

Consultation Paper on the proposal for amending Article 58 of Commission Delegated Regulation (EU) 2015/35 on the simplified calculation of the risk margin

Fields marked with * are mandatory.

Responding to the paper

EIOPA welcomes comments on the Consultation Paper on the proposal for amending Article 58 of Commission Delegated Regulation (EU) 2015/35 on the simplified calculation of the risk margin.

Comments are most helpful if they:

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

Stakeholders are invited to provide their feedback by 5 January 2026 23:59 CET.

Contributions not provided via this EU Survey or after the deadline will not be processed. In case you have any questions please contact Solvencyllreview@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Please note that personal contact details (such as name of individuals, email addresses and phone numbers) will not be published.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.

Remarks on completing the survey

EU Survey supports the last two versions of Microsoft Edge and the latest version of Mozilla Firefox and Google Chrome. Using other browsers might cause compatibility issues.

After you start filling in responses to the survey there is the option to save your answers. However, please note that the use of the online saving functionality is at the user's own risk. As a result, it is strongly recommended to complete the online survey in one go (i.e. all at once).

Should you still proceed with saving your answers, the online tool will immediately generate and provide you with a new link from which you will be able to access your saved answers.

It is also recommended that you select the “Send this Link as Email” icon to send a copy of the weblink to your email - please take care of typing in your email address correctly. This procedure does not, however, guarantee that your answers will be successfully saved.

You will have the possibility to print a pdf version of the final responses to the survey after submitting it by clicking on "Download PDF". You will automatically receive an email with the pdf file. Do not forget to check your junk / spam mailbox.

About the respondent

* Please indicate the desired disclosure level of the responses you are submitting.

- ☒ Public
- ☐ Confidential
- ☐ Partly confidential

* Stakeholder name

Actuarial Association of Europe

* Contact person (name and surname)

Stephanos Hadjistryllis

* Contact person email

info@actuary.eu

Contact person phone number

+35799547374

Questions to stakeholders

General

Q1 Do you have general comments on the consultation paper?

- ☐ Yes
☒ No

Consultation paper overview and next steps

Q2 Do you have comments on the consultation paper overview and next steps?

- ☐ Yes
☒ No

Draft technical standards

Recitals

Q3 Do you have comments on the following recitals?

	Yes	No
Recital 1	<input type="radio"/>	<input checked="" type="radio"/>
Recital 2	<input type="radio"/>	<input checked="" type="radio"/>
Recital 3	<input type="radio"/>	<input checked="" type="radio"/>
Recital 4	<input type="radio"/>	<input checked="" type="radio"/>

Articles

Q4 Do you have comments on the following articles?

	Yes	No
Article 1	<input type="radio"/>	<input checked="" type="radio"/>
Article 2	<input checked="" type="radio"/>	<input type="radio"/>

Please provide your comments on Article 2

We note that Article 2 of the draft RTS states that the Regulation shall apply from 30 June 2027. As the amended formula for the calculation of the risk margin under Article 37(1) of Commission Delegated Regulation (EU) 2015/35 is expected to apply earlier in 2027, it may be helpful if EIOPA could confirm whether the intended application date for the amended Article 58 is 30 January 2027 or 30 June 2027.

Clarifying the alignment of effective dates would support a consistent application of the revised provisions and avoid potential uncertainty during the first quarterly calculation of the risk margin in 2027, particularly where undertakings rely on the simplified approach set out in Article 58.

Other comments on the draft technical standards

Q5 Do you have any other comments on the draft technical standards?

- ☐ Yes
☒ No

Any other comments

Q6 Do you have any other comments on the consultation paper?

- ☐ Yes
☒ No

Contact

[Contact Form](#)

