0010 c0020		treat as zero/empty string	Key value: no duplicates should be reported.	
DOR_0023	Unique identifier	Warning	b_03_01	c0010 c0020		treat as zero/empty string	Key value: no duplicates should be reported.	
DOR_0024	Unique identifier	Warning	b_03_02	c0010 c0020 c0030		treat as zero/empty string	Key value: no duplicates should be reported.	
DOR_0025	Unique identifier	Warning	b_03_03	c0010 c0020		treat as zero/empty string	Key value: no duplicates should be reported.	
DOR_0026	Unique identifier	Warning	b_04_01	c0010 c0020 c0040		treat as zero/empty string	Key value: no duplicates should be reported.	
DOR_0027	Unique identifier	Warning	b_05_01	c0010 c0020		treat as zero/empty string	Key value: no duplicates should be reported.	

DOR_0028	Unique identifier	Warning	b_05_02	c0010 c0020 c0030 c0040		treat as zero/empty string	Key value: no duplicates should be reported.	
DOR_0029	Unique identifier	Warning	b_06_01	c0010 c0040		treat as zero/empty string	Key value: no duplicates should be reported.	
DOR_0030	Unique identifier	Warning	b_07_01	c0010 c0020 c0030 c0040		treat as zero/empty string	Key value: no duplicates should be reported.	
DOR_0031	Drop-down list value	Warning	b_01_01	c0030	LISTCOUNTRY	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0032	Drop-down list value	Warning	b_01_01	c0040	LISTOneForty	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0033	Drop-down list value	Warning	b_01_02	c0030	LISTCOUNTRY	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0034	Drop-down list value	Warning	b_01_02	c0040	LISTOneForty	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0035	Drop-down list value	Warning	b_01_02	c0050	LISTOneFifty	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0036	Drop-down list value	Warning	b_01_02	c0100	LISTCURRENCY	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0037	Drop-down list value	Warning	b_01_03	c0040	LISTCOUNTRY	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0038	Drop-down list value	Warning	b_02_01	c0020	LISTTwoTwenty	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0039	Drop-down list value	Warning	b_02_01	c0040	LISTCURRENCY	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0040	Drop-down list value	Warning	b_02_02	c0060	LISTANNEXIII	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0041	Drop-down list value	Warning	b_02_02	c0090	LISTTwoNinety	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0042	Drop-down list value	Warning	b_02_02	c0120	LISTCOUNTRY	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0043	Drop-down list value	Warning	b_02_02	c0130	LISTCOUNTRY	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0044	Drop-down list value	Warning	b_02_02	c0140	LISTBINARY	do not run rule	Drop down list values need to be according to DPM rules	

DOR_0045	Drop-down list value	Warning	b_02_02	c0150	LISTCOUNTRY	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0046	Drop-down list value	Warning	b_02_02	c0160	LISTCOUNTRY	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0047	Drop-down list value	Warning	b_02_02	c0170	LISTTwoSeventy	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0048	Drop-down list value	Warning	b_02_02	c0180	LISTTwoEighty	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0049	Drop-down list value	Warning	b_04_01	c0030	LISTFourThirty	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0050	Drop-down list value	Warning	b_05_01	c0040	LISTFiveForty	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0051	Drop-down list value	Warning	b_05_01	c0050	LISTCOUNTRY	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0052	Drop-down list value	Warning	b_05_01	c0060	LISTCURRENCY	treat as zero/empty string	Drop down list values need to be according to DPM rules	
DOR_0053	Drop-down list value	Warning	b_05_02	c0020	LISTANNEXIII	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0054	Drop-down list value	Warning	b_06_01	c0020	LISTSixTwenty	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0055	Drop-down list value	Warning	b_06_01	c0050	LISTSixFifty	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0056	Drop-down list value	Warning	b_06_01	c0100	LISTSixZero	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0057	Drop-down list value	Warning	b_07_01	c0040	LISTANNEXIII	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0058	Drop-down list value	Warning	b_07_01	c0050	LISTSevenFifty	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0059	Drop-down list value	Warning	b_07_01	c0060	LISTSevenSixty	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0060	Drop-down list value	Warning	b_07_01	c0080	LISTBINARY	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0061	Drop-down list value	Warning	b_07_01	c0040	LISTANNEXIII	do not run rule	Drop down list values need to be according to DPM rules	

DOR_0062	Drop-down list value	Warning	b_07_01	c0050	LISTSevenFifty	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0063	Drop-down list value	Warning	b_07_01	c0060	LISTSevenSixty	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0064	Drop-down list value	Warning	b_07_01	c0090	LISTSevenNinety	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0065	Drop-down list value	Warning	b_07_01	c0100	LISTSixZero	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0066	Drop-down list value	Warning	b_07_01	c0110	LISTSixFifty	do not run rule	Drop down list values need to be according to DPM rules	
DOR_0067	Mandatory fields	Blocking	b_01_01	c0010		treat as zero/empty string	Value should not be missing	
DOR_0068	Mandatory fields	Blocking	b_01_01	c0020		treat as zero/empty string	Value should not be missing	
DOR_0069	Mandatory fields	Blocking	b_01_01	c0030		treat as zero/empty string	Value should not be missing	
DOR_0070	Mandatory fields	Blocking	b_01_01	c0040		treat as zero/empty string	Value should not be missing	
DOR_0071	Mandatory fields	Blocking	b_01_01	c0050		treat as zero/empty string	Value should not be missing	
DOR_0072	Mandatory fields	Warning	b_01_02	c0010		treat as zero/empty string	Value should not be missing	
DOR_0073	Mandatory fields	Warning	b_01_02	c0020		treat as zero/empty string	Value should not be missing	
DOR_0074	Mandatory fields	Warning	b_01_02	c0030		treat as zero/empty string	Value should not be missing	
DOR_0075	Mandatory fields	Warning	b_01_02	c0040		treat as zero/empty string	Value should not be missing	
DOR_0076	Mandatory fields	Warning	b_01_02	c0100		treat as zero/empty string	Value should not be missing	
DOR_0077	Mandatory fields	Warning	b_01_02	c0110		treat as zero/empty string	Value should not be missing	
DOR_0078	Mandatory fields	Warning	b_02_02	c0010		treat as zero/empty string	Value should not be missing	

DOR_0079	Mandatory fields	Warning	b_02_02	c0020		treat as zero/empty string	Value should not be missing	
DOR_0080	Mandatory fields	Warning	b_02_02	c0030		treat as zero/empty string	Value should not be missing	
DOR_0081	Mandatory fields	Warning	b_02_02	c0040		treat as zero/empty string	Value should not be missing	
DOR_0082	Mandatory fields	Warning	b_02_02	c0050		treat as zero/empty string	Value should not be missing	
DOR_0083	Mandatory fields	Warning	b_02_02	c0060		treat as zero/empty string	Value should not be missing	
DOR_0084	Mandatory fields	Warning	b_04_01	c0010		treat as zero/empty string	Value should not be missing	
DOR_0085	Mandatory fields	Warning	b_04_01	c0020		treat as zero/empty string	Value should not be missing	
DOR_0086	Mandatory fields	Warning	b_05_01	c0010		treat as zero/empty string	Value should not be missing	
DOR_0087	Mandatory fields	Warning	b_05_01	c0020		treat as zero/empty string	Value should not be missing	
DOR_0088	Mandatory fields	Warning	b_05_01	c0030		treat as zero/empty string	Value should not be missing	
DOR_0089	Mandatory fields	Warning	b_05_01	c0040		treat as zero/empty string	Value should not be missing	
DOR_0090	Mandatory fields	Warning	b_05_01	c0050		treat as zero/empty string	Value should not be missing	
DOR_0091	Mandatory fields	Warning	b_05_01	c0080		treat as zero/empty string	Value should not be missing	
DOR_0092	Mandatory fields	Warning	b_05_01	c0090		treat as zero/empty string	Value should not be missing	
DOR_0093	Mandatory fields	Warning	b_06_01	c0010		treat as zero/empty string	Value should not be missing	
DOR_0094	Mandatory fields	Warning	b_06_01	c0060		treat as zero/empty string	Value should not be missing	
DOR_0095	Mandatory fields	Warning	b_07_01	c0010		treat as zero/empty string	Value should not be missing	

DOR_0096	Mandatory fields	Warning	b_07_01	c0020		treat as zero/empty string	Value should not be missing	
DOR_0097	Mandatory fields	Warning	b_07_01	c0030		treat as zero/empty string	Value should not be missing	
DOR_0098	Mandatory fields	Warning	b_07_01	c0040		treat as zero/empty string	Value should not be missing	
DOR_0099	Mandatory fields	Warning	b_07_01	c0050		treat as zero/empty string	Value should not be missing	
DOR_0100	Mandatory fields	Warning	b_07_01	c0090		treat as zero/empty string	Value should not be missing	
DOR_0101	Mandatory fields	Warning	b_07_01	c0110		treat as zero/empty string	Value should not be missing	
DOR_0102	Mandatory fields	Warning	b_01_02	c0060		treat as zero/empty string	Value should not be missing	
DOR_0103	Mandatory fields	Warning	b_01_03	c0020		treat as zero/empty string	Value should not be missing	
DOR_0104	Mandatory fields	Warning	b_03_01	c0020		treat as zero/empty string	Value should not be missing	
DOR_0105	Mandatory fields	Warning	b_03_03	c0020		treat as zero/empty string	Value should not be missing	
DOR_0106	Mandatory fields	Warning	b_06_01	c0040		treat as zero/empty string	Value should not be missing	
DOR_0107	Date format	Warning	b_01_02	c0070		do not run rule	Value entered is a date	
DOR_0108	Date format	Warning	b_01_02	c0080		do not run rule	Value entered is a date	
DOR_0109	Date format	Warning	b_01_02	c0090		do not run rule	Value entered is a date	
DOR_0110	Date format	Warning	b_02_02	c0070		do not run rule	Value entered is a date	
DOR_0111	Date format	Warning	b_02_02	c0080		do not run rule	Value entered is a date	
DOR_0112	Date format	Warning	b_06_01	c0070		do not run rule	Value entered is a date	
DOR_0113	Date format	Warning	b_07_01	c0070		do not run rule	Value entered is a date	
DOR_0114	Date format	Warning	b_01_01	c0060		do not run rule		
DOR_0117	Mandatory fields	Warning	b_06_01	c0060		treat as zero/empty string	Value should not be missing	if b_06_01_c0050 = 'eba_BT:x28'

DOR_0118	Mandatory fields	Warning	b_07_01	c0060		treat as zero/empty string	Value should not be missing	if b_07_01_c0050 in ('eba_ZZ:x959' 'eba_ZZ:x960')