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27 June 2025

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# Joint Consultation Paper

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on draft joint guidelines

to ensure that consistency, long-term considerations and common standards for assessment methodologies are integrated into the stress testing of environmental, social and governance risks pursuant to Article 100(4) of Directive 2013/36/EU and Article 304c(3) of Directive 2009/138/EC

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# 1. Responding to this consultation

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The three European Supervisory Authorities (ESAs) invite comments on all matters in this consultation paper and on the specific questions summarised in Annex II.

Comments are most helpful if they:

- respond to the question stated;
- indicate the specific point to which a comment relates;
- contain a clear rationale;
- provide evidence to support the views expressed/rationale proposed; and
- describe any alternative choices the ESAs should consider.

## Submission of responses

Please send your comments to the ESAs via the EU Survey ([link](#)) by 18 September 2025. Please note that comments submitted after this deadline, or submitted via other means may not be processed.

## Publication of responses

All contributions received will be published following the close of the consultation, unless you request otherwise. Please clearly and prominently indicate in your submission any part you do not wish to be publicly disclosed. A standard confidentiality statement in an email message will not be treated as a request for non-disclosure. A confidential response may be requested from us in accordance with the ESAs' rules on access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response is reviewable by ESAs' Boards of Appeal and the European Ombudsman.

## Data protection

The protection of individuals regarding the processing of personal data by the ESAs is based on Regulation (EU) 1725/2018 of the European Parliament and of the Council of 23 October 2018. Further information on data protection can be found under the Legal notice section on the websites of the European Banking Authority (EBA), the European Insurance and Occupational Pensions Authority (EIOPA) and the European Securities and Markets Authority (ESMA), respectively.

## 2. Executive summary

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### **Objectives**

The Joint Guidelines aim to ensure that competent authorities consistently integrate ESG risks into their supervisory stress testing activities. These guidelines are addressed to competent authorities and should be applied when performing supervisory stress tests, either by integrating ESG-related risks into their existing framework or by measuring the impact of ESG risks under adverse scenarios in a complementary assessment, where applicable according to the sectoral legislation.

### **Principles and Methodological Considerations**

When determining the principles and methodological considerations, competent authorities should decide on the most suitable design and features of the stress test based on its intended objectives. They should clearly define the coverage in terms of portfolios, sectors, geographies, and activities to ensure a balanced and pragmatic approach that reflects the maturity of available methodologies and data.

### **Organisational and Governance Arrangements**

Competent authorities should ensure that sufficient human and material resources are allocated to the ESG stress testing process. This includes the involvement of staff with expertise in ESG risk assessment, stress testing methodologies, and financial supervision. They should also have data management and collection capabilities that support access to high-quality ESG data and develop and maintain IT infrastructure for efficient data collection, scenario determination, and result analysis.

Appropriate timelines should be set for conducting ESG stress tests and scenario analyses, balancing the need for completeness and accuracy with the requirements of the decision-making process. Financial entities should be given sufficient preparation time to compile relevant information and conduct their assessments, enabling competent authorities to perform a comprehensive review and ensure accurate reporting. The process should facilitate efficient analysis, consistent communication of findings, and integration into the broader supervisory framework.

### Reasons for publication

1. In accordance with the requirements introduced by Directive 2013/36/EU as amended by Directive 2024/1619 and Directive 2009/138/EC, EBA, ESMA and EIOPA (together, the ESAs) jointly issue Guidelines to ensure that consistency, long-term considerations and common standards for assessment methodologies are integrated into the stress testing of environmental, social and governance (ESG) risks.
2. Article 100(4) of Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit

institutions and investment firms (Capital Requirements Directive, CRD) and Article 304c(3), second subparagraph of Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II), mandate the ESAs, through the Joint Committee, to develop Joint Guidelines to ensure that consistency, long-term considerations and common standards for assessment methodologies are integrated into the stress testing of ESG risks. The Joint Committee shall publish those Joint Guidelines by 10 January 2026. The ESAs shall, through that Joint Committee, explore how social and governance-related risks can be integrated into stress testing.

The ESAs have prepared this Consultation Paper (CP) to consult interested parties for the purpose of elaborating its draft Joint Guidelines. Respondents to this consultation are encouraged to provide the relevant background information, and qualitative and quantitative data on costs and benefits, as well as concrete redrafting proposals, to support their arguments where alternative ways forward are called for.

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3. Section 3 presents the background and rationale to the draft Joint Guidelines, which are presented in Section 4. Annex I includes a preliminary impact assessment and Annex II lists all questions formulated in this consultation.

## Next steps

4. The ESAs are consulting the draft Joint Guidelines for a period of three months. Feedback from the public consultation will be taken into account in Q3/Q4 2025. It is planned that the Joint Guidelines will be finalised by end-2025 and that the Joint Committee publish the final Joint Guidelines by 10 January 2026.

# 3. Background and rationale

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1. These Joint Guidelines should be read in conjunction with sectoral legislation as background. Sectoral legislation sets out obligations to competent authorities, procedural rules and evaluation criteria for the prudential assessment of how competent authorities perform supervisory stress tests, either as part of the relevant regulatory framework or as an ad hoc assessment. These Joint Guidelines are applicable pursuant to Article 100(4) of Directive 2013/36/EU and Article 304c(3), second subparagraph of Directive 2009/138/EC and do not include a new requirement for competent authorities to carry out ESG supervisory stress tests.
2. The two main objectives are:

- a) to improve the legal certainty, clarity and transparency of the supervisory approval process with regard to integrated stress testing of ESG risks; and
  - b) to ensure consistency, long-term considerations and common standards for assessment methodologies throughout the EU and across sectors.
3. ESG risks can have far-reaching implications for the stability of both individual financial entities and the financial system as a whole<sup>1</sup>. Hence, competent authorities should consistently factor those risks into their related supervisory activities, including the supervisory review and evaluation process and the stress testing of those risks, also leveraging on already available scenarios (e.g. NGFS, IPCC, IAE...).
  4. Although ESG stress testing is a relatively nascent field compared to more traditional financial stress testing, significant progress has been made to explore available data and models, in particular for environmental risk linked to climate change. Acknowledging the remaining limitations and inherent uncertainty in ESG data and modelling, competent authorities should keep their approach to ESG stress testing under review, as new methodologies become available and financial entities gain experience, starting with the environmental (E) component first with a focus on climate and increasing considerations for other nature-related risks (biodiversity, deforestation...).
  5. The guidelines also address the concepts of stress testing for different objectives and time horizons, namely in the context of assessing the financial resilience of financial entities to significant shocks but also to their business model over a longer time horizon.
  6. As per the related mandate, the Joint Guidelines are designed to support a consistent, long-term approach to ESG stress testing, while being flexible enough to accommodate further developments in methodology and data availability.
  7. In the first phase, competent authorities may focus on climate and environmental risks, addressing both physical risks and transition risks aiming to distinguish effects, even if indirect, on main risk exposures. A gradual approach for the potential consideration of the 'S' and 'G' components of ESG risks could be envisaged also in line with any revisions applied by the ESAs to these Joint Guidelines to explore whether stress testing or other tools can be considered adequate for such assessments.

## Title I - Subject matter, scope and definitions

8. These Joint Guidelines are aimed at clarifying how competent authorities should consistently integrate ESG risks into their supervisory stress testing activities.

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<sup>1</sup> Directive (EU) 2024/1619 of the European Parliament and of the Council of 31 May 2024 amending Directive 2013/36/EU (CRD VI) ([Link](#)), Recital 42.

9. These Joint Guidelines are addressed to competent authorities.
10. Competent authorities should apply these Joint Guidelines when performing supervisory stress tests focusing on ESG risks, either as part of the relevant regulatory framework or as an ad-hoc assessment, in each case only where applicable according to the sectoral legislation.
11. Unless otherwise specified, terms used and defined in the sectoral legislation defined below, have the same meaning as in these Joint Guidelines.
12. In addition, for the purposes of these Joint Guidelines, the following definitions apply:
- i. 'competent authority' means any of the following:
    - a) the competent authorities identified in Article 4(2), point (i) of Regulation (EU) No 1093/2010 establishing the European Banking Authority ("EBA");
    - b) the competent authorities identified in Article 4(2), point (i) of Regulation (EU) No 1094/2010 establishing the European Insurance and Occupational Pensions Authority ("EIOPA"), namely the supervisory authorities defined in Directive 2009/138/EC on the taking up and pursuit of the business of insurance and reinsurance;
  - ii. 'sectoral legislation' means collectively:
    - (a) Directive 2013/36/EU of the European Parliament and of the Council <sup>(2)</sup>;
    - (b) Directive 2009/138/EC of the European Parliament and of the Council <sup>(3)</sup>;
    - (c) Regulation (EU) 575/2013 of the European Parliament and of the Council <sup>(4)</sup>.

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<sup>(2)</sup> Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC (OJ L 176, 27.6.2013, p. 338, ELI: <http://data.europa.eu/eli/dir/2013/36/oj>).

<sup>(3)</sup> Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II) (OJ L 335, 17.12.2009, p. 1, ELI: <http://data.europa.eu/eli/dir/2009/138/oj>).

<sup>(4)</sup> Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (OJ L 176, 27.6.2013, p. 1, ELI: <http://data.europa.eu/eli/reg/2013/575/oj>).

## Title II- Requirements regarding consistency, long-term considerations and common standards for assessment methodologies in stress testing of ESG risks

### 3.1 Objectives

13. Pursuant to the sectoral Directives and Regulations, competent authorities should implement these Joint Guidelines in accordance with the principle of proportionality.
14. Competent authorities should consider all ESG risks and their potential evolution when designing their framework for supervisory stress testing and keep under review the relevance of ESG risks to such framework, especially while progressing towards gradual integration of each risk factor (E, S & G).
15. Competent authorities should precisely define their objectives when performing ESG stress testing, considering two main types of stress testing exercises:
  - testing the resilience of capital and liquidity position and the loss-absorption capacity of financial entities in the face of economic and financial shocks linked to all material risks including ESG risks, over a short- to medium-term (e.g. 5 years and below) horizon;
  - testing the resilience of financial entities' strategy and business model to a range of ESG-related scenarios over a medium- to long-term (e.g. 5 to 10 years or longer) horizon.

#### *Materiality assessment*

16. Competent authorities should adopt a risk-based approach, starting with a materiality assessment to identify the most relevant and impactful risks and determine which of those material risks shall be part of a stress test exercise scope as determined in the following paragraphs.
17. As part of the materiality assessment, competent authorities should identify which ESG risks are most material to financial entities, considering their business model, portfolios, geographic exposures, and sectoral activities over a short- to long-term horizon. Competent authorities should consider, over the different time horizons, both:
  - the exposure of assets and liabilities to transition risk (for example, based on their carbon footprint) and physical risks (for example, based on their geographical location); and
  - the potential impacts of ESG factors on the traditional categories of financial risks, i.e. market risk, credit risk, counterparty risk, underwriting risk, as well as operational risk, reputational risk and strategic risk through the identification of the main transmission channels.
18. Competent authorities should consider using clear qualitative and/or quantitative criteria and/or thresholds for materiality, leveraging existing regulatory frameworks, industry standards,



and supervisory experience. The materiality assessment should be dynamic, allowing for adjustments as ESG risks evolve, new data becomes available, and financial entities refine their own risk identification processes.

#### *Gradual approach to ESG stress testing*

19. Competent authorities should adopt a gradual approach to the implementation of ESG stress tests, initially prioritising environmental risks. In a first phase, competent authorities should focus on climate and environmental risks, addressing both physical risks (e.g., extreme weather events, biodiversity loss) and transition risks (e.g., policy shifts, market re-pricing) aiming to distinguish effects, even if indirect, on main risk exposures.
20. This gradual roll-out should be accompanied by continuous methodological refinement, capacity building, and stakeholder engagement, ensuring that financial entities and competent authorities are adequately prepared for the expanding scope of ESG risk assessments.

#### *Integration of ESG factors into existing stress testing frameworks*

21. Competent authorities should aim to fully integrate ESG factors into overall stress testing framework.
22. Competent authorities should review and reconsider as appropriate the types of ESG risks covered, also based on how the availability of data and the use of models develop over time.

#### *Interconnection/spillover between financial sectors*

23. Although these Joint Guidelines do not cover system-wide financial sector stress testing nonetheless, competent authorities should, where possible, coordinate across financial sectors to ensure a consistent approach to ESG risk assessment and facilitate data sharing where appropriate. The banking, insurance, and securities regulators should collaborate with a view to help identify and model transmission channels (like for instance the role of insurances on banks loans collaterals), align scenario assumptions, and prevent regulatory blind spots.
24. Competent authorities should ensure, to the extent possible, that ESG stress tests account for interconnections and spillover effects between financial sectors. They should consider how ESG-related risks can propagate through the financial system, amplifying vulnerabilities across banking, insurance, asset management, and other financial sectors.

## 3.2 Principles and methodological considerations

25. When determining the principles and methodological considerations, competent authorities should decide on the most suitable design and features of the stress test based on its intended objectives, set in accordance with paragraph 15.

### *Scope*

26. Competent authorities should clearly define the coverage in terms of portfolios, sectors, geographies, and activities to ensure a balanced and pragmatic approach that reflects the maturity of available methodologies and data.
27. For cross-border financial groups, competent authorities should ensure that all relevant entities are included in the assessment.

### *Time horizon*

28. The choice of the time horizon should be aligned with the intended objective of the exercise:
- When assessing financial resilience to adverse but plausible shocks, a short- to medium-term horizon (e.g. 5 years or below) should be used, in line with traditional stress testing practices.
  - When assessing the resilience of financial entities' business model and strategy a longer-term horizon (e.g., including at least 10 years, depending on the business activity and in line with financial entities' long-term commitments) should be adopted.

### *Scenario design*

29. Competent authorities should identify and select stress test scenarios based on the objectives of the exercise. They should consider the use of scenarios based on the most recent scientific knowledge and elaborated by widely recognised organisations. They are also encouraged to leverage sectoral and regional trajectories to provide financial entities with an adequate breakdown of macroeconomic variables, while maintaining the overall internal consistency of the scenarios.
30. Wherever possible, competent authorities should consider the integration of compound risks, i.e., the additional impact arising from the simultaneous or successive occurrence of multiple shocks (whether ESG-related or broader macroeconomic shocks). Additionally, and where relevant, they should strive to assess second-round effects, meaning the indirect and amplified consequences that result from the initial ESG shocks, either by incorporating them directly into the scenarios or as a complementary analysis.
31. For the reference scenario:

- With the aim of integrating material ESG risks, competent authorities should, where feasible and appropriate, follow the approach used when performing traditional stress tests leveraging their existing baseline scenario.
- For long-term, the reference scenario may be based on the financial entities' own, central, scenario, allowing targeted geographic or exposure testing. According to the sophistication of the approach, the scenario can take the form of simple narrative.

32. For alternative scenarios:

- In short to medium-term ESG stress testing, competent authorities should use adverse but plausible scenarios.
- When performing longer-term ESG stress testing and relevant risks impact assessment, competent authorities should consider several distinct scenarios (or narratives) covering the broad spectrum of possible futures and levels of severity.
- Competent authorities may decide to apply the same scenarios to all financial entities for comparability or to tailor scenarios to specific categories of financial entities, considering their risk profiles and business models.

*Top-down vs. bottom-up approaches*

33. Competent authorities should assess the merits of a top-down versus bottom-up approach, selecting the most suitable method based on the specific objectives, the maturity of financial entities in ESG stress testing, and the nature of exposures covered by the assessment, taking into account the following considerations:

- A top-down approach, where competent authorities centrally calculate the impacts of the stress test scenarios, ensures a certain degree of comparability across financial entities and provides competent authorities with stronger control over the process and methodology, reducing the burden for the industry.
- A bottom-up approach, where financial entities calculate the impact of the stress test scenarios themselves, offers higher level of granularity, allowing to capture idiosyncratic elements specific to some portfolios, counterparties, and exposures. It also fosters greater involvement in the stress testing process and helps enhance financial entities' capacity building.

34. When using a bottom-up approach, competent authorities should establish clear methodological frameworks to ensure consistency and level playing field across financial entities.

35. A hybrid approach could be considered, leveraging the strengths of both methodologies. Competent authorities may decide on the appropriate approach based on data availability and model ownership, taking into account that specific portfolios or activities, such as e.g. underwriting risk, might require more detailed data and modelling than feasible under a top-down approach.

### *Level of granularity*

36. In deciding on the level of granularity, competent authorities should strike an appropriate balance between complexity and precision. More granular data might be needed to, for example, appropriately capture activity- or entity-level impacts of transition risk or regional/local effects of physical risks.
37. At a minimum, competent authorities should consider the following granularity dimensions:
- a. Portfolio level: Differentiation by asset class (e.g., corporate loans, mortgages, sovereign exposures, equity and corporate bond holdings).
  - b. Sectoral level: Classification based on industry sector (e.g., high-carbon industries, energy, real estate, agriculture). For specific sectors a higher granularity may be explored (e.g., electric power, sector impacted by a breakthrough technology). For real estate, a distinction between commercial and residential real estate exposures may be explored.
  - c. Geographical level: Distinction by region (e.g. NUTS level 3) to assess exposure to location-specific ESG risks, particularly physical risks.
  - d. Counterparty level: Granularity by individual obligor or groups of obligors where concentration risks are significant.
  - e. Risk category: Separate identification of physical risks (acute and chronic climate hazards), transition risks (policy, technology, and market shifts), and other ESG factors (e.g., social and governance risks).
38. Competent authorities should decide on the appropriate combinations of granularity dimensions depending on the type of asset/portfolio and the objective of the exercise. For example, for sovereign exposures country-level could be sufficient, while for lending or underwriting portfolios at least regional granularity up to geolocation data should be explored to assess physical risk.
39. For the analysis of funds, competent authorities may consider, when possible and consistent with the applicable sectoral regulation using a look through approach with regard to holdings of funds.

### *Balance sheet assumptions*

40. For ESG stress tests, competent authorities should start by using a static balance sheet approach, which is commonly applied in traditional stress tests. However, they may consider the structural impacts of financial entities' transition plan, where feasible and applicable, depending on the time horizon.
41. For medium- to long-term exercises (e.g., time horizons exceeding five years), a dynamic or

constrained dynamic balance sheet approach could be applied to ensure greater realism, reflecting changes in portfolio composition (evolving exposures, asset reallocations and risk-mitigating actions in response to ESG-related shocks).

42. Given the uncertainties surrounding transition pathways, policy developments, and market reactions, competent authorities should consider requiring financial entities to justify their planned responses, ensuring that balance sheet adjustments — such as portfolio reallocation, changes in lending or underwriting policies, or shifts in funding structures — are realistic and consistent with their publicly disclosed transition strategies.
43. Any managerial actions recognised by financial entities should be assessed based on their feasibility, timeliness, and potential unintended consequences, avoiding excessive reliance on optimistic assumptions. Competent authorities should ensure that a constrained dynamic balance sheet approach enhances the realism and forward-looking nature of ESG stress tests through incorporating credible plans and managerial responses, while maintaining minimum safeguards against excessive flexibility in assumptions and enhancing comparability in stress test results.

#### *Sample of financial entities*

44. Competent authorities should define the appropriate sample of financial entities to participate in ESG stress testing and/or ESG scenario analysis, ensuring a sufficient sectorial/market coverage, taking into account the specified objectives and, in the case of thematic assessments, the focus of the exercise. The design of the stress test should be adapted, where necessary, to reflect the characteristics of different categories of financial entities.
45. Competent authorities should also consider conducting targeted exercises on specific subsets of entities to address particular vulnerabilities or evolving ESG risk trends.

#### *Proportionality*

46. Competent authorities should apply proportionality principles, allowing for methodological simplifications in relation to the size, nature, and complexity of financial entities' activities. The proportionality principle should extend to reporting requirements, scenario design, and modelling expectations, ensuring an adequate balance between analytical robustness and practical feasibility.
47. Given the early-stage of development of ESG stress test modelling and data availability, competent authorities may consider limiting the scope of the analysis, ensuring an adequate cost-benefit balance both for competent authorities and the financial entities.

### *Model limitations*

48. Competent authorities should recognise that all models have inherent limitations, and this applies especially to evolving ESG models. In the case of bottom-up stress test, to mitigate these limitations, and to enhance the robustness and credibility of ESG stress testing and resilience analysis, they should employ complementary analysis to cross-validate results and ensure their plausibility, use benchmarking techniques, and cross-validate results with alternative methodologies.

## 3.3 Organisational and governance arrangements

### *Allocation of resources*

49. Competent authorities should ensure that sufficient human and material resources are allocated to the process. This includes permanent or ad-hoc involvement of staff with expertise in ESG risk assessment, stress testing methodologies, and financial supervision.
50. Competent authorities should have data management and collection capabilities that support access to high-quality ESG data. They should also develop and maintain IT infrastructure that allows for efficient data collection, determining adequate scenario, and result analysis.

### *Timelines for the exercise*

51. Competent authorities should set appropriate timelines for conducting ESG stress tests and scenario analyses, balancing the need for completeness and accuracy with requirements of the decision-making process. Financial entities should be given sufficient preparation time to compile relevant information and conduct their assessments while enabling competent authorities to perform a comprehensive review and ensure accurate reporting.
52. The process should be structured to facilitate efficient analysis, consistent communication of findings, and integration into the broader supervisory framework.

### *Data collection*

53. For top-down exercises, competent authorities should rely, as much as possible, on regulatory reporting and leverage existing disclosure frameworks and external resources where relevant. They may consider ad-hoc data collections as a necessary complementary source of information. Collected information should be limited to the one used for the analyses and validation.
54. Where data gaps exist, competent authorities should promote the use of reasonable proxies, estimates, and expert judgment, while encouraging financial entities to improve internal data

capabilities over time.

#### *Quality assurance process*

55. A rigorous quality assurance process should be implemented to verify the accuracy, consistency, and reliability of stress test results. Competent authorities should establish review mechanisms to assess data quality, methodology robustness, and, where appropriate, scenario adequacy. Where necessary, expert judgment should complement quantitative findings to mitigate model limitations.

#### *Effective dialogue with financial entities*

56. Competent authorities should maintain effective and structured dialogue with financial entities throughout the stress testing process. This includes providing clear guidance on expectations, facilitating engagement at key stages, and ensuring that financial entities have the opportunity to clarify methodological aspects. Regular interaction will enhance the credibility of the exercise and improve financial entities' ability to incorporate ESG risk considerations into their own risk management frameworks.

#### *Cross-border and system-wide coordination*

57. Where relevant and possible, competent authorities should coordinate across jurisdictions to allow an harmonised approach to ESG stress testing for cross-border financial groups. This includes collaboration with other supervisory authorities to align methodologies, share best practices, and avoid regulatory fragmentation.
58. When relevant, system-wide coordination should also be pursued to ensure that ESG stress tests account for broader financial stability risks and potential spillover effects across sectors.

#### *Integration into the supervisory process*

59. ESG stress test results should be, to the extent possible, integrated into the broader supervisory process. As methodological aspect and availability of data develop over time, competent authorities should use the findings to inform risk assessments, capital adequacy reviews, and/or strategic discussions with financial entities.
60. The results should also guide supervisory follow-up measures and policy recommendations where ESG risks are identified as likely to pose material threats to financial stability.

*Public disclosure of information*

61. Publication of results should be in line with relevant sectoral regulation and supervisory practice. When choosing to publish results, Competent authorities should weigh up the comparative benefits of publishing individual or aggregate results. The level of disclosure should be calibrated based on the reliability of the methodology and the quality of the data. Competent authorities should consider that transparency enhances market discipline, stakeholder confidence, and accountability. They should also ensure that information is interpreted correctly and does not lead to unintended market distortions. Disclosure can increase as results become more robust.

*Regular review and evolution of ESG stress testing*

62. Given the evolving nature of ESG risks and stress testing methodologies, competent authorities should regularly review and refine their stress testing frameworks. Lessons learned from previous exercises should be incorporated to the following ones, and updates should reflect emerging best practices, new regulatory requirements, and advancements in ESG data and modelling techniques.

## Title III- Implementation

63. These Joint Guidelines apply from dd.mm.yyyy
64. These Joint Guidelines will be subject to a review by the ESAs.



# Accompanying documents

## 4.1 Impact assessment

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### 1. Objectives

1. The European Commission has launched a set of initiatives to enhance the resilience and contribution of the financial sector. As a result, several efforts have been initiated to incorporate ESG risks into prudential supervision.
2. As per Article 16(2) of the ESAs regulation (Regulation (EU) No 1093/2010, (EU) No 1094/2010 and (EU) No 1095/2010 of the European Parliament and of the Council), any guidelines developed by the ESAs shall be accompanied by an Impact Assessment (IA) annex which analyses 'the potential related costs and benefits' of the guidelines. Such annex shall provide the reader with an overview of the findings as regards the problem identification, the options identified to remove the problem and their potential impacts.
3. The ESAs have prepared the impact assessment included in this consultation paper analysing the policy options considered when developing the guidelines. Given the nature of the study, the impact assessment is qualitative in nature.

In drafting these guidelines, the ESAs stick to the general objectives of the CRD and the Solvency II Directive. These general objectives include:

- financial stability;
- proper functioning of the internal market.

4. The recently revised Solvency II Directive includes the following legal mandate (Article 100(4) of CRD VI and Article 304c(3) second subparagraph of the amended Solvency II Directive): *"EBA, EIOPA and ESMA shall, through the Joint Committee referred to in Article 54 of Regulations (EU) No 1093/2010, (EU) No 1094/2010 and (EU) No 1095/2010, develop guidelines to ensure that consistency, long-term considerations and common standards for assessment methodologies are integrated into the stress testing of environmental, social and governance risks. The Joint Committee shall publish those guidelines by 10 January 2026. EBA, EIOPA and ESMA shall, through that Joint Committee, explore how social and governance-related risks can be integrated into stress testing"*.
5. In view of the specific purpose of these guidelines, the following more specific objectives were identified:

- The guidelines should specify the framework to ensure a consistent application of ESG stress tests when they are carried out by competent authorities. However, the guidelines will not include a requirement for competent authorities to carry out their own stress test.<sup>5</sup>
- The guidelines should contribute to enhancing consistency among the whole financial sector in ESG stress testing/scenario analysis.

## 2. Policy issues

6. ESG risks are by now widely recognized as an important source of risk for the financial sector and can adversely affect the safety and soundness of individual financial entities and the wider financial system.
7. It is therefore increasingly relevant to the ESAs mandate to monitor and assess the resilience of the European financial sector to adverse developments and the materialisation of ESG risks. Stress testing and scenario analysis are important tools to better understand and assess potential financial and economic risks stemming from ESG risks given the high-level of uncertainty involved and the long-term nature of e.g. climate scenarios, and to ensure that the financial system is resilient to these risks.

## 3. Policy options

8. As a benchmark against which the policy options are assessed a “baseline scenario” option is introduced.

### 3.1 POLICY ISSUE A: SCOPE OF THE GUIDELINES

9. The current frameworks under the ESAs’ remit do not specify any guidelines about how competent authorities shall perform ESG stress tests/scenario analyses to assess financial entities’ financial and business model resilience. As a result, competent authorities may follow different approaches when conducting ESG stress tests/scenario analyses which could create divergencies in they are defined, designed and incorporated into supervisory stress testing frameworks. Such a situation complicates supervisory convergence and these guidelines are meant to fill the potential gaps to ensure that both competent authorities and financial entities are prepared and resilient to the potential materialisation of ESG risks.
10. The guidelines focus on supervisory stress testing, which encompasses both traditional short-to medium term stress tests targeting capital and/or liquidity adequacy, as well as scenario analysis, assessing also resilience of financial entities’ strategy and business model to a range of ESG-related scenarios also over a longer-term horizon. Both types of stress test exercises are essential tools for effective risk management and micro- and macro-prudential supervision.<sup>6</sup>

<sup>5</sup> For example, for Solvency II (insurance), the guidelines would be of a conditional nature for NCAs: the guidelines would only be relevant for them, if they perform national stress tests. NCAs not performing national stress test should not apply the joint guidelines.

<sup>6</sup> While a scenario describes a consistent future state of the world over time, resulting from a plausible and possibly adverse set of events or sequences of events, a stress test provides an assessment of an extreme scenario, usually with a severe impact on a financial entity, reflecting the inter-relations between its significant risks.

11. Defining the expectations for supervisory stress testing to assess financial entities' resilience to the negative impacts of climate but also of other ESG risks is an ambitious target, considering the limited maturity of stress test/scenario analysis work beyond climate risks. Therefore, while developing these guidelines, the ESAs have analysed three possible options.
  - a. POLICY OPTION A.1: Focus equally on all three aspects of ESG risks.
  - b. POLICY OPTION A.2: Focus on environmental risks and especially climate (E) only.
  - c. POLICY OPTION A.3: Focus on environmental risks and especially climate (E), while giving guidance on the remaining environmental, social, and government factors.
12. ESG risks include environmental, social and governance factors. Article 100(4) of the CRD and Article 304c(3) of the amended Solvency II Directive mandate the ESAs to issue guidelines on ESG stress testing for the full scope of these risks.
13. The development of relevant regulation, disclosure frameworks, practices, as well as models and data is more advanced for environmental risks, especially linked to climate, than for other ESG factors. Although it is important to continue the development of risk management practices, stress testing and scenario analysis for ESG factors beyond environmental and climate risks, it is also important to allow sufficient time for the financial sector, including competent authorities, to introduce the necessary changes.
14. In order to reduce the burden for financial entities and competent authorities, it is considered that the guidelines should focus primarily on climate risk, while introducing some guidance on other ESG aspects. Therefore, the Policy option A.3: Focus on environmental risks and especially climate (E), while giving guidance on the remaining environmental, social, and government factors, is identified as the preferred option.

### 3.2 POLICY ISSUE B: PROPORTIONALITY

15. Financial entities may be subject to many ESG risks at different levels of materiality for supervisory purposes. To ensure that proportionality is maintained in stress testing frameworks, both for competent authorities and for financial entities, the ESAs have analyzed two possible options related to proportionality and materiality.
  - a. POLICY OPTION B.1: Mandate competent authorities to cover all risks associated with ESG risks.
  - b. POLICY OPTION B.2: Mandate competent authorities to focus on the most material ESG risks.
16. A good materiality assessment is essential to enable competent authorities to optimize the cost/benefit balance for their supervisory stress testing framework, therefore Policy option B.2 is identified as the preferred option.