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By PwC Deutschland | 27 May 2026

9th amendment to the Minimum Requirements for Risk Management (9th MaRisk Amendment) under way

The German Federal Financial Supervisory Authority has fundamentally revised the “Minimum Requirements for Risk Management” (MaRisk) and, on 1 April 2026, presented the draft of the 9th amendment to these administrative guidelines for public comment.

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The 9th MaRisk Amendment is a major regulatory overhaul by the German Federal Financial Supervisory Authority (BaFin) that introduces a paradigm shift. It moves away from rigid, detailed rules toward a more principle-based approach, offering significant bureaucratic relief and flexibility - particularly for smaller and less complex targets. Along with the proposal, the supervisory authority is also implementing new guidelines from the European Banking Authority (EBA) on risk management. Specifically, these are the guidelines on environmental scenario analysis (EBA/GL/2025/04) and the guidelines on internal governance (EBA/GL/2021/05).

The envisaged changes focus on **three main issues**: **Simplifying proportional grading**, **Individual risk assessment** based on the principle of proportionality, and **sharpened risk & emergency management** (while rules are relaxed for smaller banks, requirements for emergency planning are explicitly tightened).

In future, the graduated application will be based on **a transparent classification system**. There will be **three size categories**:

Very small institutions with total assets of up to one billion euros,

Small institutions (Small and Non-complex Institutions – SNCIs), and

Other less significant institutions (Less Significant Institutions – LSIs)

In summary, it can be said that the escape clauses (“Öffnungsklauseln”) allowing small and very small institutions to take advantage of simplifications or exemptions from MaRisk requirements are now easier to apply because most additional requirements have been eliminated.

Note: BaFin and the Deutsche Bundesbank have accepted comments on the draft of the 9th amendment to MaRisk until 8 May 2026.

Source:

Federal Financial Supervisory Authority, press release of 1 April 2016.

Keywords

MaRisk (Mindestanforderungen an das Risikomanagement), Risk Assessment