

Response - Consultation on Revised ITS on disclosure templates

Our reference:	ECO-PRU-25-149	Date:	19-12-2025
Referring to:	Consultation on revised ITS on disclosures templates		
Related documents:	Consultation paper		
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Pages:	1	Transparency Register ID no.:	33213703459-54

Introduction

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

- Yes
- The industry notes that the effectiveness of the revised ITS on disclosure by supervisory authorities depends on NSAs publishing the required information in a manner that is easily accessible, complete and regularly updated. In practice, these disclosures are often difficult to locate on NSA websites and, in some cases, not up to date. As a result, the templates are not widely used by stakeholders. It is therefore important that any revised requirements are accompanied by clear expectations for consistent and timely publication to ensure that the intended transparency benefits are achieved. As an additional practical measure, EIOPA could consider maintaining a central list or database of the relevant NSA URLs to facilitate the location of these disclosures.