Memo for information

To: Prudential Working group
From: Prudential team
cc:
Date: 30-04-2026
Reference: ECO-PRU-26-217

Subject: EIOPA Batch 2 IRRD Guidance - Secretariat Assessment

Background

On 24 April 2026, EIOPA published the second batch of draft technical standards related to the IRRD. These cover:

- The functioning of **resolution colleges**
- Procedures and templates for **resolution reporting**

Overall, these **did not substantially reflect industry's feedback** with the scope and number of reporting template remaining unchanged. In particular, companies are still required to make self-assessments of judgemental areas such as critical functions and substitutability. As such, it **does not represent a material change in the likely future burden posed by IRRD**. Changes were made to confirm that for some templates data already reported under Solvency II does not need to be rereported, and that data must be requested first from the NSA before approaching companies.

Members are invited to provide any **comments or questions on the assessment** by email to **prudential@insuranceeurope.eu by COB Friday 8 May 2026.**

Summary

Annex I is a comparison of the RTS on the functioning of resolution colleges (here) to the industry response (ECO-PRU-25-054).

- The revised RTS does not incorporate key industry feedback including:
  - The group's perspective should be taken into account explicitly in the resolution college.
  - The resolution college should be responsible for resolving inconsistencies between individual and group plans.
  - Clarification is needed on how uniform communication can be ensured across Member States.
- Comments on clarifying how silence as consent should apply and that information can be provided from other sources than the ultimate parent were incorporated.

Annex II is a comparison of the ITS on the procedures and templates for resolution planning (here) to the industry response (ECO-PRU-25-053).

- Overall, the revised ITS does not make any changes to the wide scope of information being requested with no material changes to any of the draft templates.
- The revised ITS does reflect the following more specific feedback:
  - Reporting deadlines extended two weeks to avoid clashing with Solvency II reporting
  - Clarification that Solvency II reporting formats should be used

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- Avoiding double reporting by clarifying that:
  - Data already provided under Solvency II need not be rereported,
  - The Resolution Authority must request data from the supervisory authority before approaching companies, and
  - Existing data can not be re-requested in a different format

Annex I: RTS on the functioning of resolution colleges

Insurance Europe Request	Status	Notes
RTS is overly detailed	**Not addressed**	No changes to level of detail
RTS should refer to 'parents' rather than 'ultimate parents'	**Not addressed**	RTS consistently uses 'ultimate parent undertaking' throughout.
Art 6.5: Should be clarified to state specific IRRD communication channels should not be required	**Not addressed**	Not explicitly addressed.
Art 7.2: Remove reference to information "provided by the ultimate parent undertaking"	**Addressed**	Article has been reworded and this section has been removed.
Art 8.1: Should be clarified how uniform communication can be ensured across Member States	**Not addressed**	Not explicitly addressed.
Art 10.1c, 12.3, 29.4: Alignment on "silence as consent" vs "explicit consent" would be welcomed	**Addressed**	Text amended / removed in these articles.
Art 11.1g, 15.1g, 22.1h: Group perspective should be taken into account explicitly	**Not addressed**	Although Art 11.1g is slightly amended, group perspective is not explicitly included. EIOPA notes that "engagement with insurance undertakings is not within the scope of the RTS. Nevertheless, the draft RTS does not preclude resolution authorities of either subsidiaries or ultimate parent undertakings from engaging in discussions or consultations with the insurance undertakings under their jurisdiction during the joint decision-making process".
Should be stated that resolution college are responsible for resolving inconsistencies between individual and group plans and ensuring no duplicate reporting	**Not addressed**	Not explicitly addressed. EIOPA notes that in line with Art 17.1 and Art 69.1c of the IRRD, "the general principle on decision-making involving more than one Member State […] emphasises that resolution authorities, supervisory authorities, and other relevant authorities must cooperate to ensure that decisions are taken and actions implemented in a coordinated and efficient manner. […] In line with the principles of simplification and proportionality, EIOPA considers that no further provision on this aspect is necessary in the draft RTS. However, to raise awareness additional clarification has been incorporated."

Insurance Europe Request	Status	Notes
		It is unclear what this additional clarification is.
Clarification needed for practical interaction of group and individual plans	**Not addressed**	Not explicitly addressed.

Annex II: ITS on the procedures and templates for resolution planning

Insurance Europe Request	Status	Notes
Templates covering critical functions should be deleted	**Not addressed**	No changes to templates. EIOPA note that "Information on critical functions is essential for resolution planning and not collected elsewhere. Some specific information (on products, business lines, markets) is only available to insurers and essential for the impact and substitutability analyses. Therefore, the self-assessment is core input for resolution authorities and an important element to ensure that the perspective of the industry is evaluated in a dialogue with the resolution authority."
Templates requiring judgemental market-level assessments should be deleted	**Not addressed**	No changes to templates
Data request goes beyond IRRD and not appropriate to envisage more data as experience is gained	**Not addressed**	No changes to templates and wording about more data as experience gained remains. EIOPA note "At the same time, the required data set already omits desirable information, such as more granular information on liabilities, as proposed in the revised ITS in the banking sector, or a separate template on reinsurance business. Moreover, several pieces of information only have to be reported if applicable."
Care should be taken to avoid duplication of SII reporting requests	**Partially addressed**	EIOPA have added wording clarifying that reporting formats should be consistent: however, the scope of reporting remains the same. EIOPA note that "the approach proposed in the ITS simplifies the reporting by requesting information using the formats used in Solvency II reporting. In particular, liability data is requested using Solvency II consistent 'going concern' valuation instead of 'gone concern' valuation. This aims to avoid specific adjustments in the regular reporting for the assessment of certain tools, such as the WDCT, and, thus substantially reduces the reporting burden."
Impact assessment disregards negative impact on policyholders of increased reporting costs	**Not addressed**	No quantitative assessment of costs carried out. EIOPA have added additional qualitative wording, but this only covers the existing policy options around frequency of reporting and reporting of granular liabilities. EIOPA note "A detailed quantitative assessment of the costs associated with such policy options is not feasible due to the lack of information and the difficulty of monetizing the (mostly) administrative costs, which are influenced by various factors such as organizational efficiency and labor costs."
ITS should refer to 'ultimate parent in scope of group supervision' rather than 'ultimate parents'	**Not addressed**	Not explicitly addressed.
Art 1: Clarification required that only companies required to have resolution plans are in scope	**Addressed**	Clarifying comment added.
Art 1.1: Clarification needed that only information not already	**Not addressed**	Not explicitly addressed.

Insurance Europe Request	Status	Notes
provided to supervisors should be requested		
Art 1.2: Scope and mechanics of simplified requirements should be clarified	**Not addressed**	Not explicitly addressed.
Art 2: Clarification required that immaterial undertakings do not need to be including	**Not addressed**	Not explicitly addressed.
Art 2: Clarification that SNCUs are not subject to resolution planning at the group level needed	**Not addressed**	Not explicitly addressed.
Art 3: Clarification needed that more frequent reporting is exceptional and the conditions needed for this	**Partially addressed**	Additional comment added that increased frequency must be for "the purposes of drawing up, reviewing and implementing resolution plans". No comment added around exceptionality.
Art 3: Deadline clashes with SII reporting and should be amended or (ideally) removed and left at discretion of Member States	**Addressed**	Deadline remains, but has been pushed back two weeks to avoid coinciding with SII reporting. EIOPA note "there are important merits to a scheduled data submission, which grants transparency, certainty, and a smooth process for both authorities and industry."
Art 3: Sequencing of implementation should be appropriate.	**Not addressed**	Not explicitly addressed.
Art 4: Definition of a "material change" should be clarified	**Not addressed**	Not explicitly addressed.
Art 5: Should refer to formats and specifications used in Solvency II QRT reporting	**Addressed**	Clarifying comment referring to Solvency II added.
Art 6.1 and 12.3: Remove requirement to reprovide data in different formats in Art 6.1 which is inconsistent with Art 12.3	**Addressed**	This requirement has been removed.
Art 6: Clarification needed on how RAs will need to justify requests for additional data and	**Not addressed**	Not explicitly addressed.

Insurance Europe Request	Status	Notes
the flexibility allowed around these requests.		
Art 7: Clarification needed that the RA must request information from the supervisor before approaching companies	**Addressed**	Clarifying comment added.
Art 7: Clarification needed on how RA and supervisors should ensure coordination and verify information availability	**Not addressed**	Not explicitly addressed.
Art 7: Should mandate cooperation between RAs for financial conglomerates	**Not addressed**	Not explicitly addressed.
Annex I: Impact Assessment should compare impact of collecting all data in scope not just granular liabilities, giving reasons for why information is required	**Not addressed**	Not explicitly addressed. See commentary above on lack of quantitative impact assessment for EIOPA comments.
Annex I: EIOPA should redraft ITS to reflect need to specify procedures and forms/templates as two distinct information pathways	**Not addressed**	Not explicitly addressed. No significant redrafting has taken place.
Annex I: Reinsurance information in addition to that provided via Solvency II should not be required	**Not addressed**	Not explicitly addressed. EIOPA mention the lack of a reinsurance specific template as a simplification measure.
Annex II: Should be explicit that additional requests should be exceptional	**Not addressed**	Not explicitly addressed.
IR.01.02: Unclear distinction between information provided for undertakings and groups	**Not addressed**	Not explicitly addressed.

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IR.02.01: Should largely be available from NSA	Partially addressed	Comment added that data reported under Solvency II does not have to be rereported here.
IR.02.01: Should largely be available from NSA. Threshold for shareholders should be increased to 10%	Not addressed	EIOPA notes "a higher threshold could miss important shareholders material for resolution planning and the application of the WDCT. Understanding ownership in detail is a key consideration for resolution action and is necessary for assessing contagion. Moreover, shareholders can be written down under IRRD in order to recognize losses. As a consequence, identifying also small shareholders is a main concern. These factors require special attention in resolution planning and therefore require a lower threshold for the reporting, whereas in supervision a higher threshold seems justified."
IR.03.01: General comments missing. Information on liabilities with maturity <7 days not relevant for insurers	Partially addressed	General comments added. Information on liabilities with maturity <7 days retained.
IR.03.02: General comments missing	Addressed	General comments added.
IR.04.01: Should largely be available from NSA	Not addressed	Not explicitly addressed.
IR.05.01: Clarification needed that only 10 material counterparties to be included. 'Insolvency ranking' is unclear as a term	Partially addressed	Additional comment added on the number of counterparties. No further information given on insolvency ranking.
IR.06.01: Should largely be available from NSA	Not addressed	Not explicitly addressed.
IR.07.01: Should be deleted	Not addressed	Not explicitly addressed. Note EIOPA comments on critical functions above.
IR.07.02: Should be deleted	Not addressed	Not explicitly addressed. Note EIOPA comments on critical functions above.
IR.07.03: Should be deleted. If included, further guidance is needed. ITS should not refer to Guidelines addressed to the RA (C0020).	Not addressed	Not explicitly addressed. Note EIOPA comments on critical functions above.

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IR.07.04: Should be deleted	**Not addressed**	Not explicitly addressed. Note EIOPA comments on critical functions above.
IR.07.06: Should be deleted	**Not addressed**	Not explicitly addressed. Note EIOPA comments on critical functions above.
IR.08.01: Information about reinsurance should be derived from existing SII reporting	**Not addressed**	Not explicitly addressed.
IR.09.01: General comments and definition of FMI missing	**Addressed**	General comments added along with definition of FMI.
IR.09.02: General comments missing	**Addressed**	General comments added.
Sample data would add clarity	**Not addressed**	Not explicitly addressed.