

To: Prudential Working group  
From: Prudential team  
cc:  
Date: 19-11-2025  
Reference: ECO-PRU-25-084

Subject: Assessment - EIOPA RTS on macroprudential analyses in ORSA and PPP

## Summary

The secretariat has assessed the Final Report on draft RTS on **macroprudential analyses** in ORSA and PPP ([here](#)) published on 17 November compared to the industry consultation response ([here](#)).

In parallel, EIOPA has also published a detailed resolution of comments [here](#).

**EIOPA incorporated meaningful adjustments, including a higher threshold and clarified supervisory discretion, but retained most qualitative criteria, leading to a mixed outcome overall.**

Should members have any questions or comments please write to [prudential@insuranceeurope.eu](mailto:prudential@insuranceeurope.eu).

Assessment of final report on draft RTS on macroprudential analyses in ORSA and PPP

Topic	Consultation Response	Assessment
<b>Threshold</b>	<ul style="list-style-type: none"> <li>■ Threshold for medium/long-term analysis should be qualitative, or at least inflation-adjusted if quantitative; €12bn is arbitrary.</li> <li>■ If a threshold is kept, align with IAIS threshold for IAIGs (\$50bn).</li> <li>■ Supervisory authorities should always issue individual request for additional macroprudential analysis.</li> </ul>	<p><b>Positive</b></p> <ul style="list-style-type: none"> <li>■ EIOPA increased the threshold from €12bn to €20bn, adjusted for inflation.</li> <li>■ Supervisors can opt-in/opt-out based on risk.</li> </ul> <p>EIOPA notes:</p> <ul style="list-style-type: none"> <li>■ <i>The "opt-in" and "opt-out" options are envisaged to be totally flexible according to risk based considerations made by the National Supervisors, complementing the size criteria and not representing any automatism.</i></li> <li>■ <i>In relation to the IAIS Criterion of total assets of USD 50 bn, it is relevant to notice that its scope is globally, while the scope of this RTS is for ESAs and their local market. As such the IAIS threshold has to be scaled.</i></li> </ul>
<b>Qualitative Criteria and Proportionality</b>	<ul style="list-style-type: none"> <li>■ Clarify or delete vague criteria (e.g., "activities related to exposures with macroprudential implications which can potentially generate spillover effects")</li> <li>■ Offering products with guarantees should not be a criterion for systemic risk.</li> <li>■ Material use of synthetic leverage should be required as a criterion (not just any use).</li> <li>■ Add a legal definition of "substitutability."</li> </ul>	<p><b>Mixed</b></p> <p>Overall, the criteria are retained as in the previous draft.</p> <ul style="list-style-type: none"> <li>■ Activities related to exposures with macroprudential implications: text was amended to convey the message in a more clear manner.</li> <li>■ EIOPA notes that <i>the risk profile of these products is commonly identified as possible amplifier of systemic risks.</i></li> <li>■ Regarding synthetic leverage: While we acknowledge the relevance of this comment, the reference to "material use" is considered too generic for the purpose of a RTS. In addition, the paragraph has been redrafted to increase clarity.</li> <li>■ No legal definition of substitutability was introduced.</li> </ul>
<b>Process and Implementation</b>	<ul style="list-style-type: none"> <li>■ Ensure that the opt-out (Article 2(2)) is used extensively to avoid unnecessary burden.</li> <li>■ Update Annex II data (entities above threshold)</li> </ul>	<p><b>Positive</b></p> <ul style="list-style-type: none"> <li>■ The opt-out is retained and it is clarified that supervisors must use it where inclusion would be disproportionate.</li> <li>■ EIOPA updated the impact assessment and threshold and data in the final RTS (Annex</li> </ul>

	to reflect recent asset growth	2), using more recent figures ( <i>year end 2023</i> ).
<b>Policy Options and Impact Assessment</b>	<ul style="list-style-type: none"> <li>■ Support for policy option A.1 (purely qualitative, principle-based, no threshold)</li> </ul>	<p><b>Mixed</b></p> <ul style="list-style-type: none"> <li>■ While EIOPA chose Option 3 (hybrid approach) it is positive that the quantitative threshold was substantially increased.</li> </ul>