

Public consultation on the supervisory reporting and public disclosure package including Guidelines on reporting for financial stability purposes and Guidelines on the supervision of branches of third-country insurance undertakings

Fields marked with * are mandatory.

Consultation Paper on the following proposals:

- amendments to Implementing Regulation (EU) 2023/894 on supervisory reporting
- amendments to Implementing Regulation (EU) 2023/895 on public disclosure
- revised Guidelines on reporting for financial stability purposes
- revised Guidelines on the supervision of branches of third-country insurance undertakings

The European Insurance and Occupational Pensions Authority (EIOPA) published today a Consultation Paper on the revision of the reporting and disclosure framework under Solvency II, including proposals for reporting burden reduction. The proposals aim to keep the reporting requirements fit for purpose while further enhancing proportionality and limiting administrative burden in the Solvency II reporting and disclosure framework.

EIOPA invites comments on the consultation paper and the presented proposals. Comments are most helpful if they respond to the question stated and contain a clear rationale.

To submit your comments, please click on the blue “Submit” button in the last part of the present survey. Please note that comments submitted after 10 October 2025 or submitted via other means may not be processed.

Please clearly express in the consultation form if you wish your comments to be disclosed or to be treated as confidential.

The protection of individuals with regard to the processing of personal data by the ESAs is based on Regulation (EU) 1725/2018 of the European Parliament and of the Council of 23 October 2018. Further information on data protection can be found under the Legal notice section of the ESA websites.

General Information

* Name of the stakeholder

IRSG

Name of the Organisation

* Country

Germany

* Contact Person

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* Email Address of Point of Contact

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Treatment of the comments provided

- ☐ Confidential
☒ Publicly available

ITS on Reporting

Changes stemming out of Solvency II Level I Review

If applicable, please clearly indicate in your comment if you are referring to the solo, group - or both requirements.

Please include any comment you might have regarding the amendments to S.22.01 - Impact of long-term guarantee measures and transitional measures (both at solo and group reporting):

Please include any comment you might have on the proposed amendments to template S.22.06 - Best estimate subject to volatility adjustment by country and currency (replaced with S.22.07 - Calculated volatility adjustment and corresponding best estimates by country and currency):

Request of new information in the ITS on Reporting

Please include any comment you might have regarding the amendments to template S.14.01 - (Life obligation analysis) on new pensions data:

Regarding new pensions data: Do you agree that Option 1 (Enhancing Template S.14 with classifications from E.02.16) as presented in Annex II is currently the most appropriate approach for collecting enhanced data on occupational pensions provided by insurance undertakings? If not, what do you consider as the most appropriate way forward?

Are there other data points on pension products that are currently missing or insufficiently captured in existing reporting frameworks?

Please include any comment you might have regarding the new template S.27.02 - Catastrophe data - Loss data:

Please include any comment you might have regarding the new template S.27.03 - Exposure and premium data:

Regarding Collecting data for natural catastrophes: To improve the collection of catastrophe losses, it would also be possible to collect the data per event for a given year. Would you find this information important? Which unique identifier could be used to identify an event?

EIOPA's approach on reducing the reporting burden

Reduction of the reporting frequency

Regarding S.28.01/S.28.02: Please include any comment you might have regarding the proposal to remove S. 28.01 and S.28.02 from the quarterly reporting package and instead rely on S.23.01 to ensure compliance with Article 129(4) of Directive 2009/138/EC:

Regarding S.06.03 - Collective investment undertakings look through approach: Please include any comment you might have regarding the proposal to reduce the reporting frequency from quarterly to semi-annually:

Regarding Small and Non-complex undertakings (SNCUs) and small non-complex groups (SNCG): Please include any comment you might have regarding the proposal to reduce the required information for SNCU and SNCG in Q1 and Q3:

Deletion of templates

Please include any comment you might have regarding the proposal to **delete** S.21.01 - Loss distribution risk profile (solo):

Please include any comment you might have regarding the proposal to **delete** S.21.02 Underwriting risks non-life (solo):

Please include any comment you might have regarding the proposal to **delete** S.21.03 Non-life distribution of underwriting risks by sum insured (solo):

Please include any comment you might have regarding the proposal to **delete** S.23.02 - Detailed information by tiers on own funds (solo):

Please include any comment you might have regarding the proposal to **delete** S.23.03 - Annual movements on own funds (solo):

Please include any comment you might have regarding the proposal to **delete** S.29.01 - Excess of Assets over Liabilities (solo):

Please include any comment you might have regarding the proposal to **delete** S.29.02 - Excess of Assets over Liabilities - explained by investments and financial liabilities (solo):

Please include any comment you might have regarding the proposal to **delete** S.29.04 - Detailed analysis per period - Technical flows versus Technical provisions (solo):

Please include any comment you might have regarding the proposal to **delete** S.30.01 - Facultative covers for non-life and life business basic data (solo) from the regular reporting package while keeping it available for justified ad-hoc requests:

Please include any comment you might have regarding the proposal to **delete** S.30.02 - Facultative covers for non-life and life business shares data - item-by-item reporting on facultative reinsurance at contract level (solo) from the regular reporting package while keeping it for justified ad-hoc requests:

Please include any general comment you might have regarding the proposal to **delete** S.37.03 - Risk Concentration – Exposure by asset class and rating (group):

Changes to templates: Simplifications, clarified instructions and enhanced proportionality:

If applicable, please clearly indicate in your comment if you are referring to the solo, group - or both requirements.

Please include any comment you might have regarding the proposals on S.02.01 - Balance sheet:

Please include any comment you might have regarding the proposal to increase the threshold from 2% to 3,5% in S.03.01 - Off-balance sheet items – general:

Please include any comment you might have regarding the proposals on S.04.03 - Basic Information - List of underwriting entities:

Please include any comment you might have regarding the proposals on S.04.04 - Activity by country - location of underwriting:

Please include any comment you might have regarding the proposals on S.04.05 - Activity by country - location of risk:

Please include any comment you might have regarding the proposals on S.05.01 - Premiums, claims and expenses by line of business:

Please include any comment you might have regarding the proposals on S.05.02 - Premiums, claims, and expenses by country:

Please include any comment you might have regarding the proposals on S.06.02 - List of assets:

Please include any comment you might have regarding the proposals on S.06.03 - Collective Investment Undertakings - look through approach:

Please include any comment you might have regarding the proposals S.06.04 - Climate change-related risks to investments:

Please include any comment you might have regarding the proposals on S.08.01 - Open derivatives:

Please include any comment you might have regarding the proposals on S.14.01 - Life obligation analysis:

Please include any comment you might have regarding the proposals on S.14.02 - Non-life business - policy and customer information:

Please include any comment you might have regarding the proposals on S.16.01 - Information on annuities stemming from Non-Life insurance obligations:

Please include any comment you might have regarding the proposals on S.19.01 -Non-Life Insurance claims:

Please include any comment you might have regarding S.23.01 - Own Funds:

Please include any comment you might have regarding the proposals on S.23.04 - List of items on own funds:

Please include any comment you might have regarding the proposals on

- S.25.05 - Solvency Capital Requirement - for undertakings using an internal model (partial or full)
- S.25.05 – Solvency Capital Requirement - for groups using an internal model (partial or full):

Please include any comment you might have regarding the proposals on

- S.26.08 - Solvency Capital Requirement - for undertakings using an internal model (partial or full)

- S.26.08 – Solvency Capital Requirement - for groups using an internal model (partial or full):

Please include any comment you might have regarding the proposals on S.26.09 – Internal model: Market & Credit risk – for financial instruments:

Please include any comment you might have regarding the proposals on S.26.13 – Internal model: Non-Life & Health NSLT Underwriting risk:

Please include any comment you might have regarding the proposals on S.30.03 - Outgoing Reinsurance Program basic data:

Please include any comment you might have regarding the proposals on S.30.04 - Outgoing Reinsurance Program shares data:

Please include any comment you might have regarding the proposals on S.31.01 - Share of reinsurers (including Finite Reinsurance and SPV's):

Please include any comment you might have regarding the proposals on S.31.02 - Special Purpose Vehicles:

Please include any comment you might have regarding the proposals on S.33.01 — Insurance and reinsurance individual requirements:

Please include any comment you might have regarding the proposals on S.34.01 — Other regulated and non-regulated financial undertakings including insurance holding companies and mied financial holding companies individual requirements:

Please include any comment you might have regarding the proposals on S.36.01 — IGT — Equity-type transactions, debt and asset transfer:

Please include any comment you might have regarding the proposals on S.36.02 - IGT - Derivatives:

Please include any comment you might have regarding the proposals on S.36.05 - IGT - Profit and Loss:

Please include any comment you might have regarding the proposals on S.36.06 IGT — Off-balance sheet and contingent liabilities:

Please include any comment you might have regarding the proposals on S.36.07 - IGT — Insurance and Reinsurance:

Please include any comment you might have regarding the proposals on S.37.01 — Risk concentration – Exposure to Counterparties:

Please include any comment you might have regarding the proposals on S.37.02 — Risk Concentration – Exposure by currency, sector, country:

Please include any comment you might have regarding the proposals on Annex IV - Asset categories:

Please include any comment you might have regarding the proposals on Annex V - Complementary Identification Code (CIC) Table:

Please include any comment you might have regarding the proposals on Annex VI - Definitions of the CIC Table:

ITS on Reporting: Legal Act

Please include any comment you might have regarding the amended legal Act on the ITS on Reporting:

Technical simplifications

Please include any general comments you might have regarding the proposals presented in section 2.4.5 on technical simplification of the Consultation paper:

Application date of the taxonomy 2.10.0

Please share which of the following two options you would prefer:

Maximum 1 selection(s)

- ☐ Option 1: Application date as of 30 January 2027 - the application of the new taxonomy will be aligned with the application date of the legal acts. This will imply that the Q4/2026 and Annual/2026 reporting will be still done based on the old taxonomy (2.8.2, to be submitted in 2027), while the Q1/2027 reporting will be done based on the new taxonomy 2.10.0. Possibly to reduce the reporting burden already for the Annual 2026 reporting by allowing undertakings to submit the templates proposed for deletion (present in the 2.8.2 taxonomy) empty without filling them
- ☐ Option 2: Application date as of 31 December 2026 - This approach will require 2 application dates in the ITS, e.g. a clear specification that while the ITS is applicable as of 31 December 2026, the changes stemming from Level 1 and Level 2 review (e.g. changes in the annual S.22.01, S.22.06 – renamed to S.22.07 and new cell in S.01.02) shall be applicable as of 30 January 2027 to align with the Level 1 and Level 2 application date.

In case of Option 2: As S.22.06 has been changed significantly and renamed to S.22.07 to avoid having both templates S.22.06 and S.22.07 in the taxonomy (one for Annual/2026 reporting and another one for Annual/2027 reporting) please share whether in your view it will be possible to report S.22.07 already for the Annual 2026 submission without filling in the information not already available:

General comment

Please include any other comment you might have regarding the proposals on the ITS on Reporting:

ITS on Disclosure

If applicable, please clearly indicate in your comment if you are referring to the solo, group - or both requirements.

Please include any comment you might have on the proposals regarding S.02.01 — Balance sheet:

Please include any comment you might have on the proposals regarding S.04.05 - Premiums, claims and expenses by country:

Please include any comment you might have regarding the proposals on S.05.01 — Premiums, claims and expenses by line of business:

Please include any comment you might have regarding the proposals on S.05.02 - Premiums, claims and expenses by country:

Please include any comment you might have regarding the proposals on S.12.01 — Life and Health SLT Technical Provisions:

Please include any comment you might have regarding the proposals on S.19.01 — Non-life insurance claims:

Please include any comment you might have regarding the proposals on S.22.01 — Impact of long term guarantees measures and transitional:

Please include any comment you might have regarding the proposals on S.22.06 - Best estimate subject to volatility adjustment by country and currency:

Please include any comment you might have regarding the proposals on S.23.01 — Own Funds:

Please include any comment you might have regarding the proposals on

- S.25.01 — Solvency Capital Requirement — for undertakings on Standard Formula
- S.25.01 — Solvency Capital Requirement — for groups on Standard Formula:

Please include any comment you might have regarding the proposals on

- S.25.05 – Solvency Capital Requirement - for undertakings using an internal model (partial or full)
- S.25.05 — Solvency Capital Requirement — for groups using an internal model (partial or full):

ITS on Disclosure: Legal Act

Please include any comment you might have regarding the amended legal Act on the ITS on Disclosure:

General comment

Please include any other comment you might have regarding the proposals on the ITS on Disclosure:

Guidelines on reporting for financial stability purposes

Please include any comment you might have regarding the proposed deletions in the Guidelines:

Guidelines on the supervision of branches of third-country insurance undertakings

Please include any comment you might have regarding the proposals on S.02.01 - Balance sheet:

Please include any comment you might have regarding the proposals on S.23.01 - Own funds:

Please include any comment you might have regarding the proposed deletions in the Guidelines:

Please include any other comment you might have on the Guidelines:

Annex I: Impact Assessment on the overall reporting burden reduction

Please include any general comment you might have on this section of the document

General comment

Please include any other comment you might have regarding the Consultation Paper:

1000 character(s) maximum

The Insurance and Reinsurance Stakeholder Group (IRSG) welcomes the opportunity to comment on the Consultation on supervisory reporting and public disclosure requirements under Solvency II. The IRSG supports the objective to reduce regulatory burden, particularly for insurance undertakings and groups. From the members of the IRSG no detailed feedback was received. Please refer to any other submissions by IRSG members or their organizations.

Contact

[Contact Form](#)

