



# Public consultation on revised Guidelines on Supervisory Review Process

Fields marked with \* are mandatory.

## Introduction

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The European Insurance and Occupational Pensions Authority (EIOPA) has published a consultation paper on revised Guidelines on Supervisory Review Process.

Stakeholders are invited to provide their feedback on the consultation paper by Wednesday 24 September 2025.

Comments are most helpful if they:

- respond to the question stated, where applicable;
- contain a clear rationale; and
- describe any alternatives EIOPA should consider.

To submit your comments, please click on the blue “Submit” button in the last part of the survey. Please note that comments submitted after 24 September 2025 or submitted via other means will not be processed. In case you have any questions please contact [SolvencyIIreview@eiopa.europa.eu](mailto:SolvencyIIreview@eiopa.europa.eu).

### **Publication of responses**

Your responses will be published on the EIOPA website unless: you request to treat them confidential, or they are unlawful, or they would infringe the rights of any third party. Please, indicate clearly and prominently in your submission any part you do not wish to be publicly disclosed. EIOPA may also publish a summary of the survey input received on its website.

Please note that EIOPA is subject to Regulation (EC) No 1049/2001 regarding public access to documents and [EIOPA's rules on public access to documents](#).

Declaration by the contributor

By sending your contribution to EIOPA you consent to publication of all non-confidential information in your contribution, in whole/in part – as indicated in your responses, including to the publication of the name of your organisation, and you thereby declare that nothing within your response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.

### Data protection

Please note that personal contact details (such as name of individuals, email addresses and phone numbers) will not be published. EIOPA, as a European Authority, will process any personal data in line with Regulation (EU) 2018/1725. More information on how personal data are treated can be found in the privacy statement at the end of this material.

## General information on the respondent

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\* Name of the stakeholder

IRSG

\* Type of stakeholder

- ☐ Insurance or reinsurance undertaking
- ☐ Industry association
- ☐ Consumer protection association
- ☐ Academic
- ☒ Other

\* If other, please specify:

Insurance and Reinsurance Stakeholder Group (IRSG)

\* Jurisdiction of establishment

Germany

\* Name of point of contact

Prof. Dr. Mirko Kraft

\* Email address of point of contact

mirko.kraft@hs-coburg.de

\* Please provide your explicit consent for the publication of your response

- ☒ Yes, publish my whole response
- ☐ Yes, publish a part of my response
- ☐ No, do not publish my response

## Questions

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### General comments

\* Q1. Do you have general comments on the consultation paper?

- ☒ Yes  
☐ No

#### Comments field

The Insurance and Reinsurance Stakeholder Group (IRSG) welcomes the opportunity to comment on the Consultation Paper on the proposal for revised Guidelines on supervisory review process under Solvency II. The IRSG supports the objective of the review of the Guidelines on the supervisory review process (SRP) to align them with the revised Solvency II Directive, a revised Delegated Act and the other revised legal acts (legal framework after the Solvency II review). In addition, the IRSG supports the objective to reduce regulatory burden, particularly for insurance undertakings and groups. While acknowledging that the guidelines are primarily relevant for supervisory authorities we would therefore like to emphasise that the revised guidelines for them should not pose additional burden on insurance undertakings and groups. We call on legislators that supervisory authorities and EIOPA should be adequately resourced and staffed to fulfil their tasks appropriately. From the members of the IRSG no detailed feedback was received. Please refer to any other submissions by IRSG members or their organisations,

### Guidelines on Supervisory Review Process

\* Q2. Do you have comments on Section I on 'Overall supervisory review process (SRP)'?

- ☐ Yes  
☒ No

\* Q3. Do you have comments on Section II on 'Input to the supervisory review process'?

- ☐ Yes  
☒ No

\* Q4. Do you have comments on Section III on 'Risk assessment framework'?

- ☐ Yes  
☒ No

\* Q5. Do you have comments on Section IV on 'Detailed Review'?

- ☐ Yes  
☒ No

\* Q6. Do you have comments on Section V on 'Supervisory Measures'?

- ☐ Yes

☒ No

\* Q7. Do you have comments on Section VI on 'Recovery and resolution'?

☐ Yes

☒ No

\* Q8. Do you have comments on Section VII on 'Conduct of business'?

☐ Yes

☒ No

\* Q9. Do you have comments on Section VIII on 'Emerging risks'?

☐ Yes

☒ No

## Any other comment

\* Q10. Do you have any other comments?

☒ Yes

☐ No

Comments field

We would like to remind EIOPA to update and publish the “SRP Guidelines Diagram” (mentioned in the introduction, p. 5).

## Contact

[Contact Form](#)