IRSG

INSURANCE AND REINSURANCE STAKEHOLDER GROUP

Advice to 2 consultations:

Proposal for RTS on Functioning of the Resolution Colleges (EIOPA-BoS-25/285)

AND

proposal for ITS on procedures and a minimum set of standard forms and templates for the provision of information referred to in Article 12(1) of the Directive (EU) 2025/1 (EIOPA-BOS-25/286)

IRSG-25-21

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IRSG SUMMARY

The Insurance and Reinsurance Stakeholder Group (IRSG) commends EIOPA for its diligent efforts in advancing the regulatory framework for insurance resolution framework. We recognize EIOPA's positive steps toward harmonizing reporting, leveraging existing Solvency II data, and engaging with stakeholders to minimize unnecessary burdens. We also reiterate our previous recommendations (link) —resolution plans should avoid duplicating information already available through Solvency II, the definition of "relevant services" should be strictly aligned with business continuity management, and reinsurance should not be classified as a relevant service. Furthermore, we maintain that critical functions should be primarily identified by undertakings, with resolution authorities intervening only in cases of material deficiencies. While some of these concerns have been acknowledged, further refinement is necessary.

On the RTS for Resolution Colleges:
We support the initiative to clarify roles and responsibilities within resolution colleges and to enhance cooperation between supervisory and resolution authorities. The structured approach to group and cross-border resolution planning is welcomed. However, we note a significant inconsistency: the draft RTS suggests that all relevant information for group resolution plans is to be provided by the ultimate parent undertaking. This contradicts Article 12(2) and 12(3) of the IRRD, which require resolution authorities to first seek information from supervisory authorities and only approach undertakings if necessary. We recommend amending the RTS to remove the phrase "provided by the ultimate parent undertaking" to ensure compliance with the Directive (see Chapter 1, Article 7). In addition, the terminology should be aligned with recital 25 IRRD, referring to "the ultimate parent in scope of group supervision" rather than only "ultimate parents," to ensure that group treatment applies to all group entities subject to group supervision.

We also stress the importance of social dialogue and employee involvement in resolution planning. While Solvency II enables stakeholder engagement during solvency deterioration, such dialogue should continue throughout planning. Despite confidentiality and time constraints, including employees—who offer unique operational insights—is vital for trust and transparency. Strengthening social dialogue mechanisms supports IRRD implementation and helps prevent unintended consequences for insurers, employees, and policyholders.

On the ITS for minimum set of standard forms and templates:
We appreciate the intention to standardize procedures and templates, which can streamline information exchange and reduce ad hoc requests. However, the draft ITS does not fully incorporate the procedural safeguards and limitations of IRRD Article 12. Specifically, the ITS should address all paragraphs of Article 12, not just Article 12(1), and must reflect that information should only be requested from undertakings if it is both necessary and not already

available from supervisory authorities (see Chapter 2, Q1 and Article 12(2)). We recommend revising Recitals 1–3 and relevant articles to ensure full alignment with the Directive.

We further advise that reporting templates should only require information not already provided through Solvency II or other supervisory reporting. The scope of entities required to report should be clarified, explicitly excluding those not in scope for resolution planning. The proposed reporting deadlines overlap with Solvency II deadlines, creating unnecessary burden; we recommend extending or postponing these deadlines, or allowing flexibility in coordination with competent authorities (see Chapter 2, Article 3). Additional information requests should be exceptional and strictly subordinated to requests to supervisory authorities.

We urge EIOPA to limit "relevant services" to essential providers (HR, IT, premises) and to exclude reinsurance services, as this information is already available through existing reporting. The assessment of critical functions and their impact should remain the responsibility of resolution authorities, not undertakings, as these require a market-wide perspective (see Chapter 2, IR.07.01–IR.07.04).

We note that the impact assessment lacks a robust estimate of implementation costs and underestimates the burden on undertakings. All new reporting requirements should be justified on a data item-by-item basis, consistent with the "once-only" principle and the Commission's objective to reduce regulatory burdens

1. PROPOSAL FOR RTS ON THE FUNCTIONING OF THE RESOLUTION COLLEGES

Q1. Do you have comments on the Background and Analysis Section?

In general, the Regulatory Technical Standards (RTS) should refer to **"the ultimate parent in scope of group supervision"** rather than only "ultimate parents" to appropriately reflect recital 25 IRRD that stipulates that *"any group treatment for pre-emptive recovery and resolution planning should apply to all group entities subject to group supervision".*

The IRSG wishes to emphasize the critical importance of social dialogue and employee involvement in resolution planning. While the Solvency II regulation already mandates insurers to disclose additional information when their solvency ratio deteriorates—thereby enabling stakeholder dialogue—such engagement should someways be maintained throughout the resolution planning process. We acknowledge that resolution planning may involve non-public information, considerations related to the "no creditor worse off" (NCWO) principle, and general time constraints. Nevertheless, the inclusion of key stakeholders, particularly employees, is essential for fostering trust and transparency in the process.

Insurance employees possess unique, first-hand insights into daily operations and customer relationships. While these perspectives are often reflected in formal reports, maintaining active engagement during resolution planning remains vital. We believe that strengthening mechanisms for social dialogue will support the successful implementation of the IRRD's objectives, while mitigating potential unintended consequences for insurers, their employees, and policyholders.

Q2. Do you have comments on the Recitals?

See answer to Q1.

Articles:

Q3. Do you have comments on the SECTION I on the OPERATIONAL ORGANISATION OF RESOLUTION COLLEGES?

See answer to Q1.

Article 7 (Cooperation between supervisory authorities and resolution authorities)

The subparagraph 2 implies that all relevant information for the development of group resolution plans is provided by the ultimate parent undertaking in scope of group supervision. This contradicts Article 12(2)/12(3) of the IRRD. According to the Directive, resolution authorities should first obtain information from supervisory authorities, and only if such data is unavailable or unsuitable should undertakings be required to provide it directly. We thus recommend removing the part ", provided by the ultimate parent undertaking,"

Q4. Do you have comments on the SECTION II on the GROUP RESOLUTION PLANNING?

Article 10.1c, Article 12.3, Article 29.4: An alignment within the consultations between "silence as consent" versus "explicit consent" would be welcomed.

Q5. Do you have any questions on the SECTION III on the CROSS-BORDER GROUP RESOLUTION?

Any fragmentation by way of subsidiary resolution plans should be avoided, therefore all measures should be taken to preserve group resolution plans in their entirety. It should be stated explicitly that the resolution colleges are responsible for resolving potential inconsistencies between individual and group resolution plans, and not the subsidiary or the group. Additional individual resolution plans on subsidiary level should not lead to a duplication of reporting requirements for the individual subsidiary or the group.

Q6. Do you have comments on the policy issue?

Policy Issue A: The structure, scope and level of detail when defining the requirements for the setting up and functioning of the resolution colleges

No

Q7. Do you have any other comments?

No

2. PROPOSAL FOR ITS ON PROCEDURES AND A MINIMUM SET OF STANDARD FORMS AND TEMPLATES FOR THE PROVISION OF THE INFORMATION REFERRED TO IN ARTICLE 12(1) OF THE DIRECTIVE (EU) 2025/1

Q1. Do you have comments on the Background and Analysis Section?

The document BOS-24/286[1] claims to have "regard to Article 12(3) of DIRECTIVE (EU) 2025/1 (IRRD). However, the implementing standards must cover the "**procedures** and minimum set of standard forms and templates for the provision of information under this **Article**, and to specify the minimum content of such information". Specifically, the ITS should cover all paragraphs of Article 12. Unfortunately, this shortcoming affects not only the form but also the content of the Draft ITS.

In the Section "Background and Analysis" EIOPA states that based "on Article 12(1) of Directive (EU) 2025/1, insurance and reinsurance undertakings or the ultimate parent undertaking in scope of group supervision (collectively "insurers") have to provide the resolution authorities with all information necessary to draw up and implement (group) resolution plans".

This broad statement is incorrect and misleading as important caveats and limitations are not mentioned. As stated above, additional procedural requirements for data collection are clearly defined in Article 12 IRRD and must not be ignored in the ITS. The main requirements are that information is only requested from the undertakings, when (i) the information is necessary to draw up and implement (group) resolution plans, and (ii) the information is not already available from the supervisory authority. The draft ITS fails to implement these two requirements; therefore, we do not consider the draft ITS in its current form to be consistent with the objective of Article 12 of the IRRD (similarly see comment to Article 6).

Article 12(2) of the IRRD is clear: "Resolution authorities shall obtain all such available information from supervisory authorities before requesting information from insurance and reinsurance undertakings". Therefore, any information available as part of existing S-II processes must not be

[1] CONSULTATION PAPER on the proposal for Implementing Technical Standards (ITS) on procedures and a minimum set of standard forms and templates for the provision of information referred to in Article 12(1) of the Directive (EU) 2025/1

requested from undertakings as part of the IRRD reporting. In particular, this includes all information provided in QRTs, RSR, SFCR, ORSA and Recovery Plans.

The purpose of the provisions in the Directive must be that if the information is requested in a slightly different format, or if this information can be derived from SII reporting, then such a request for information is also contrary to the principles of the IRRD. Note that the requirements in the IRRD to obtain data first from the supervisory authority are more explicit than the corresponding rules in the corresponding Directive for credit institutions and investment firms (Article 11(2) and Annex B Directive 2014/59/EU)).

As EIOPA shall "develop draft implementing technical standards to specify procedures and a minimum set of standard forms and templates for the provision of information" under Article 12 IRRD, and Article 12 IRRD also requires that supervisory authorities provide some of this information, we recommend that EIOPA redrafts the ITS to consider these two distinct information pathways. The ITS might also specify how information is exchanged between resolution authorities and supervisory authorities, or between resolution authorities, regardless of whether this information is provided by insurance undertakings as part of SII reporting.

Relevant services is a concept in the Directive meant to cover those services that are provided by essential providers (HR, IT and premises). The instructions imply extending this concept far beyond this and this can have major consequences and complexity, not only in terms of reporting burden but also in terms of resolution planning. The IRSG urges EIOPA to limit the list of service types to point 1 to 3 in the tab IR.08.01 cell C0020.

Regarding reinsurance in particular, please refer to the IRSG's response to EIOPA Proposal for RTS on the Content of Resolution Plans and Group Resolution Plans. The IRSG argued that the definition of "relevant services" should be aligned with "essential service providers" (as defined in Article 2(86) of the IRRD) in the context of business continuity management and that "reinsurance services" should not be included as relevant services. Besides, information about reinsurance should be largely available from the existing and very detailed S-II reporting. Besides, extensive information about reinsurance (ceded and accepted) is available from existing Solvency II reporting. For this reason alone, information about reinsurance should not be included in the data collection requirements of the IRRD.

Some examples, where EIOPA claims to use a less burdensome approach for the industry are misleading. Neither for the template LIAB1, LIAB2, or for derivative transactions, EIOPA justifies the additional reporting burden to undertakings based on the actual IRRD text ("necessary", and "not available from supervisory authority").

Some further examples of information that should already be available to supervisory authorities:

- information on legal entities and ownership/shareholding structures (templates IR.02.01 and IR.02.02), intragroup transactions (IR.04), major counterparties (IR.05), and several aspects of "relevant services" (IR.08)
- List of "critical functions": These are determined by the resolution authority and therefore do not need to be requested from the insurer. Additionally, templates IR.07.01. to 07.03 (list of critical functions and their impact on the financial system, real economy, substitutability) require the submission of data that lies outside the responsibility of the insurance company. These assessments require a higher-level, market-wide perspective and should be carried out by the resolution authority, not the insurance company.

More generally, the EIOPA Impact Assessment lacks an appropriate implementation cost estimate. A purely qualitative assessment was carried out, which highly underestimates the actual costs to be expected (introduction costs, additional personnel, IT costs, etc.).

Q2. Do you have comments on the Recitals?

Recitals 1 to 3 should be changed:

- Recital 1, see our answer in Q1
- Recital 2, see our answer in Q3, Article 3
- Recital 3, see our answer in Q3, Article 5

In general, the Implementing Technical Standards (ITS) should refer to "the ultimate parent in scope of group supervision" rather than only "ultimate parents" to appropriately reflect recital 25 IRRD that stipulates that, as *"any group treatment for pre-emptive recovery and resolution planning should apply to all group entities subject to group supervision".*

Q3. Do you have comments on the following articles?

In general, the Implementing Technical Standards (ITS) should refer to "the ultimate parent in scope of group supervision" rather than only "ultimate parents" to appropriately reflect recital 25 IRRD that stipulates that, as *"any group treatment for pre-emptive recovery and resolution planning should apply to all group entities subject to group supervision".*

Article 1 - Resolution reporting templates

The Article should be changed to "Insurance and reinsurance undertakings and, in the case of groups, the ultimate parent undertaking in scope of group supervision shall submit to the resolution authority, or to the group-level resolution authority, respectively, the information

considered necessary by the resolution authority, and not already provided to the supervisory authorities, according to the format specified in the templates set out in Annex I, following the instructions set out in Annex II.". Otherwise, it is not aligned with the actual requirements of the Directive.

Furthermore, article 1 should bring more clarity on the entities in scope as at least two situations may occur. First, for insurance and reinsurance undertaking not in scope of resolution planning, it should be clarified that this reporting requirement is not applicable. Second, for related undertakings which are part of a group subject to resolution planning but which would not have be in scope of resolution planning on a standalone basis because of its limited size or lack of existence of critical functions, these entities should also be excluded from reporting requirement.

Article 2 - Content of information

For groups (paragraph 2), the current ITS could be interpreted such that – irrespective of any materiality thresholds – information must be provided for all (re-)insurance undertakings, and their respective "service entities". In particular, information seems to be required in the group templates with respect to undertakings that would not be covered by resolution planning requirements based on Article 9(2) of the IRRD and that are not relevant to the resolution objectives of the group. This should be clarified in article 1 of the ITS as suggested above.

The requirement of Article 9(2) that small and non-complex undertakings shall not be subject to resolution planning requirements, except where the resolution authority considers that such an undertaking represents a particular risk at national or regional level also applies to group resolution plans and must be reflected in the ITS

Article 3 - Frequency and reference dates

While we acknowledge the need for timely submission of information, the current deadlines (16 weeks for individual undertakings and 22 weeks for groups) coincide with Solvency II reporting deadlines. This overlap creates a significant additional burden for undertakings, as both reporting streams would have to be prepared simultaneously. The nature and purpose of resolution reporting is different as it is not closely related to a particular closing date, but of a more fundamental and longer-term nature, so that the tight reporting deadlines for regular supervisory reporting should not apply. We therefore suggest to at least **extend or postpone the reporting deadline for resolution reporting** to avoid overlapping workload and ensure high data quality (for example to September 30 of the year following the closing date).

However, it is questionable if a fixed deadline and frequency should be covered by the ITS at all, as the frequency is related to Article 11 IRRD and not Article 12. Therefore, this is in the discretion of Member States and the resolution authorities. Solvency II reporting deadlines are fixed to allow a timely going concern supervision aligned with the one-year horizon of the prudential regime. This

justification for short deadlines is not applicable in the case of resolution planning in absence of an imminent risk of failure. In line with this rationale, we propose that the first resolution plan to be drawn up by the authorities for the financial year from 1 January to 31 December 2029, based on the recovery plan for the first full financial year 2028. Such a sequencing approach would ensure a balanced and proportionate implementation of the RTS and ITS requirements. Lessons learned from the recovery planning process could be directly applied to the resolution phase, thereby improving the overall quality, consistency, and reliability of both frameworks overall. We consider this sequential approach to be the most efficient and proportionate solution for all stakeholders involved. It would enhance quality, reduce risks and costs, and ultimately strengthen the resilience of both insurers and supervisors.

Article 4 - Data quality and re-submission of information

Information can be provided by supervisory authorities or by the undertakings. It might thus be helpful to clarify that this Article only refers to the information provided for resolution purposes that the resolution authority requested from the undertaking for this purpose. Data quality issues related to other information pathways (e.g., covered by Solvency II processes) should be covered there.

Article 5 - Resolution reporting formats

To avoid potential inconsistencies, this Article should refer to the corresponding formats and specifications defined for Solvency II QRT reporting.

As the ultimate decision, which additional information is required lies with the resolution authority, subparagraph (1)(a) should be changed to “the information not required by the resolution authority or not applicable shall not be included in a data submission”.

Article 6 - Provision of additional information

While we understand that resolution authorities must be able to request information necessary for resolution planning, the current draft of Article 6(1) appears to contradict Article 12(2)/12(3) of the IRRD. According to the Directive, resolution authorities should first obtain information from supervisory authorities, and only if such data is unavailable or unsuitable should undertakings be required to provide it directly. We therefore suggest clarifying that **additional information requests to undertakings should be strictly subordinated** to the requests addressed to supervisory authorities. Undertakings should only be approached in exceptional cases where information is lacking. This would ensure consistency with the IRRD, avoid duplication of reporting channels, and reduce unnecessary administrative burden for undertakings.

It seems reasonable that resolution authorities adopt the S-II formats directly, where available. If resolution authorities want to change the format and structure of the data (e.g., to align with the

corresponding banking resolution data), this task must not be assigned to the insurance industry. Therefore, in paragraph 1, the part ", or where the format in which additional information is provided by the supervisory authority is not suitable for the purposes of drawing up or implementing resolution plans" should be dropped.

Article 7 - Cooperation between supervisory authorities and resolution authorities

This Article is not in line with the IRRD Directive, which requires cooperation between supervisory and resolution authority (in particular Article 12(2), sentence 2), irrespective of whether the data is covered in Annex 1 or Implementing Regulation (EU) 2023/894.

Q4 Do you have comments on the policy issues?

Concerning the discussion of policy options we are of the opinion that it must be assessed if specific information is requested from the individual undertakings, or not. Specifically, these two test must be passed to be compliant with the text of the IRRD.

1. Why is EIOPA / The Commission of the opinion that this information is necessary to draw up (group) resolution plans for the majority of undertakings/ groups that are subject to resolution planning? Only information that is necessary can be requested from the undertakings / groups. And only if this information is necessary for the majority of undertakings, would it be reasonable to include it into the "minimum set of standard forms".
2. If the information is considered necessary: Can this information be derived from existing S-II-Reporting, and thus requested from the supervisory authority? Only information that is not available from the supervisory authority can be requested from the undertakings/ groups .

The IRRD does not allow for the preemptive collection of data from undertakings that is (likely) not relevant to resolution planning. As EIOPA is not stating the underlying reasons why a specific piece of information is required, compliance of the ITS with the IRRD cannot be assessed. Therefore, the current consultation is not assessing the true potential costs and benefits of the regulation, which should be between the two options "requesting the information" and "not requesting the information". The Impact Assessment is not compliant with Article 29 of the EIOPA Regulation. This applies to all information requested in the templates, and not only to the "reporting on granular liabilities" options. The EIOPA Impact Assessment generally lacks an appropriate implementation cost estimate. A purely qualitative assessment highly underestimates the actual implementation and ongoing costs to be expected (introduction costs, additional personnel, IT costs, etc.).

In light of the text of the IRRD, the Commission's objective to reduce regulatory burdens by 25% for all businesses, and the 'once-only' principle (compare the initiative "Simplification - European Commission" as of August 2025), EIOPA must justify new, industry-wide reporting requirements on a data item-by-data item basis. The justification of EIOPA to request extensive data from insurers is that "that while some information might not be relevant for all of them, a very restrictive set of information would increase ad-hoc data requests in a format that is not harmonized" is insufficient. This request clearly goes beyond the requirement of the Directive that resolution authorities have the power to request „necessary" information (Article 12). "Necessary information" does not include information that „might not be relevant". In this context, we reject the objective of EIOPA to ask "for more data as resolutions authorities and insurers and reinsurers undertakings gain experience". Resolution authorities should request information when required (and only then), but not when the industry has experience to provide the information.

Policy issue A: ANNUAL REPORTING

These are not two options to assess at all, as this is in the discretion of Member States and the resolution authority.

Policy issue B: Reporting on Granular Liabilities

As already stated before, the policy option "No reporting", and "Using solvency II" information are missing.

Concerning the statement "It is important to ensure a gradual approach to the data request asking for more data as resolutions authorities and insurers and reinsurers undertakings gain experience", we would like to stress that this is the wrong approach. Resolution Authorities should request information when required, and not when industry has experience to provide this information.

Q5 Do you have comments on the following templates or the corresponding instructions?

Please always state the exact sheet and cell of the Excel template you are referring to in brackets after your comment, e.g. "(sheet IR.03.01.39, cell B12)".

IR.01.01 - Content of the submission

No

IR.01.02 - Basic information

No

IR.02.01 - Legal Entities

Should largely be available from NSA. Only necessary information not available from NSA should be requested.

Irrespective thereof, the formats should be aligned with QRT S32.01.04, in particular C0020 which would serve as a key.
C0100 should already be available to the Resolution Authority.

IR.02.02 - Ownership Structure

Should largely be available from NSA. Only necessary information not available from NSA should be requested. If this is the case, then 10% threshold should be applied in accordance with Article 13 (21) of the Solvency II Directive (2009/138/EC), which defines the qualifying holding. Given the limited impact and low risk, we therefore recommend increasing the threshold to at least 10%, in line with the Solvency II Directive.

IR.03.01 - Liability Structure – Non-insurance

General Comments are missing; therefore, it is difficult to provide an assessment for this template. It should be examined whether information on liabilities with a maturity of less than 7 days is actually necessary for resolution planning.

IR.03.01 - Liability Structure – Non-insurance

No

IR.04.01 - Intragroup Financial Interconnections

Should largely be available from NSA. Only necessary information not available from NSA should be requested

IR.05.01 - Major Liability Counterparties

Should largely be available from NSA. Only necessary information not available from NSA should be requested.

IR.05.02 - Major Off Balance Sheet Counterparties

Should largely be available from NSA. Only necessary information not available from NSA should be requested.

IR.06.01 - Insurance Guarantee Schemes

No

IR.07.01 - Critical functions – Insurance (Life and Non-L.)

The proposed templates should not include tasks that are outside companies' remit, i.e.:

- Assessment of critical functions (IR.07.01-IR.07.04)
- Assessment of impact on financial system, on real economy and on substitutability (IR.07.01-IR.07.03)

These tasks are judgements rather than data, require a market-wide perspective and should be carried out by resolution authorities. In addition, Article 1 of IRRD clearly highlights the lack of extra-territoriality of the IRRD outside of the European Union. Therefore, for the avoidance of doubt, where the template requests to populate the "**country** in which the critical function is provided", the instructions be adjusted to say "Member State" in line with Article 2(2)(f) of the ITS.

IR.07.02 - Critical functions – Non-Insurance functions

Same comment as above.

IR.07.03 - Critical functions – Insurance or reinsurance related functions

Same comment as above. The added value of a self-assessment of the impact of the financial system on the real economy and of substitutability is questionable. Such an assessment can only reasonably be conducted at the industry level and requires the availability of all relevant industry data. Therefore, if the RA requires this information, it should be derived from information of the NCA, without requesting additional information from the undertakings.

ITS should not refer to Guidelines addressed to the resolution authorities (C0020).

IR.07.04 - Critical functions – Mapping to Legal Entities

Article 1 of IRRD clearly highlights the lack of extra-territoriality of the IRRD outside of the European Union. Therefore, for the avoidance of doubt, where the template requests to populate the "**country** in which the critical function is provided", the instructions be adjusted to say "Member State" in line with Article 2(2)(f) of the ITS.

IR.07.05 - Core Business Lines – Mapping to Legal Entities

No

IR.07.06 - Critical Functions – Mapping to Core Business Lines

Article 1 of IRRD clearly highlights the lack of extra-territoriality of the IRRD outside of the European Union. Therefore, for the avoidance of doubt, where the template requests to populate the "**country** in which the critical function is provided", the instructions be adjusted to say "Member State" in line with Article 2(2)(f) of the ITS.

IR.08.01 - Relevant Services

Relevant services is a concept in the Directive meant to cover those services that are provided by essential providers (HR, IT and premises). The instructions imply extending this concept far beyond this and this can have major consequences and complexity, not only in terms of reporting burden but also in terms of resolution planning. The IRSG urges EIOPA to limit the list of service types to point 1 to 3 in the tab IR.08.01 cell C0020.

Regarding reinsurance in particular, please refer to the IRSG's response to EIOPA Proposal for RTS on the Content of Resolution Plans and Group Resolution Plans. The IRSG argued that the definition of "relevant services" should be aligned with "essential service providers" (as defined in Article 2(86) of the IRRD) in the context of business continuity management and that "reinsurance services" should not be included as relevant services. Besides, information about reinsurance should be largely available from the existing and very detailed S-II reporting.

In addition, as far as IT is concerned (service type 2), the information requested is already extensively covered by DORA and therefore should significantly trimmed down if not deleted.

IR.08.02 - Relevant Services – Mapping to Critical Functions

Please refer to the above response.

In addition, Article 1 of IRRD clearly highlights the lack of extra-territoriality of the IRRD outside of the European Union. Therefore, for the avoidance of doubt, where the template requests to populate the "**country** in which the critical function is provided", the instructions be adjusted to say "Member State" in line with Article 2(2)(f) of the ITS.

IR.08.03 - Relevant Services – Mapping to Core Business Lines

Please refer to the above response.

IR.09.01 - FMI – Providers and Users

No

IR.09.02 - FMI – Mapping to Critical Functions and Core Business Lines

No

Q6. Do you have any other general comments?

As already mentioned, undertakings should not be required to provide information for resolution purposes (in the form of templates or otherwise), if this or similar information has already been provided to the supervisory authorities as part of the supervisory reporting process. In consequence, all reporting templates should be verified against this requirement, and EIOPA should justify any new reporting requirements against this approach. Otherwise, the ITS is not compliant with the IRRD.