

Consultation Paper on the proposal for Regulatory Technical Standards on the content of resolution plans and group resolution plans

Fields marked with * are mandatory.

Responding to the paper

The European Insurance and Occupational Pensions Authority (EIOPA) has published a Consultation Paper on the proposal for Regulatory Technical Standards on the content of resolution plans and group resolution plans

Stakeholders are invited to provide their feedback on the consultation paper by **31 July 2025, 23:59 CET**. The feedback received will be taken into account in the finalisation of the RTS.

Comments are most helpful if they:

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

To submit your comments, please click on the blue “Submit” button in the last part of the survey. Please note that comments submitted after 31 July 2025 or submitted via other means will not be processed. In case you have any questions please contact IRRD_PC@eiopa.europa.eu.

Publication of responses

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

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

Declaration by the contributor

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

Data protection

Please note that personal contact details (such as name of individuals, email addresses and phone numbers) will not be published.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

General information about the respondent

* Name of the stakeholder

Actuarial Association of Europe

* Type of stakeholder

Other

* If other, please specify:

Professional Association

* Please indicate your country.

Belgium

* Contact person (name and surname)

Stephanos Hadjistrylis

* Email address of contact person

info@actuary.eu

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

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

Questions to stakeholders

1. General comments

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

- ☒ Yes
☐ No

Please provide your general comments on the consultation paper.

We welcome the opportunity to comment on this consultation and support EIOPA's objective of strengthening the resilience and resolvability of insurance undertakings. It is important to establish a clear separation of responsibilities between supervisory authorities and resolution authorities. At the same time, close cooperation and effective exchange of information between them is essential to ensure efficient coordination and to minimise any additional effort on undertakings. As noted on page 7 of the consultation paper, the goal of the RTS is to provide a framework that ensures operational preparedness for resolution, with a particular focus on the analysis and planning of different resolution strategies under a range of scenarios. While we support this objective, we are concerned that the level of detail required by the proposed RTS may impose a compliance burden that challenges the principle of proportionality and may run counter to broader EU efforts to simplify regulation and enhance competitiveness. The volume and granularity of information required under the draft RTS can be quite extensive. While we recognise that the responsibility for preparing the resolution plan rests with the resolution authority, it might be helpful to clarify that undertakings, when asked to provide supporting information, should be able to do so by referencing existing documentation such as ORSA reports, QRTs, or SFCRs (provided the material is up-to-date). We also note that the draft RTS leave significant scope for interpretation, which may lead to inconsistent or overly rigid implementation by national authorities. We propose that EIOPA explicitly reinforce the importance of proportionality in applying these standards, especially for insurers with simpler structures. Clear guidance for national authorities would help ensure consistent implementation across countries and avoid the risk of additional national requirements being added unnecessarily. We hope these considerations can support a more balanced and proportionate approach to resolution planning that remains operationally effective while not unduly burdensome.

2. Background and Analysis

Q2. Do you have comments on the Background and Analysis Section?

- ☐ Yes
☒ No

3. Draft Technical Standards

Recitals

Q3. Do you have comments on the Recitals?

- ☐ Yes
☒ No

Articles

Q4. Do you have comments on the following articles?

	Yes	No
Article 1 - Definitions	<input checked="" type="radio"/>	<input type="radio"/>
Article 2 - Information to be included in resolution plans	<input checked="" type="radio"/>	<input type="radio"/>
Article 3 - Information to be included in group resolution plans	<input checked="" type="radio"/>	<input type="radio"/>

Please provide your comments on Article 1 - Definitions.

• Article 1 – Definitions We suggest clarifying the definition of "relevant services" to better align with the scope of business continuity management as understood under the IRRD. It might be helpful to interpret "relevant services" specifically as those provided by "essential service providers", as already defined in Article 2(86) of the IRRD. This would promote consistency in terminology and reduce the potential for misinterpretation by different resolution authorities. Additionally, we propose removing the reference to "reinsurance services" in the definition. This term is not defined in either the IRRD or Solvency II frameworks and does not align with the types of services typically associated with operational continuity. The IRRD Annex focuses on essential operational enablers such as IT systems, premises and facilities management, and human resources. Including "reinsurance services" could lead to confusion regarding the intended scope of operational support functions in resolution planning.

Please provide your comments on Article 2 - Information to be included in resolution plans (please specify the paragraph you refer to).

• Article 2 - Information to be included in resolution plans We acknowledge that Article 2 already allows supporting material to be included in annexes and that resolution authorities can make use of documents such as the ORSA, SFCR, and QRTs in preparing resolution plans. For the avoidance of doubt, it might be helpful for EIOPA to confirm that undertakings may meet information requests by referencing such documents, provided they are up-to-date and accessible. This would promote proportionality and efficiency without compromising the completeness of resolution plans.

Please provide your comments on Article 3 - Information to be included in group resolution plans (please specify the paragraph you refer to).

- Article 3 - Information to be included in group resolution plans We think that that some additional clarity can be provided on the types of legal entities to which Article 3 refers, particularly in light of the differing legal and operational implications of the IRRD for EEA undertakings compared with third-country entities. Since the winding-up of non-EEA entities is subject to local legal regimes, it might be helpful to specify the scope of undertakings more precisely within the RTS. In this regard, we suggest amending Article 3(1)(a)(ii) to read: “information about all EEA insurance or reinsurance undertaking(s) and, where relevant, their branches operating under the freedom of establishment in the single market, (...)”. Similarly, Article 3(1)(b) could be refined to clarify that resolution tools and powers should refer specifically to undertakings within the IRRD’s legal scope: “a description of the group resolution strategy or strategies considered in the plan, including the identification of the EEA insurance or reinsurance undertaking(s) to which resolution tools or resolution powers may be applied.” Additionally, we believe that the reference to “liquid assets adjusted to the duration of liabilities” in Article 3(1)(g) could benefit from further clarification. While we understand this may relate to liquidity gap assessments, it would be helpful if EIOPA could confirm the intended interpretation or provide examples to support consistent application across firms and resolution authorities.

Annex I: Impact assessment

Q5. Do you have comments on the policy issue?

	Yes	No
Policy issue A: the structure, scope and level of detail when defining the content of the resolution plans	<input type="radio"/>	<input checked="" type="radio"/>

Any other comments

Q6. Do you have any other comments?

- ☐ Yes
- ☒ No

Contact

[Contact Form](#)

