

RESULTS OF THE PEER REVIEW ON THE REGULAR SUPERVISORY REPORT (RSR)

2020

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EXECUTIVE SUMMARY

It is important that national competent authorities (NCAs) take a consistent approach to insurance undertakings' supervisory reporting. This helps to ensure that there is the same level of oversight across the European Economic Area (EEA), which in turn protects consumers and contributes to the stability of the financial system. Supervisory convergence in this regard will improve the efficiency and effectiveness of the supervision of these institutions, which is one of the key objectives of the European Insurance and Occupational Pensions Authority (EIOPA).

BACKGROUND AND OBJECTIVES

The Solvency II Directive introduced a number of supervisory reporting requirements, further specified in Delegated Regulation (EU) 2015/35. These include the requirement for undertakings to submit a regular supervisory report (RSR) to their NCA on a regular basis.

Under the proportionate approach set out in the Delegated Regulation, all NCAs must decide if each undertaking has to submit a complete RSR or a summary RSR that documents any material changes. NCAs have to inform undertakings about their decision at least 3 months before the reference date. In line with Article 312(1)(a) of the Delegated Regulation, as a minimum, a full RSR needs to be submitted every 3 years. However, a full RSR may be required by NCAs more frequently than once every 3 years. This could be based on national legislation, an NCA's internal policy or the rules of the supervisory review process (SRP) within a particular authority. If the full RSR is required annually or once every 2 years, NCAs can exempt certain undertakings from this yearly/biennial submission of the RSR. NCAs are expected to take a risk-based and proportionate approach when making decisions in this regard.

The peer review collected information on NCA practices from self-assessments provided by the NCAs, as well as from information and evidence gathered during fieldwork, which consisted of site visits and conference calls. Following the completion of the fieldwork, an analysis of the evidence was undertaken, and key findings and

proposed recommended actions were communicated to each NCA.

The main objectives were to assess how and to what extent the proportionate approach set out under the Delegated Regulation had been implemented and to determine if further convergence was needed on the frequency of submission of RSRs.

The reference period for the peer review was from the entry into force of Solvency II (SII) to the end of March 2019, and 31 NCAs participated. Given that the reference period for this peer review concluded before 31 January 2020, the United Kingdom's Prudential Regulation Authority also participated in full and its results are included in this report.

PEER REVIEWS: AN ESSENTIAL OVERSIGHT TOOL

The main tasks of EIOPA are to enhance supervisory convergence, strengthen consumer protection and preserve financial stability.

Through its oversight function, underpinned by the Authority's founding regulation, EIOPA supports national supervisory authorities in the task of delivering high-quality, effective supervision, as well as overseeing the level playing field and appropriate application of supervisory measures within the EEA.

EIOPA has developed a range of tools to support oversight. In this context, peer reviews have proved essential as a means of increasing consistency and effectiveness in the outcome of supervisory actions. Peer reviews have also proved productive in strengthening dialogue within and between supervisory authorities and in facilitating sharing of best practices.

EIOPA conducts peer reviews based on an agreed methodology, with experts from national supervisory authorities acting as reviewers in coordination with EIOPA. In line with its mandate, the outcomes of peer reviews, including identified best practices, are made public. Where there may be a risk to the stability of the financial system, the Board of Supervisors may decide not to publish certain outcomes.

MAIN FINDINGS

The peer review identified divergent practices among NCAs in a number of areas, in particular:

- the implementation of the option to request a more frequent submission of the RSR than once every 3 years (five groups of similar practices were identified);
- the definition of 'material changes' and NCAs' requirements with regard to their official communication (two groups of similar practices were identified);
- the communication of the decision on the frequency of submission of the RSR to market participants (practices varied from no communication at all with any of the market participants to communication with all undertakings on an individual basis).

These divergent practices have a negative impact on the level playing field for EEA undertakings. Therefore, EIOPA issued a number of recommended actions that NCAs should take to bring about greater convergence in their approaches and a more consistent implementation of the principle of proportionality.

Around one-third of the NCAs apply, to a certain extent, the principle of proportionality set out in the SII Directive

and the Delegated Regulation by performing risk-based supervision and setting the frequency of submission of the full and summary RSRs differently from the minimum defined by EU law.

➤ Overview of recommended actions

EIOPA issued 51 recommended actions, addressed to NCAs in 26 countries.

The recommended actions can be grouped into four categories. These are:

- 36 recommended actions in the area of proportionality;
- 8 recommended actions in the area of communication of material changes;
- 3 recommended actions in the area of the communication of the decision on the frequency of submission of the full/ summary RSR;
- 4 country-specific recommended actions.

A full list of the recommended actions and countries to which they have been issued can be found in Annex IV.

Topic	NCAs
Area of recommended action: Proportionality	
The NCA should take into account proportionality and apply a risk-based supervisory approach for defining the reporting frequency based on the outcome of the risk assessment.	Financial Supervision Commission (Bulgaria), Cyprus Insurance Companies Control (Cyprus), Estonia Financial Supervision and Resolution Authority (Estonia), Bank of Greece (Greece), Financial Supervision Authority (Finland), Hrvatska agencija za nadzor financijskih usluga (Croatia), Magyar Nemzeti Bank (Hungary), Financial Supervisory Authority (Iceland), Istituto per la Vigilanza sulle Assicurazioni (Italy), Bank of Lithuania (Lithuania), Financial and Capital Market Commission (Latvia), Malta Financial Services Authority (Malta), Finanstilsynet (Norway), Komisja Nadzoru Finansowego (Poland), Financial Supervisory Authority (Portugal), Financial Supervisory Authority (Romania), Finansinspektionen (Sweden), Insurance Supervision Agency (Slovenia), National Bank of Slovakia (Slovakia), The Prudential Regulation Authority (United Kingdom)
The NCA currently imposing annual submission of the full RSR should (propose to) amend its local legislation currently imposing annual submission of the full RSR accelerating the possibility for exemption of yearly submission.	Financial Supervision Commission (Bulgaria), Cyprus Insurance Companies Control (Cyprus), Bank of Greece (Greece), Magyar Nemzeti Bank (Hungary), Bank of Lithuania (Lithuania)
The NCA should introduce an internal policy which structures the process of defining the different frequency of submission of the full RSR.	Financial Supervision Commission (Bulgaria), Danish Financial Supervisory Authority (Denmark), Estonia Financial Supervision Authority (Estonia), Financial Supervision Authority (Finland), Hrvatska agencija za nadzor financijskih usluga (Croatia), Finanstilsynet (Norway), Financial Supervisory Authority (Portugal) Financial Supervisory Authority (Romania), Finansinspektionen (Sweden), Insurance Supervision Agency (Slovenia), National Bank of Slovakia (Slovakia)
Area of recommended action: Communication of (no) material changes	
The NCA should require the undertakings to submit a formal notification of "no material changes" in order to enhance effectiveness of the supervision. Based on the experience of the practice in other EEA countries NSAs explicit submission of a notification of "no material changes" is contributing to the efficient supervision of the requirements defined in the Article 312 (3) of the Delegated Regulation (EC) 2015/35.	Financial Supervision Commission (Bulgaria), Danish Financial Supervisory Authority (Denmark), Autorité de Contrôle Prudentiel et de Résolution (France), Financial and Capital Market Commission (Latvia), Financial Supervisory Authority (Romania), Insurance Supervision Agency (Slovenia), National Bank of Slovakia (Slovakia), The Prudential Regulation Authority (United Kingdom)
Area of recommended action: Communication of the decision on the RSR frequency	
The NCA should collect information on and communicate the frequency of submission of the RSR at solo and group level (link to EIOPA Guideline 23 SRP paragraph 1.58).	Bundesanstalt für Finanzdienstleistungsaufsicht (Germany), De Nederlandsche Bank (Netherlands), Dirección General de Seguros y Fondos de Pensiones - Ministerio de Asuntos Económicos y Transformación (Spain)
Area of recommended action: Country specific recommended actions	
The NCA should include the exemptions from annual submission of the full RSR based on specific to the undertaking events (merge/ acquisitions) in the "instructions" or any other official document (e.g. local legislation) which is known by undertakings.	Autorité de Contrôle Prudentiel et de Résolution (France)
The NCA should accelerate the decision on the undertakings' RSR frequency in order to notify the undertakings of the frequency of the RSR in line with Guideline 23 of the EIOPA Guidelines on SRP, i.e. no later than three months in advance of the undertakings' financial year end.	Malta Financial Services Authority (Malta)

Topic	NCAs
By introducing a different frequency of submission of the full RSR based on the outcome of the risk assesment the NCA should further work on enhancing the usage of the information of the RSR for supervisory purposes on account of further limiting the usage of country specific templates to collect the information needed.	Komisja Nadzoru Finansowego (Poland)
The risk-based approach implemented by the NCA should also be applied to captives to ensure that captives performing third party business are assessed based on their risk profile and not automatically considered low risk due to their legal nature as captives.	Commissariat aux Assurances (Luxembourg)

› Proportionality

Most of the recommended actions in this area relate to achieving a more appropriate implementation of the principle of proportionality by requiring submission of the RSR more frequently than the minimum of every 3 years. These recommended actions involve either a change to the local legislation or the adoption of an internal policy to accelerate the process of introducing different frequencies of submission of the full RSR.

Some of these recommended actions relate to the use of a risk-based approach when deciding on the different frequencies of submission of the RSR, in particular when there is a lack of any IT/risk assessment system underpinning decision-making.

› Communication of material changes

To enhance the effectiveness of supervision, recommended actions have been issued to all of the NCAs that do not require undertakings to submit a formal notification of 'no material changes' to ensure that in future they do so.

› Communication of the decision

Recommended actions have been issued to NCAs that are group supervisors and that do not collect information on and do not communicate the frequency of submission of the RSR to ensure that in future they do so.

› Country-specific recommended actions

Some recommended actions were issued to address specificities observed in individual countries' practices:

- › France has been issued with a recommended action to include exemptions from annual submission of the full RSR based on specific events in an official document.
- › Luxembourg has been issued with a recommended action to expand the risk-based approach implemented as well to captives to ensure that captives performing third party business are assessed based on their risk profile and not automatically considered low risk due to their legal nature as captives.
- › Malta has been issued with a recommended action to accelerate decisions on undertakings' RSR submission frequency to enable it to notify undertakings in line with Guideline 23 of the EIOPA guidelines on SRP.
- › Poland has been issued with a recommended action to increase its information in the RSR for supervisory purposes and limit its use of templates to collect additional country-specific qualitative information.

FOLLOW-UP STEPS FOR EIOPA

As a result of the findings of the peer review, EIOPA will take the following actions to further supervisory convergence in this area:

- introducing supervisory guidance by keeping the minimum requirement for submission of the full RSR as once every 3 years but requiring a mandatory assessment by NCAs and communication of the frequency of the RSR;
- including in its guidelines or supervisory handbook guidance on issuing exemptions from annual or biennial submission of the full RSR based on a list of events that are specific to the undertaking (e.g. mergers/acquisitions);
- developing further guidance in relation to the communication to the group supervisor and college in the context of Guideline 23, paragraph 1.58, of the EIOPA guidelines on SRP, by either updating this guideline or including this aspect in the supervisory handbook.

SOUND PRACTICES

In this peer review, no best practices were identified, as Article 312 of the Delegated Regulation provides a lot of room for flexibility in applying practices that are in line with European legislation. EIOPA did, however, identify some sound practices underpinned by the principles and key characteristics of high-quality and effective supervision. These practices are listed below.

Deciding on the reporting frequency of the full RSR, based on the outcome of the risk assessment, helps to achieve risk-based and proportionate supervision, with at least those undertakings that have a high risk profile and impact on the market submitting the RSR more frequently than once every 3 years and those undertakings with a low risk profile and impact on the market submitting the RSR less frequently than yearly.

Having an internal policy that outlines a structure for the process and sets out criteria for deciding on submission of the full RSR more frequently than once every 3 years helps to make supervision forward-looking, preventive and proactive.

Segmenting the market, allowing even distribution of the workload and an in-depth assessment of the full RSRs submitted, helps to ensure that supervision is challenging, sceptical and engaged; requesting that undertakings submit a statement of no material changes also helps to

meet the requirements of Article 312(3) of the Delegated Regulation.

Having a standardised RSR assessment process and tools helps NCAs to achieve conclusive supervision.

IMPACT ON THE CREATION OF A COMMON SUPERVISORY CULTURE

The creation of a common supervisory culture is one of EIOPA's key goals. The development of such a culture is vital to ensuring a high, effective and consistent level of supervision throughout the EEA, thus guaranteeing consumers the same level of protection regardless of where they live and promoting the stability of the financial system.

The analysis carried out for this peer review has revealed diverging legal and regulatory frameworks and supervisory practices in the area of the RSR. As a result of this, recommended actions have been issued and sound practices identified to inspire NCAs and to help them benefit from each other's experiences.

EIOPA believes that the implementation of these actions and practices by NCAs will bring about greater supervisory convergence. This peer review exercise aims to contribute to EIOPA's efforts to create among the NCAs a common understanding and application of the principles and key characteristics of high-quality and effective supervision when dealing with the RSR.

CONCLUSIONS AND NEXT STEPS

In this peer review on the RSR, EIOPA has analysed legal and regulatory frameworks and national supervisory practices across 31 NCAs in relation to decisions on the frequency of submission of the RSR and the communication of those decisions to undertakings. Differences in NCAs' approaches and practices in this area were found, and as a result, EIOPA issued a number of recommended actions with the aim of achieving greater supervisory convergence.

NCAs are expected to have implemented the recommended actions targeting supervisory shortcomings by 2022.

Furthermore, EIOPA has concluded, based on the issues observed in several countries in relation to proportionality in setting the frequency of submission of the RSR, that the SII legislation needs to be further clarified. Therefore, EIOPA will continue to monitor developments in this area and will implement the follow-up steps identified to introduce further supervisory guidance.

INTRODUCTION

APPROACH TO THE PEER REVIEW

After 3 years of implementation of the Solvency II (SII) Directive, it is important to assess how the proportionate approach set out under the Delegated Regulation (EU) 2015/35 has been implemented and to determine if further convergence is needed in this area when it comes to the frequency of submission of regular supervisory reports (RSRs).

The European Insurance and Occupational Pensions Authority (EIOPA) used peer review as a tool for assessing the issues of proportionality and fit for purpose with regard to the RSR. The preliminary results of the exercise served as an input in the SII 2020 review.

This report starts with an overview of the methodology and approach used in this peer review. The following chapters outline the key practices identified within national competent authorities (NCAs); the main findings, per section, of the self-assessment questionnaire; and the key findings for each NCA.

1. SCOPE, METHODOLOGY AND APPROACH

1.1 SCOPE

All NCAs must decide if each undertaking has to submit a complete RSR or simply a summary RSR that documents any material changes. NCAs have to inform undertakings about their decision at least 3 months before the reference date. As a minimum, a complete RSR needs to be submitted every 3 years. When taking such a decision, NCAs have to follow a risk-based approach and consider proportionality. The aim of this peer review is to explore, both for individual NCAs and in a comparative assessment among NCAs, supervisory practices in order to enhance the effectiveness of supervision and promote convergence and consistency among NCAs, where appropriate, with respect to supervisory practices and outcomes relating to the **frequency of submission of the RSR**. The reference period¹ for this peer review was from

the introduction of the SII Directive to March 2019. This peer review also **summarises the information received about supervisors' expectations with regard to the content and structure of the full and summary RSRs**.

For the purposes of the assessment, reference is made to cases in which the full RSR is required by NCAs more frequently than once every 3 years, as defined in Article 312(1)(a) of the Delegated Regulation (e.g. annually or once every 2 years). This could be based on national legislation², an NCA's internal policy³ or the rules of the supervisory review process (SRP) within a particular authority. If the full RSR is required annually or once every 2 years, NCAs can exempt certain undertakings from this yearly/

¹ Given the reference period, the actual practices discussed in this peer review are taken from the 2016 full RSRs received in 2017 and, in the case of more frequent RSR submissions in any of the European Economic Area countries, also from the 2017 full/summary RSRs submitted in 2018, as well as from the 2018 full/summary RSRs if these had already been received by an NCA in the first quarter of 2019.

² Here, national legislation is considered as legally binding measures by European Economic Area countries that define the frequency of submission of the RSR, in addition to EU legislation.

³ Here, a policy is considered to include national guidelines, internal supervisory handbooks or any formal documents approved by the NCA's senior management that sets rules for defining the frequency of the full RSR and the process of granting exemptions from yearly or biennial submission.

biennial submission of the RSR. Therefore, this document generally refers to the frequency of submission, rather than to exemptions⁴ from RSR submission.

An assessment of the content of the full/summary RSRs is outside the scope of this peer review. However, the content of the RSRs served as a background for understanding the justification by NCAs of defining the frequency of submission of the RSR. Furthermore, the content of the full/summary RSRs also served as a background for drafting the advice to the European Commission on the SII 2020 review.

1.2 METHODOLOGY AND APPROACH

This peer review was conducted on the basis of the methodology⁵ for conducting peer reviews developed by EIOPA.

This peer review used evidence from the self-assessments provided by NCAs, as well as information and evidence gathered during fieldwork. The **self-assessments** provided by NCAs were collected via a questionnaire that was sent out via the EU survey tool⁶, with a deadline for responses of mid-April 2019.

The initial analysis of the NCA self-assessments was used to identify the priorities for fieldwork, consisting of key points that needed clarification, and the **means by which the fieldwork would be conducted**. Overall, the fieldwork consisted of 24 conference calls and seven visits held between mid-June and mid-September 2019 (Table 1). NCAs were informed in advance of the questions and were able to prepare and disclose detailed documents regarding their supervisory practices. This allowed the team of reviewers to confirm their understanding of the answers provided and to discuss any potential issues identified. An example of one of the topics discussed is the definition of 'exemptions from RSR submission' when the RSR is submitted more frequently

than the minimum requirement set out in Article 312 of the Delegated Regulation.

Table 1: Communication means during fieldwork

Proposed communication means	Number of NCAs	NCAs
Conference call	24	AT, BE, BG, CY, DK, EE, EL, ES, FI, HR, HU, IS, IT, LT, LU, LV, NL, NO, PT, RO, SE, SI, SK, UK
Visit	7	CZ, DE, FR, IE, LI, MT, PL

Following the completion of the fieldwork, an analysis of the material and evidence was undertaken and the key findings of and proposed recommended actions following this analysis were reported to each NCA. EIOPA issued 51 recommended actions for NCAs and decided on three actions to be undertaken by EIOPA. Finally, in this peer review, no best practices were identified, as Article 312 of the Delegated Regulation gives a lot of room for flexibility in applying practices that are in line with European legislation. EIOPA has though identified a number of sound practices that are in line with the European legislation and the key characteristics of high-quality and effective supervision and can support NCAs gaining benefits from each other's experience, which are listed in this report.

⁴ In several instances in this report, references to exemptions are made.

⁵ Methodology The governance arrangements for conducting peer reviews changed in January 2020, with adaptations to the European Supervisory Authorities' regulation introduced. This peer review was conducted in 2019 and therefore under the oversight of the former EIOPA Review Panel.

⁶ Some NCAs provided additional information on their policies through means other than the EU survey tool.

1.2.1 COUNTRIES ASSESSED

Table 2 includes the list of countries that participated in the peer review, as well as the country codes that are used in this report (see also Annex II for the abbreviations of the names of the NCAs). Given that the reference period for this peer review concluded before 31 January 2020, the United Kingdom's Prudential Regulation Authority also participated in full and its results are included in this report.

Table 2: Countries that participated in the peer review

AT	Austria
BE	Belgium
BG	Bulgaria
CY	Cyprus
CZ	Czechia
DE	Germany
DK	Denmark
EE	Estonia
EL	Greece
ES	Spain
FI	Finland
FR	France
HR	Croatia
HU	Hungary
IE	Ireland
IS	Iceland
IT	Italy
LI	Liechtenstein
LT	Lithuania
LU	Luxembourg
LV	Latvia
MT	Malta
NL	Netherlands
NO	Norway
PL	Poland
PT	Portugal
RO	Romania
SE	Sweden
SI	Slovenia
SK	Slovakia
UK	United Kingdom

1.2.2 REFERENCE PERIOD

For each peer review, a reference period is set to provide an appropriate time period for assessing the application of EU measures and the assessment of supervisory practices more generally.

For this peer review, the reference period was from 1 January 2016 to 31 March 2019. Any improvements implemented by NCAs after the reference period were outside the scope of this peer review and will be taken into account during the follow-up of this peer review.

1.2.3 TEAM OF REVIEWERS

The team of reviewers was led by EIOPA and it included representatives from the NCAs in Germany, Italy, Lithuania, Poland and Slovenia.

1.2.4 ASSESSMENT CRITERIA

In a peer review, the assessment criteria are set to provide a common understanding of expected supervisory approaches and outcomes.

In accordance with the methodology, the assessment criteria refer to provisions in EU measures, which supervisors are required to apply in order to set out their expectations for the supervised entities in a clear and transparent manner. If the peer review, as in this case, also focuses on supervisory practices not described in EU measures, the assessment criteria are to be developed in relation to the approach agreed by the Board of Supervisors and underpinned by a general agreement on the common supervisory practices that could be expected in practice.

The **key assessment criteria**⁷ for this peer review are based on:

- Article 35(1) to (8) of the SII Directive;
- Recitals (113) and (115) of the Delegated Regulation;
- Article 304(1)(b) and (2) and Article 305 of the Delegated Regulation;
- Articles 307 to 311 of the Delegated Regulation (used as a background to complement the assessment of the practice on the frequency of submission of full/summary RSRs);
- Article 312(1)(a), (2) and (3) of the Delegated Regulation;

⁷ Detailed references to the legal and non-legal assessment criteria are provided in Annex I.

- Article 372 of the Delegated Regulation;
- Guidelines 2-7, 9 and 23 of the EIOPA guidelines on SRP; and
- Guidelines 16-29 of the EIOPA guidelines on reporting and public disclosure (used as a background to complement the assessment of the practice on the frequency of submission of full/summary RSRs).

The **additional assessment criteria** for this peer review are based on most of the [five principles and key characteristics of high-quality and effective supervision](#): supervisory practices in relation to the RSR are expected to be risk-based and proportionate, Forward-looking, preventive and proactive, challenging, sceptical and engaged and conclusive.

Table 3 groups the assessment criteria by the section of the self-assessment questionnaire in which they appear.

Table 3: Assessment criteria in each section of the self-assessment questionnaire

Section of the self-assessment questionnaire	Assessment criteria applied
1. Context of the assessment	Article 35(5) of the SII Directive; Guidelines 2, 3 and 9 of the EIOPA guidelines on SRP Principles and key characteristics of high-quality and effective supervision
2. Taking the decision	Article 35(5) and (8) of the SII Directive Recitals (113) and (115) of the Delegated Regulation Article 304(1)(b) and (2) and Article 305 of the Delegated Regulation Article 312(1)(a) and (2) of the Delegated Regulation Guidelines 2, 3 and 7 of the EIOPA guidelines on SRP Principles and key characteristics of high-quality and effective supervision
3. Communicating the decision	Guidelines 5, 6 and 23 of the EIOPA guidelines on SRP
4. Content and structure of the full and summary RSRs	Articles 312 (3) and 372 of the Delegated Regulation The questions asked in this regard served as a background to understanding the justification by NCAs of defining the frequency of submission of the RSR. The findings will be used as supporting evidence to draw conclusions regarding the NCAs' approaches and practices to defining the frequency of the RSR. Therefore, no assessment criteria have been introduced for this section
5. Supervision of the full and summary RSRs	The questions asked in this regard served as a background to understanding the justification by NCAs of defining the frequency of submission of the RSR. The findings will be used as supporting evidence to draw conclusions regarding the NCAs' approaches and practices to defining the frequency of the RSR. Therefore, no assessment criteria have been introduced for this section

2. MAIN FINDINGS

2.1 CURRENT SITUATION WITH REGARD TO THE FREQUENCY OF SUBMISSION OF THE FULL RSR

All NCAs must decide if each undertaking has to submit a full RSR or simply a summary RSR that documents any material changes in the reporting period. Undertakings have to be informed by NCAs about their decision at least 3 months before the reference date⁸.

As a minimum, a full RSR needs to be submitted every 3 years. When taking a decision regarding the frequency of submission of the RSR, NCAs have to follow a risk-based approach and consider proportionality (Guidelines 4 and 23 of the EIOPA guidelines on SRP).

There are divergent practices in the implementation of the option to request a more frequent submission than once every 3 years. These differences include, for example, common or perhaps rare use of this option, different criteria being used to define the frequency of the RSR submission, different market circumstances and different expectations regarding the content of the summary RSR. These differences have a negative impact on the level playing field for European Economic Area (EEA) undertakings.

2.2 KEY PRACTICES IDENTIFIED IN THE CONTEXT OF THE FREQUENCY OF SUBMISSION OF THE RSR

With regard to the frequency of submission of the full RSR, five different practices were identified within the EU, which are grouped as follows (see the corresponding group numbers in Table 4):

1. NCAs directly applying Article 312 of the Delegated Regulation by requiring a full RSR submission once every 3 years **with no existing** requirement for a more frequent submission based on the outcome of the SRP;
2. NCAs applying national legislation in addition to EU legislation, imposing an **annual submission of the full RSR** on the entire market, with or without the possibility for exemption;
3. NCAs having an internal policy in place in addition to EU legislation, imposing an **annual submission of the full RSR** on the entire market;
4. NCAs directly applying Article 312 of the Delegated Regulation by requiring a full RSR submission once every 3 years and **with a possibility for more frequent submission** based on the outcome of the SRP;
5. NCAs applying national legislation combined with the outcome of the SRP in addition to EU legislation, imposing an **annual submission of the full RSR** on the entire market.

⁸ Guideline 23 of the EIOPA guidelines on SRP is included in Annex I.

Table 4: Grouping of similar practices within NCAs regarding the frequency of the RSR submission

Groups with similar practices in RSR submission frequency	Legal background and defining frequency	Directly applying Article 312	More frequent RSR submission required based on national legal framework	More frequent RSR submission required based on internal NCA policy	More frequent RSR submission required based on NCA supervisory practice	Existing exemptions	Communicating frequency of the RSR to the entire market (with the same content of the letter)
Group I	AT, DK, EE, HR, LV, NO, RO, SE, SI, SK	Yes	No	No	No*	No	N/A
Group II	BG, CY, EL, HU, IT, LI, LT	No	Yes	No	No	No**/ Yes***	N/A
Group III	FI, IS, PL	Yes	No	No	Yes	No	Yes
Group IV	BE, CZ, DE, ES, IE, LU, NL, MT, PT, UK	Yes	No	No	Yes	No	No
Group V	FR	No	Yes	No	Yes	No	Yes/ No****

* Among the NCAs of Group I, AT has an option for requiring more frequent submissions of the full RSR based on supervisory practice; however, this option did not materialise in the reference period of this peer review.

** Among the NCAs of Group II, IT has the possibility of applying exemptions integrated in the local legislation; however, it did not materialise in the reference period of this peer review.

*** Among the NCAs of Group II, LI is the only one applying exemptions to the annual full RSR submission.

**** With regard to the communication of the frequency of the RSR to the entire market in the particular case of Group V, on one hand, the frequency is communicated by introducing an NCA instruction equal to a law for the entire market, while, on the other hand, the follow-up communication is undertaken for single specific undertakings based on the outcome of the risk assessment.

2.2.1 RECOMMENDED ACTIONS IN THE AREA OF PROPORTIONALITY

The peer review confirmed that the majority of the NCAs require an annual submission of the full RSR without the possibility for exemptions, while only one NCA (Liechtenstein) has an option for exemption, which is set out in the local legislation.

All in all, around one-third of the NCAs (Belgium, Czechia, France, Germany, Ireland, Luxembourg, Malta, the Netherlands, Portugal, Spain, the UK) apply, to a certain extent, the principle of proportionality set out in the SII Directive and the Delegated Regulation by performing risk-based supervision and setting the frequency of submission of the full and summary RSRs differently from the minimum defined by EU law.

INDIVIDUAL RECOMMENDED ACTIONS IDENTIFIED DURING THE REFERENCE PERIOD

Of the recommended actions, 70 % relate to increasing the proportionality by introducing a different frequency of submission of the RSR than that set out in Article 312 of the Delegated Regulation. Those recommended actions involve either a change to the local legislation or introducing an internal policy that accelerates the process of the introduction of different frequencies of submission of the full RSR. Recommended actions were issued to 21 countries.

Some of these recommended actions relate to the use of a risk-based approach when defining the different frequencies of submission of the RSR and in particular when there is a lack of any IT/risk assessment system underpinning the decision (when a decision has been taken). Recommended actions in this context were issued to 11 countries.

2.3 KEY PRACTICES IDENTIFIED IN THE CONTEXT OF THE COMMUNICATION OF MATERIAL CHANGES WITHIN THE SUMMARY RSR

As regards defining and officially communicating material changes as part of the summary RSR (Article 312(3) of the Delegated Regulation), the peer review identified two different practices (see the corresponding group numbers in Table 5):

Group A: a definition of material changes on top of Article 305 of the Delegated Regulation has been introduced by NCAs and/or official communication by the undertakings is required with regard to a summary RSR.

Group B: no NCA definition of material changes on top of Article 305 of the Delegated Regulation exists and/or no official communication by the undertakings is required, even in cases with no material changes, in a summary RSR.

The group of NCAs requiring an annual submission of the full RSR but without the possibility for exemption are not subject to the evaluation for defining and communicating material changes in the summary RSR.

2.3.1 RECOMMENDED ACTIONS IN THE AREA OF COMMUNICATION OF MATERIAL CHANGES WITHIN THE SUMMARY RSR

The peer review confirmed that the summary RSR is hardly used as a tool for reporting to the NCAs, taking into account that the majority of EEA countries require an annual submission of the full RSR without any possibility for exemption.

In addition to the NCAs applying, to a certain extent, the principle of proportionality that is embedded in SII legislation, another three NCAs (Estonia, Norway, Sweden) officially require material changes to be communicated in a summary RSR.

To enhance the effectiveness of supervision, a recommended action has been issued to all of the NCAs (no matter whether the NCA has its own definition in addition to the definition in Article 305 of the Solvency II Delegated Regulation) that do not require undertakings to submit a formal notification of 'no material changes'. Based on the evidence of the practices in numerous EEA countries, NCAs that require the submission of an explicit notification of 'no material changes' are contributing to the efficient supervision of the requirements defined in Article 312(3) of the Delegated Regulation.

INDIVIDUAL RECOMMENDED ACTIONS IDENTIFIED DURING THE REFERENCE PERIOD

In total, 16 % of the recommended actions capture the specific issue of there being no requirement to submit a formal notification of 'no material changes' in at least eight countries (Denmark, France, Latvia, Malta, Romania, Slovakia, Slovenia and the United Kingdom).

Table 5: Grouping of similar practices within NCAs as regards officially communicating material changes

Groups with similar practices in defining and officially communicating material changes	Country	Summary RSR and official communication of material changes
Group A	AT, BE, CZ, DE, EE, ES, HR, IE, LI, LU, NL, NO, PT, SE	Yes
N/A*	BG, CY, EL, HU, IT, LT	N/A
N/A*	FI, IS, PL	N/A
Group B	DK, FR, LV, MT, RO, SI, SK, UK	No

* The not applicable (N/A) practices are split over two rows to make sure there is a clear distinction between NCAs requiring a full RSR submission on an annual basis based on local legislation and those requiring the same RSR frequency based on the outcome of the SRP without any 'official' NCA policy being in place.

2.3.2 RECOMMENDED ACTIONS IN THE AREA OF THE COMMUNICATION OF THE DECISION OF THE FREQUENCY OF SUBMISSION OF FULL/SUMMARY RSRs

The peer review confirmed that there were issues with collecting information and communicating the decision made on the frequency of submissions of the RSR at the solo and group levels (see Guideline 23, paragraph 1.58, of the EIOPA guidelines on SRP). It should be highlighted that Guideline 23 has been interpreted differently by group and solo supervisors. Therefore, the recommended action (which is currently issued only to group supervisors) should also be considered by solo supervisors. For more details on the different interpretations of this guideline, please refer to section 5.1 of this report.

INDIVIDUAL RECOMMENDED ACTIONS IDENTIFIED DURING THE REFERENCE PERIOD

A recommended action has been introduced for NCAs that are group supervisors and that did not collect information on and did not communicate the frequency of submission of the RSR at the solo and group levels.

In total, 6 % of the recommended actions cover this specific issue and a recommendation issued to three NCAs (Germany, the Netherlands and Spain) to collect information on and communicate the frequency of submission of the RSR at solo and group level.

2.3.3 COUNTRY-SPECIFIC RECOMMENDED ACTIONS WITH REGARD TO THE PROCESS OF DECIDING ON THE FREQUENCY OF SUBMISSION OF THE FULL/SUMMARY RSRs

During this peer review, a few country specificities were observed (which are the subject of recommended actions):

INDIVIDUAL RECOMMENDED ACTIONS IDENTIFIED DURING THE REFERENCE PERIOD

- Based on the practice reported by the French Prudential Supervision and Resolution Authority and taking into account the example of similar NCAs, EIOPA issued a recommended action to include exemptions from annual submission of the full RSR based on specific events in an official document.
- To comply with the EIOPA guidelines on SRP, EIOPA has issued a recommended action to the Malta Financial Services Authority to accelerate the decision on undertakings' RSR submission frequency in order to notify undertakings of the frequency of the RSR in line with Guideline 23 of the EIOPA guidelines on SRP.
- EIOPA has been made aware of the practice of the Polish Financial Supervision Authority of annually collecting country-specific qualitative information in addition to the RSR through a letter sent by the NCA to the undertakings on the market. This additional information overlaps partly with the information that is expected to be in the RSR and has been used more intensively for supervising the undertakings in relation to the RSR. In this context, a recommended action has been issued to enhance the use of the information in the RSR for supervisory purposes and so limit the use of country-specific templates. EIOPA has been informed that the Polish Financial Supervision Authority has already reduced the country-specific information requested.

A full list of the recommended actions by country and type can be found in Annex IV of this report.

THE RELATION WITH RSR AFTER THE SII 2020 REVIEW

All of the recommended actions are supplemented by a general comment based on the feedback received on the content of the RSR (although it should be noted that the content of the RSR itself has not been assessed in the context of this peer review): any recommended action should be implemented while bearing in mind that the SII 2020 review will introduce amendments to the content and to the approach to determining the frequency of the RSR, with the aim being for the RSR report to bring more added value to the supervisors.

2.3.4 TIME FRAME FOR IMPLEMENTING THE RECOMMENDED ACTIONS

With this peer review, EIOPA is, for the first time, introducing a time frame for NCAs to implement the recommended actions.

TIME FRAME FOR IMPLEMENTING THE RECOMMENDED ACTIONS

Given the fact that the SII 2020 review is ongoing and as one of the suggested changes is to the frequency of submission of the full RSR, EIOPA expects NCAs to comply with the recommended actions, at the latest, by the time the SII 2020 amendments enter into force or, in relation to the RSR for 2021, no later than 2022.

The options considered in EIOPA's consultation paper on the SII 2020 review are focused on solving the issue of proportionality when setting frequencies of submission of the full RSR that are different from the minimum frequency defined under Article 312 of the Delegated Regulation. Of the recommended actions in this peer review, 70 % address this topic. EIOPA is of the view that the timeline proposed can partially relieve the burden of implementing, over 2 consecutive years, the recommended actions from the peer review and the new SII legislation (or any further guidelines) proposed in the context of the SII 2020 review. Furthermore, for more than half of the NCAs, an amendment of the local legislation is required.

3. PROCESS OF ASSESSMENT

During the assessment of the results of the self-assessment questionnaire, the focus was on two main topics:

- › **The proportionality** in implementing the requirements laid down in the SII Directive with regard to setting the frequency of submission of the full and summary RSRs, as well as the communication of this decision and the definition and explicit communication of material changes within the summary report. The proportionality in the supervision of insurance undertakings and insurance groups based on the RSR is referred to only for context to better understand the correlation between the frequency of reporting and the use of the RSR for supervisory purposes.
- › **How fit for purpose** the full and summary RSRs are, namely an assessment of the information regularly used in the supervisory process (e.g. as part of the risk assessment framework, as a background for setting a different frequency of submission of the full/summary RSRs and when identifying overlapping information between own risk solvency assessments (ORSAs)/solvency and financial condition reports (SFCRs) and RSRs that have served as an input for the SII 2020 reporting review).

3.1 CONTEXT OF THE ASSESSMENT

The team of reviewers focused its efforts firstly on understanding the legal context in which NCAs are acting with regard to setting the frequency of submission of the RSR. Three aspects were identified as important:

- › if there is local legislation in place in addition to EU legislation that explicitly defines a different frequency of submission of the full RSR;
- › if there is a policy⁹ in place (different from EU/local legislation) within the particular NCA that sets a different frequency for the entire market;
- › if there is a policy in place (different from EU/local legislation) within the particular NCA that sets a different frequency for single specific undertakings.

⁹ A policy is considered to include national guidelines, internal supervisory handbooks and any formal documents approved by the NCA's senior management that sets rules for defining the frequency of the full RSR and the process of granting exemptions.

Many NCAs were not able to provide an answer framed within only one of the possibilities given in the self-assessment questionnaire. The team of reviewers identified the context in which such NCAs were working based on additional information received from numerous countries (France, Germany, Luxembourg and Poland) and by taking into account some explanatory notes given in other chapters of the questionnaire. The situations in the different countries are shown in Figure 1.

The analysis of the results from the self-assessment questionnaire concerning the legal context with regard to setting the frequency of submission of the full RSR shows that only one-third of all NCAs (those classified under Group IV and partially Group V in Table 4) use the principle of proportionality outlined in the SII Directive and the Delegated Regulation following a risk-based approach. Those are the countries where NCAs are using an approach classified under Group IV (Table 4) to set the frequency of submission of the RSR. The usual approach in those NCAs is to directly apply Article 312 of the Delegated Regulation, according to which a full RSR should be submitted once every 3 years, without any existing additional local legislation in place (except France). However, these NCAs have internal practices (risk assessment approaches) in place on the basis of which they request a more frequent submission of the full RSR. An exemption is considered a case in which an undertaking is exempted (based on an SRP) from a submission of the RSR more frequently than once every 3 years.

The three NCAs classified under Group III in Table 4 (one-tenth of all NCAs) currently require the full RSR to be submitted annually, based on letters sent to the entire (re)insurance market; however, those NCAs are slowly migrating to a risk-based approach by developing an assessment framework in which the RSR would be used as an input.

Group I in Table 4 consists of the ten NCAs that directly apply Article 312 of the Delegated Regulation without having any further local legislation or any risk-based approach in place with regard to setting a different frequency of the RSR. This group represents one-third of all NCAs.

The remaining eight NCAs (i.e. less than one-third), which are classified under Group II and partially Group V in Table 4, require the full RSR to be submitted annually, based

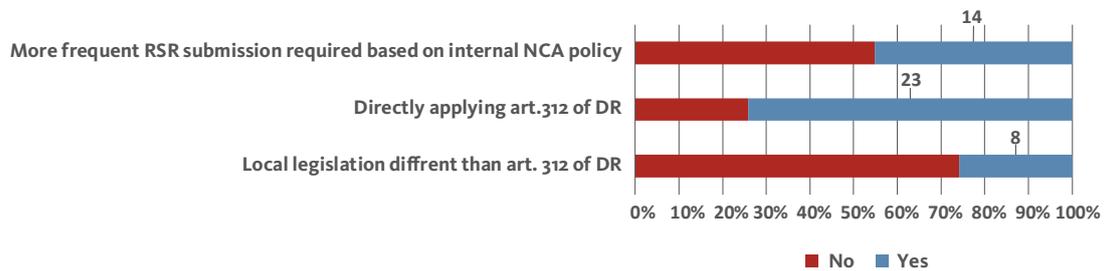
on local legislation; however, in the case of France, this is combined with the possibility for exemptions from annual full RSR submission in special cases based on the French Prudential Supervision and Resolution Authority's SRP. In the case of Group II, exemptions are an option but have so far never been used.

In total, 23 NCAs (spread across Groups I, III and IV in Table 4) directly apply Article 312 of the Delegated Regulation, eight NCAs (spread across Groups II and V) have

introduced local legislation for a frequency of submission different from the frequency defined in the Delegated Regulation, and 14 NCAs (spread across Groups I, III and IV) require the RSR to be submitted more frequently, based on internal policy.

It is noted that the direct application of Article 312 of the Delegated Regulation does not exclude the possibility of having an internal policy in place for more frequent submissions.

Figure 1: Context of assessment - Legal background and defining frequency (number of NCAs represented as a % of all EEA)

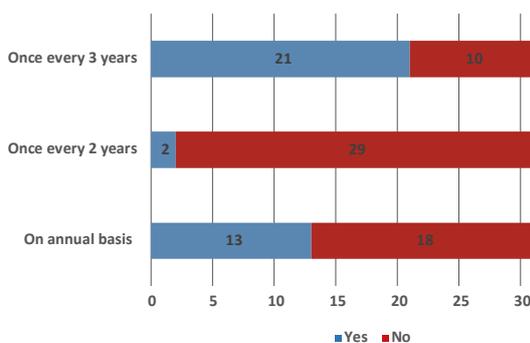


3.2 TAKING THE DECISION

Different approaches exist in relation to how the decision is taken about setting the frequency of the RSR (Figure 2); however, those differences correlate with the general context in which the NCA is operating.

The majority of NCAs (Groups II, III, IV and V in Table 4) that set a frequency of submission of the RSR that is different from once every 3 years for the entire market or on a case-by-case basis have different criteria when taking this decision. Most often, the decision is based on a combination of criteria as listed in Article 35(8) of the SII Directive.

Figure 2: Taking the decision - The frequency of the submission of the full RSR (by number of NCAs applying a different frequency in line with Article 312 of the Delegated Regulation)



When it comes to setting different frequencies for single specific undertakings, the practices across the EEA vary significantly.

There is only one NCA (Liechtenstein) that reports using the option of exemption¹⁰.

All NCAs use an IT tool for risk assessment, although in many NCAs this tool does not yet directly affect the decision taken on the frequency of submission of the RSR (those NCAs in Groups I, II and III (except Poland) in Table 4). The majority of the NCAs that belong to Group IV (see Table 4) have an IT system in place that supports their decision on setting the frequency of the RSR. The NCA in Group V also reports using an IT system for defining the frequency of submission of the RSR; however, in these NCAs there is also local legislation in place for annual submission, as well as local policies affecting submission frequency. In addition, NCAs in Group III are working towards an approach that includes the RSR as an input into their future risk assessment systems¹¹.

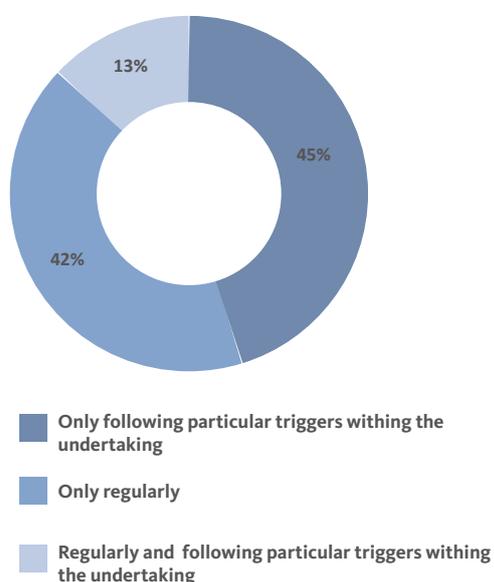
When it comes to the reassessment of the decision on setting the frequency of submission of the RSR for the entire market, the practices are quite diverse across the

¹⁰ For the purposes of this questionnaire, references are made to cases in which NCAs require the full RSR to be submitted more frequently than once every 3 years (e.g. annually or once every 2 years, either based on national legislation or following the rules of the SRP within a particular authority) as is defined in Article 312(1)(a) of the Delegated Regulation.

¹¹ In Group III, only PL is using the RSR as an input into the risk assessment framework (see Table 4).

EEA (Figure 3). The vast majority of NCAs reassess their decisions regarding the frequency of submission of the full RSR either on a regular basis or only after particular triggers within the undertaking. Only a minority of NCAs both regularly reassess their decisions and take into consideration particular triggers. However, all NCAs reassess their decisions.

Figure 3: Reassessment of the decision - NCAs' reassessment of the decisions regarding the frequency of the full RSR



None of the NCAs reported that they had reassessed decisions on setting the frequency of submission of the RSR for single specific undertakings during the reference period of the peer review (or they reported that such a reassessment was not applicable in their case – this was true for 10 % of the NCAs).

Most of the NCAs that define the frequency of submission of the RSR use the vast majority of the criteria listed in Article 35(8) of the SII Directive. Some NCAs pointed out that those criteria are also included in their risk assessment framework. NCAs also use other criteria, namely:

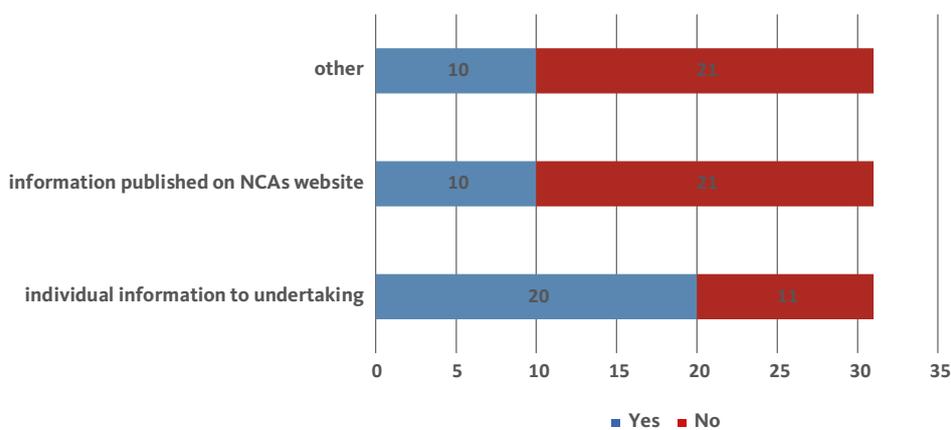
- the quality/completeness of the RSRs received;
- the internal rating of an undertaking (Risk Assessment Score);
- significant changes in the risk profile during the period monitored and systemic risk;
- significant business changes;
- whether or not manageable and relevant data are disclosed to supervisors in a timely manner;
- whether or not the submission of duplicated data is minimised;
- the volume of premiums, technical provisions and the assets of the undertakings;
- the possible effects of the management of undertakings' assets on financial stability;
- whether or not an internal model is used;
- whether or not the SCR rate at the end of the year in question is significantly lower than the target rate as defined in the ORSA;
- if there has been a significant change in the nature or complexity of the risks inherent to the business of the (re)insurance undertaking following an extension of activity;
- if there has been a transfer of the portfolio, a merger or a change;
- if there are extragroup shareholders; and
- if there is information suggesting a deterioration of the company's risk situation.

3.3 COMMUNICATING THE DECISION

With regard to communicating the decision on the frequency of submission of the RSR to market participants, there are divergent practices across the EEA, varying

from no communication at all with any of the market, as a result of directly applying Article 312 of the Delegated Regulation, to communication with all undertakings on an individual basis, based on the supervisory practice within the NCA (Figure 4). The way the decision is communicated is related to the group in which the NCA is allocated (see Table 4), as follows:

Figure 4: Communicating the decision - Communication of the full RSR frequency* (by number of NCA's depending on the type of communication)



* Please note that there are a number of NCAs that apply more than one approach of communicating their decision

- NCAs belonging to Group I (those directly applying Article 312 of the Delegated Regulation) do not inform market participants of the expected frequency of submission of the full RSR because the undertakings follow the frequency defined by EU law.
- NCAs belonging to Group II (those that have introduced local legislation in addition to Article 312 of the Delegated Regulation, requiring annual submission of the full RSR or, in the case of Liechtenstein, with exemptions) do not inform market participants of the expected frequency of submission of the full RSR because the undertakings follow the frequency defined in the local legislation¹².
- NCAs belonging to Group III (those following the NCA's supervisory practice to require annual submission of the full RSR) do inform market participants of the expected frequency of submission of the full RSR by sending the same letter to all market participants annually.
- NCAs belonging to Group IV (those following the NCA's supervisory practice, which is usually based on a risk assessment framework) do not inform all market participants of the expected frequency of submission of the full RSR; however, they follow a case-by-case approach targeting single specific undertakings. Therefore, the letter sent to undertakings differs.
- The NCA belonging to Group V (the NCA that has introduced local legislation combined with NCA supervisory practice) follows a mixed approach. On the one hand, all market participants are informed of the frequency expected following the main criteria (e.g. the balance-sheet threshold) via the instruction/legislation issued by the particular NCA. On the other hand, single specific undertakings are informed when needed by a separate communication.

If the undertaking is part of a group, most NCAs report that the decision on the frequency of submission (in case it is different from the minimum set in the Delegated Regulation of once every 3 years) is communicated to the college of supervisors; however, some NCAs report that they do not communicate this decision.

¹² There is an exception for Liechtenstein where individual letters are sent to the market participants to inform them about the expected frequency of submission of the full RSR, driven from the fact that LI is using the option for exemption from annual submission of full RSR.

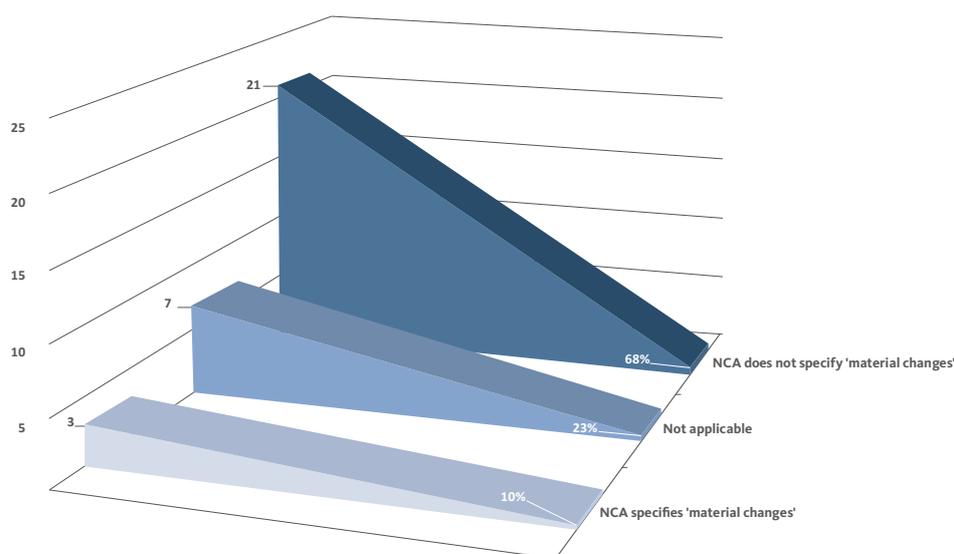
3.4 SUPPORTING OBSERVATIONS FOR THE PEER REVIEW

As already mentioned, EIOPA has assessed the content of the full and summary RSRs, as well as their benefit for supervisory purposes, only for context in this peer review.

In summary, only one-third of NCAs (Group IV and partially Group V defined in Table 4) apply the principle of proportionality set out in the SII Directive and the Delegated Regulation by taking a **risk-based decision on the frequency of the RSR** when it is (most often) different from the minimum defined by EU law.

The initial analysis of the results from the self-assessment questionnaire with regard to **defining and officially communicating material changes** required in the summary RSR shows that almost half of the NCAs (Group A defined in Table 5) require material changes in a summary RSR to be officially communicated, even if there is not an additional (NCA-specific) definition of material changes in addition to the requirement of Article 305 of the Delegated Regulation (Figure 5).

Figure 5: Specification of material changes (in addition to those changes outlined in Article 305 of the Delegated Regulation) triggering Article 312(3) of the Delegated Regulation - Spread of the different approaches among the NCAs in the EEA (expressed as number of NCAs applying particular approach and as a percentage of all EEA)

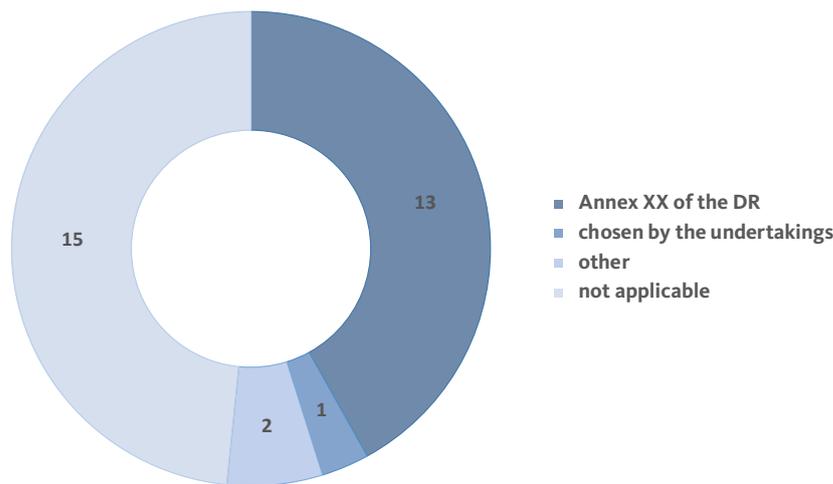


The majority of the NCAs report that undertakings' RSRs, in general, comply with the structure of the RSR given in Annex XX of the Delegated Regulation (Figure 6). However, in cases of non-compliance with the practices identified so far, supervisors take additional measures, for example by advising undertakings to:

- exactly match the headings in Annex XX of the Delegated Regulation when drafting their full RSRs;
- incorporate disclosures into the RSR, rather than using cross-references to extraneous materials such as ORSAs;
- always include a summary section that outlines past or present material changes and expected (future) strategic developments;
- be guided by Article 307 of the Delegated Regulation when drafting the business and performance section of the their RSRs;
- make more comprehensive disclosures (and to avoid material omissions) in relation to their systems of governance;
- make more comprehensive disclosures of their risk profiles, being guided by Article 309(2) to (9) of the Delegated Regulation;

- include information on the valuation of their assets, technical provisions etc., noting the specific requirements of Guidelines 21 to 23 of the EIOPA guidelines on reporting and public disclosure; and
- make more comprehensive and more forward-looking disclosures of capital management, particularly the development of their own funds, planned actions in the case of SCR volatility, etc.

Figure 6: Structure of the summary RSRs received by NCAs - Type of summary RSR received (presented by number of NCAs depending on the approach)



Incomplete summary RSRs will trigger direct engagement with undertakings. Supervisors have a wide discretion to:

- request the submission of a full RSR; and
- request further information on the material changes already listed.

The majority of the NCAs that use a risk-based approach for setting the frequency of submission of the RSR (Group IV, as well as Group III, which is migrating to this approach) underline that the report is used to a large extent for supervisory purposes. The experience of those EEA supervisors is that the RSRs provide modest amounts of new information, with more than 90 % of the RSR content aligning with supervisors' understanding of undertakings (i.e. information that had already been provided by way of quantitative reporting templates (QRTs), ORSAs or SFCRs). Notwithstanding the limited volume of additional information provided by RSRs, supervisors have noted that RSRs are a particularly useful supervisory tool because they:

- contain accessible board-approved information, which, supervisors have noted, tends to be particularly useful in the case of lower impact undertakings;
- are confidential/not for publication and may therefore be honest and objective on matters that have a critical impact on the undertaking in the future.

The parts of the full/summary RSRs that were found to be useful from a supervisory point of view – because, in these

sections, undertakings provide information that is not available in other reports – are the following (see also Figure 7):

- proposals for changes to governance, ownership, etc.;
- proposals for changes to the business strategy;
- proposals for changes to the operational strategy;
- proposals on outsourcing strategies;
- details of internal audits; and
- financial projections.

Among the NCAs applying risk-based and proportionate approaches or migrating to such approaches in relation to the RSR (Group IV and partially Group V, as well as Poland (Group III); see Table 4), the quality of the content of the report is mostly perceived as a driving factor for whether more or less frequent submission is needed. In one of the EEA countries (Ireland), inadequacies in a full or summary RSR usually trigger a request for:

- the deficient RSR to be reworked and resubmitted;
- an RSR to be submitted for the following year's exercise;
- more frequent submissions of full RSRs; and
- missing information to be submitted in other formats, such as updated QRTs, addenda to an ORSA or SFCRs.

Besides the practices considered within NCAs that directly apply Article 312 of the Delegated Regulation and that

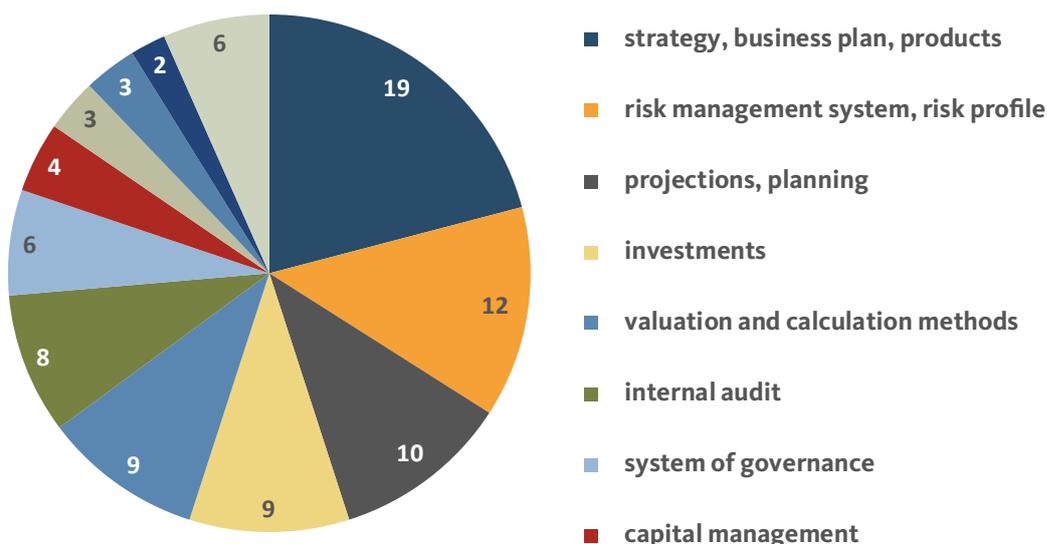
follow a risk-based and proportionate approach to more frequent submissions of RSRs (Group IV), there are number of NCAs (Groups II and V) that require a full RSR to be submitted on an annual basis and these NCAs report a large overlap between RSRs and other narrative reporting formats such as ORSAs and SFCRs, which subsequently have a lower added value from a supervisory perspective. These NCAs constitute one-third of all NCAs.

There is another group of NCAs (Group I), which again make up one-third of all NCAs, that directly apply Article 312 of the Delegated Regulation without any additional provisions or NCA practices; these NCAs require a

full RSR to submitted only once every 3 years. In most of these cases, the supervisors consider that the content of the RSR overlaps with the information in the other narrative reporting formats and, to certain extent, with some information sourced from QRTs, and so the benefit for supervisors is based on less than 50 % new information.

In summary, only one-third (Group IV) of the NCAs currently consider the RSR as more or less fit for purpose, because they use it as an input for risk-based supervision (using an IT risk assessment tool) of undertakings and because the content of the RSR is easily combined with other information reported under SII.

Figure 7: Information from the RSR that provides added value for supervisors - Split of the information retrieved from the full and summary RSRs that provided value for supervisors (representing only areas of the RSR content highlighted by NCAs)



The most valuable information for NCAs concerns undertakings' business objectives, planning and strategy, development plans, the profitability for each class of business and product, the main trends and factors affecting development, the results, and the situation of the insurance undertaking during the whole period of business planning.

In addition, information about the risk management system, risk profile, valuation for solvency purposes, risks projection for the risk margin calculation and analysis of SCR risks in relation to the assets of the undertaking and risk mitigation techniques is important for NCAs.

The third most valuable category of information retrieved from RSRs is any projections and plans presented by undertakings.

Generally, all NCAs pointed out that the RSR is more detailed than the SFCR and can include confidential information that is helpful for supervisory purposes. The SFCR is perceived as less valuable in that respect. The most valuable aspect of the RSR is that it includes forward-looking sections; however, NCAs noted that the quality of this information mostly depends on the quality of the RSR of the specific undertaking.

4. IMPACT ON COMMON SUPERVISORY CULTURE

In this peer review on the RSR, EIOPA has analysed legal and regulatory frameworks and national supervisory practices across 31 NCAs in the context of taking a decision on the frequency of submission of the RSR and on the communication of this decision to undertakings. The reference period for this peer review was from the start of SII to the end of March 2019. The analysis has revealed diverging legal and regulatory frameworks and supervisory practices in this area. As a result of this, over 51 recommended actions have been issued and four sound practices have been identified to inspire NCAs and to help them gain benefits from each other's experience (see Annex VI for the sound practices).

EIOPA believes that the implementation of the recommended actions and, if applicable, the sound practices by NCAs will contribute towards supervisory convergence. EIOPA also aims to create among the NCAs a common understanding and application of the principles and key characteristics of high-quality and effective supervision when dealing with the RSR.

By promoting the following supervisory practices, this peer review could have a positive impact on the common supervisory culture, as these practices are underpinned by the principles and key characteristics of high-quality and effective supervision:

- Risk-based and proportionate supervision is achievable by **defining the reporting frequency of the full RSR based on the outcome of the risk assessment**, with at least those undertakings that have a high risk profile and impact on the market submitting the RSR more frequently than once every 3 years and those undertakings with a low risk profile and impact on the market submitting the RSR less frequently than yearly.
- Supervision can be forward-looking, preventive and proactive if it is based on an **internal policy that outlines a structure for the process and sets out criteria for defining a different frequency of submission of the full RSR**.
- It is possible to achieve challenging, sceptical and engaged supervision by **segmenting the market, which would allow the workload to be distributed evenly and an in-depth assessment to take place of the full RSRs submitted**; a request for undertakings to submit a statement of no material changes would also help to meet the requirements of Article 312(3) of the Delegated Regulation.
- Conclusive supervision is achieved through a **standardised RSR assessment process and tools**.

5. CONCLUSIONS

5.1 ACTIONS TO BE TAKEN BY EIOPA

EIOPA has concluded, based on the issues observed in several countries in relation to the proportionality in setting the frequency of submission of the RSR during the process of assessment, that the SII legislation needs to be further clarified. Therefore, EIOPA will continue to monitor the developments in this area and will initiate the following improvements to achieve supervisory convergence:

- EIOPA will introduce supervisory guidance by keeping the minimum requirement for submission of the full RSR as once every 3 years but requiring a mandatory assessment by NCAs and communication of the frequency of the RSR (see EIOPA's advice in the SII 2020 review).
- EIOPA will include in its guidelines or supervisory handbook (depending on the decision to be taken for the SII 2020 review on how to ensure proportionality in taking a decision on the frequency of reporting of the full RSR) guidance on issuing exemptions from (bi)annual submission of the full RSR based on a list of events that are specific to the undertaking (e.g. mergers/acquisitions).

Another action that EIOPA will take is linked to the communication of the decision and the additional clarity needed in the existing EIOPA guidelines:

- EIOPA will develop further guidance in relation to the communication to the group supervisor and college in the context of Guideline 23, paragraph 1.58, of the EIOPA guidelines on SRP by either updating this guideline or including this aspect in the supervisory handbook. It was noted by some NCAs that the current guideline is not applied by the NCAs because input from the group supervisor is not required for the solo supervisor to take a decision on solo undertakings' RSR frequency and vice versa.

Detailed information on the actions to be taken by EIOPA can be found in Annex V of this report.

5.2 FOLLOW-UP MEASURES

EIOPA issued 51 recommended actions to 26 NCAs. Notwithstanding the fact that the SII legislation needs to be clarified, the recommended actions target supervisory shortcomings and will remain valid after the review of the SII Directive. NCAs are expected to have implemented the recommended actions by 2022.

In addition, EIOPA identified four sound practices that are currently being applied by 13 NCAs. These practices are related to the use of internal policy for defining a more frequent submission of the RSR, segmenting the market for the purposes of assessing the full RSR, the added value of an explicit statement of no material changes and the standardisation of the assessment among NCAs by using a clear process and tools.

As regards the follow-up, in 2022, EIOPA will, in line with the EIOPA Regulation, assess how NCAs have implemented the recommended actions.

ANNEX I

LEGAL AND NON-LEGAL ASSESSMENT CRITERIA

› Solvency II Directive

Article 35

Information to be provided for supervisory purposes

1. Member States shall require insurance and reinsurance undertakings to submit to the supervisory authorities the information which is necessary for the purposes of supervision, taking into account the objectives of supervision laid down in Articles 27 and 28. Such information shall include at least the information necessary for the following when performing the process referred to in Article 36:
 - a) to assess the system of governance applied by the undertakings, the business they are pursuing, the valuation principles applied for solvency purposes, the risks faced and the risk-management systems, and their capital structure, needs and management;
 - b) to make any appropriate decisions resulting from the exercise of their supervisory rights and duties.
 2. Member States shall ensure that the supervisory authorities have the following powers:
 - a) to determine the nature, the scope and the format of the information referred to in paragraph 1 which they require insurance and reinsurance undertakings to submit at the following points in time:
 - (i) at predefined periods;
 - (ii) upon occurrence of predefined events;
 - (iii) during enquiries regarding the situation of an insurance or reinsurance undertaking;
 - b) to obtain any information regarding contracts which are held by intermediaries or regarding contracts which are entered into with third parties; and
 - c) to require information from external experts, such as auditors and actuaries.
 3. The information referred to in paragraphs 1 and 2 shall comprise the following:
 - a) qualitative or quantitative elements, or any appropriate combination thereof;
 - b) historic, current or prospective elements, or any appropriate combination thereof; and
 - c) data from internal or external sources, or any appropriate combination thereof.
 1. The information referred to in paragraphs 1 and 2 shall comply with the following principles:
 - b) it must reflect the nature, scale and complexity of the business of the undertaking concerned, and in particular the risks inherent in that business;
 - c) it must be accessible, complete in all material respects, comparable and consistent over time; and
 - d) it must be relevant, reliable and comprehensible.
 5. Member States shall require insurance and reinsurance undertakings to have appropriate systems and structures in place to fulfil the requirements laid down in paragraphs 1 to 4 as well as a written policy, approved by the administrative, management or supervisory body of the insurance or reinsurance undertaking, ensuring the ongoing appropriateness of the information submitted.
 6. Without prejudice to Article 129(4), where the predefined periods referred to in paragraph 2(a)(i) are shorter than one year, the supervisory authorities concerned may limit regular supervisory reporting, where:
 - a) the submission of that information would be overly burdensome in relation to the nature, scale and complexity of the risks inherent in the business of the undertaking;
 - b) the information is reported at least annually.
- Supervisory authorities shall not limit regular supervisory reporting with a frequency shorter than one year in the case of insurance or reinsurance undertakings that are part of a group within the meaning of Article 212(1)(c), un-

less the undertaking can demonstrate to the satisfaction of the supervisory authority that regular supervisory reporting with a frequency shorter than one year is inappropriate, given the nature, scale and complexity of the risks inherent in the business of the group.

The limitation to regular supervisory reporting shall be granted only to undertakings that do not represent more than 20 % of a Member State's life and non-life insurance and reinsurance market respectively, where the non-life market share is based on gross written premiums and the life market share is based on gross technical provisions.

Supervisory authorities shall give priority to the smallest undertakings when determining the eligibility of the undertakings for those limitations.

7. The supervisory authorities concerned may limit regular supervisory reporting or exempt insurance and reinsurance undertakings from reporting on an item-by-item basis, where:
- a) the submission of that information would be overly burdensome in relation to the nature, scale and complexity of the risks inherent in the business of the undertaking;
 - b) the submission of that information is not necessary for the effective supervision of the undertaking;
 - c) the exemption does not undermine the stability of the financial systems concerned in the Union; and
 - d) the undertaking is able to provide the information on an ad-hoc basis.

Supervisory authorities shall not exempt from reporting on an item-by-item basis insurance or reinsurance undertakings that are part of a group within the meaning of Article 212(1)(c), unless the undertaking can demonstrate to the satisfaction of the supervisory authority that reporting on an item-by-item basis is inappropriate, given the nature, scale and complexity of the risks inherent in the business of the group and taking into account the objective of financial stability.

The exemption from reporting on an item-by-item basis shall be granted only to undertakings that do not represent more than 20 % of a Member State's life and non-life insurance or reinsurance market respectively, where the non-life market share is based on gross written premiums and the life market share is based on gross technical provisions.

Supervisory authorities shall give priority to the smallest undertakings when determining the eligibility of the undertakings for those exemptions.

8. For the purposes of paragraphs 6 and 7, as part of the SRP, supervisory authorities shall assess whether the submission of information would be overly burdensome in relation to the nature, scale and complexity of the risks of the undertaking, taking into account, at least:
- a) the volume of premiums, technical provisions and assets of the undertaking;
 - b) the volatility of the claims and benefits covered by the undertaking;
 - c) the market risks that the investments of the undertaking give rise to;
 - d) the level of risk concentrations;
 - e) the total number of classes of life and non-life insurance for which authorisation is granted;
 - f) possible effects of the management of the assets of the undertaking on financial stability;
 - g) the systems and structures of the undertaking to provide information for supervisory purposes and the written policy referred to in paragraph 5;
 - h) the appropriateness of the system of governance of the undertaking;
 - i) the level of own funds covering the Solvency Capital Requirement and the Minimum Capital Requirement;
 - j) whether the undertaking is a captive insurance or reinsurance undertaking only covering risks associated with the industrial or commercial group to which it belongs.

› Delegated Regulation

Recital (113)

On the basis of a risk assessment of the insurance and reinsurance undertaking in accordance with Article 36 of Directive 2009/138/EC, supervisory authorities may require an annual submission of its regular supervisory report. When this is not the case and insurance and reinsurance undertakings submit their regular supervisory report only every 3 years, they should nevertheless inform annually the supervisory authorities of any major developments that have occurred since the last reporting period.

Recital (115)

The application of the proportionality principle in the area of supervisory reporting should not result in insurance and reinsurance undertakings or branches established within the Union being required to submit any information which would not be relevant to their business or not be material.

*Article 304*Elements of the regular supervisory reporting

1. The information which supervisory authorities require insurance and reinsurance undertakings to submit at predefined periods in accordance with Article 35(2)(a)(i) of Directive 2009/138/EC shall comprise the following: (b) the regular supervisory report comprising the information referred to in Articles 307 to 311 of this Regulation. It shall also present any information referred to in Articles 293 to 297 of this Regulation which supervisory authorities have permitted insurance and reinsurance undertakings not to disclose in their solvency and financial condition report, in accordance with Article 53(1) of Directive 2009/138/EC. The regular supervisory report shall follow the same structure as the one set out in Annex XX for the solvency and financial condition report.
2. The regular supervisory report shall include a summary which shall in particular highlight any material changes that have occurred in the undertaking's business and performance, system of governance, risk profile, valuation for solvency purposes and capital management over the reporting period, and provide a concise explanation of the causes and effects of such changes. The summary shall include information on the own risk and solvency assessment for the purposes of Article 45(6) of Directive 2009/138/EC.

*Article 305*Materiality

For the purposes of this Chapter, the information submitted to supervisors shall be considered as material where its omission or misstatement could influence the decision-making or judgement of the supervisory authorities.

*Article 307*Business and performance

1. The regular supervisory report shall include all of the following information regarding the business of the insurance or reinsurance undertaking: (a) the main trends and factors that contribute to the development, performance and position of the undertaking over its business planning time period including the undertaking's competitive position and any significant legal or regulatory issues; (b) a description of the business objectives of the undertaking, including the relevant strategies and time frames.
2. The regular supervisory report shall include all of the following qualitative and quantitative information regarding the underwriting performance of the insurance or reinsurance undertaking, as shown in the undertaking's financial statements: (a) information on the undertaking's underwriting income and expenses by material line of business and material geographical areas where it writes business during the reporting period, a comparison of the information with that reported on the previous reporting period and the reasons for any material changes; (b) an analysis of the undertaking's overall underwriting performance during the reporting period; (c) information on the undertaking's underwriting performance by line of business during the reporting period against projections, and significant factors affecting deviations from these projections; (d) projections of the undertaking's underwriting performance, with information on significant factors that might affect such underwriting performance, over its business planning time period; (e) information on any material risk mitigation techniques purchased or entered into during the reporting period.
3. The regular supervisory report shall include all of the following qualitative and quantitative information regarding the performance of the investments of the insurance or reinsurance undertaking, as shown in the undertaking's financial statements: (a) information on income and expenses with respect to investment activities during the last reporting period, a comparison of the information with that reported on the previous reporting period and reasons for any material changes; (b) an analysis of the undertaking's overall investment performance during the reporting period and also by relevant asset class; (c) projections of the undertaking's expected investment performance, with information on significant factors that might affect such investment performance, over its

business planning time period; (d) the key assumptions which the undertaking makes in its investment decisions with respect to the movement of interest rates, exchange rates, and other relevant market parameters, over its business planning time period; (e) information about any investments in securitisation, and the undertaking's risk management procedures in respect of such securities or instruments.

4. The regular supervisory report shall include information of any material income and expenses, other than underwriting or investment income and expenses, over the undertaking's business planning time period.
5. The regular supervisory report shall include any other material information regarding their business and performance.

Article 308

System of governance

1. The regular supervisory report shall include all of the following information regarding the insurance or reinsurance undertaking's system of governance: (a) information allowing the supervisory authorities to gain a good understanding of the system of governance within the undertaking, and to assess its appropriateness to the undertaking's business strategy and operations; (b) information relating to the undertaking's delegation of responsibilities, reporting lines and allocation of functions; (c) the remuneration entitlements of the members of the administrative, management or supervisory body, over the reporting period and a comparison of the information with that reported on the previous reporting period and the reasons for any material changes.
2. The regular supervisory report shall include all of the following information regarding the compliance of the insurance or reinsurance undertaking with fit and proper requirements: (a) in accordance with the requirements set out in Article 42 of Directive 2009/138/EC, a list of the persons in the undertaking that are responsible for key functions; (b) information on the policies and processes established by the undertaking to ensure that those persons are fit and proper.
3. The regular supervisory report shall include all of the following information regarding the risk management system of the insurance or reinsurance undertaking: (a) information on the undertaking's risk management strategies, objectives, processes and reporting procedures for each category of risk; (b) information on significant risks that the undertaking is exposed to over the life-time of its insurance and reinsurance obligations, and how these have been captured in its overall solvency needs; (c) information on any material risks that the undertaking has identified and that are not fully included in the calculation of the Solvency Capital Requirement as set out in Article 101(4) of Directive 2009/138/EC; (d) information on how the undertaking fulfils its obligation to invest all its assets in accordance with the 'prudent person principle' set out in Article 132 of Directive 2009/138/EC; (e) information on how the undertaking verifies the appropriateness of credit assessments from external credit assessments institutions including how and the extent to which credit assessments from external credit assessments institutions are used; (f) results of the assessments regarding the extrapolation of the risk-free rate, the matching adjustment and the volatility adjustment, as referred to in Article 44(2a) of Directive 2009/138/EC.
4. The regular supervisory report shall include all of the following information regarding the own risk and solvency assessments which were performed over the reporting period by the insurance or reinsurance undertaking: (a) a description of how the own risk and solvency assessment is performed, internally documented and reviewed; (b) a description of how the own risk and solvency assessment is integrated into the management process and into the decision-making process of the undertaking.
5. The regular supervisory report shall include all of the following information regarding the internal control system of the insurance or reinsurance undertaking: (a) information on the key procedures that the internal control system includes; (b) information on the activities performed in accordance with Article 46(2) of Directive 2009/138/EC during the reporting period; (c) information on the undertaking's compliance policy prepared pursuant to Article 270 of this Regulation, the process for reviewing that policy, the frequency of review and any significant changes to that policy during the reporting period.
6. The regular supervisory report shall include all of the following information regarding the internal audit function of the insurance or reinsurance undertaking: (a) a description of internal audits performed during the reporting period, with a summary of the material findings and recommendations reported to the undertaking's administrative, management or supervisory body, and any action taken with re-

spect to these findings and recommendations; (b) a description of the undertaking's internal audit policy, the process for reviewing that policy, the frequency of review and any significant changes to that policy during the reporting period; (c) a description of the undertaking's audit plan, including future internal audits and the rationale for these future audits; (d) where the persons carrying out the internal audit function assume other key functions in accordance with Article 271(2), an assessment, in qualitative and quantitative terms, of the criteria set out in points (a) and (b) of Article 271(2).

7. With regard to the actuarial function the regular supervisory report shall include an overview of the activities undertaken by the actuarial function in each of its areas of responsibility during the reporting period, describing how the actuarial function contributes to the effective implementation of the undertaking's risk management system.
8. The regular supervisory report shall include all of the following information regarding outsourcing: (a) where the undertaking outsources any critical or important operational functions or activities, the rationale for the outsourcing and evidence that appropriate oversight and safeguards are in place; (b) information on the service providers to whom any critical or important operational functions or activities have been outsourced and on how the undertaking ensures that the service providers comply with Article 274(3)(a). (c) a list of the persons responsible for the outsourced key functions in the service provider.
9. The regular supervisory report shall include any other material information regarding the system of governance of the insurance or reinsurance undertaking.

Article 309

Risk profile

1. The regular supervisory report shall include qualitative and quantitative information regarding the risk profile of the insurance and reinsurance undertaking, in accordance with paragraphs 2 to 9, separately for all of the following categories of risk: (a) underwriting risk; (b) market risk; (c) credit risk; (d) liquidity risk; (e) operational risk; (f) other material risks.
2. The regular supervisory report shall include all of the following information regarding the risk exposure of the insurance or reinsurance undertaking, including the exposure arising from off-balance sheet positions and the transfer of risk to special purpose vehicles:
 - (a) an overview of any material risk exposures anticipated over the business planning time period given the undertaking's business strategy, and how these risk exposures will be managed;
 - (b) where the undertaking sells or re-pledges collateral, within the meaning of Article 214 of this Regulation, the amount of that collateral, valued in accordance with Article 75 of Directive 2009/138/EC;
 - (c) where the undertaking has provided collateral, within the meaning of Article 214, the nature of the collateral, the nature and value of assets provided as collateral and the corresponding actual and contingent liabilities created by that collateral arrangement;
 - (d) information on the material terms and conditions associated with the collateral arrangement;
 - (e) a complete list of assets and how those assets have been invested in accordance with the 'prudent person principle' set out in Article 132 of Directive 2009/138/EC;
 - (f) where the undertaking has entered into securities lending or borrowing transactions, repurchase or reverse repurchase agreements as referred to in Article 4(1)(82) of Regulation (EU) No 575/2013, including liquidity swaps, information on their characteristics and volume;
 - (g) where the undertaking sells variable annuities, information on guarantee riders and hedging of the guarantees.
3. The regular supervisory report shall include information regarding the volume and nature of the loan portfolio of the insurance or reinsurance undertaking.
4. With respect to risk concentration the regular supervisory report shall include information on the material risk concentrations to which the undertaking is exposed to and an overview of any future risk concentrations anticipated over the business planning time period given that undertaking's business strategy, and how these risk concentrations will be managed.
5. The regular supervisory report shall include all the following information regarding the risk-mitigation techniques of the insurance or reinsurance undertaking: (a) information on the techniques currently used to mitigate risks, and a description of any material risk-mitigation techniques that the undertaking is considering purchasing or entering into over the business planning time period given the undertaking's business strategy, and the rationale for and effect of such risk mitigation techniques; (b) where the insurance or reinsurance undertaking holds collateral, within the meaning of Article 214 of this Regulation: (i) the value of the collateral in accordance with

- Article 75 of Directive 2009/138/EC; (ii) information on the material terms and conditions associated with the collateral arrangement.
6. With respect to the liquidity risk, the regular supervisory report shall include in particular information of the insurance or reinsurance undertaking regarding the expected profit included in future premiums as calculated in accordance with Article 260(2) of this Regulation for each line of business, the result of the qualitative assessment referred to in Article 260(1)(d) (ii) and a description of the methods and main assumptions used to calculate the expected profit included in future premiums;
 7. The regular supervisory report shall include all of the following information regarding the risk sensitivity of the insurance or reinsurance undertaking: (a) a description of the relevant stress tests and scenario analysis referred to in Article 259(3), carried out by the undertaking including their outcome; (b) a description of the methods used and the main assumptions underlying those stress tests and scenario analysis.
 8. The regular supervisory report shall include information regarding quantitative data which is necessary for determining dependencies between the risks covered by the risk modules or sub-modules and of the Basic Solvency Capital Requirement.
 9. The regular supervisory report shall include any other material information regarding their risk profile of the insurance or reinsurance undertaking.
4. Where insurance or reinsurance undertakings value assets or liabilities based on the valuation methods they use to prepare their financial statements in accordance with Article 9(4) of this Regulation, they shall report an assessment, in qualitative and quantitative terms, of the criterion set out in Article 9(4)(d).

Article 311

Capital management

1. The regular supervisory report shall include all of the following information regarding the own funds of the insurance or reinsurance undertaking: (a) information on the material terms and conditions of the main items of own funds held by the undertaking; (b) the expected developments of the undertaking's own funds over its business planning time period given the undertaking's business strategy, and appropriately stressed capital plans and whether there is any intention to repay or redeem any own-fund item or plans to raise additional own funds. (c) the undertaking's plans on how to replace basic own-fund items that are subject to the transitional arrangements referred to in Article 308b(9) and (10) of Directive 2009/138/EC over the timeframe referred to in that Article.
 2. The regular supervisory report shall include all of the following information regarding the Solvency Capital Requirement and the Minimum Capital Requirement of the insurance or reinsurance undertaking: (a) quantitative information on the undertaking's Solvency Capital Requirement split by risk modules where the undertaking applies the standard formula, and by risk categories where the undertaking applies an internal model; (b) the expected developments of the undertaking's anticipated Solvency Capital Requirement and Minimum Capital Requirement over its business planning time period given the undertaking's business strategy; (c) an estimate of the undertaking's Solvency Capital Requirement determined in accordance with the standard formula, where the supervisory authority requires the undertaking to provide that estimate pursuant to Article 112(7) of Directive 2009/138/EC.
 3. Where an internal model is used to calculate the Solvency Capital Requirement, the regular supervisory report shall also include all of the following information: (a) the results of the review of the causes and sources of profits and losses, required by Article 123 of Directive 2009/138/EC, for each major business unit and how the categorisation of risk chosen in the
1. The regular supervisory report shall include any important information, other than that already disclosed in the solvency and financial condition report of the insurance or reinsurance undertaking, regarding the valuation of its assets, technical provisions and other liabilities for solvency purposes.
 2. The regular supervisory report shall include a description of: (a) the relevant assumptions about future management actions; (b) the relevant assumptions about policyholder behaviour.
 3. The regular supervisory report shall include information on the areas set out in Article 263 of this Regulation in complying with the reporting requirements of the insurance or reinsurance undertaking in relation to valuation for solvency purposes.

Article 310

Valuation for solvency purposes

- internal model explains those causes and sources of profits and losses; (b) information on whether, and if so to what extent, the risk profile of the undertaking deviates from the assumptions underlying the undertaking's internal model; (c) information about future management actions used in the calculation of the Solvency Capital Requirement.
4. Where undertaking-specific parameters are used to calculate the Solvency Capital Requirement, or a matching adjustment is applied to the relevant risk-free interest term structure, the regular supervisory report shall include information regarding whether there have been changes to the information included in the application for approval of the undertaking-specific parameters or matching adjustment that are relevant for the supervisory assessment of the application.
 5. The regular supervisory report shall include information on any reasonably foreseeable risk of non-compliance with the undertaking's Minimum Capital Requirement or Solvency Capital Requirement, and the undertaking's plans for ensuring that compliance with each is maintained.
 6. The regular supervisory report shall include any other material information regarding the capital management of the insurance or reinsurance undertaking.
2. Supervisory authorities may require an insurance or reinsurance undertaking to submit its regular supervisory report at the end of any financial year of the undertaking, subject to the deadlines set out in paragraph 1(a).
 3. Where there is no requirement for a regular supervisory report to be submitted in relation to a given financial year, insurance and reinsurance undertakings shall nevertheless submit to their supervisory authority a report which sets out any material changes that have occurred in the undertaking's business and performance, system of governance, risk profile, valuation for solvency purposes and capital management over the given financial year, and provide a concise explanation about the causes and effects of such changes. That report shall be submitted within the deadlines set out in paragraph 1(a).

Article 312

Deadlines

1. Insurance and reinsurance undertakings shall submit to the supervisory authorities: (a) the regular supervisory report referred to in Article 304(i)(b) of this Regulation at least every 3 years within the deadlines set out in Article 308b(5) of Directive 2009/138/EC and, after the end of the transitional period set out in that Article, no later than 14 weeks after the undertaking's financial year in question ends; (b) the ORSA supervisory report referred to in Article 304(i)(c) within 2 weeks after concluding the assessment. (c) the annual quantitative templates referred to in Article 304(i)(d) of this Regulation within the deadlines set out in article 308b(5) of Directive 2009/138/EC and, after the end of the transitional period set out in that Article, no later than 14 weeks after the undertaking's financial year end. (d) the quarterly quantitative templates referred to in Article 304(i)(d) of this Regulation within the deadlines set out in article 308b(7) of Directive 2009/138/EC and, after the end of the transitional period set out in that Article, no later than five weeks related to any quarter ending.
2. The group regular supervisory report shall include all of the following additional information: (a) regarding the group's business and performance: (i) a list of all subsidiaries, related undertakings and branches; (ii) a description of activities and sources of profits or losses for each material related undertaking within the meaning of Article 256a of Directive 2009/138/EC and for each significant branch within the meaning of Article 354(i) of this Regulation; (iii) a description of the contribution of each subsidiary to the achievement of the group strategy; (iv) qualitative and quantitative information on significant intra-group transactions by insurance and reinsurance undertakings with the group and the amount of the transactions over the reporting period and their outstanding balances at the end of the reporting period;

Article 372

Elements and contents

1. Articles 304 to 311 of this Regulation shall apply to the information which participating insurance and reinsurance undertakings, insurance holding companies or mixed financial holding companies shall be required to submit to the group supervisor. Where all insurance and reinsurance undertakings in the group are exempted from quarterly reporting obligations in accordance with Article 35(6) of Directive 2009/138/EC, the group regular supervisory report shall include annual quantitative templates only. Annual reporting obligations shall not include reporting on an item-by-item basis where all undertakings in the group are exempted from it according to Article 35 (7) of that Directive.
2. The group regular supervisory report shall include all of the following additional information: (a) regarding the group's business and performance: (i) a list of all subsidiaries, related undertakings and branches; (ii) a description of activities and sources of profits or losses for each material related undertaking within the meaning of Article 256a of Directive 2009/138/EC and for each significant branch within the meaning of Article 354(i) of this Regulation; (iii) a description of the contribution of each subsidiary to the achievement of the group strategy; (iv) qualitative and quantitative information on significant intra-group transactions by insurance and reinsurance undertakings with the group and the amount of the transactions over the reporting period and their outstanding balances at the end of the reporting period;

(b) regarding the group's system of governance: (i) a description of how the group internal control mechanism comply with the requirements set out in Article 246(2) of Directive 2009/138/EC; (ii) where applicable, information on the subsidiaries included in the own risk and solvency assessment as referred to in the third subparagraph of Article 246(4) of Directive 2009/138/EC; (iii) qualitative and quantitative information on material specific risks at group level; (c) regarding the group's capital management: (i) qualitative and quantitative information on the Solvency Capital Requirement and own funds for each insurance and reinsurance undertaking within the group, in so far as it is included in the calculation of the group solvency; (ii) qualitative and quantitative information on the Solvency Capital Requirement and own funds for each intermediate insurance holding company, insurance holding company, intermediate mixed financial holding company, mixed financial holding company and ancillary services undertaking within the group, in so far as it is included in the calculation of the group solvency; (iii) qualitative and quantitative information on the solvency requirements and own funds for each related undertaking which is a credit institution, investment firm, financial institution, UCITS management company, alternative investment fund manager or institutions for occupational retirement provisions in so far as it is included in the calculation of the group solvency; (iv) qualitative and quantitative information on the notional solvency requirement and own funds for each related undertaking which is a non-regulated undertaking carrying out financial activities, in so far as it is included in the calculation of the group solvency; (v) qualitative and quantitative information on the solvency requirement and own funds for each related third- country insurance or reinsurance undertaking, in so far as it is included in the calculation of the group solvency; when method 2 within the meaning of Article 233 of Directive 2009/138/EC is used in the case of a related third country insurance or reinsurance undertaking that has its head office in a third country whose solvency regime is deemed to be equivalent pursuant to Article 227 of that Directive, the Solvency Capital Requirement and the own funds eligible to satisfy that requirement as laid down by the third country concerned shall be separately identified; (vi) qualitative and quantitative information on the solvency requirement and own funds for any other related undertaking, in so far as it is included in the calculation of the group solvency; (vii) a description of special purpose vehicles within

the group which comply with the requirements set out in Article 211 of Directive 2009/138/EC; (viii) a description of special purpose vehicles within the group, which are regulated by a third country supervisory authority and comply with requirements equivalent to those set out in Article 211(2) of Directive 2009/138/EC, for the purposes of including a description of the verification carried out by the participating insurance and reinsurance undertaking, insurance holding company or mixed financial holding company whether the requirements to which these special purpose vehicles are subject to in the third country are equivalent to those set out in Article 211(2) of Directive 2009/138/EC; (ix) a description of each special purpose entity within the group other than those referred to in points (vii) and (viii) together with qualitative and quantitative information on the solvency requirement and own funds of these entities, in so far as they are included in the calculation of the group solvency; (x) where relevant, for all related insurance and reinsurance undertakings which are included in the calculation of the group solvency, qualitative and quantitative information on how the undertaking complies with Article 222(2) to (5) of Directive 2009/138/EC; (xi) where relevant, qualitative and quantitative information on the own-fund items referred to in Article 222(3) of Directive 2009/138/EC that cannot effectively be made available to cover the Solvency Capital Requirement of the participating insurance or reinsurance undertaking, insurance holding company or mixed financial holding company for which the group solvency is calculated, including a description of how the adjustment to group own funds has been made; (xii) where relevant, qualitative information on the reasons for the classification of own-fund items referred to in Articles 332 and 333 of this Regulation.

➤ **EIOPA Guidelines on supervisory review process**

Guideline 2 – Consistency of the supervisory review process

1.15. The national supervisory authority should ensure that the supervisory review process is applied in a consistent manner over time, across insurance and reinsurance undertakings and within the national supervisory authority.

Guideline 3 – Proportionality in the supervisory review process

1.16. The national supervisory authority should ensure that the principle of proportionality is observed throughout all the stages of the supervisory review process.

Guideline 4 – Supervisory judgement in the supervisory review process

1.17. The national supervisory authority should ensure that supervisors use their supervisory judgement at each stage of the supervisory review process. The national supervisory authority should ensure that the supervisory review process is kept flexible enough to allow appropriate supervisory judgement to be used.

Guideline 5 – On-going communication with insurance and reinsurance undertakings

1.18. The national supervisory authority should ensure that there is an appropriate level of communication between the personnel of the national supervisory authority and the insurance and reinsurance undertaking throughout the entire supervisory review process in order to facilitate effective supervision.

1.19. If there is a college, the communication with the supervised undertakings should be coordinated as described in Guideline 15 of the Guidelines on operational functioning of colleges.

Guideline 6 – On-going communication with and involvement of other supervisors

1.20. The national supervisory authority should undertake an appropriate level of communication and involvement with other relevant national supervisory authorities throughout the entire supervisory review process.

1.21. Communication with third-country supervisory authorities should be in line with any relevant memoranda of understanding in place.

1.22. If there is a college, communication should follow the relevant requirements and guidelines.

Guideline 7 – Inclusion of market-wide risks in the supervisory review process

1.23. The national supervisory authority should take into account market wide analyses throughout the supervisory review process.

1.24. If there is a college the supervisory authority should take into account the outcome of any relevant market-wide analysis that has been shared within the college.

Guideline 9 – Governance over and regular review of the supervisory review process

1.26. The national supervisory authority should have an adequate governance mechanism in place to properly monitor the conduct of the supervisory review process.

1.27. The national supervisory authority should regularly review their method of implementation of the supervisory review process to ensure its on-going appropriateness.

Guideline 23 – Notification of the frequency of regular supervisory report

1.56. The national supervisory authority should notify insurance and reinsurance undertakings of the frequency of the regular supervisory report required, be it annually, every two or three years as well as any subsequent change to that, as soon as possible and no later than three months in advance of the insurance and reinsurance undertakings' financial year end.

1.57. The decision on frequency should, at least, take the outcome of the risk assessment framework, other supervisory information and the exercise of supervisory judgement into consideration.

1.58. If there is a college, the supervisory authorities should communicate changes to the regular supervisory report frequency to the group supervisor before notifying the insurance and reinsurance undertakings if appropriate.

➤ EIOPA Guidelines on reporting and public disclosure

Section II – Regular Supervisory Reporting

A. Business and Performance

Guideline 16 - Business

1.30. Under section “A.1 Business” of the RSR as defined in Annex XX of the Delegated Regulation, insurance and reinsurance undertakings should, when providing information regarding their business, include information on: a) the number of full time equivalent employees; b) a list of all related undertakings and branches.

Guideline 17 - Underwriting performance

1.31. Under section “A.2 Underwriting performance” of the RSR as defined in Annex XX of the Delegated Regulation, insurance and reinsurance undertakings should, when providing information on risk mitigation techniques related to underwriting activities, include a description of: a) the impact of the risk mitigation techniques on underwriting performance; b) the effectiveness of the risk mitigation techniques.

B. System of Governance

Guideline 18 - Governance structure

1.32. Under section “B.1 General information on the system of governance” of the RSR as defined in Annex XX of Delegated Regulation, insurance and reinsurance undertakings should explain: a) the internal organisational structure, including a detailed organisational structure chart and positions of key function holders; b) how the undertaking’s remuneration policy and practices are consistent with and promote sound and effective risk management and do not encourage excessive risk taking.

Guideline 19 - Risk management system

1.33. Under section “B.3 Risk management system including the own risk and solvency assessment” of the RSR as defined in Annex XX of the Delegated Regulation, insurance and reinsurance undertakings should: a) explain how the strategies, objectives, processes and reporting procedures of the undertaking’s risk management for each separate category of risk are documented, monitored and enforced; b) in the cases where it has in place an outsourcing agreement that led to the limitation (no reporting) of the external rating and nominated ECAI in the quantitative

reporting templates explain the procedures implemented by the undertaking to oversight and safeguard the compliance of the requirements in the referred area and how it is guaranteed that all relevant information underlying the investment portfolio is taken into account in the risk management; c) describe the nature and appropriateness of the key data used in internal models and at least describe the process in place for checking data quality.

C. Risk Profile

Guideline 20 – Other material risks

1.34. Under section “C.6 Other material risks” of the RSR as defined in Annex XX of the Delegated Regulation, insurance and reinsurance undertakings should: a) explain how it is ensured that the use of derivatives contribute to the reduction of risks or facilitate efficient portfolio management; b) include details of any material allowance for reinsurance and financial mitigation techniques and material future management actions used in the SCR calculation and how these have met the criteria for recognition; c) where the undertaking selected ‘Other’ in item “C0140 - Type of underwriting model” in template S.30.03 as defined in Technical Standard with regard to the templates for the submission of information to the supervisory authorities, provide an explanation of the underwriting model applied; d) where belonging to a group, provide qualitative and quantitative information regarding significant transactions within the group including information on: i. the amount of the transactions; ii. the amount of outstanding balances, if any; iii. relevant terms and conditions of the transactions.

D. Valuation for Solvency Purposes

Guideline 21 – Valuation of other assets

1.35. Under section “D.1 Assets” of the RSR as defined in Annex XX of the Delegated Regulation, insurance and reinsurance undertakings should explain in particular: a) when material deferred tax assets are recognised, how they assess the probability of future taxable profits, where applicable, and identify the amount and expected time horizons for reversal of temporary differences; b) where they were not able to provide a maximum value on any unlimited guarantees (in or off balance-sheet) they reported in the quantitative reporting templates S.03.03 as defined in the Implementing Technical Standard on the templates for the submission of information to the supervisory authorities.

Guideline 22 - Technical provisions

1.36. Under section “D.2 Technical provisions” of the RSR as defined in Annex XX of the Delegated Regulation, insurance and reinsurance undertakings, excluding participating insurance and reinsurance undertakings, insurance holding companies and mixed financial holding companies, should provide information on technical provisions including: a) Details of the relevant actuarial methodologies and assumptions used in the calculation of the technical provisions including details of any simplifications used (including in calculating the future premiums and risk margin and its allocation to the single lines of business) and including a justification that the method chosen is proportionate to the nature, scale and complexity of the undertaking’s risks including the reasons for any material changes in the use of those methods; b) An explanation of the contract boundaries applied to each different business in the valuation of technical provisions, and details of any contracts that include significant renewals within existing business; c) Details of the key options and guarantees within the calculation of the technical provisions and the significance of each and how they are evolving; d) An overview of any material changes in the level of technical provisions since the last reporting period, including reasons for material changes, especially the rationale of material changes in assumptions;

e) Material changes in lapse rates; f) Details of the homogeneous risk groups used to calculate the technical provisions; g) Any recommendations on the implementation of improvements in the internal procedures in relation to data that are considered relevant; h) Information about any significant data deficiencies and adjustments; i) A description of the technical provisions that have been calculated as a whole; j) A description of where unbundling has been used for material contracts; k) Details of the Economic Scenario Generator, including an explanation of how consistency to the risk free rate has been achieved and which volatility assumptions have been chosen; l) Description of the assessments referred to in points (a), (b) and (c) of the first subparagraph of article 44 of Solvency II Directive. Where the reduction of the matching adjustment or the volatility adjustment to zero would result in non-compliance with the SCR, an analysis of the measures it could apply in such a situation to re-establish the level of eligible own funds covering the SCR or to reduce its risk profile to restore compliance with the SCR; m) Details of the approach used to calculate material reinsurance recoverables.

Guideline 23 – Off-balance sheet items

1.37. Under section “D.1. Assets” or “D.3 Other liabilities” of the RSR as defined in Annex XX of the Delegated Regulation, insurance and reinsurance undertakings should include a description of any other material off-balance assets or liabilities not reported in template S.03.01 as defined in the Implementing Technical Standard on the templates for the submission of information to the supervisory authorities.

E. Capital ManagementGuideline 24 – Distributions to shareholders

1.38. Under section “E.1 Own Funds” of the RSR as defined in Annex XX of the Delegated Regulation, insurance and reinsurance undertakings should provide details on the amount of distributions made to shareholders.

Guideline 25 – Simplified calculation in the standard formula

1.39. Under section “E.2 Solvency Capital Requirement and Minimum Capital Requirement” of the RSR as defined in Annex XX of the Delegated Regulation, insurance and reinsurance undertakings should, if material, explain how the use of a simplified calculation in the SCR standard formula is justified by the nature, scale and complexity of the risks faced by the undertaking.

Group RSRB. System of GovernanceGuideline 26 – Preparation of consolidated data

1.40. Under section “B.1 General information on the system of governance” of the group RSR as defined in Annex XX of the Delegated Regulation, participating insurance and reinsurance undertakings, insurance holding companies and mixed financial holding companies should provide at least information on: a) how the group’s consolidated, aggregated or combined data (depending on the method used) has been prepared as well as the processes in place to prepare it; b) information on the bases, methods and assumptions used at group level for the valuation for solvency purposes of the group’s assets and liabilities other than technical provisions in particular with regard to the valuation of the contributions to group data from third country undertakings and non-regulated undertakings.

C. Risk Profile

Guideline 27 - Any other material information on business

1.41. Under section “C.6 Other material risks ” of the group RSR as defined in Annex XX of the Delegated Regulation, participating insurance and reinsurance undertakings, insurance holding companies and mixed financial holding companies should provide information on the terms and conditions of the significant intra-group transactions including information on: a) Commercial rationale for the operation or transaction; b) Risks borne by, and rewards available to, each party to the operation or transaction; c) Any particular aspects of the operation or transaction that are (or may become) disadvantageous to either party; d) Any conflicts of interest that may have arisen in negotiating and executing the operation or transaction, and any potential conflicts of interest that may arise in the future; e) If the transaction is linked to other operations or transactions in terms of timing, function and planning, the individual effect of each operation or transaction and the overall net impact of the linked operations and transactions on each party to the operation or transaction and on the group should be reported; f) Extent to which the operation or transaction is depending on a winding-up and circumstances in which the operation or transaction can be executed.

Guideline 28 - Risk profile

1.42. Under section “C.6 Other material risks” of the group RSR as defined in Annex XX of the Delegated Regulation, participating insurance and reinsurance undertakings, insurance holding companies and mixed financial holding companies should provide qualitative and quantitative information on any significant risk concentration at the level of the group, including: a) A description of the risk(s); b) Probability of risks materialising; c) Mitigation actions including an assessment of a worst case scenario in case of default of the exposure; d) Analysis and quantification of the risk concentrations along legal entity lines; e) Consistency with the group’s business model, risk appetite and strategy, including compliance with the limits set by the internal control system and risk management processes of the group; f) Whether losses arising from risk concentrations affect the overall profitability of the group or its short-term liquidity; g) Relationship, correlation and interaction between risk factors across the group and any potential spill over effects from risk concentrations in a particular area; h) Quantitative information about the risk concentration and the effect on the undertaking and the group and the effect of reinsurance contracts; i) Whether

the item concerned is an asset, a liability or an off-balance sheet item.

D. Valuation for Solvency Purposes

Guideline 29 - Technical provisions

1.43. Under section “D.2 Technical provisions” of the RSR as defined in Annex XX of the Delegated Regulation, participating insurance and reinsurance undertakings, insurance holding companies and mixed financial holding companies should provide information on group technical provisions including: a) Information on any material adjustments done to the individual technical provision, e.g. elimination of intragroup transactions, for the calculation of the group technical provisions; b) where the group applies the Long term guarantees measures or Transitional measures, the information on how the adjustments at group level affect the measures used at individual level; c) information on bases, methods and assumptions used for the calculation of the contribution of technical provisions from third country insurance and reinsurance undertakings, either if Solvency II rules are used or other rules from equivalent regime where allowed.

➤ **Principles and key characteristics of high-quality and effective supervision**

Risk-based and proportionate - Under a risk-based and proportionate supervisory regime, supervisory efforts should focus on the market participants that pose the highest risks to the objectives of supervision.

Examples¹³ for risk-based and proportionate supervision in the context of the RSR:

- A NCA belongs to a jurisdiction which has directly transposed the EU legislation and does not require more frequent than once every 3 years submission of the full RSR for all participants on the market. It would be considered the NCA is applying a risk-based approach in the supervision if an undertaking bearing high (red) or medium-high (orange) risk (in the 3 years period between the submission of the two consecutive RSRs) is requested to submit additionally an RSR (e.g. annually or once every 2 years).
- A NCA belongs to a jurisdiction which follows a national legislation on top of the EU legislation transposed which requires more frequent than once every 3 years (e.g. annual) submission of the full RSR for all

¹³ The examples are not exhaustive, only listing possible scenarios when assessing one of the key characteristics within a NCA.

undertakings on the market. It would be considered the NCA is applying a proportionate approach in the supervision if a small size undertaking bearing lower (green) risk is exempted from annual submission of the RSR and is required to submit the RSR e.g. only once every 2 years.

Forward-looking, preventive and proactive - A forward-looking perspective covers all types of future changes that might have an impact on insurance markets, insurance undertakings or products. NCAs shall be able to require undertakings to take both preventive and corrective measures.

Example for forward-looking, preventive and proactive supervision in the context of the RSR:

- A NCA belongs to a jurisdiction which has directly transposed the EU legislation but following its supervisory review process it requires more frequent than once every 3 years (e.g. annual) submission of the full RSR for all undertakings on the market. It would be considered the NCA is applying a forward-looking, preventive and proactive approach in the supervision if the supervisors are taking into account the information reported under the RSR together with other supervisory information available and require undertakings to take preventive and corrective measures based on it. The following event has been reported in the RSR by a small undertaking running a specific low risk business: it has recently purchased a large part of the portfolio of another insurer on the market running high risk traditional business. A possible outcome of the supervisory work taking into account the RSR submitted would be to follow up with preventive and corrective measures – e.g. more intense on-site visits, more intense reporting required, more intense dialogue with the undertaking's management to foresee possible negative impact on undertaking's performance and consumer protection.

Challenging, sceptical and engaged – Challenges used by supervisors should cover all relevant and material areas that may have an impact on an undertaking's viability. NCAs should use all the information available to form their supervisory opinion towards a particular undertaking.

Example for challenging, sceptical and engaged supervision in the context of the RSR:

- A NCA belongs to a jurisdiction which has directly transposed the EU legislation but following its supervisory review process it requires more frequent than

once every 3 years (e.g. annual) submission of the full RSR for all undertakings on the market. It would be considered the NCA is applying challenging, sceptical and engaged approach in the supervision if the supervisors are taking into account the information reported under the RSR together with other supervisory information available and challenge undertakings based on it. The following event has been reported in the RSR by a small undertaking running a specific low risk business: it has recently purchased a large part of the portfolio of another undertaking on the market running high risk traditional business. A possible outcome of the supervisory work taking into account the RSR submitted would be to engage in a discussion with the undertaking and challenge the decision and the approach towards the new business taken over.

Conclusive – NCAs must draw conclusions and follow up on matters as soon as possible following a due process.

Example for conclusive supervision in the context of the RSR:

- A NCA belongs to a jurisdiction which has directly transposed the EU legislation and does not require more frequent than once every 3 years submission of the full RSR for all participants on the market. It would be considered the NCA is applying a conclusive approach in its supervision if an undertaking with a very high volatility in the non-life claims during the last reporting period (which has been reported in the RSR and drawn as a conclusion from supervisory work) is requested to submit additionally an RSR (e.g. annually, once every 2 years) as part of the supervisory follow-up work.

ANNEX II

COUNTRIES AND COMPETENT AUTHORITIES PARTICIPATING IN THIS PEER REVIEW AND THEIR ABBREVIATIONS, AS WELL, AS OTHER ABBREVIATIONS AND ACRONYMS USED

Country	Abbreviation	Name of concerned NCA	Abbreviation used in the report (if any)
Austria	AT	Finanzmarktaufsicht	FMA-AT
Belgium	BE	National Bank of Belgium	NBB
Bulgaria	BG	Financial Supervision Commission	FSC
Cyprus	CY	Cyprus Insurance Companies Control	CICC
Czechia	CZ	Czech National Bank	CNB
Germany	DE	Bundesanstalt für Finanzdienstleistungsaufsicht	BaFin
Denmark	DK	Danish Financial Supervisory Authority	DFSA
Estonia	EE	Estonia Financial Supervision and Resolution Authority	EFSA
Greece	EL	Bank of Greece - Department of Private Insurance Supervision	BoG
Spain	ES	Dirección General de Seguros y Fondos de Pensiones - Ministerio de Asuntos Económicos y Transformación Digital	DGSFP
Finland	FI	Financial Supervision Authority	FIN-FSA
France	FR	Autorité de Contrôle Prudentiel et de Résolution(Prudential Control Authority)	ACPR
Croatia	HR	Hrvatska agencija za nadzor financijskih usluga	HANFA
Hungary	HU	Magyar Nemzeti Bank	MNB
Ireland	IE	Central Bank of Ireland	CBI
Iceland	IS	Fjármálaeftirlitið (Financial Supervisory Authority)	FME
Italy	IT	Istituto per la Vigilanza sulle Assicurazioni	IVASS
Liechtenstein	LI	Finanzmarktaufsicht Liechtenstein	FMA-LI
Lithuania	LT	Lietuvos Bankas (Bank of Lithuania)	BoL
Luxembourg	LU	Commissariat aux Assurances	CAA
Latvia	LV	Financial and Capital Market Commission	FCMC
Malta	MT	Malta Financial Services Authority	MFSA
Netherlands	NL	De Nederlandsche Bank	DNB
Norway	NO	Finanstilsynet	NFSA
Poland	PL	Komisja Nadzoru Finansowego	KNF
Portugal	PT	Autoridade de Supervisão de Seguros e Fundos de Pensões	ASF-PT
Romania	RO	Financial Supervisory Authority	ASF-RO
Sweden	SE	Finansinspektionen (Financial Supervisory Authority)	FI
Slovenia	SI	Insurance Supervision Agency	AZN
Slovakia	SK	National Bank of Slovakia	NBS
United Kingdom	UK	Prudential Regulation Authority	PRA

➤ Other abbreviations and acronyms used

The table below includes the acronyms used in this report.

Delegated Regulation	Commission Delegated Regulation (EU) 2015/35 of 10 October 2014 supplementing Directive 2009/138/EC of the European Parliament and of the Council on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II)
EEA	European Economic Area
EIOPA	European Insurance and Occupational Pensions Authority
Exemptions	Cases referring to the following: In case a more frequent than once every 3 years as defined in Article 312 (1)(a) of the Delegated Regulation (e.g. annually or once every 2 years) reporting of the full RSR is required by NCAs, NCAs can exempt undertakings from the yearly/biannual submission of the RSR
Methodology	EIOPA Methodology for conducting peer reviews
n/a	Not applicable
NCA(s)	National competent authority(ies)
ORSA	Own Risk and Solvency Assessment
RAF	Risk assessment framework
RSR (Full RSR - Summary RSR)	Regular supervisory report as referred to in Annex XX of the Delegated Regulation Full RSR is the regular supervisory report referred to in Article 304(1)(b) of the Commission Delegated Regulation (EU) 2015/35. Summary RSR is a report which sets out any material changes that have occurred in the undertaking's business and performance, system of governance, risk profile, valuation for solvency purposes and capital management over the given financial year, and provide a concise explanation about the causes and effects of such changes (Article 312(3) of the Commission Delegated Regulation (EU) 2015/35).
SII Directive	Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance
SCR	Solvency capital requirement
SFCR	Solvency and financial condition report
SRP	Supervisory review process
QRT	Quantitative reporting template

ANNEX III

OVERVIEW KEY FINDINGS BY COUNTRY

In this annex a detailed overview of the **key findings** is presented **per topic by country in alphabetical order**. The findings are split by topic. As the 'Context of the assessment' is heavily impacting the process of 'Taking the decision' on the frequency of submission of the RSR the topics are considered together. In the case of Austria, Belgium, Czechia, Ireland and Liechtenstein, the findings did not lead to any recommended action.

1. AUSTRIA (AT)

1.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The FMA-AT is following Article 312 (i) of the Delegated Regulation and there is no additional local legislation which imposes a more frequent submission of full RSR than the minimum defined in the Delegated Regulation. The full RSR needs to be submitted by insurance and reinsurance undertakings mandatorily at least once every 3 years. There is a policy in place to set the different frequency of submissions of the full RSR than the one defined by Article 312 of the Delegated Regulation. After an internal assessment and thorough discussion within the authority, the FMA-AT decided that from a supervisory point of view, the complete RSR has to be sent once for a 3 years period. The decision is reassessed annually. However, up to now the FMA-AT did not set any different frequency of submission of the full RSR.

1.2 COMMUNICATING THE DECISION

With regards to the summary RSR received by FMA-AT no additional definition of material changes has been introduced on top of Article 305 of the Delegated Regulation. However, FMA-AT specified that the summary RSR shall indicate how the internal company materiality thresholds

for the relevant items (e.g. changes in the relevant strategies and timetables pursuant to Article 307 (1) (b) [e.g. for reinsurance policy or strategic asset allocation] or changes in the valuation for solvency purposes, in accordance with Article 310 of the Delegated Regulation, are defined. The FMA-AT also requires undertakings to submit a formal communication that there were "no material changes".

2. BELGIUM (BE)

2.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The NBB policy concerning the frequency of submission of the RSR is explained in Chapter 15 of the circular on system of governance (circular 2016_31 published in July 2016 and updated in September 2018)¹⁴. It is also reminded, in the circular 2018_24 relating to the reporting, that it should be transmitted to the NBB through the platform eCorporate¹⁵.

The NBB usually receives the full RSR once every 3 years. In addition, there are currently 11 significant undertakings and 5 significant groups, which are set to an annual submission of the RSR. A declaration of material changes for those undertakings, which do not submit annually, is also needed. The frequency of submission of the RSR depends on the classification used by the NBB – for 'significant' undertakings the RSR has to be provided annually and for 'less significant' undertakings it should be submitted once every 3 years. For the years in between the submission of the full RSR 'less significant' undertakings should provide

¹⁴ <https://www.nbb.be/en/financial-oversight/prudential-supervision/areas-responsibility/insurance-or-reinsurance-8>.

¹⁵ <https://www.nbb.be/en/articles/communication-nbb201824-secteur-de-l'assurance-et-de-la-reassurance-rapports-periodiques>.

a summary RSR stating the material changes or a notification of 'no material changes'.

An IT Tool is used for the classification of solo undertakings and groups which is based on quantitative and qualitative elements.

2.2 COMMUNICATING THE DECISION

The criteria used for the classification of the undertakings are publicly available in the NBB circular on system of governance. As these criteria are the basis for the difference of frequency for the submission of a full RSR, the rules followed by the NBB on the RSR frequency of submission are publicly available. Each undertaking receives a letter stipulating in which category it is classified.

For groups where the NBB is only host Supervisor, the decision concerning the submission date of the RSR is communicated to the college after it has been taken. For groups where the NBB is the group supervisor, the coordination agreement of the colleges foresees that an exchange of information is organized with regards to the frequency of submission of the group RSR before the decision is officially taken.

3. BULGARIA (BG)

3.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

There is a local legislation (Ordinance No 53) in place in Bulgaria, which explicitly defines a different frequency of the full RSR submission compared to the one defined in Article 312 (1) of the Delegated Regulation. Based on the current legislative framework, the RSR is classified as an annual report and shall be submitted in full on an annual basis. This legislation will be enforced after a transitional period, which is, in the view of the FSC, the period referred to in Article 308b (5) of the Solvency II Directive, which started on 1 January 2016 and ended on 1 January 2020. Consequently, all undertakings are allowed to provide a summary RSR for the year 2019 at the latest, and the full RSR for the following years to come. There is no

additional policy for setting the frequency of submission of the RSR in place.

The Code on Insurance, part of which is ordinance No 53, envisages all criteria listed in the Solvency II Directive for defining the frequency of submission of the full RSR and the summary RSR. So far, the FSC has not received any application for exemption. Thereafter, no individual decisions have been taken by the FSC modifying the frequency of submission of the full RSR as there is no basis for their reassessment.

3.2 COMMUNICATING THE DECISION

The FSC does not specify "material changes" triggering Article 312 (3) of the Delegated Regulation in the context of the RSR content additionally to the ones prescribed in Article 305 of the Delegated Regulation and neither requires the undertakings to submit a formal communication that there were "no material changes".

At the end of 2018 a RAF was introduced to support the risk-based supervision of (re)insurance undertakings. This system, theoretically, could support potential decisions on the different frequency of submissions of the RSR.

4. CZECHIA (CZ)

4.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

In Czechia there is no local legislation which explicitly defines the different frequency (i.e. more often than once every 3 years) of the full RSR submission. There is an internal policy in place to set the different frequency of submission of the full RSR than the one defined by the Delegated Regulation and it is addressed to solo undertakings (there is no group supervised by the CNB).

The CNB can decide whether to require an individual undertaking to submit its full RSR more frequently than the minimum defined in the Delegated Regulation. The decision is made based on criteria that are defined in the formal policy document.

The summary report (referred to as a “change report” by the CNB) is required from undertakings for reporting periods when the full RSR is not due. The summary report documents any material change occurred or notifies that there were no material changes within undertaking’s business and performance, system of governance, risk profile, valuation for solvency purposes and capital management.

The decision on the frequency of submission of the RSR is based on an internal rating of the undertakings (RAS) which comprises many variables (risk exposures, solvency and financial position, governance) including the ones listed in Article 35(8) of the SII Directive and also on other factors as for example quality of preceding RSR, significant changes in risk profile during the monitored period or systemic risk.

Due to the fact that the Czech market is rather small and there is no group supervised by the CNB, the CNB takes decisions rather on an individual basis each year.

4.2 COMMUNICATING THE DECISION

The undertakings are informed about the frequency of the full RSR submission through an individual communication (formal notice being sent). The CNB should inform undertakings at least 3 months before end of the reporting period the RSR should refer to.

In case an undertaking is part of a group, the frequency of the solo full RSR is communicated to the college of supervisors after the decision has been taken.

5. CYPRUS (CY)

5.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The ICCS is following Article 312 of the Delegated Regulation and there is local legislation on annual submission of RSR (“Orders for submission of information” issued by the ICCS), without a possibility to exempt undertakings from the full RSR, in place. The criteria for setting up an annual frequency of submission are driven by the ICCS approach

to enhance more effective supervision and more efficient use of the RSR as a tool for the undertakings themselves. Due to the inexperience of the insurance undertakings in preparing narrative reports during the first years, following the implementation of the SII Directive, the ICCS decided to require an annual full RSR from the whole (re) insurance market. The ICCS plans to reassess the frequency based on the quality of the current year (2019) RSR submissions and potentially change the reporting requirement for a full RSR into once every 3 years.

6. GERMANY (DE)

6.1 COMMUNICATING THE DECISION

The practice set by the BaFin with regards to communication of the decision of the frequency of submission of the RSR is that every (re)insurance undertaking is informed about the frequency of reporting of the full RSR individually by an official letter. This was done as a one-off individual communication in autumn 2018, when all undertakings were informed about the frequency of submission required with regards to the full RSR submission irrespective of the frequency set.

The college of supervisors is usually not informed about the frequency of reporting of the full RSR, at least not systematically. According to BaFin’s understanding, it is up to the individual supervisor to decide whether and when to inform the college of supervisors about the frequency of reporting of the full RSR for an undertaking part of a group.

7. DENMARK (DK)

7.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The regulation on the RSR was implemented in the Danish legislation in 2015. The frequency of submission was changed in the Danish legislation in 2017 from “yearly submission” to a direct reference to the frequency set in Article 312 (1) of the Delegated Regulation. The reason for this change was that an annual frequency was deemed as overregulation. Currently, the submission of the full RSR

is required once every 3 years with a possibility of a more frequent submission. There is no additional NCA policy in place for the entire market or for single specific undertakings.

In 2018, there was no request for a more frequent submission of the full RSR. However, the representatives of the DFSA consider to request a more frequent submission of the full RSR in case of three undertakings based on the outcome of the SRP.

7.2 COMMUNICATING THE DECISION

DFSFA does not specify “material changes” triggering Article 312 (3) of the Delegated Regulation, in the context of the RSR content, additionally to the ones prescribed in Article 305 of the Delegated Regulation and neither requires the undertakings to submit a formal communication that there were “no material changes”.

8. ESTONIA (EE)

8.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The submission of the full RSR by Estonian undertakings strictly follows Article 312 (1) of the Delegated Regulation. The submission of the full RSR is required once every 3 years with a possibility for more frequent submissions. There is no additional NCA policy in place for the entire market or for single specific undertakings. The decision to submit the full RSR more than once every 3 years is based on the outcome of the risk assessment, the content of the previous RSR and any other supervisory information. The Estonian insurance market is small and the EFSA receives the information needed for their supervision directly from the undertakings and long before the RSR submission deadline.

The EFSA doesn't have plans to reassess the decision regarding the frequency of the full RSR submission defined for the entire insurance market in the near future. This may become a topic when the content of other reports (SFCR, ORSA) changes (some topics from the SFCR will be moved to the RSR as part of the SII 2020 review) or the structure of the insurance market drastically changes.

9. GREECE (EL)

9.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The annual submission of the full RSR is explicitly defined in the local legislation (L 4364/2016) without any possibility of derogation from the prescribed frequency. There is no additional NCA policy in place for the entire market or for single specific undertakings. Annual full RSR submission, as provided by law, allows the Bank of Greece to continue collecting all information provided by the (re) insurance undertakings prior to the implementation of SII Directive (such as specific deviations from the expected results, methods of projections etc.) and also to induce its supervised entities to develop the content of the full RSR to a satisfactory level of quality. The representatives of the BoG are considering that, in the future, when the full RSR will be of a more satisfactory quality, a change in the legislation could be proposed allowing for a less frequent reporting of the full RSR.

10. SPAIN (ES)

10.1 COMMUNICATING THE DECISION

Due to the fact that the frequency of submission of the full RSR of (re)insurance companies on the Spanish market is defined by the European Legislation, Article 312 (1) of the Delegated Regulation, the DGSFP did not envisage a targeted communication to undertakings. The information about the expected frequency of the RSR submission has only been published on the NCA's website. In case of a request for more frequent submission than the one defined in the Delegated Regulation, a formal communication is sent to the particular undertaking(s) individually in a written form. In particular, as indicated by the NCA, a series of letters were sent at the beginning of 2018 to request the submission of the 2018 full RSR. In case an undertaking belongs to a group the RSR frequency is communicated to the group supervisor after the decision taken by the DGSFP.

11. FINLAND (FI)

11.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The FIN-FSA requires annual submission of the full RSR. There is no national legislation or any internal policy imposing a more frequent submission of the RSR than the one defined in Article 312 (1) of the Delegated Regulation in place.

The FIN-FSA has initially communicated in letters to all insurance companies its requirement for an annual full RSR submission until further notice. The decision is reassessed on a yearly basis, taking into account supervisory expert judgement, when deciding on the FIN-FSA's work plan for the following year.

The FIN-FSA's understanding is that an annual submission of the full RSR is easier for the undertakings rather than the submission of a summary RSR, as well as it is considered as a prerequisite for improving the quality of the full RSR. The FIN-FSA has not received any complaints concerning the annual full RSR submission so far.

12. FRANCE (FR)

12.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The ACPR follows local legislation that defines the frequency of the full RSR submission depending on particular thresholds (Article 1 of an "instruction" issued by ACPR on 19.12.2017 — Instruction n° 2017 I 22 that refers to Instruction n° 2016-I-01). (Re)insurers, below the above mentioned thresholds, are obliged to submit the RSR once every 3 years, however according to Article 2 of the Instruction n° 2017 I 22 the ACPR may also require an annual submission from these undertakings.

There is, however, a possibility to exempt undertakings from an annual submission of the full RSR in special cases based on the ACPR's supervisory practice. These special cases are not included in the local legislation nor any other official document.

On a group level, a full RSR has to be delivered annually.

12.2 COMMUNICATING THE DECISION

The ACPR does not specify "material changes" triggering Article 312 (3) of the Delegated Regulation in the context of the RSR content additionally to the ones prescribed in Article 305 of the Delegated Regulation and neither requires the undertakings to submit a formal communication that there were "no material changes".

13. CROATIA (HR)

13.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The HANFA is following Article 312 of the Delegated Regulation. There is no additional local legislation and no official NCA policy which imposes a more frequent submission of the full RSR than the minimum defined in the Delegated Regulation in place. The full RSR needs to be submitted by (re)insurance undertakings mandatorily at least once every 3 years.

According to Article 215 of the Croatian Insurance Act (Official gazette no. 30/15 and 112/18), the HANFA may request the submission of the full RSR from undertakings more frequently than once every 3 years.

13.2 COMMUNICATING THE DECISION

The HANFA does not specify "material changes" triggering Article 312(3) of the Delegated Regulation, in the context of the RSR content, additionally to the ones prescribed in Article 305 of the Delegated Regulation and requires the undertakings to submit a formal communication that there were "no material changes".

14. HUNGARY (HU)

14.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The MNB defines a different frequency of the full RSR submission compared to the one defined in Article 312 (1) of the Delegated Regulation. The annual submission of the full RSR is defined in Regulation 39/2018 of the MNB without any possibility foreseen for exemptions. There is no additional MNB policy in place for the entire market or for single specific undertakings.

The Regulation 39/2018 applies to 23 insurance undertakings in Hungary and is reviewed on a yearly basis. The Regulation doesn't apply only to the RSR but also to other country specific reporting due by (re)insurance companies. The review of the Regulation starts every spring (April-May) and all concerned departments in the MNB have the right to propose changes including the frequency of reporting of the full RSR.

The MNB decided to follow a unique approach without using any specific criteria for defining the frequency of reporting the full RSR due to the small number of undertakings under supervision.

15. IRELAND (IE)

15.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The CBI follows the Article 312 regarding the frequency of submission of the full RSR. The CBI's approach is to split the market into 3 groups, each submitting full RSR in one of the 3 consecutive years. The CBI considers the 3-year circle sufficient since information received in RSRs is received more frequently in other forms (notwithstanding supervisors' noting added value to getting RSRs of lower-impact companies). The criteria to split the undertakings into the 3 groups are based on: (1) impact - meaning financial impact (gross written premiums, technical provisions, etc.) which is the static criterion and (2) probability - the likelihood that this will happen which is the dynamic criterion. The CBI use the "RSR review template" to be

consistent in its approach with regards to the RSR content reviews. By phasing future RSR returns for all companies over 3 consecutive years, the CBI has the discretion to determine to request a full RSR for a particular year, for any individual company, depending on the content of the RSR received (e.g. weak RSR or not properly structured RSR).

The CBI specifies "material changes" triggering Article 312 (3) of the Delegated Regulation, in the context of the RSR content, additionally to the ones prescribed in Article 305 of the Delegated Regulation and requires the undertakings to submit a formal communication of "no material changes".

15.2 COMMUNICATING THE DECISION

The Irish insurance undertakings are informed, about the full RSR submission frequency, by a letter to the CEO. A sample of such a non-addressed letter is also published on the CBI's website.

The college of supervisors is informed about the frequency of submission of the RSR during a meeting preceding the end of the reporting period.

16. ICELAND (IS)

16.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The Icelandic legislation does not define different frequency of submissions of the full RSR than the one defined in Article 312 (1) of the Delegated Regulation. The FME requires annually the full RSR submission based on a SRP. This decision of the FME, which is not based on a specific internal policy concerning the RSR submission, was initially communicated to all four insurance companies on the Icelandic market via an official letter.

17. ITALY (IT)

17.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

There is a local legislation in place in Italy, which explicitly defines a different frequency of the full RSR submission compared to the one defined in Article 312 (1) of the Delegated Regulation. The annual submission of the full RSR is defined in IVASS Regulation 33/2016, Article 31, in which a possibility for exemptions is foreseen but has not been used so far. As far as the method to which the procedure of granting exemptions should be processed, there is no additional NCA's guidance in place for the entire market or for single specific undertakings.

The IVASS did not envisage providing any exemptions to the insurance undertakings so far due to the fact that the full RSR is being reported for a very short period of time. In the future, it will be possible to grant exemptions based on proportionality criteria taking into account the undertaking's risk profile. However, the process on assessing needs will be initiated by the undertaking.

18. LIECHTENSTEIN (LI)

18.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The annual submission of the full RSR is defined in the LI Insurance Supervision Act (Article 99 I) with a possibility of granting an exemption of reporting the full RSR (Article 99 II). The FMA-LI uses an internal supervisory handbook in the process of granting approval of exemptions for a particular undertaking for submission of the full RSR for an accounting year. The criteria for exemptions defined in the internal supervisory handbook are neither defined as a formula nor as thresholds but are rather instructions on what should be taken into consideration when deciding on exemptions.

The FMA-LI doesn't specify "material changes" triggering Article 312 (3) of the Delegated Regulation, in the context of the RSR content, additionally to the ones prescribed in Article 305 of the Delegated Regulation and requires the undertakings to submit a formal communication of "no material changes".

18.2 COMMUNICATING THE DECISION

The undertakings are informed about the frequency of submission/exemption of the full RSR referring to the current year by the 30th of September. This is usually done in a formal way by sending a letter to all concerned undertakings.

The information about the exemptions from reporting of the full RSR is communicated to the college after the decision is been taken. The college can potentially impact the decision of FMA-LI if it is still on its way. Once the decision is taken it is not changed for the year it refers to. Due to the specific market in LI, there are many undertakings operating that belong to a Swiss group for which no RSR is required and therefore no communication is needed within the group.

19. LITHUANIA (LT)

19.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

There is a local legislation in place in Lithuania, which explicitly defines a different frequency of the full RSR submission compared to the one defined in Article 312 (1) of the Delegated Regulation. The annual submission of the full RSR is defined in the Law on Insurance, without any possibility foreseen for exemptions. Therefore, no additional NCA guidance is put in place neither for the entire market nor for single specific undertakings when it comes to the procedure of granting exemptions. Currently, the BoL is reviewing annually the reports received and once the supervisor comes to the conclusion that the content and the quality of the full RSR is in line with the NCA's requirements, the frequency of reporting of the full RSR might be subject to change. The BoL has committed to the Lithuanian market to revise the local legislation after a period of 3 years when there will be enough history to make a change with regards to the frequency of the full RSR submission.

20. LUXEMBOURG (LU)

20.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The CAA is following Article 312 of the Delegated Regulation, there is no additional local legislation or NCA policy in place which imposes a more frequent submission of the full RSR than the minimum defined in the Delegated Regulation. However there is a possibility foreseen for a more frequent submission of the full RSR based on the assessment of major events affecting the undertakings on the Luxembourg market.

Luxembourg's undertakings should submit the full RSR on an annual basis in case of using an internal model. Should there occur a predefined event, as described in the National guideline publicly available, the undertakings should submit the full RSR referring to the year of occurrence. In case of other material changes, as defined in Article 305 of the Delegated Regulation, the undertaking needs to submit the summary RSR. In case of no material changes, the undertakings are still required to submit an explicit summary RSR declaring this.

Due to the profile of the insurance and reinsurance market in Luxembourg, where many captives are operating, the CAA focuses on the most complex companies when analysing the full RSR. The full RSR of insurance companies with less complex risks (captive insurance and reinsurance companies) are analysed with lower priority. The CAA uses information of the full RSR to focus on different topics for on-site inspections. The CAA uses an IT system to check if predefined events or circumstances occurred and if the full RSR was submitted according to the frequency prescribed by the National guideline.

20.2 COMMUNICATING THE DECISION

The CAA does not specify "material changes" triggering Article 312(3) of the Delegated Regulation, in the context of the RSR content, additionally to the ones prescribed in Article 305 of the Delegated Regulation. However in case of no material changes explicit submission is required from (re)insurance undertakings on the market.

The CAA informs the market via circular letter on the authority's website (notification to the companies including the list of conditions for a more frequent submission of the RSR) about the required frequency of the full RSR submission. Should it be needed, the undertakings could be informed on a case-by-case basis by a letter. The full RSR is perceived as a holistic document, which brings value to on-site visits.

21. LATVIA (LV)

21.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The FCMC defines the submission of the full RSR following Article 312 of the Delegated Regulation. The insurance undertakings on the Latvian market are required to submit the full RSR once every 3 years. There is no additional local legislation or NCA policy in place imposing a different frequency from the one defined in the Delegated Regulation, neither for the entire market nor for single specific undertakings.

21.2 COMMUNICATING THE DECISION

The FCMC does not specify "material changes" triggering Article 312 (3) of the Delegated Regulation, in the context of the RSR content, additionally to the ones prescribed in Article 305 of the Delegated Regulation and neither requires the undertakings to submit a formal communication that there were "no material changes".

22. MALTA (MT)

22.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The MFSA is following the frequency of the submission of the full RSR as defined in Article 312 (i) of the Delegated Regulation. There is no local legislation in place, explicitly defining a different frequency of the full RSR submission compared to the one defined in the Delegated Regulation.

All supervised (re)insurance undertakings and groups were required to submit the full RSR for the year 2016. For the year 2017, in order to be able to adapt the SRP to the new supervisory reporting, a full RSR submission was required again from the entire market. The RSR for the year 2018 was required on a case-by-case basis taking into account the outcomes of the risk assessment conducted by the MFSA. Other criteria used were the market coverage requirements defined in Article 35 (6) of the SII Directive, further developed in accordance with the EIOPA Guidelines on the methods determining the market share for reporting issued on 14 September 2015.

The MFSA has drafted an internal policy document which defines the process to set a different frequency of the full RSR submission than the one defined in the Delegated Regulation. The policy is an internal document prepared after the reference period for this peer review. In the answers to the self-assessment questionnaire on April 16, 2019 the MFSA answered that there is no formal policy in place. During the fieldwork, the representatives of the MFSA stated that the formal policy recently approved, was already in place process wise for the RSR referring to the year 2018.

For assessing undertakings' risks the MFSA uses an excel based IT tool which assists the NCA in determining the overall risk score of an undertaking based on the impact and probability dimensions. The tool is currently being reviewed in order to carry out a number of enhancements in order to produce better results.

The MFSA's decision on the RSR exemption is currently bound more or less with the decision for exemption of quarterly reporting seeking to reach 80% of the market coverage.

22.2 COMMUNICATING THE DECISION

In January 2019, the MFSA informed all (re)insurance undertakings and groups on the Maltese market, whether a submission of the full RSR for the year 2018 is required. The MFSA included this information in the same letter which is used for communicating (non)exemptions from quarterly reporting.

23. NETHERLANDS (NL)

23.1 COMMUNICATING THE DECISION

The DNB is following Article 312 of the Delegated Regulation. There is no local legislation in the Netherlands imposing a different frequency (i.e. more often than once every 3 years) of the full RSR submission in place. There is a policy document in place, which was approved by the DNB's senior management on 6 September 2018. The policy is setting a different frequency of submission of the full RSR than the one defined by Delegated Regulation, Article 312 (1), and it is subject to a reassessment on an annual basis.

In this context, a general statement on the RSR frequency of submission was published on DNB's website and in its monthly insurance newsletter on 26 September 2018. Unless there is a request to a single specific undertaking for a more frequent submission of the full RSR, (re)insurers are required to deliver a summary of the material changes for the financial years the full RSR is not due. DNB requires the undertakings to also submit a formal communication in case of "no material changes". The means of communication in case of a more frequent submission required is done in individual emails/letters to the undertakings.

The frequency of the full RSR submission is usually shared with the group supervisor orally after the decision is taken.

24. NORWAY (NO)

24.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The NFSA requests the submission of the full RSR following Article 312 of the Delegated Regulation. The (re)insurance undertakings on the Norwegian market are required to submit the full RSR once every 3 years. There is no additional local legislation or NCA policy in place imposing a more frequently submission of the full RSR compared to the one defined in Article 312 (1) of the Delegated Regulation neither for the entire market nor for single specific undertakings. Based on Article 312 (2) of the Delegated

Regulation a more frequent submission of the full RSR of a single specific undertaking could be required by the NFSA as a supervisory measure.

Supervisory activities in the NFSA are prioritized based on the risk and the impact classification. The NFSA continuously reassesses whether the RSR frequency for a single specific undertaking needs to be changed. As a general rule, the NFSA would impose measures like ad-hoc reporting to the NCA with regards to a specific risk, or perform an on-site inspection prior to changing the RSR frequency. Ad-hoc reporting or on-site inspections are considered more suitable from NFSA's perspective to pinpoint the risk. Moreover, the outputs from these measures are received quicker than in the case of a request for more frequent submission of RSR. The NFSA does not have an official policy covering the reassessment of the RSR frequency of submission, neither are triggers set for more frequent submission.

For the reference period of the peer review the NFSA did not request from (re)insurance undertakings a different RSR submission frequency than once every 3 years.

25. POLAND (PL)

25.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The KNF requires an annual submission of the full RSR. There is no national legislation or any internal policy imposing a more frequent submission of the RSR than the one defined in Article 312 (1) of the Delegated Regulation in place.

The KNF asked for an annual submission of the full RSR for the years 2017 and 2018 with letters of the same content sent to all (re)insurance undertakings on the Polish market. The team of reviewers has been made aware about the practice in the KNF for collecting annually national specific qualitative information on top of the full RSR required. The KNF has already reduced the amount of national specific information requested in order to avoid duplication of information requests. The KNF is in a stage of defining the internal procedure for setting a more frequently submission of the full RSR than the one defined in the Article 312 of the Delegated Regulation. The KNF has recently introduced IT tools for its risk assessment which

potentially could support the decision making on the frequency of the full RSR submission.

26. PORTUGAL (PT)

26.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The submission of the full RSR in Portugal follows the prescription of Article 312 (1) of the Delegated Regulation which states that the full RSR needs to be submitted by (re)insurance undertakings mandatorily at least once every 3 years. There is no additional local legislation or NCA's policy in place which defines a different frequency of submission of the full RSR neither for the entire market nor for single specific undertakings.

The ASF specified during the fieldwork that there was no request for submission of the full RSR for the year 2017. The ASF requested eight undertakings to submit the full RSR for the year 2018 and received the full RSR (for the year 2018) only from selected undertakings. The ad-hoc requests to these (re)insurers were made taking into account the impact of the companies on the market as well as their risk profile assessed based on SII quantitative information, the information from the previously submitted RSR and the outcome of other supervisory activities. The approach followed regarding the RSR 2018 submission was proportionate from a quantitative (premiums and technical provisions) and qualitative (risk management) perspective. The eight undertakings which submitted the full RSR represent 62,7% of the market.

In addition, different IT tools are put in place that support the supervisors to analyse QRTs and other reports. Moreover, a complete Risk Assessment Framework (RAF) is currently being developed based on 2018 figures. Once it is ready, this will help to establish an approach with regards to the frequency of submission of the RSR for the (re)insurance undertakings on the market taking into account the results of the RAF. The ASF stated that there is a plan to reassess the frequency of the submission of the RSR after the RAF system is completed.

27. ROMANIA (RO)

27.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The ASF directly applies the provisions of Article 312 of the Delegated Regulation. There is no local legislation in place, explicitly defining a different frequency of the full RSR submission compared to the one defined in the Delegated Regulation. Based on Article 312 (2) of the Delegated Regulation a more frequent submission of the full RSR for a single specific undertaking could be required. There is an IT system in place to analyze quantitative data and to perform undertakings' risk assessment. However, due to the absence of an internal policy to set different frequency of submissions of the full RSR, the IT system is not used to support the decision making on the RSR frequency.

The ASF has not used criteria based on e.g. the volume of premiums, technical provisions and the assets of the undertakings, the volatility of the claims and benefits covered by the undertakings, the market risks that the investments of the undertakings give rise to, the level of the risk concentrations, etc. to ask for a more frequent submission of the RSR, due to the fact that there are no provisions with regards to that in the national legislation and there is no internal policy to guide any decision on this matter. However, the ASF states that there is an intention to analyze the opportunity for introducing the possibility to ask for a more frequent submission in the internal procedures.

28. SWEDEN (SE)

28.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The FI requests the submission of the full RSR following Article 312 of the Delegated Regulation. The insurance undertakings on the Swedish market are required to submit the full RSR once every 3 years. There is no additional local legislation or NCA policy in place for the entire market or for single specific undertakings. The FI directly applies

the provisions of Article 312 of the Delegated Regulation. Based on the Article 312 (2) of the Delegated Regulation a more frequent submission of the full RSR on a single undertaking level could be required. The FI considers that a more frequent RSR submission is one of the possible supervisory measures.

The FI doesn't use any IT system supporting the decision on the frequency of the full RSR but an IT system is used for the undertakings' risk assessment which potentially could be used for supporting the decision on the RSR frequency as well. The risk assessment is based on the quantitative risk indicators but it also includes qualitative information sourced from the RSR.

If an insurance undertaking faces difficulties, the FI would ask the undertaking for the information needed. However, the latter will not be necessarily requested with the submission of a full RSR, since it might not be the most effective way to gather the information needed. The FI considers that a request to submit the full RSR more frequently is a less effective supervisory measure comparing with others such as an ad-hoc information request or on-site inspection to ensure high-level supervision. Due to that and the fact that each undertaking submits the summary RSR every year (including years with no material changes), the FI has not taken any decision to impose the full RSR more frequently during the reference period of this peer review.

Currently, all insurance undertakings on the Swedish market are required to produce the full RSR once every 3 years. Taking into account the provisions of Article 312 (3) of the Delegated Regulation, the FI considers that all relevant information needed for an effective supervision of all insurance undertakings will be received also, in the interim periods between every full RSR submission by reporting a summary.

29. SLOVENIA (SI)

29.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The AZN requires the submission of the full RSR following the direct application of Article 312 of the Delegated Regulation. The insurance undertakings on the Slovenian market are required to submit the full RSR once every 3 years. There is no additional local legislation or policy from the NCA in place which introduces a more frequent

submission of the full RSR neither for the entire market nor for single specific undertakings. Based on the Article 312 (2) of the Delegated Regulation a more frequent submission of the full RSR on a single undertaking level could be required.

Based on the annual risk assessment, the AZN takes a decision if there is a need for a more frequent submission of the full RSR. Any request for a more frequent submission of the full RSR, would have to be approved by the top management.

The AZN uses an IT system for the undertaking's risk assessment which could potentially support decisions on different frequencies of submission of the RSR. The AZN states that a more frequent RSR submission would be requested also, in case of a significant deterioration of particular triggers such as the solvency ratio, the performance indicators and changes in the ownership.

It should be noted that the approach to set a frequency of the RSR takes into account the outcome of the annual risk assessment and the variation of certain ratios is commonly agreed among supervisors but it is not formally approved and defined in any AZN internal document. Following this approach, the AZN has not requested any undertaking to submit the full RSR more frequently than once every 3 years for the reference period of this peer review. Currently, all insurance undertakings on the Slovenian market are required to send the full RSR once every 3 years due to the fact that the results of the annually performed risk assessment and the variation of the monitored ratios have not triggered, so far, requirements for more frequently reporting.

29.2 COMMUNICATING THE DECISION

The AZN does not specify "material changes" triggering Article 312 (3) of the Delegated Regulation, in the context of the RSR content, additionally to the ones prescribed in Article 305 of the Delegated Regulation and neither requires the undertakings to submit a formal communication that there were "no material changes".

30. SLOVAKIA (SK)

30.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The submission of the full RSR follows the prescription of Article 312 (i) of the Delegated Regulation stating that the full RSR needs to be submitted by (re)insurance undertakings mandatorily at least once every 3 years. There is no additional NCA local legislation or policy in place neither for the entire market nor for single specific undertakings. The NBS considers that, based on the ongoing supervisory activity performed, the annual quantitative and narrative reports provided under SII and the fact that the market under NBS' supervision is quite small (only 14 solo undertakings and no groups), there is no need for more frequent submission of the full RSR.

The NBS doesn't consider changing the approach to the frequency of the full RSR. However, there was one case during the reference period of the peer review, when an undertaking was asked to submit the RSR for the years 2017 and 2018. The NBS considers the criteria that reveal the risk profile of the undertaking are more relevant than the criteria indicating the size of undertaking to decide on the RSR frequency.

The NBS uses an IT system for analyzing insurance undertakings and perform their risk assessment. In particular, based on the examination of the QRTs and of the ORSA report there is an assessment of the undertakings from a supervisory point of view.

30.2 COMMUNICATING THE DECISION

The NBS states that no summary RSR is required even if material changes occur. The reason is that the market is very small and NBS is in close contact with the management of the undertakings. For this reason, every important change is promptly communicated to the NBS without the need for a formal communication.

31. UNITED KINGDOM (UK)

31.1 CONTEXT OF THE ASSESSMENT/TAKING THE DECISION ON THE FREQUENCY OF THE RSR

The submission of the full RSR in the UK is based on Article 312 of the Delegated Regulation. (Re)insurance undertakings are required to submit the full RSR once every 3 years. There is a supervisory handbook in place which defines the conditions for requiring a more frequent submission of the full RSR than the minimum defined in the Delegated Regulation. PRA's supervisory handbook is, however, rather defining the approach to the assessment of the RSR, than defining quantitative triggers for a more frequent submission of the report than once every 3 years.

31.2 COMMUNICATING THE DECISION

The PRA does not specify "material changes" triggering Article 312 (3) of the Delegated Regulation, in the context of the RSR content, additionally to the ones prescribed in Article 305 of the Delegated Regulation and neither requires the undertakings to submit a formal communication that there were "no material changes"

ANNEX IV

OVERVIEW RECOMMENDED ACTIONS TO NCAS

In this annex an overview is provided of the recommended actions to NCAs by country by topic and type of recommended actions.

There are seven different types of recommended actions identified based on the context in which they are issued: proportionality (differentiating between the cases when the recommended action touches upon the risk-based supervisory approach, amending the local legislation and introducing internal policy), communication of (no) material changes, communication of the decision on the RSR frequency, including exemptions from annual submission of the full RSR based on specific events in an official document, accelerating the decision on the undertakings' RSR frequency in order to notify the undertakings of the frequency of the RSR in line with a Guideline 23, enhancing the use of the information of the RSR for supervisory purposes on account of further limiting the use of country specific templates, equally applying the risk-based approach with regards to the frequency of submission of the RSR also to low impact undertakings.

Recommended actions in the context of proportionality

Type of recommended action	Group 1	Group 2	Group 3
Topic	Context of the assessment/taking the decision		
Context of the recommended action	Proportionality - risk-based supervisory approach	Proportionality - amend local legislation	Proportionality - internal policy
AT	n/a	n/a	n/a
BE	n/a	n/a	n/a
BG	The FSC should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequent than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequent than yearly.	In this context FSC should amend the local legislation imposing annual submission of full RSR accelerating the possibility for exemption in order to apply the approaches described above.	The FSC should introduce an internal policy which structures the process of defining different frequencies of submission of the full RSR.
CY	ICCS should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequent than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequent than yearly.	In this context, ICCS should amend the local legislation imposing annual submission of a full RSR accelerating the possibility for exemption in order to apply the approaches described above.	n/a
CZ	n/a	n/a	n/a
DE	n/a	n/a	n/a

Type of recommended action	Group 1	Group 2	Group 3
Topic	Context of the assessment/taking the decision		
Context of the recommended action	Proportionality - risk-based supervisory approach	Proportionality - amend local legislation	Proportionality - internal policy
DK	n/a	n/a	DFSA should introduce an internal policy which structures the process of defining different frequency of submissions of the full RSR.
EE	EFSA should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequent than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	EFSA should introduce an internal policy which structures the process of defining the different frequency of submissions of the full RSR.
EL	BoG should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	In this context BoG should propose an amendment to the local legislation imposing annual submission of the full RSR without any possibility for exemption in order to apply the approaches described above.	n/a
ES	n/a	n/a	n/a
FI	FIN-FSA should take into account proportionality and a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	FIN-FSA should introduce an internal policy which structures the process of defining different frequency of submissions of the full RSR.
FR	n/a	n/a	n/a
HR	HANFA should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	HANFA should introduce an internal policy which structures the process of defining the different frequency of submissions of the full RSR.

Type of recommended action	Group 1	Group 2	Group 3
Topic	Context of the assessment/taking the decision		
Context of the recommended action	Proportionality - risk-based supervisory approach	Proportionality - amend local legislation	Proportionality - internal policy
HU	MNB should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	In this context MNB should propose an amendment of the local legislation imposing an annual submission of the full RSR in order to apply the approaches described above.	n/a
IE	n/a	n/a	n/a
IS	FME should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	n/a
IT	IVASS should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly. Based on experience shared from similar in terms of size and complexity EEA markets, IVASS may consider splitting the market into categories relating to size, risk and impact for the purposes of defining a different RSR frequency than the existing annual one.	n/a	n/a
LI	n/a	n/a	n/a
LT	BoL should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	In this context the BoL should amend the local legislation imposing an annual submission of the full RSR in order to apply the approaches described above.	n/a
LU	n/a	n/a	n/a

Type of recommended action	Group 1	Group 2	Group 3
Topic	Context of the assessment/taking the decision		
Context of the recommended action	Proportionality - risk-based supervisory approach	Proportionality - amend local legislation	Proportionality - internal policy
LV	FCCM should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	n/a
MT	MFSa should be more risk-based and proportional taking the decision on the RSR frequency by separating the decision on the RSR frequency and the decision on the exemption from the quarterly quantitative reporting and grounding the decision regarding the RSR frequency only on the outcomes of the risk assessment without seeking to reach 80 % of the market coverage. In this context exempting 20% of the market as well shouldn't be seen as a limitation with regards to the RSR.	n/a	n/a
NL	n/a	n/a	n/a
NO	NFSA should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	NFSA should develop an internal policy which structures the process of defining different frequency of submission of the full RSR in order to ensure consistency of the SRP following the Guideline 2 of the EIOPA Guidelines on SRP.
PL	The KNF should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	n/a
PT	ASF should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	ASF should develop an internal policy which structures the process of defining different frequency of submission of the full RSR in order to ensure consistency of the SRP following the Guideline 2 of the EIOPA Guidelines on SRP.

Type of recommended action	Group 1	Group 2	Group 3
Topic	Context of the assessment/taking the decision		
Context of the recommended action	Proportionality - risk-based supervisory approach	Proportionality - amend local legislation	Proportionality - internal policy
RO	The ASF should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	ASF-RO should develop an internal policy which structures the process of defining different frequency of submission of the full RSR in order to ensure consistency of the SRP following the Guideline 2 of the EIOPA Guidelines on SRP.
SE	The FI should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment.	n/a	The FI should develop an internal policy which structures the process of defining different frequency of submission of the full RSR in order to ensure consistency of the SRP following the Guideline 2 of the EIOPA Guidelines on SRP.
SI	The AZN should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	The AZN should also develop an internal policy which structures the process of defining different frequency of submission of the full RSR in order to ensure consistency of the SRP following the Guideline 2 of the EIOPA Guidelines on SRP.
SK	The NBS should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	The NBS should develop an internal policy which structures the process of defining different frequency of submission of the full RSR in order to ensure consistency of the SRP following the Guideline 2 of the EIOPA Guidelines on SRP.

Type of recommended action	Group 1	Group 2	Group 3
Topic	Context of the assessment/taking the decision		
Context of the recommended action	Proportionality - risk-based supervisory approach	Proportionality - amend local legislation	Proportionality - internal policy
UK	It is acknowledged that there is an existing supervisory handbook guiding the assessment of the RSR, however to use the results of the risk assessment in defining the different frequencies of submission of the RSR has not been taken into account in the beforementioned handbook. The PRA should take more into account proportionality and the risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	n/a

Recommended actions in the context of communication of (no) material changes and communication of the decision on the RSR frequency with the college, including exemptions from annual submission of the full RSR based on specific events in an official document

Type of recommended action	Group 1	Group 2	Group 3
Topic	Context of the assessment/taking the decision		
Context of the recommended action	Proportionality - risk-based supervisory approach	Proportionality - amend local legislation	Proportionality - internal policy
AT	n/a	n/a	n/a
BE	n/a	n/a	n/a
BG	The FSC should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequent than once every 3 years and the undertakings with a low risk profile and impact a are submitting the RSR less frequent than yearly.	In this context FSC should amend the local legislation imposing annual submission of full RSR accelerating the possibility for exemption in order to apply the approaches described above.	The FSC should introduce an internal policy which structures the process of defining different frequencies of submission of the full RSR.
CY	ICCS should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequent than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequent than yearly.	In this context, ICCS should amend the local legislation imposing annual submission of a full RSR accelerating the possibility for exemption in order the apply the approaches described above.	n/a
CZ	n/a	n/a	n/a
DE	n/a	n/a	n/a
DK	n/a	n/a	DFSA should introduce an internal policy which structures the process of defining different frequency of submissions of the full RSR.
EE	EFSA should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequent than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	EFSA should introduce an internal policy which structures the process of defining the different frequency of submissions of the full RSR.

Type of recommended action	Group 1	Group 2	Group 3
Topic	Context of the assessment/taking the decision		
Context of the recommended action	Proportionality - risk-based supervisory approach	Proportionality - amend local legislation	Proportionality - internal policy
EL	BoG should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	In this context BoG should propose an amendment to the local legislation imposing annual submission of the full RSR without any possibility for exemption in order to apply the approaches described above.	n/a
ES	n/a	n/a	n/a
FI	FIN-FSA should take into account proportionality and a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	FIN-FSA should introduce an internal policy which structures the process of defining different frequency of submissions of the full RSR.
FR	n/a	n/a	n/a
HR	HANFA should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	HANFA should introduce an internal policy which structures the process of defining the different frequency of submissions of the full RSR.
HU	MNB should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	In this context MNB should propose an amendment of the local legislation imposing an annual submission of the full RSR in order to apply the approaches described above.	n/a
IE	n/a	n/a	n/a

Type of recommended action	Group 1	Group 2	Group 3
Topic	Context of the assessment/taking the decision		
Context of the recommended action	Proportionality - risk-based supervisory approach	Proportionality - amend local legislation	Proportionality - internal policy
IS	FME should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	n/a
IT	IVASS should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly. Based on experience shared from similar in terms of size and complexity EEA markets, IVASS may consider splitting the market into categories relating to size, risk and impact for the purposes of defining a different RSR frequency than the existing annual one.	n/a	n/a
LI	n/a	n/a	n/a
LT	BoL should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	In this context the BoL should amend the local legislation imposing an annual submission of the full RSR in order to apply the approaches described above.	n/a
LU	n/a	n/a	n/a
LV	FCCM should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	n/a

Type of recommended action	Group 1	Group 2	Group 3
Topic	Context of the assessment/taking the decision		
Context of the recommended action	Proportionality - risk-based supervisory approach	Proportionality - amend local legislation	Proportionality - internal policy
MT	MFSA should be more risk-based and proportional taking the decision on the RSR frequency by separating the decision on the RSR frequency and the decision on the exemption from the quarterly quantitative reporting and grounding the decision regarding the RSR frequency only on the outcomes of the risk assessment without seeking to reach 80 % of the market coverage. In this context exempting 20% of the market as well shouldn't be seen as a limitation with regards to the RSR.	n/a	n/a
NL	n/a	n/a	n/a
NO	NFSA should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	NFSA should develop an internal policy which structures the process of defining different frequency of submission of the full RSR in order to ensure consistency of the SRP following the Guideline 2 of the EIOPA Guidelines on SRP.
PL	The KNF should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	n/a
PT	ASF should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	ASF should develop an internal policy which structures the process of defining different frequency of submission of the full RSR in order to ensure consistency of the SRP following the Guideline 2 of the EIOPA Guidelines on SRP.

Type of recommended action	Group 1	Group 2	Group 3
Topic	Context of the assessment/taking the decision		
Context of the recommended action	Proportionality - risk-based supervisory approach	Proportionality - amend local legislation	Proportionality - internal policy
RO	The ASF should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	ASF-RO should develop an internal policy which structures the process of defining different frequency of submission of the full RSR in order to ensure consistency of the SRP following the Guideline 2 of the EIOPA Guidelines on SRP.
SE	The FI should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment.	n/a	The FI should develop an internal policy which structures the process of defining different frequency of submission of the full RSR in order to ensure consistency of the SRP following the Guideline 2 of the EIOPA Guidelines on SRP.
SI	The AZN should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	The AZN should also develop an internal policy which structures the process of defining different frequency of submission of the full RSR in order to ensure consistency of the SRP following the Guideline 2 of the EIOPA Guidelines on SRP.
SK	The NBS should take into account proportionality and apply a risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	The NBS should develop an internal policy which structures the process of defining different frequency of submission of the full RSR in order to ensure consistency of the SRP following the Guideline 2 of the EIOPA Guidelines on SRP.

Type of recommended action	Group 1	Group 2	Group 3
Topic	Context of the assessment/taking the decision		
Context of the recommended action	Proportionality - risk-based supervisory approach	Proportionality - amend local legislation	Proportionality - internal policy
UK	It is acknowledged that there is an existing supervisory handbook guiding the assessment of the RSR, however to use the results of the risk assessment in defining the different frequencies of submission of the RSR has not been taken into account in the beforementioned handbook. The PRA should take more into account proportionality and the risk-based approach for defining the reporting frequency of the full RSR based on the outcome of the risk assessment where at least the undertakings with a high risk profile and impact on the market are submitting the RSR more frequently than once every 3 years and the undertakings with a low risk profile and impact are submitting the RSR less frequently than yearly.	n/a	n/a

Type of recommended action	Group 7	Group 8	Group 9
Topics	Communication of the decision	Taking the decision	Taking the decision
Context of the recommended action	Accelerate the decision on the undertakings' RSR frequency in order to notify the undertakings of the frequency of the RSR in line with a Guideline 23 (S)	To enhance the use of the information of the RSR for supervisory purposes on account of further limiting the use of country specific templates (S)	Equally apply the risk-based approach with regards to the frequency of submission of RSR also to low impact undertakings (S)
AT	n/a	n/a	n/a
BE	n/a	n/a	n/a
BG	n/a	n/a	n/a
CY	n/a	n/a	n/a
CZ	n/a	n/a	n/a
DE	na	na	n/a
DK	n/a	n/a	n/a
EE	n/a	n/a	n/a
EL	n/a	n/a	n/a
ES	n/a	n/a	n/a
FI	n/a	n/a	n/a
FR	n/a	n/a	n/a
HR	n/a	n/a	n/a
HU	n/a	n/a	n/a
IE	n/a	n/a	n/a
IS	n/a	n/a	n/a

Type of recommended action	Group 7	Group 8	Group 9
Topics	Communication of the decision	Taking the decision	Taking the decision
Context of the recommended action	Accelerate the decision on the undertakings' RSR frequency in order to notify the undertakings of the frequency of the RSR in line with a Guideline 23 (S)	To enhance the use of the information of the RSR for supervisory purposes on account of further limiting the use of country specific templates (S)	Equally apply the risk-based approach with regards to the frequency of submission of RSR also to low impact undertakings (S)
IT	n/a	n/a	n/a
LI	n/a	n/a	n/a
LT	n/a	n/a	n/a
LU	n/a	n/a	The risk-based approach implemented by CAA should also be applied to captives to ensure that captives performing third party business are assessed based on their risk profile and not automatically considered low risk due to their legal nature as captives.
LV	n/a	n/a	n/a
MT	MFSA should accelerate the decision on the undertakings' RSR frequency in order to notify the undertakings of the frequency of the RSR in line with Guideline 23 of the EIOPA Guidelines on SRP, i.e. no later than three months in advance of the undertakings' financial year end.	n/a	n/a
NL	n/a	n/a	n/a
NO	n/a	n/a	n/a
PL	n/a	By introducing different frequency of submission of full RSR based on the outcome of the risk assesment the KNF should further work on enhancing an usage of the information of the RSR for supervisory purposes on account of further limiting the usage of country specific templates to collect the information needed.	n/a
PT	n/a	n/a	n/a
RO	n/a	n/a	n/a
SE	n/a	n/a	n/a
SI	n/a	n/a	n/a
SK	n/a	n/a	n/a
UK	n/a	n/a	n/a

ANNEX V – OVERVIEW ACTIONS FOR EIOPA

As a result of the peer review EIOPA will take actions in three domains.

Actions for EIOPA			
Peer Review on RSR			
AP No	Action point 1	Action point 2	Action point 3
Topic	2. Taking the decision	2. Taking the decision	3. Communicating the decision
Reasoning	Input to the SII 2020 review on the RSR frequency of submission and its revision in terms of applying a proportionate and risk-based approach	Recognized as a sound practice from numerous countries applying a risk- based approach	It was noted by numerous NCAs that the current guideline is not applied and possible reason for that is the fact that it is not very clear and therefore not correctly understood by supervisors. The non-compliance with the guideline is already included as a recommended action to numerous countries, however EIOPA considers revision of Guideline 23, par. 1.28 of the EIOPA Guidelines on the SRP as beneficial.
Action to be taken	Introduce in EIOPA guidelines/ supervisory handbook for achieving supervisory convergence by keeping the minimum requirement for submission of the full RSR once every 3 years but ask mandatory assessment by NCAs and communication of the frequency of the RSR.	EIOPA to include in EIOPA Guidelines or in the supervisory handbook (depending on the decision to be taken for the SII 2020 review on how to ensure proportionality in taking the decision on the frequency of reporting of full RSR) the aspect of exemptions from annual submission of the full RSR based on a list of specific to the undertaking events (e.g.merge/acquisitions, pls see LU example).	EIOPA to develop the supervisory convergence in the context of Guideline 23, paragraph 1.58 of the EiOPA Guidelines on SRP by either updating the respective guideline or include the aspect in the Supervisory handbook: It was noted by some NCAs that the current guideline is not applicable in the NCAs due to the fact that input from the group supervisor is practically not needed for the solo supervisor to make decision on solo undertaking RSR frequency and vice versa. Most of the NCAs read the guideline in this way even if initially it purpose might have been different one. The recommended action issued to a few group supervisors where this was not observed as a practice is to collect information on and communicate the frequency of RSR submission at solo and group level.

ANNEX VI – SOUND PRACTICES IDENTIFIED DURING THE REFERENCE PERIOD

No.	Topic of the sound practice	Country	Sound practice identified during the reference period
1	Internal policy defining a more frequent submission of the RSR		<p>EIOPA considers it a sound practice when an NCA's decision on the RSR frequency is based on an internal policy where a process and the criteria that allow on a proportional and risk-based basis to have more frequent RSR submissions are defined in case they are not part of the national legislation.</p> <p>Details on the application of the sound practice in NCAs:</p>
		BE	The NBB defines the RSR frequency following an internal policy applicable for the entire market where the RSR frequency for each group or undertaking depends on its classification into a significant or less significant category. NBB publicly discloses the criteria that are used to make the classification.
		CZ	The CNB has approved an internal policy to define the RSR frequency for single specific undertakings. The internal policy contains the key criteria such as the quality of the preceding RSR, the internal rating of an undertaking, significant changes in a risk profile during the monitored period and the systemic risk of an undertaking triggering a more frequent RSR submission.
		DE	The BaFin has endorsed an internal policy to define the RSR frequency for a single specific group or undertaking.
		ES	The DGSFP defines the RSR frequency following an internal policy applicable for a single specific undertaking. The internal policy contains the key criteria such as high risk score, imposed capital add-on, non-compliance with the SCR requirements and application of the transitional measures triggering a more frequent RSR submission.
		IE	The CBI has issued an internal policy to define the RSR frequency for a single specific undertaking, where a case-by-case assessment is performed considering the content of the full RSR.
		ML	The MFSA defines the RSR frequency for a single specific undertaking following an internal policy where a process and the key criteria to define the RSR frequency such as risk score of an undertaking, its belonging to a group and its impact on the market are described.
		NL	The DNB has an internal policy where the annual RSR frequency for the 5 largest insurance groups and its respective undertakings and possibility foreseen for more a frequent submission from smaller undertakings according to the outcomes of the risk assessment is defined.
2	Segmentation of the market		<p>EIOPA considers it is a sound practice when a NCA that supervises a large number of group and solo undertakings determines the number of sets of undertakings with regards to phasing the submission of the full RSR and assessment of submitted RSRs. This enables the NCA to distribute the workload evenly and assess the full RSRs submitted by all supervised undertakings over a maximum period of 3 years.</p> <p>Details on the application of the sound practice in NCAs:</p>

No.	Topic of the sound practice	Country	Sound practice identified during the reference period
		DE	The BaFin makes a segmentation of insurance groups and solo undertakings and has initially defined different buckets with annual, once every 2 years and once every 3 years submission of the full RSR according to the outcomes of the risk assessment matrix used. The split of undertakings between the different buckets can change at any time depending on the risks undertakings are bearing. BaFin's decision regarding the frequency of reporting the full RSR is communicated with an official letter.
		IE	The CBI has defined three groups of undertakings after performing a review of the full RSRs received. The first group sent the full RSR for the year 2016 and year 2017. The second group of undertakings had to submit the full RSR for the year 2016 and year 2018, the third group - for the year 2016 and year 2019. Each group has to submit the next full RSR in a period of 3 years. The frequency of submission has been initially set after a sampling exercise done based on the first RSR submission which has taken into account the outcome of CBI's risk assessment tool. The frequency of submission is being continuously reassessed and might be changed at any time taking into account the outcomes of the SRP.
		SE	FI uses the risk assessment results to prioritise the review of the submitted full and summary RSR. The RSR of the undertakings attributed to the two most risky categories are reviewed each year, others are spread over the next years. Hence the RSR for all undertakings is reviewed over a 3 year cycle. When reviewing a summary RSR for an undertaking in the two lowest risk categories, the review is also based on the latest full RSR and a prior summary RSR if relevant.
3	Explicit submission of no material changes		EIOPA considers it a sound practice when NCAs require the submission of a statement of no material changes that helps to fulfil compliance with Article 312 (3) of the Delegated Regulation. Details on the application of the sound practice in NCAs: Requirement to submit (or Supervisory expectation to receive) an official notification from an undertaking in case of no material changes in the content of its RSR during the reporting period is implemented in the supervisory practice of the following NCAs: FMA-AT, NBB, CNB, BaFin, EFSA, FMA-LI, CAA, DNB, ASF-PT, FI. This is publicly disclosed on the NCAs websites or communicated by other means to the undertakings.
		AT	The FMA-AT requires the undertakings to submit a formal communication that there were "no material changes".
		BE	In case of no material changes the explicit submission of a statement is required from insurance undertakings on the market.
		CZ	During CNB's formal communication with undertakings, it was emphasized that the NCA expects that the phrase "no material changes" is mentioned if applicable in case an undertaking is obliged to submit a summary RSR.
		DE	Official communication in case of no material changes is in the advice on supervisory reporting conveyed as an expectation that a summary RSR should contain a statement of "no material changes".
		EE	The EFSA requires the undertakings to submit a formal communication that there were "no material changes".
		LI	The FMA-LI has received only one summary RSR so far due to the fact that in 2016 and 2017 all companies had to submit the full RSR and only now some of them are exempted. Another reason for not receiving a summary RSR is the current status-quo that there is no requirement for an official communication of no material changes through a summary RSR. However during the reference period for this peer review there was an expectation for that, FMA-LI is actually requiring a formal notification of no material changes starting from the RSR 2019.

No.	Topic of the sound practice	Country	Sound practice identified during the reference period
		LU	In case of no material changes the undertakings are still required to submit a summary RSR explicitly declaring this.
		NL	In case of no material changes an explicit submission is required from insurance undertakings on the market. DNB published a general statement on the RSR frequency on its website.
		NO	In case of no material changes an explicit submission is required from insurance undertakings on the market. In 2018 the NFSA sent a reminder to all undertakings which failed to submit a summary RSR within the deadline. In this reminder the NFSA informed the undertakings of the requirement to file a report stating no material changes. In 2019 these reminders were sent automatically the following day of the reporting deadline. In the cases where undertakings have contacted the NFSA seeking advice regarding the layout and requirement of the summary RSR, the NFSA has urged the undertakings to follow the layout of Annex XX and to include a subheading for each article and letter of the Delegated Regulation regarding the RSR and to state for each requirement that there have been no material change
		PT	In case of no material changes explicit submission is required from insurance undertakings, however the undertaking can request to be exempted from the latter.
		SE	The FI requires from insurance undertakings an explicit submission in case of no material changes.
4	Standardised RSR assessment tools		<p>EIOPA considers it a sound practice when an NCA has implemented standardised RSR assessment processes and tools that help to achieve a consistent approach on the RSR structure and content compliant with the Delegated Regulation, to come up with the well-founded conclusive feedback to the undertakings and to keep records of the supervisory assessment performed over time.</p> <p>Details on the application of the sound practice in NCAs:</p>
		MT	The MFSA has a standardized, consistent and conclusive process for the RSR assessment. MFSA uses a standardized RSR assessment form where a rating for each section and sub-section of the RSR is assigned in an Excel RSR review file. An overall rating is given for each of the five sections of the RSR. Comments justifying the given rating are provided where the rating is not satisfactory. Guidelines explaining how to rate the sections and sub-sections of the RSR are provided to the supervisors. The individual RSR assessments are discussed and challenged at a panel meeting. Next a draft letter for each undertaking is prepared with the overall quality rating and the key observations and areas for improvements. Afterwards the draft letter is reviewed by a Senior Manager or Deputy Director within the Insurance and Pensions Supervision unit and the letter is submitted to the undertaking.
		NL	The DNB has developed a standardised RSR assessment form that is supported by an IT solution. The structure and content of the full RSR is assessed by the assigned supervisor using this form. In the standardised assessment form each section and sub-section of the RSR has to be assessed identifying information that is missing and giving an overall quality assessment per section as well as the final assessment of the whole report and the points for the feedback interview or letter.

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