



Finalyse

REGULATORY BRIEF
FEBRUARY 2025



Our purpose

Our aim is to support our clients incorporating changes and innovations in valuation, risk and compliance. We share the ambition to contribute to a sustainable and resilient financial system. Facing these extraordinary challenges is what drives us every day.

Regulatory Brief

The RegBrief provides a catalogue of policy updates impacting the financial industry. Emphasis is made on risk management, reporting and disclosure. It further covers legislation on governance, accounting and trading, as well as information on the current business environment.

Note: The Cross-Sector chapter includes regulatory updates that may affect multiple industries.

Data: 1 January 2025 - 31 January 2025

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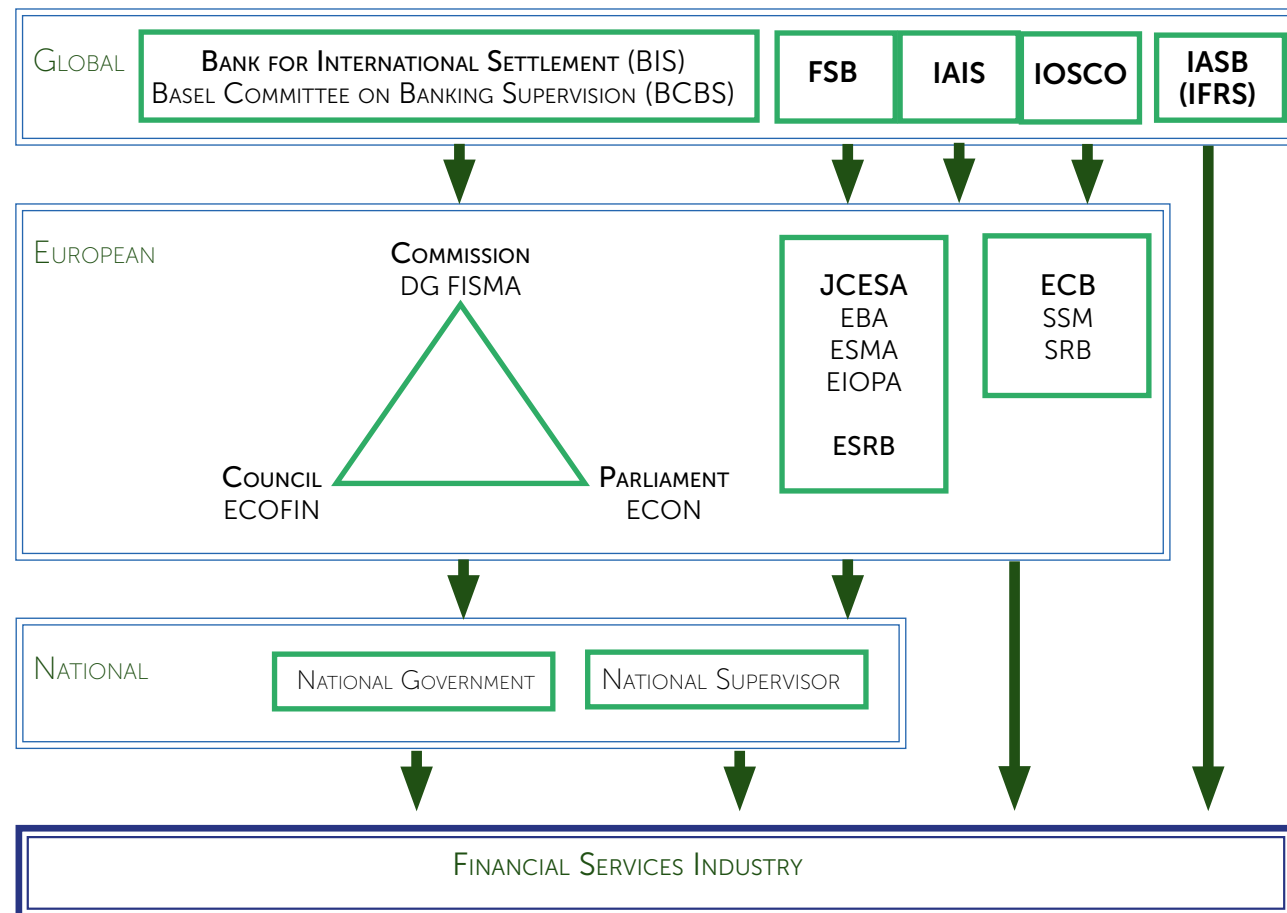
Abbreviations

AIFMD	Alternative Investment Fund Managers Directive	ECB	European Central Bank
AMA	Advanced Measurement Approach	ECL	Expected Credit Loss
AML	Anti-Money Laundering	EDIS	European Deposit Insurance Scheme
AT1	Additional Tier 1	EEA	European Economic Area
BCBS	Basel Committee on Banking Supervision	EEAP	European Electronic Access Point
BIS	Bank of International Settlements	EFTA	European Free Trade Association
BMR	Benchmarks Regulation	EIOPA	European Insurance & Occupational Pensions Authority
BRRD	Bank Recovery and Resolution Directive	ELTIF	European Long-Term Investment Fund
CCP	Central Counterparty	EMIR	European Markets Infrastructure Regulation
CET 1	Common Equity Tier 1	ESMA	European Securities & Markets Authority
CFR	Core Funding Ratio	ESRB	European Systemic Risk Board
CMU	Capital Markets Union	EU	European Union
Council	Council of the European Union	EuSEF	European Social Entrepreneurship Fund
CPMI	Committee on Payments & Market Infrastructures	EuVECA	European Venture Capital Fund
CRA	Credit Rating Agencies (Regulation)	FINREP	Financial Reporting
CRD	Capital Requirements Directive	FICOD	Financial Conglomerates Directive
CRR	Capital Requirements Regulation	FRTB	Fundamental Review of the Trading Book
CSD	Central Securities Depository	FSB	Financial Stability Board
CTP	Consolidated Tape Provider	FX	Foreign Exchange
CVA	Credit Valuation Adjustment	GAAP	Generally Accepted Accounting Principles
DGS	Deposit Guarantee Scheme	G-SIB	Global Systemically Important Bank
DPM	Data Point Model	G-SII	Global Systemically Important Institution
EBA	European Banking Authority	IAS	International Accounting Standards
ECAI	External Credit Assessment Institution	IASB	International Accounting Standards Board

Abbreviations

IBIP	Insurance-Based Investment Product	NCA	National Competent Authority
ICAAP	Internal Capital Adequacy Assessment-Process	NPL	Non-Performing Loan
IDD	Insurance Distribution Directive	NSFR	Net Stable Funding Ratio
IFRS	International Financial Reporting Standards	OSII	Other Systemically Important Institution
ILAAP	Internal Liquidity Adequacy Assessment Process	PAD	Payment Accounts Directive
IORP	Institutions for Occupational Retirement Provision (Directive)	Parl	European Parliament
IOSCO	International Organisation of Securities Commissions	PD	Probability of Default
IRB	Internal Rating Based Approach	PRIIPs	Packaged Retail and Insurance-Based Investment Products (Regulation)
IRRBB	Interest Rate Risk in the Banking Book	PSD	Payment Services Directive
ITS	Implementing Technical Standards	REFIT	Regulatory Fitness & Performance Programme
JCESA	Joint Committee of European Supervisory Authorities	RTS	Regulatory Technical Standards
KID	Key Information Document	RWA	Risk-Weighted Asset
LCR	Liquidity Coverage Ratio	SFT(R)	Securities Financing Transaction (Regulation)
LEI	Legal Entity Identifier	SI	Systematic Internaliser
LGD	Loss Given Default	SMA	Standardized Measurement Approach
LR	Leverage Ratio	SREP	Supervisory Review & Evaluation Process
LSI	Less Significant Institution	SRM	Single Resolution Mechanism
MCD	Mortgage Credit Directive	SSM	Single Supervisory Mechanism
MiFID	Markets in Financial Instruments Directive	STC	Simple, Transparent & Comparable (Securitisation)
MiFIR	Markets in Financial Instruments Regulation	TLAC	Total-Loss Absorbing Capacity
MMF	Money Market Fund	TR	Trade Repository
MS	Member States	UCITS	Undertakings for Collective Investment in Transferable Securities
		UPI	Unique Product Identifier
		UTI	Unique Transaction Identifier

Institutional Framework



The international organisations on the top row set global standards for their respective members. These global norms are not binding, but have to be further translated in national (European) legislation.

European legislation is proposed by the Commission and, after political negotiations, voted in the European Parliament and the Council of Ministers. Adopted regulations and decisions are directly applicable to EU member states, while directives have to be translated into national law before they apply. The technical details are fine-tuned by the supervisory authorities: EBA, ESMA and EIOPA.

Finally, where necessary, national governments and supervisors translate and supplement the international and European policies for the domestic market.

Regulatory Calendar

2025 Q1

CRR
Regulation
Most of CRR 3 provisions are intended to come into force
Application date: 1 Jan 2025

Basel
Standards
Prudential treatment of banks' exposures to cryptoassets
Application date: 1 Jan 2025

CRD
Guidelines
On output floor and impact on the SREP
Application date: 1 Jan 2025

ITS
ITS on joint decision process for internal model applications
Document Release: tbd

Guidelines
GL to specify proportionate diversification methods for retail exposures
Document Release: tbd

2025 Q3

Stress Test
Results
EBA publication of the 2025 EU-wide stress test results
Document Release: July 2025

CRR

ITS
On joint decision process for internal model applications
Document Release: tbd

RTS
On criteria that institutions shall use to assign off-balance-sheet items, constraining factors for UCC and notification process
Document Release: tbd

Guidelines
To specify proportionate diversification methods for retail definition
Document Release: tbd

SFDR
Report
Joint ESAs report under article 18 of the SFDR for voluntary reporting standards
Document release: tbd

IORP
Opinion
On the liquidity risk management of IORPs
Document release: tbd

Insurance Supervision
Report
Annual Insurance Sector overview report
Document release: tbd

2025 Q4

EMIR
Assessment
On the initial margin models under EMIR
Document Release: tbd

2028 Q1

Basel
Standards
Basel IV capital floor implementation end postponed from 1 Jan 2027
Implementation deadline: 1 Jan 2028

CRR
Report
On the use of insurance in the context of operational risk and the availability and quality of data when calculating their own funds requirements for operational risk
Document Release: tbd

2028 Q3

CRD
Guidelines
On monitoring operations between the third-country branches of the same head undertaking
Document Release: tbd

CRR
Guidelines
On immateriality of size and risk profile of exposures
Document Release: tbd

Explanatory Note & Legend

SCOPE Regulatory updates include EU legislation, international standards and other relevant publications from the European authorities. They are gathered from official publications and institutions' official communication channels.

STATUS Updates are labelled with a symbol which indicates the status of the regulation at the time of publication:



Consultation: The first circle is filled when an official draft is open for public consultation.



Pending: The second circle is filled when a final proposal needs to be adopted by a vote or non-objection.



Effective: The third circle is filled when a regulation is final and adopted. There might be a certain delay until it applies.



Informative: This symbol indicates purely informative documents, such as briefings and reports.

Click on these links to open the original documents

CRD6

EBA (Guidelines)

Final Guidelines on the Management of ESG Risks

The EBA has published its final Guidelines on managing ESG risks, detailing how institutions should identify, measure, manage, and monitor these risks. Aligned with the CRD6, the Guidelines aim to ensure institutions resilience and preparedness for the EU's transition to a sustainable economy, including climate neutrality by 2050. They outline requirements for internal processes and plans addressing financial risks from ESG factors. The Guidelines will allow for a delayed implementation for small and non-complex institutions until January 2027.

Release date: 2025-01-19
Application Date: 2026-01-11

[EBA/GL/2025/01](#)

Key Sector Developments

1. BANKING PACKAGE - CRR3/CRD 6



The banking institutions are getting ready for the implementation of CRR 3 and CRD VI, which were adopted and published on 31st May 2024. The updated banking package is set to come into force in 2025 with a few exceptions.

In particular, the rules for calculating banks own funds requirements for market risk will only take effect from January 2026, aligning with timelines in jurisdictions such as the US and the UK. Until then, the current market risk provisions under CRR 2 will remain applicable.

The publication of the finalised texts provides banks with much-needed clarity on the regulatory framework, enabling them to proceed with implementation. At the same time, certain aspects remain subject to further specification through technical standards, which will address unresolved details and enhance practical guidance. While the timeline remains challenging—particularly in areas such as reporting—the finalised framework and forthcoming technical standards together establish a robust foundation for compliance ahead of the 2025 and 2026 deadlines.

2. SOLVENCY II REVIEW AND THE INSURANCE RECOVERY DIRECTIVE



The European Commission has published the long-awaited Solvency II Review and the Insurance Recovery Directive (IRD), marking a significant move in the regulatory framework for insurers. These reforms will help enhance the financial stability, improve risk sensitivity, and strengthen the protection of the policyholder across the sector in the EU.

The Solvency II Review introduces targeted adjustments to capital requirements, and proportionality measures, to reinforce the insurers ability to support economic growth while maintaining a level prudential scrutiny. It also focuses on supervisory reporting, to improve transparency and regulatory oversight.

Complementing these changes, the IRD establishes a harmonised framework for crisis management in the insurance sector. It introduces pre-emptive recovery planning, early intervention powers, and resolution tools, to help insurers effectively manage financial distress without harming the interests of policyholders or the stability of the market.

With implementation timelines just around the corner, insurers must prepare for these changes by reassessing their capital strategies, strengthening internal recovery planning, and aligning governance structures with the new regulatory expectations.

3. 2025 EU-WIDE STRESS TEST: A KEY SUPERVISORY EVENT



The EBA has launched the 2025 EU-wide stress test, a major supervisory exercise that will put the resilience of EU Banks to the test under severe but plausible economic scenarios. This year's edition uses refined methodologies to better capture new and emerging risks such as climate-related financial impacts and systemic vulnerabilities.

The stress test will assess banks' ability to resist against economic shocks by evaluating their capital strength, liquidity, and overall risk exposure. With the ECB also closely monitoring banks that are not in the scope of the EBA Stress test, this exercise will play a crucial role in shaping the regulatory expectations and guiding institutions' capital and risk management strategies.

The results, expected mid-2025, will offer valuable insights into how well banks are prepared to navigate an increasingly complex risk environment.



Recent articles

1. Process Automation in Insurance Series #1: Workflow optimisation with automated process mapping

*Written by Bence Zaupper, Managing Consultant,
and Seán Burke, Senior Consultant*

2. SCR Target Ratios – Eight Considerations for (Re)Insurers

*Written by Gary Stakem, Principal Consultant
Peer Reviewed by Francis Furey, Principal Consultant*

3. Liquidity Risk Management Planning Under the Solvency II Amendments: Key Actions for Compliance

*Written by Jérémie Sarfati, Consultant
Reviewed by Francis Furey, Principal Consultant*

4. Empowering Valuation with Machine Learning: Tackling Complex Derivatives Classification

Written by Boris Makara, Consultant

5. BMA's EBS Framework vs. Solvency II: Key Differences for Life Insurers

*Written by Divyank Garg, Senior Consultant
Reviewed by Francis Furey, Principal Consultant*

Discover more articles on our [page](#).



Banking

- pp. 14-19 Banking Regulatory Timeline
- p. 20 Supervision
- p. 20 Recovery & Resolution
- p. 21 Risk Management
- p. 21 Climate Risk

Banking Regulatory Timeline

2025 Q1

CRR

Regulation

Most of CRR 3 provisions are intended to come into force

Application date: 1 Jan 2025

Guidelines

Updates to regulatory products, additional supervisory guidance, and implementation of the EBA Heatmap action plan for IRRBB

Document Release: tbd

RTS

2024 benchmarking report on IRB models

Document Release: tbd

RTS

RTS to define the term 'equivalent legal mechanism' ensuring timely completion of property under construction

Document Release: tbd

Report

2024 Benchmarking Report on Market Risk models

Document Release: tbd

RTS

On CVA for SFTs

Document Release: tbd

RTS

On the calculation and aggregation of Crypto-Exposure values

Document Release: tbd

RTS

On the elements to calculate the BI components

Document Release: tbd

Covered Bonds Directive

Q&As

Q&A on credit risk, large exposures, and securitisation and covered bonds

Document Release: tbd

CRD

Guidelines

Final Guidelines on ESG Risk Management

Document Release: tbd

Basel

Standards

Prudential treatment of banks' exposures to cryptoassets

Application date: 1 Jan 2025

2025 Q2

CRR

Report

Joint Committee spring risk report

Document Release: tbd

Report

Risk Assessment report

Document Release: tbd

CRD

Guidelines

On output floor and impact on the SREP

Application date: 1 Jan 2025

ITS

ITS on joint decision process for internal model applications

Document Release: tbd

Guidelines

To specify proportionate diversification methods for retail exposures

Document Release: tbd

Guidelines

GL specifying the methodology institutions shall apply to estimate IRB-CCF

Document Release: tbd

RTS

Establishing a risk taxonomy of OpRisk loss events

Document Release: tbd

RTS

On the adjustments to the loss Data Set

Document Release: tbd

RTS

On the calculation of aggregated losses

Document Release: tbd

2025 Q3

Stress Test

Results

EBA publication of the 2025 EU-wide stress test results

Document Release: July 2025

Guidelines

On Institutions climate scenario analysis and Stress test

Document Release: tbd

Guidelines

On supervisory climate Stress test

Document Release: tbd

CRR

ITS

On joint decision process for internal model applications

Document Release: tbd

RTS

On criteria that institutions shall use to assign off-balance-sheet items, constraining factors for UCC and notification process

Document Release: tbd

Guidelines

To specify proportionate diversification methods for retail definition

Document Release: tbd

RTS

Specifying the term "equivalent legal mechanism" in place to ensure that the property under construction will be finished within a reasonable time frame

Document Release: tbd

Banking Regulatory Timeline

Guidelines

Specifying the terms 'substantial cash deposits', 'appropriate amount of obligor-contributed equity' and 'significant portion of total contracts'

Document Release: tbd

Guidelines

On the definition of default, in particular for diminished financial obligation

Document Release: tbd

RTS

On the specification of long and short positions

Document Release: tbd

RTS

On supervisory delta for commodity prices

Document Release: tbd

RTS

On FX and commodity risk in the banking book

Document Release: tbd

RTS

On risk factor modellability

Document Release: tbd

RTS

On profit and loss attribution

Document Release: tbd

RTS

On Crypto

Document Release: tbd

RTS

On disclosure requirements/ disclosure formats and instructions

Document Release: tbd

ITS

Specifying uniform disclosure formats for ESG risks

Document Release: tbd

Report

On the completeness and appropriateness of the relevant CRR definitions and provisions on consolidation

Document Release: tbd

Report

On the appropriate calibration of risk parameters applicable to specialised lending exposures under the IRB

Document Release: tbd

RTS

On criteria for high quality project finance specialised lending exposures

Document Release: tbd

Report

Joint Committee autumn risk report

Document Release: tbd

ITS

On supervisory reporting for ESG risks

Document Release: tbd

ITS

On disclosure requirements- Implementation of CRR3/CRD6 changes in Pillar 3 framework

Document Release: tbd

CRD

Guidelines

On specific publication requirements

Document Release: tbd

Report

On whether any financial sector entity in addition to credit institutions should be exempted from the requirement to establish a branch for the provision of banking services by third-country undertakings

Document Release: tbd

Guidelines

On artificial cash flow and discount rate

Document Release: tbd

Securitisation Regulation

Report

JC Report on Securitisation Framework under 44 of SECR

Document Release: tbd

RTS

On data inputs

Document Release: tbd

BRRD

Report

RTS on Resolution planning

Document Release: tbd

SFDR

Report

2025 Report under article 18 SFDR

Document Release: tbd

Report

On effective riskiness, framework modifications, and their impact on financial stability and bank lending

Document Release: tbd

2025 Q4

CRR

Guidelines

On effective riskiness, additional modifications to the framework and effects on financial stability and bank lending

Document Release: tbd

RTS

On Structural FX

Document Release: tbd

RTS

On the exclusion of losses

Document Release: tbd

RTS

On the Risk Management Framework

Document Release: tbd

Banking Regulatory Timeline

RTS
On the Materiality of extensions and changes for the SA-CVA
[Document Release: tbd](#)

RTS
On the assessment methodology for SA-CVA
[Document Release: tbd](#)

RTS
On the assessment methodology for the FRTB-SA
[Document Release: tbd](#)

2026 Q1

CRR
RTS
Specifying types of factors to be considered for risk weights for exposures secured by mortgages on immovable property
[Document Release: tbd](#)

RTS
Specifying the conditions for assessing the materiality of the use of an existing rating system for other additional exposures and changes to rating systems under the IRB approach
[Document Release: tbd](#)

Guidelines
On artificial cash flow and discount rate
[Document Release: tbd](#)

RTS
On data inputs of Market Risk
[Document Release: tbd](#)

RTS
On the elements to calculate the business indicator components
[Document Release: tbd](#)

ITS
On mapping BIC components to FINREP
[Document Release: tbd](#)

RTS
On adjustments of the BIC
[Document Release: tbd](#)

RTS
Establishing a risk taxonomy of operational risk loss events
[Document Release: tbd](#)

CRD
ITS
Templates for IPU monitoring threshold
[Document Release: tbd](#)

RTS
On the minimum information to be provided for assessing QHs
[Document Release: tbd](#)

RTS
On booking arrangements TCBS
[Document Release: tbd](#)

ITS
On minimum common reporting of TCBS
[Document Release: tbd](#)

ITS
On mechanisms of cooperation and functioning of supervisory colleges for third-country branches
[Document Release: tbd](#)

Guidelines
On minimum standards and reference methodologies for the identification, measurement, management and monitoring of ESG risks
[Document Release: tbd](#)

Guidelines
Joint guidelines on methodologies for the stress testing of ESG risks
[Document Release: tbd](#)

2026 Q3

CRD
RTS
On the list of information to be submitted by the proposed acquirer, the assessment criteria and the process for the assessment of the acquisition of material holdings and mergers
[Document Release: tbd](#)

ITS
On the cooperation between CAs for the acquisition of material holdings
[Document Release: tbd](#)

Guidelines
Joint EBA ESMA GLs on the assessment of the suitability of members of the MB taking into account the changes introduced re the assessment of the MB and KFHS both by institutions and CAs
[Document Release: tbd](#)

CRR
RTS
On the calculation of aggregated losses above 750k and unduly burdensome exemption
[Document Release: tbd](#)

RTS
Specifying the assessment methodology for compliance with the requirements to use the IRB
[Document Release: tbd](#)

RTS
On the categorisation to PF, OF and CF, and the determination of IPRE
[Document Release: tbd](#)

RTS
On how to take into account the factors when assigning risk weights to specialised lending exposures
[Document Release: tbd](#)

Banking Regulatory Timeline

RTS
On the methodologies to assess the integrity of the assignment process and the regular and independent assessment of risks
[Document Release: tbd](#)

RTS
Specifying the methodology of an institution for estimating PD under Article 143
[Document Release: tbd](#)

Report
On the appropriate calibration of risk parameters applicable to specialised lending exposures under the IRB
[Document Release: tbd](#)

Report
On the recognition of capped or floored unfunded credit protection
[Document Release: tbd](#)

Report
On the impact of the new framework for securities financing transactions in terms of capital requirements
[Document Release: tbd](#)

RTS
On structural FX for Market Risk
[Document Release: tbd](#)

RTS
On conditions for not counting overshootings
[Document Release: tbd](#)

RTS
On extraordinary circumstances for prudent valuation
[Document Release: tbd](#)

RTS
On SFTs for CVA risk
[Document Release: tbd](#)

Report
On the implementation of international standards on own funds requirements for market risk in third-countries
[Document Release: tbd](#)

2026 Q4

CRR
Guidelines
Specifying the methodology institutions shall apply to estimate IRB-CCF
[Document Release: tbd](#)

Report
To the Commission on the consistency with the current measurement of credit risk
[Document Release: tbd](#)

RTS
On the hypothetical portfolios of CIUs in the trading book
[Document Release: tbd](#)

Report
On the prudential treatment of securitisation transactions including the application of the output floor
[Document Release: tbd](#)

2027 Q1

CRD
Guidelines
On internal governance of third-country branches
[Document Release: tbd](#)

CRR
Report
On haircut floors for SFTs
[Document Release: tbd](#)

RTS
On the exclusion of losses
[Document Release: tbd](#)

RTS
On the adjustments to the loss dataset
[Document Release: tbd](#)

RTS
On the risk management framework
[Document Release: tbd](#)

Guidelines
On the application of aggregate limits or tighter individual limits to exposures to shadow banking entities
[Document Release: tbd](#)

2027 Q3

CRR
RTS
On specifying further the conditions and criteria for assigning exposures to the IRB exposure classes
[Document Release: tbd](#)

RTS
On the calculation of the risk-weighted exposure amount for dilution risk of purchased receivables
[Document Release: tbd](#)

RTS
On comparable property
[Document Release: tbd](#)

Report
On the appropriate calibrations of risk parameters associated with leasing exposures under the IRB approach
[Document Release: tbd](#)

RTS
On net short credit and equity positions
[Document Release: tbd](#)

Guidelines
On exceptional circumstances for the reclassification of a position
[Document Release: tbd](#)

Banking Regulatory Timeline

RTS

On proxy spread
[Document Release: tbd](#)

RTS

On further technical elements for regulatory CVA
[Document Release: tbd](#)

RTS

On instruments appropriate to estimating PDs
[Document Release: tbd](#)

Report

On the feasibility of using qualitative and quantitative information
[Document Release: tbd](#)

2027 Q4

CRR

Report
On the appropriateness of the treatment of exposures secured by mortgages on commercial property
[Document Release: tbd](#)

Report

Intermediary report on the impact of the requirements on agricultural financing
[Document Release: tbd](#)

Report

The contribution of non-banking financial intermediation to the Capital Markets Union
[Document Release: tbd](#)

2028 Q1

BASEL

Standards
Basel IV capital floor implementation end postponed from 1 Jan 2027
[Implementation deadline: 1 Jan 2028](#)

CRR

Report
On the use of insurance in the context of operational risk and the availability and quality of data when calculating their own funds requirements for operational risk
[Document Release: tbd](#)

2028 Q3

CRD

Guidelines
On monitoring operations between the third-country branches of the same head undertaking
[Document Release: tbd](#)

CRR

Guidelines
On immateriality of size and risk profile of exposures
[Document Release: tbd](#)

RTS

On the assessment methodology for the FRTB-SA
[Document Release: tbd](#)

RTS

On the materiality of extensions and changes for the SA-CVA
[Document Release: tbd](#)

RTS

On the assessment methodology for the SA-CVA
[Document Release: tbd](#)

2028 Q4

CRD

Report
On the use of the waiver as envisaged in accordance with paragraph 3a as well as on the use of the power under point 1(b)(iii) of Article 4(1) of the CRR
[Document Release: tbd](#)

CRR

Report
On the results of monitoring activity of specialised debt restructurers
[Document Release: tbd](#)

Report

On the use of the transitional treatment and appropriateness of risk weights for exposures secured by residential property
[Document Release: tbd](#)

Report

On transitional arrangements for unconditional cancellable commitments
[Document Release: tbd](#)

2029 Q3

CRR

Report
On immateriality of size and risk profile of exposures
[Document Release: tbd](#)

2029 Q4

CRD

Report
With ECB on the application of paragraphs 1d to 1j and on their efficiency in ensuring that the fit and proper framework is fit for purpose taking into account the principle of proportionality
[Document Release: tbd](#)

CRR

Report
On the exemption from residual risks for hedging positions
[Document Release: tbd](#)

Banking Regulatory Timeline

2030 Q4

CRR

Report
On the impact of the requirements on agricultural financing
[Document Release: tbd](#)

2031 Q4

CRR

Report
On operational risk ILDC
[Document Release: tbd](#)

Supervision

Policy Agenda FSB (Work Programme)

FSB 2025 Work Programme

The FSB has published its 2025 work programme which includes a timeline for key publications and events. Key publications will concern formats for Incident Reporting Exchange, a final report on non-bank financial intermediation leverage policy recommendations, a climate roadmap progress report, a thematic peer review of crypto-asset recommendation implementation, and a cross-border payments roadmap progress and KPI monitoring report.

Release date: 2025-01-23

[P230125](#)



CRD EBA (Opinion)

The interaction between the output floor and Pillar 2 requirements

The EBA has published an Opinion on the interaction between the output floor and Pillar 2 Requirements under the CRD. The EBA states that pillar 2 should not increase due to the output floor and advises calculating pillar 2 requirement temporarily based on the unfloored total risk exposure amount when an institution becomes bound by the floor. Institutions are encouraged to inform authorities at an early stage what the potential impacts might be.

Release date: 2025-01-21

[EBA/Op/2025/01](#)



Recovery & Resolution

Stress Testing EBA (Press Release)

EBA Launches the 2025 EU Wide Stress Test

The EBA has announced that the 2025 EU-wide stress test has been launched alongside the macroeconomic scenarios to evaluate the resilience of EU banks. The test aims to assess EU banks solvency, ensure adequate capital levels, and promote transparency. The results will be published in August 2025.

Release date: 2025-01-20

[eba.europa.eu](#)



Supervision SRB (Guidance)

Operational Guidance on Continuity in Resolution

The SRB has published an updated version of its operational guidance on operational continuity in resolution (OCIR). The update takes into account new EU legislative frameworks like the Digital Operational Resilience Act and other new measures such as the European Banking Authority's guidelines on improving resolvability. The update also provides further clarifications arising from the SRB's Expectations for Banks, updated references and citations, and removes redundant content.

Release date: 2025-01-23

[srb.europa.eu](#)



Risk Management

CRR Commission (RTS)

Calculating the supervisory delta of call and put options related to commodities

The European Commission has published an amendment to a Delegated Regulation under the CRR. The amendment specifies a formula for calculating the supervisory delta of call and put options related to commodities under the standardized approach for counterparty credit risk. This formula accommodates negative commodity prices using a lambda (λ) shift. The amendment details the calculation of the shift and parameters used in the supervisory delta formula.

Release date: 2025-01-28

[C\(2025\)459](#)



Climate Risk

CRD6 EBA (Consultation)

Draft Guidelines on ESG Scenario Analysis

The EBA has launched a public consultation on draft Guidelines for ESG scenario analysis. These Guidelines aim to help institutions integrate forward-looking ESG scenario analysis into their management frameworks to assess financial and business model resilience to ESG risks, especially climate-related factors. They complement the EBA's earlier Guidelines on managing ESG risks published on 9 January 2025. The Guidelines propose testing institutions' resilience to ESG-related shocks and scenarios, including climate neutrality goals by 2050, to ensure long-term stability.

Release date: 2025-01-16

Consultation End: 2025-04-16

[EBA/GL/2025/02](#)



CRR3 EBA (Consultation)

Crypto Asset Exposure under the CRR3

The EBA has published a Consultation Paper on draft RTS for calculating and aggregating crypto-asset exposures under the CRR3. These RTS align with the Basel standards and specify capital treatment for exposures to e-money tokens (EMTs), asset-referenced tokens, and unbacked crypto-assets like Bitcoin. They include technical details for credit risk, counterparty credit risk, market risk, and prudent valuation, ensuring harmonised capital requirements across the EU.

Release date: 2025-01-08

Consultation End: 2024-04-08

[EBA/CP/2025/01](#)



CRD6 EBA (Guidelines)

Final Guidelines on the Management of ESG Risks

The EBA has published its final Guidelines on managing ESG risks, detailing how institutions should identify, measure, manage, and monitor these risks. Aligned with the CRD6, the Guidelines aim to ensure institutions' resilience and preparedness for the EU's transition to a sustainable economy, including climate neutrality by 2050. They outline requirements for internal processes and plans addressing financial risks from ESG factors. The Guidelines will allow for a delayed implementation for small and non-complex institutions until January 2027.

Release date: 2025-01-19

Application Date: 2026-01-11

[EBA/GL/2025/01](#)





Insurance

- pp. 24-25 Insurance Regulatory Timeline
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- p. 27 Climate Risk
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Insurance Regulatory Timeline

2025 Q1

Solvency II

Guidelines

On Climate Stress Testing

Document release: tbd

Technical Advice

On the delegated regulation of Solvency II as regards to Proportionality and Central Counterparties

Document release: tbd

2025 Q3

SFDR

Report

Joint ESAs report under article 18 of the SFDR for voluntary reporting standards

Document release: tbd

IORP

Opinion

On the liquidity risk management of IORPs

Document release: tbd

Insurance Supervision

Report

Annual Insurance Sector overview report

Document release: tbd

Guidelines

On Supervisory Review Process (SRP)

Document release: tbd

2025 Q4

Solvency II

Report

Follow-up on the survey to NCAs regarding EIOPA's opinion on climate change scenarios in the ORSA

Document release: tbd

Dashboard

Annual Internal Models

Dashboard

Document release: tbd

Policy

Development and annual update of RFR based on the Methodological Policy, covering representative portfolios, transparent criteria, and the ultimate forward rate

Document release: tbd

Report

On the use of reinsurance for NCAs

Document release: tbd

ITS

Update of the draft ITS on ECAI mapping for CRR and Solvency II

Document release: tbd

Report

On the Prudential Treatment of ESG factors

Document release: tbd

RTS

On the exceptional sector-wide shocks

Document release: tbd

IDD

Report

On the application of the IDD

Document release: tbd

Insurance Supervision

Report

Financial Stability Report

Document release: tbd

Report

Insurance Risk Dashboard

Document release: tbd

Report

IORP Risk Dashboard

Document release: tbd

Report

Joint Report on Risks and Vulnerabilities

Document release: tbd

Report

Annual Supervisory Convergence Plan 2026

Document release: tbd

Insurance Stress Testing

Stress Test

2025 EU-wide IORP stress test exercise

Document release: tbd

2026

Solvency II

Assessment

Assessment of the prudential treatment under Solvency II of adaptation measures in Nat Cat insurance

Document release: tbd

2028

IRRD

Directive

Beginning of the implementation of the IRRD

Document release: tbd

RTS

Further specifying the information that an insurance or reinsurance undertaking is to include in the pre-emptive recovery plan, the remedial actions and their implementation

Document release: tbd

RTS

On the methodology for calculating the buffer for additional losses to be included in provisional valuations

Document release: tbd

Insurance Regulatory Timeline

2031

Solvency II

Report

Treatment of related credit institutions in the group Solvency Capital Requirement

Document release: tbd

Risk Management

Solvency II

EIOPA (Technical Advice)

Standard Formula capital requirements for direct exposures to qualifying CCP

The EIOPA has published its final technical advice to the European Commission on the standard formula capital treatment of insurers' direct exposure to qualifying central clearing counterparties (CCPs). The advice seeks to align Solvency II with the CRR by extending the treatment of indirect exposures to direct exposures, addressing risk sensitivity and reducing disincentives to direct clearing. As CCPs have evolved to allow direct membership for (re)insurers, the EIOPA also recommends adjusting the treatment of default fund contributions to reflect a risk-sensitive approach.

Release date: 2025-01-30

[EIOPA-BoS-24-588](#)



Supervision

EIOPA (Technical Document)

Biannual shifted risk-free rates for duration calculation

The EIOPA has published the updated shifted risk-free interest rate (RFR) term structures used to calculate the option-adjusted duration of technical provisions, as outlined in Template S.38.01.11 of the Guidelines on reporting for financial stability purposes. While reporting this duration metric is optional, insurers are encouraged to consult their national supervisory authorities regarding material options in their technical provisions.

Release date: 2025-01-08

eiopa.europa.eu



Solvency II

EIOPA (Technical Advice)

The Implementation of the New Proportionality Framework under Solvency II

The EIOPA has published its technical advice on implementing the new proportionality framework under Solvency II, as requested by the European Commission. The advice confirms the methodology for classifying 'small and non-complex undertakings' (SNCUs) and outlines conditions for extending proportionality measures to other (re)insurers. The EIOPA supports the classification criteria for SNCUs and proposes a mix of quantitative and qualitative conditions for granting proportionality to non-SNCUs.

Release date: 2025-01-30

[EIOPA-BoS-24-590](#)



Solvency II

Commission (Directive)

Commission Publishes Directive amending Solvency II

The Official Journal of the EU has published the amending Directive under Solvency II. The new directive covers proportionality, quality of supervision, reporting, long-term guarantee measures, macro-prudential tools, sustainability risks and group and cross-border supervision.

Release date: 2025-01-08

Application Date: 2025-01-28

[\(EU\) 2025/2](#)



Market Environment

IORP II

EIOPA (Report)

IORP Risk Dashboard

The EIOPA has published its January 2025 Risk Dashboard on IORPs which shows that risks in the European IORP sector remain stable at medium levels, though market volatility continues to pose vulnerabilities. Macro risks reflect the continued rising 10-year swap rates, with a steady GDP growth and inflation, and increasing geopolitical tensions. Market and asset return risks remain high despite a relative stability, while liquidity risks are declining due to some improvements in derivative positions. Defined benefit IORPs maintain a strong financial position, and digitalisation & cyber risks have leveled off.

Release date: 2025-01-30

[EIOPA-BoS-25-011](#)



Recovery & Resolution

IRRDR

Commission (Directive)

Commission Publishes IRRDR

The Official Journal of the EU has published the Insurance Recovery Resolution Directive. The Directive establishes rules and procedures for the recovery and resolution of insurance and reinsurance undertakings, parent companies, holding companies, and certain branches established in the EU or connected to third countries. The IRRDR introduces a new regulatory framework aimed at strengthening the stability and resilience of the EU insurance sector.

Release date: 2025-01-08

Application Date: 2025-01-28

[\(EU\) 2025/1](#)



Climate Risk

Solvency II

EIOPA (Opinion)

Update to the Standard Formula for Natural Catastrophe Risks

The EIOPA has published an opinion recommending updates to the insurers' standard formula calibrations for natural catastrophe risks following a reassessment in 2023–2024. Using brand new climate data and risk models, it proposes adjustments for flood, hail, windstorm, earthquake, and subsidence risks across 24 regions, adding new countries like Ireland and Luxembourg. The updates aim to ensure insurers' capital requirements reflect increasing climate-related losses. The EIOPA is also monitoring emerging risks like wildfires and coastal floods for potential inclusion. The proposals have been submitted to the European Commission for consideration as they are part of the EIOPA's mandate under the Solvency II Review.

Release date: 2025-01-30

[EIOPA-BoS-24-462](#)





Asset Management

- p. 30 Asset Management Regulatory Timeline
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Asset Management Regulatory Timeline

2025 Q1

Covered Bonds Directive

Q&As

Q&A on credit risk, large exposures, and securitisation and covered bonds

Document Release: tbd

MiFIR

RTS

Draft RTS under amended MiFIR Arts. 5, 9(5), 14(7), 15(1).

Document Release: 29 March 2025

2025 Q2

EMIR

Directive

Margin requirements to apply to intragroup transactions

Application Date: 30 June 2025

Requirements

AAR applies to the first group of inscope counterparties. ESMA to submit draft RTS to the Commission

Application Date: 25 June 2025

Directive

Clearing Obligations to apply to intragroup transactions

Application Date: 30 June 2025

SFTR

Report

On SFTR Data quality

Document Release: tbd

IFD

Report

On the appropriateness of remuneration provisions in IFD

Document release: tbd

2025 Q3

MiFID3

Directive

All MiFID3 provisions apply

Application Date: 29 Sep 2025

2025 Q4

EMIR

Assessment

On the initial margin models under EMIR

Document Release: tbd

RTS

Other technical standards under EMIR 3 submitted to the Commission

Document Release: 25 Dec 2025

Guidelines

On Data quality procedures and arrangements.

Document Release: 25 Dec 2025

2026 Q2

AIFMD2

Directive

Application of the new Amending Directive

Application Date: 16 April 2026

EMIR

Guidelines

Published by the EBA on integrating concentration risk arising from exposure to CCPs into supervisory Stress Testing

Application Date: 16 April 2026

2028 Q2

EMIR

Directive

Expiry Date for the equivalence decisions for UK CCPs

Application Date: 30 June 2028

Supervision

MMF Regulation

ESMA (Report)

Guidelines on stress test scenarios under the MMF Regulation

The ESMA has published its Final Report on updated stress test scenario guidelines under the MMF Regulation. These 2024 Guidelines, which build on the 2023 Guidelines, include enhanced reporting for macro systemic shocks and updated risk parameters to aid MMF managers in completing reporting templates. The European Systemic Risk Board also issued the adverse scenario for the guidelines on December 3, 2024. Following translation into EU languages, a two-month compliance notification period for NCAs will begin, and the new guidelines will apply two months after publication. Until then, managers should continue using the 2023 parameters.

Release date: 2025-01-07

[ESMA50-43599798-10651](#)





Cross-Sector

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Cross-Sector Regulatory Timeline

2025 Q1

Sustainable Finance

Delegated Regulation

The Commission to include crypto-asset mining in the economic activities that contribute to climate change mitigation

Application date: 1 Jan 2025

MiFIR

RTS

Draft RTS under amended MiFIR Arts. 5, 9(5), 14(7), 15(1).

Document Release: 29 March 2025

2025 Q2

EMIR

Directive

Margin requirements to apply to intragroup transactions

Application Date: 30 June 2025

Requirements

AAR applies to the first group of inscope counterparties. ESMA to submit draft RTS to the Commission

Application Date: 25 June 2025

Directive

Clearing Obligations to apply to intragroup transactions

Application Date: 30 June 2025

SFTR

Report

On SFTR Data quality

Document Release: tbd

IFD

Report

On the appropriateness of remuneration provisions in IFD

Document release: tbd

SFDR

Review

Of the SFDR by the Commission

Document release: tbd

2025 Q3

Sustainable Finance

Guidelines

On minimum standards and reference methodologies for the identification, measurement, management and monitoring of ESG risks

Document Release: tbd

Report

ESAs report on the extent of the voluntary disclosure of PAI under art 18 of the SFDR.

Document Release: tbd

Covered Bonds

Directive

Q&As

Q&A on credit risk, large exposures, and securitisation and covered bonds

Document Release: tbd

MiFID3

Directive

All MiFID3 provisions apply

Application Date: 29 Sep 2025

CSDR

RTS

On settlement discipline and tools to improve settlement efficiency

Document Release: July 2025

EU AI Act

Regulation

Provisions on general purpose AI Member state penalties and on notifications in respect of high risk AI Systems apply

Application Date: 2 Aug 2025

2025 Q4

EMIR

Assessment

On the initial margin models under EMIR

Document Release: tbd

RTS

Other technical standards under EMIR 3 submitted to the commission

Document Release: 25 Dec 2025

Guidelines

On Data quality procedures and arrangements.

Document Release: 25 Dec 2025

CSDR

Report

On tools to improve settlement discipline and efficiency

Document Release: July 2025

2026 Q1

CSDR

Directive

Application Date for the remaining CSDR Refit amendments

Application Date: 17 Jan 2026

2026 Q2

SFDR

ESG rating Regulation applies to marketing communications

Application Date: 2 July 2026

Cross-Sector Regulatory Timeline

2026 Q3

EU AI Act

Draft RST

Most of the provisions of the EU AI Act will apply

Application Date: 2 Aug 2026

2026 Q4

CSDR

Draft RST

On the mandatory buy-in process

Document Release: tbd

2028 Q2

EMIR

Directive

Expiry Date for the equivalence decisions for UK CCPs

Application Date: 30 June 2028

Climate Risk

Climate Risk

FSB (Report)

Analytical framework and toolkit for the Assessment of Climate-Related Vulnerabilities

The FSB has published a report introducing an analytical framework and toolkit to assess climate-related vulnerabilities in the global financial system. The framework helps trace how physical and transition climate risks propagate and amplify financial stability risks, including credit, market, and liquidity risks. The toolkit includes three categories of forward-looking metrics: early signals of climate risk drivers, exposure metrics for real economy and financial system impacts, and risk metrics to quantify financial consequences.

Release date: 2025-01-16

[P160125](#)



Climate Risk

FSB (Report)

Importance of Transition Plan for Financial Stability

The FSB has published a report on the importance of Transition plans for financial stability. The report highlights the growing importance of transition plans in assessing and addressing climate-related financial risks. These plans enhance financial stability by supporting firms' risk management, informing investment decisions, and enabling macro-level monitoring of climate risks in the financial system and real economy. Transition plans must meet certain criteria like transparency, credibility, comparability, and availability. The standardisation efforts by international bodies are crucial for improving their use for macroprudential purposes and reinforcing climate resilience across sectors.

Release date: 2025-01-14

[fsb.org](#)



Risk Management

Supervision

BCBS/IOSCO (Report)

Streamlining VM processes and IM responsiveness of margin models in non-centrally cleared markets

The BCBS and the IOSCO have published a report on streamlining variation margin (VM) processes and enhancing initial margin (IM) model responsiveness in non-centrally cleared markets. Building on a 2022 review of margining practices, the report presents eight recommendations to improve market practices. Four focus on seamless VM exchanges during stress periods, and four address ensuring IM calculations adapt adequately to extreme market shocks. Supervisors are urged to monitor the implementation's effectiveness.

Release date: 2025-01-15

[bcbs/publ/d589](#)



Supervision

BCBS/IOSCO (Report)

Transparency and responsiveness of initial margin in centrally cleared markets

The BCBS, the CPMI, and the IOSCO have published a final report with ten policy proposals to strengthen the resilience of centrally-cleared market ecosystems during stress. These proposals aim to improve transparency, predictability of margin requirements, and liquidity preparedness for non-bank participants. They address CCP governance, transparency in initial margin models, and clearing member-client interactions. Building on previous reports from 2022 and 2023, the recommendations reflect industry feedback and align with global efforts to enhance financial stability.

Release Date: 2025-01-15

[publ/d590](#)



Reporting & Disclosure

EMIR 3

ESRB (Report)

ESRB Responds to ESMA about the AAR under EMIR 3

The ESRB has published its response to the ESMA's consultation on EMIR 3's Active Account Requirement (AAR). The ESRB believes the current AAR (Level 1) may be insufficient to mitigate financial stability risks from reliance on third-country clearing services. Despite it being a positive step towards more stability, the AAR's effectiveness and potential unintended consequences require effective monitoring and evaluation.

Release date: 2025-01-28

[ESMA91-1505572268-3934](#)



MiFIR

Commission (Regulation)

Data to be used for the purposes of the transparency requirements

The European Commission has adopted a Delegated Regulation supplementing the MiFIR regarding OTC derivatives transparency. This regulation, mandated by MiFIR Article 27(5), specifies identifying reference data for OTC derivatives, focusing primarily on interest rate swaps due to issues surrounding daily expiry dates and ISINs.

Release date: 2025-01-24

[C\(2025\)417](#)



Market Environment

Supervision

Commission (Report)

European Competitiveness Compass

The European Commission has published its Competitiveness Compass, outlining policies to boost the EU's competitiveness over the next five years in response to the EU's declining position compared to the U.S. and China. The document identifies three key priorities: closing the innovation gap, aligning decarbonization with competitiveness, and reducing dependencies while enhancing security. To support these goals, the Commission emphasizes regulatory simplification, Single Market integration, financing through a Savings and Investments Union (SIU), skills promotion, and better policy coordination. More concrete initiatives are detailed in the Commission's 2025 work program of February 9, 2025.

Release date: 2025-01-29

[COM \(2025\) 30 final](#)



Supervision

ESMA/ECB/EC (Press Release)

Next steps for the transition to T+1 governance

The ESMA, DG FISMA, and ECB-DG MI have published a joint statement outlining the next steps towards shortening the securities settlement cycle in the EU from T+2 to T+1, following North America's lead. While the move offers potential benefits, including risk reduction, cost savings, and enhanced efficiency, challenges remain, especially concerning harmonization and modernization. EU stakeholders favour legal amendments to mandate a coordinated transition. To ensure a smooth shift, the authorities will accelerate technical preparations and establish a governance structure involving stakeholders from the financial industry.

Release date: 2024-10-15

[ESMA74-2119945925-2085](#)



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