News from Brussels

September 2026 issue

IN THIS ISSUE:

Key EU developments relevant to insurance and financial intermediaries

As the regulatory landscape across Europe continues to evolve, Brussels remains at the heart of critical discussions shaping the future of insurance and financial intermediaries. Several dossiers currently under debate could significantly impact the way intermediaries operate across the EU.

In this edition, we provide a concise overview of the most relevant initiatives, consultations and legislative developments coming from the European institutions and European supervisory authorities, based on emails sent to BIPAR members in July & August 2026.

This document is not for publication. It is designed for distribution to staff and board members of national associations that are members of BIPAR. We hope this service will be useful to you and will help you to communicate with your Board members about BIPAR and European issues that you are working on within your national association.

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DOSSIERS

RIS (Retail Investment Strategy)

(for details, see mails on this dossier sent on 25 & 28 August)

RIS/IDD - European Commission's Call for Advice to EIOPA on some possible level 2 measure on IDD under RIS

The European Commission has asked EIOPA for technical advice on selected level 2 measures under the Insurance Distribution Directive (IDD), following RIS. The advice, due by 1 October 2027, will cover key areas including value for money/product governance, inducements, simplification of the investor journey, suitability and appropriateness assessments including "simple advice", and marketing communications.

The request is made ahead of the final adoption of the RIS Omnibus Directive and does not cover all future level 2 measures, so further requests may follow.

BIPAR will prepare comments and proposals for members' input and will engage with EIOPA ahead of the forthcoming EIOPA consultations on its draft advice.

RIS/MiFID II - European Commission's Call for Advice to EIOPA on some possible level 2 measure on IDD under RIS

The European Commission has asked ESMA for technical advice on selected level 2 measures under MiFID II, following RIS. ESMA is requested to group the mandates in two delegated acts (a delegated Regulation and a delegated Directive dealing in particular with the currently existing level 2 texts). The advice, due by 1 October 2027, will cover key areas including value for money (peer groups)/product governance, inducements, simplification of the investor journey, suitability and appropriateness assessments including "simple advice", and marketing communications. ESMA is asked in various places to take into account existing ESMA guidelines, or for instance ESMA's recent report on the retail investor journey).

The request is made ahead of the final adoption of the RIS Omnibus Directive.

BIPAR will prepare comments and proposals for members' input.

RIS Timeline:

According to the Commission's current planning:

- ✓ Final adoption of the RIS is expected in Q4 2026.
- ✓ Publication in the Official Journal is expected by January 2027.
- ✓ EIOPA's technical advice on the above issues is due by 1 October 2027.
- ✓ Application of the new requirements is expected from mid-2029 following the implementation period.

Reminder:

The European Parliament and Council reached a provisional agreement on the RIS on 18 December 2025. The compromise was approved by the Council in COREPER on 5 June 2026 and by the European Parliament in ECON on 23 June 2026.

The adapted legislative texts are still subject to lawyer-linguists' review, but the Commission does not expect any substantive changes. The completion of the lawyer linguists work is expected in the course of the summer or at the latest in September. Final votes by the European Parliament and the Council are expected in Q4 2026, which means the publication of the Retail Investment Strategy in the Official Journal should occur at the latest in January 2027.

Member States will have 24 months from the date of entry into force of the Omnibus Directive to transpose the text into their national laws and regulations. They will have to apply the provisions of the legal text as from July 2029, assuming that the Omnibus Directive is published in January 2027 and that a 30-month implementation period will apply following the date of entry into force.

A number of provisions laid down in the RIS Omnibus Directive need to be further specified in level 2 measures. Some of them will be adopted by the Commission based on EIOPA's and ESMA's draft advice.

Value for money

(for details, see mail on this dossier sent on 8 July)

EIOPA revises its methodology on value for money benchmarks for unit-linked / hybrid products

On 6 July 2026, EIOPA published a revised Value for Money (VfM) benchmark methodology for unit-linked and hybrid insurance products, replacing the 2024 version; methodology remains under development and will continue to be refined (especially taking into account RIS and its value for money provisions).

Benchmarks are still a supervisory tool for National Competent Authorities to identify potential VfM risks; they are not a safe harbour, price regulation, cost cap, or consumer disclosure tool.

Benchmarking still remains complementary to the POG process; products must demonstrate value for money regardless of their position relative to benchmarks.

Benchmarks will continue to be shared only with NCAs. Future publication/sharing will depend on the final published RIS legislative text.

Still a 4-step approach:

1. Cluster products with similar features (simplified 6 clusters; simplified reporting requirements for multi-option products (MOPs); updated treatment of flexible premiums and biometric coverage);
2. Assess VfM indicators (reduced from 8 to 5 indicators - Previous indicators on insurance benefits and break-even return removed; commissions and advice fees remain relevant and incorporated where possible – for advice fees NCAs should consider the resulting additional cost for the respective products separately when assessing VfM risk.);
3. Set benchmarks ;
4. Collect information on non-clustering features that may justify deviations from benchmarks (e.g. guarantees, digitalisation, risk-mitigation techniques).

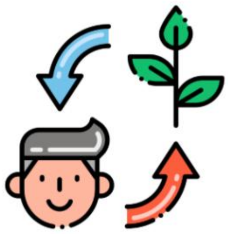
Background

EIOPA has been working for the past years on VfM, in particular in the unit-linked and hybrid market (unit-linked: insurance wrapper carrying a unit-linked investment option regardless of whether the investment option comprises one or more fund/asset. Hybrid: Insurance wrapper carrying and/or offering the possibility to carry both unit-linked investment option and profit participation investment option. Hybrid products can be differentiated between Type 1 and 2, depending on the allocation of investments between the unit-linked and the profit participation component).

In this respect, EIOPA published a Supervisory Statement on VfM for unit-linked and hybrid products in November 2021, a methodology to ensure a consistent and convergent approach by NCAs towards the implementation of the Supervisory Statement, in 2022 and the now outdated 2024 Methodology.

Greenwashing

(for details, see mail on this dossier sent on 21 August)



Directive for empowering consumers for the green transition

The Empowering Consumers for the Green Transition Directive (ECGT Directive) will apply from 27 September 2026 and must be transposed into national law by Member States. Concretely, as of September 2026, sustainability-related communications in all sectors (including financial services) need to be assessed through both sectoral rules and the EU anti-greenwashing principles.

Until today a clothing retailer could place its own logo on products: "Eco Excellence Label" with no independent certification behind it. As of September, sustainability labels that are not based on a certification scheme or established by public authorities are targeted by the Directive and may no longer be used in this way.

The Directive amends the Unfair Commercial Practices Directive (UCPD) and the Consumer Rights Directive (CRD) to strengthen consumer protection against misleading environmental and sustainability claims.

The ECGT Directive does not replace sector-specific financial services rules such as the IDD or the Sustainable Finance Disclosures Regulation (SFDR). Instead, it complements them as a horizontal consumer protection framework, filling regulatory gaps that sector-specific legislation may not address.

The Directive expands scrutiny beyond product suitability assessments and advice processes to include all commercial and marketing communications, such as websites, brochures, advertising materials and promotional content.

Generic environmental claims such as "green", "eco-friendly" or "climate-friendly" will be prohibited unless supported by recognised evidence demonstrating excellent environmental performance.

Self-created or self-certified sustainability labels are banned. Reliance on ESG ratings alone may not be sufficient where they do not qualify as recognised certification schemes.

The European Commission also published a Q&A regarding this Directive.

As a reminder, this Directive entered into force in March 2024.

AML/CFT (Anti-money laundering/countering the financing of terrorism)

(for details, see mails on this dossier sent on 20 July and 24 August)

AMLA's consultations on draft RTS/Guidelines under the EU revised AML/CFT framework

AMLA, the Authority for Anti Money Laundering and Countering the Financing of Terrorism, launched various consultations on draft RTS/Guidelines under the EU revised AML/CFT framework over the last months.

1. **BIPAR draft response to AMLA consultation on the draft Guidelines on ongoing monitoring of a business relationship:** in its draft response sent to its members on 24 August, BIPAR asks for more clarity and for more practical and effective proportionality for micro and SME intermediaries in particular. It also wants to ensure that micro and SMEs intermediaries who do not collect premiums and do not process transaction flows are not burdened with useless measures. Based on the additional input BIPAR receives from its members, it will finetune its draft response and submit it to EIPOA by the deadline of 3 September.
   Next step: AMLA will consider the feedback to this consultation when preparing the final guidelines, expected to be issued in Q4 2026.
2. **AMLA's consultation on its draft Implementing Technical standards (ITS) specifying the format to be used for the reporting of suspicions and for the provision of transaction record to Financial Intelligence Units (FIUs)**: the primary objective of the proposed ITS is therefore to establish uniform and comprehensive formats for the reporting of suspicions and for the provision of transaction records, reaching a high level of convergence among Member States while accommodating differences among sectors, and in particular the specificities of the non-financial sector.
   Next steps: A Public Hearing on the draft ITS is planned for 9 September 2026, 10:00 – 12:00 CEST. The BIPAR Secretariat will attend the hearing. AMLA will consider the feedback to this consultation when preparing its submission to the European Commission by 30 November 2026.

Supplementary pensions

(for details, see mail on this dossier sent on 30 July)

PEPP - EP ECON Rapporteur publishes her draft report

MEP Stéphanie Yon-Courtin, ECON Rapporteur on the review of the PEPP Regulation (Pan-European Personal Pension Product), published her draft report.

Certain amendments are in line with BIPAR position.
She deletes the Commission's proposal which removed mandatory advice for Basic PEPP and only allowed advice if on the request of the saver and on an independent basis with a ban on inducements. However, the mandatory advice that the Rapporteur reintroduces for Basic PEPP, is digital by default and only upon request via in-person advice through a financial adviser.

Other key amendments include:
- a new name (label) for Basic PEPP: "Euro Pension Product";
- deletion of the "light suitability test" for the Basic PEPP;
- the "prudent person principle" for the Basic PEPP instead of the EC's proposed asset allocation in listed and non-complex assets;
- deletion of the EC's proposals on POG/value for money (which proposed mutatis mutandis application of the RIS IDD rules);

- EIOPA 's public PEPP Register to be made more consumer friendly and with a detailed list of information to figure in the Register, including "fees";
- More alignment between the PEPP KID and the PRIIPs KID;
- Easier and broader switching possibilities between PEPPs and between PEPPs and (national) personal pension products.

The BIPAR Secretariat will prepare a call for action / suggest amendments for its members to share with their ECON members.

Next steps:

- 02/09/2026 - Consideration of draft report
- 21/09/2026 - Deadline for tabling amendments
- 15/10/2026 - Consideration of amendments
- 01/12/2026 - Adoption of draft report and vote on the decision to enter into interinstitutional negotiations

Taxation

(for details, see mail on this dossier sent on 17 July)

European Commission's study on the taxation of the financial sector and EP INI report

The European Commission has published a comprehensive study on the taxation of the financial sector, covering both the VAT treatment of financial and insurance services and the wide range of sector-specific taxes applied across the EU.

As a reminder, BIPAR and several of its member associations were contacted by Syntesia two years ago to contribute to this study through a stakeholder survey. Intermediaries (and BIPAR) are mentioned many times in this study.

Although the study does not represent an official Commission's position, it may indicate areas that could become the subject of future policy and legislative discussions. It concludes that the current VAT exemption regime for financial services, introduced in 1977, is increasingly outdated and no longer fully reflects today's digital and specialised financial services market.

A major concern identified is "hidden VAT": because exempt businesses cannot fully recover input VAT, significant irrecoverable VAT costs arise, creating incentives for in-house production and discouraging outsourcing, specialisation and cross-border service provision. The study estimates that 83% of the VAT burden associated with financial services consists of hidden VAT, generating economic distortions and affecting business decisions.

The current framework is also considered highly complex and fragmented, with divergent national approaches to VAT exemptions, VAT grouping, cost-sharing arrangements, deduction methods and sector-specific taxes.

The study identifies 92 sector-specific tax measures across the EU. Member States currently collect approximately €82 billion through such taxes, including around €54 billion through Insurance Premium Taxes (IPTs) alone.

To address these challenges, the study examines three broad reform paths: (i) modernising and simplifying the current VAT exemption framework, (ii) reducing hidden VAT while retaining the exemption, and (iii) undertaking more fundamental reforms, including the partial or full taxation of currently exempt financial services.

Among the options considered are updating VAT definitions (including for insurance intermediation), simplifying input VAT deduction rules, expanding VAT grouping and cost-sharing arrangements, and introducing a broader option to tax financial services across the EU.

The study concludes that incremental reforms could improve legal certainty and reduce administrative burdens, but that more fundamental reforms would be more effective in addressing underlying distortions and supporting EU objectives such as greater market integration and the Savings and Investment Union. BIPAR will continue to monitor developments closely, given the potential implications for insurance intermediaries, IPTs and cross-border insurance distribution.

BIPAR will continue to monitor developments closely and discuss the implications within its Tax Working Party.

Financial literacy

(for details, see mail on this dossier sent 24 July)

Commission's 2 financial literacy initiatives

On 23 July 2026, the European Commission launched:

1. **A call for submissions of successful financial literacy initiatives to identify and collect best practices across the EU:** the Commission is asking for existing projects in the form of programmes, tools, campaigns, training activities, educational materials, digital resources, policy frameworks and other measures that address investment, savings and risk literacy. Initiatives that primarily address budgeting, credit, debt management, scams and fraud fall outside the scope of this exercise.

As its members have interesting initiatives regarding financial literacy, BIPAR suggested that they submit such initiatives (but asked its members to send them to BIPAR first) and to mention that they are members of BIPAR - deadline to send in examples: 30 October, using Commission's online application form.

Next steps:
- *The Commission will analyse the submissions against three criteria set out in the template to identify common themes and key factors that contributed to the success of the initiatives.*
- *The findings will be presented in a synthesis report for Member States to select the best practices that will be discussed at the end of 2026 at a meeting of the GEGRFS subgroup on financial literacy.*
- *Further exercises on additional financial literacy themes may be launched in 2027.*

2. A call for expression of interest for stakeholders to participate in a roundtable to provide input to a voluntary European Code of Conduct for private and not-for-profit organisations promoting financial literacy: as a reminder, in its Literacy Strategy, the Commission stated that the involvement of private stakeholders in improving financial literacy has clear merits, but that the absence of a standardised code of conduct for these stakeholders can lead to (perceived) conflicts of interest or inconsistencies in the quality and reliability of the information provided.

Such a voluntary European code of conduct should be principle-based and developed jointly by relevant stakeholder representatives under the auspices of the Commission. It also recommends that Member States consider incorporating the EU code of conduct into their national financial literacy strategies.

DG FISMA is now setting up Stakeholder Roundtables on the EU Code as a sub-group of the Government Expert Group on Retail Financial Services (GEGRFS). The sub-group will provide practical expertise and stakeholder input to support the development of the EU Code by Member States' authorities. The sub-group will work in close cooperation with the above-mentioned GEGRFS sub-group on Financial Literacy.

BIPAR already contacted DG FISMA ahead of this publication of a call for expression of interest. It will prepare a BIPAR application to participate in this workstream.

Next steps:
- *The call will remain open until 16 September.*
- *Selected stakeholders will be invited to participate in a series of meetings to support the development of the Code, which is expected to be adopted in the first quarter of 2027.*

Environmental liability

(for details, see mail on this dossier sent on 27 July)

European Commission's evaluation of the ELD

The European Commission published its evaluation of the Environmental Liability Directive (ELD) on 16 July 2026 along with the outcome of its fitness check on the "polluter pays" principle). BIPAR had provided input into consultations that preceded and contributed to the evaluation.

The evaluation concludes that the Directive remains relevant and has established a common EU framework based on the "polluter pays" principle, but that its application across Member States remains uneven and often limited with some Member States reporting no ELD cases during the reporting period. The evaluation identifies shortcomings in effectiveness, including unclear thresholds for "significant" environmental damage, inconsistent enforcement, and situations where polluters do not bear remediation costs due to insolvency or lack of adequate financial security.

The Commission notes a growing use of environmental insurance and other financial security instruments, both mandatory (in some Member States) and voluntary, which can improve prevention, risk management and the ability to fund remediation measures. The report devotes significant attention to insurance and financial security, highlighting continued differences between Member States, varying availability of cover, and divided stakeholder views on the introduction of an EU-wide mandatory financial security regime.

No revision of the Directive seems foreseen for now – BIPAR will continue to monitor this file.

Social Dialogue

(for details, see mails on this dossier sent on 2 July, 26 and 28 August)

Final text of the addendum on violence and harassment at work to the existing joint declaration on diversity, equity, and inclusion

The next in-person only working group meeting of the European Insurance Sectoral Social Dialogue Committee (ISSDC) in Brussels will take place on Thursday 17 September (all day). The BIPAR Secretariat shared the agenda with its members. Topics on the agenda include the signature of an addendum on violence and harassment at work to the existing joint declaration on diversity, equity and inclusion; the Pay Transparency Directive; and the use of AI in the insurance sector. The BIPAR Secretariat invited members to indicate by 2 September if they are interested in attending the ISSDC meeting (in person) on 17 September).

BIPAR Investment Working Party

(for details, see mail on this dossier sent on 23 July)

Call for interested members to join the BIPAR WP

Several BIPAR member associations represent financial/investment advisers or intermediaries who operate under the MiFID II framework, whether through a dual IDD-MiFID registration or a standalone MiFID II registration. As a result, BIPAR closely follows legislative and regulatory developments in this area, including our work on the MiFID-related aspects of the Retail Investment Strategy (RIS) and ongoing monitoring of ESMA's activities. To support this work, BIPAR has a MiFID II / Investment Working Party.

In July, members of this Working Party had the opportunity to participate in a one-hour online exchange with ESMA Head of Unit for Investor Protection and Intermediaries, Salvatore Gnoni, and ESMA Senior Policy Officer, Joeri Buiten. A key topic of discussion was ESMA's upcoming work related to the RIS. The exchange proved highly valuable, and BIPAR agreed with ESMA to continue holding such discussions on a more regular basis going forward.

BIPAR asked therefore its members to come forward if they were interested in joining the investment/MiFID II working party.

EVENTS

Future

8 September: 4th WFII Webinar on the use of AI by insurance intermediaries

(mail on this issue sent on 20 August)

On Tuesday 8 September 2026, from 15:00 to 16:00, Brussels time, WFII will be organizing its 4th Webinar on the use of AI by insurance intermediaries. For this web meeting, WFII has identified the Australian-based company Cova to share its expertise and experience in the application of AI within the insurance intermediary sector.

Cova is an AI platform for Australian insurance intermediaries, built to take care of the time-consuming administration such as policy comparisons, client summaries, renewals and much more, so intermediaries can spend more time looking after their clients. It's now used by just under 1,000 Australian and New Zealand intermediaries with plans to expand into the US and UK later this year. Cova was recently certified as ISO 42001 compliant making it one of the world's first platforms for insurance intermediaries to be certified by this new AI specific standard.

Topics to be covered during this 60-minute session are:
- The Cova journey and observations on the impact of AI on insurance intermediary activities.
- Real-world case studies demonstrating how AI supports the role of the insurance intermediary.
- Future developments and the roadmap ahead.
- Q&A session.

25 September: BIPAR Webinar with EIOPA - Next Consumer Trends Report

(mail on this issue sent on 17 July)

EIOPA has kindly agreed to organise a webinar with BIPAR on EIOPA's next Consumer Trends Report (due for end of this year /early next year) on **Friday 25 September at 10:00 (till 12:00) Brussels time.**

BIPAR has been regularly providing input into EIOPA consumer trends report. Over the last years, EIOPA organised webinars with us to provide us with a preview of their draft reports and to discuss some emerging developments with us.

EIOPA decided to focus on:
- insurance product trends;
- current and future consumer protection issues and positive developments (also current and future)
- insurance-related focus topics: claims handling and embedded insurance
- cross-sectoral (insurance and pensions) topics: disclosure and protection gaps

The webinar is for BIPAR members' delegates only, including Chairpersons, board members, directors and staff of national associations. BIPAR asked its members not to publish the invitation in order to avoid any misunderstandings.

13 October: BIPAR Web meeting on PRICL

(mail on this issue sent on 28 July)

BIPAR will organise on **Tuesday 13 October 2026 from 10:00 to 11:30** a dedicated web meeting on reinsurance contracts and the Principles of Reinsurance Contract Law (=PRICL). The session will be presented by Professor Dr. Helmut Heiss, principal author of the PRICL, and will provide participants with an overview of this important initiative and its practical relevance for the reinsurance market.

According to its authors, the PRICL provides specific rules on reinsurance contract law while incorporating uniform rules on general contract law through a reference to the UNIDROIT Principles of International Commercial Contracts (=PICC). The parties to a reinsurance contract may choose to apply these rules by agreement. The PRICL aims to enhance contractual certainty by reflecting international reinsurance practice and by promoting greater legal predictability and uniformity in the interpretation of key legal concepts and terms used in reinsurance contract law.

The topic will be of particular interest to:

- Reinsurance brokers and professionals active in the reinsurance market.
- Legal and compliance experts within national associations.
- Members interested in dispute resolution and mediation, where the PRICL approach may also offer valuable insights.

Further information on the PRICL can be found here.

WHAT TO EXPECT IN SEPTEMBER?

3 September, Ljubljana ***(BIPAR Director attending as a speaker)***
Insurance Conference: "Insured 360°-Will Policyholders Keep Their Trust?"

16, 17 & 18 September, Dublin
Eurofi Financial Forum 2026

17 September, Brussels
ISSDC in-person meeting