Dear AMICE member,

In Brussels, the trees are turning from summer green to autumn gold, and the city has welcomed back European workers as work in the institutions start gathering pace. This hasn’t however, been a quiet summer for us; AMICE’s summer schedule had been dictated by the volume of requests for information and consultations from the policymakers. Our Prudential Regulation working group, which is focussing on the Solvency II programme, worked diligently throughout the summer, preparing AMICE’s positions in response to EIOPA requests, and engaging in EIOPA’s catastrophe working group in advance of the full Solvency II review. We have already seen the mutuals’ position considered and embodied in the direction of amending proposals for Solvency II, and I would personally like to thank all members of that working group for the huge contribution they make with their time and expertise for the benefit of all mutual and cooperative insurers throughout Europe.

Also during the summer, the European Commission announced a Refit review of the Motor Insurance Directive, and we have convened a focussed Task Force to identify important elements for review – or not, as the case may be – and respond to the European Commission’s consultation in October. Sustainability has also been on the agenda over the summer, where we responded to a questionnaire from the High-Level Expert Group on Sustainable Finance’s interim report. We cooperated on this and on a number of consultations issued by the International Association of Insurance Supervisors (IAIS) with ICMIF’s advocacy function, pulling in their expertise in areas where we required it with the former, and ensuring that the European position was fully considered and appropriately represented in the latter.

Our work with ICMIF towards a fully engaged structural cooperation has been continuing during the summer, reflecting the schedule and activities which were described to the AMICE membership at our General Meeting. ICMIF’s contribution to AMICE’s response to the European consultation on sustainability and AMICE’s contribution to ICMIF’s responses to the IAIS’s insurance core principles consultations are clear indications that we are stronger together, for the benefit for all our members in Europe. For it is this principle – that AMICE exists to further the cause and environment for all mutual and cooperative insurers in Europe – which is the foundation for all our activities.

Sarah Goddard
AMICE Secretary General
Promotion

Publication | European Market InSights 2015

For the fourth year running, ICMIF in collaboration with AMICE, has published the European Market InSights 2015 based on data the global association collects about the mutual and cooperative insurance sector.

Data on premiums, market share, members/policyholders, employment and assets for the European mutual and cooperative insurance market (36 countries) and for the EU life and non-life markets give an accurate overview of the mutual and cooperative insurance sector.

The report highlights that mutual insurers held a 31.3% share (up from 24.1% in 2007) of the European insurance market and a 32.4% share (24.7% in 2007) of the EU insurance market.

Publication | Annual Report 2016

At the General Meeting, members received AMICE’s Annual Report 2016 which is available for the first time in four languages (English, French, German and Spanish). The report’s production was undertaken in conjunction with ICMIF. The report has been circulated to all members and further copies are available from the AMICE Secretariat.

European Mutual Insurance Award

In December 2016, the Belgian association, UAAM-VVOV, ICODA European Affairs and AMICE launched “The European Mutual Insurance Award”. It is aimed at younger members of our community and from a wider range such as academia and institutions, and now has its own Facebook page! Don't hesitate to share the page to your network so we can spread the word and build a community supporting this initiative.

The first award will be presented at the AMICE Congress in Stockholm on 3-5 June 2018.

Assistance

Health | Digital healthcare consultation

The European Commission has launched a consultation on the transformation of health and care in the digital single market.

The purpose of the consultation is to define the need and scope of policy measures that will promote digital innovation in improving people’s health, and address systemic challenges to healthcare systems, aligned with legislation on the protection of personal data, patient rights and electronic identification.

The consultation seeks to collect information on:

- Cross-border access and portability of personal health data
- Sharing of resources (scientific research expertise, data capacity and advanced digital infrastructure) that will accelerate research and advance prevention, treatment and personalised medicine, initially in three areas:
  - rare and complex diseases in order to facilitate the transfer of knowledge from the laboratory to the clinical setting;
  - preparedness for upcoming epidemics and EU-wide identification of infectious threats within days;
  - the use of real world data for the purpose of pharmacovigilance and assessment of effectiveness of products placed on the market.
- Measures to ensure widespread uptake of digital innovations, enabling more patient-centred and integrated healthcare, and allowing for feedback and interaction between patients and healthcare providers.

Data protection workshop | 6 November 2017

AMICE is organising a workshop on 6 November in light of the GDPR implementation, which comes into force in May 2018. Speakers will include the European Commission (Data protection Unit, DG for Justice and Consumers) and the Article 29 Working Party Presidency.

Members will be invited to share their experience in the implementation of GDPR within their organisation.

For more information and registration, please contact Helen Sheppard.
Advocacy

Motor Insurance Directive Refit

New AMICE Taskforce on Motor Insurance Directive

In view of the upcoming review of the Motor Insurance Directive (MID), AMICE has set up a new taskforce to identify current challenges faced with the functioning of the MID and propose amendments if the need arises.

The mission of the taskforce is twofold:
- Identify current challenges faced with the functioning of the MID and propose changes to it;
- Propose and prepare AMICE’s position on the EC consultation on the Motor Insurance Directive Refit.

If you are interested in joining the taskforce, please contact Belma Yasharova.

In mid-July, AMICE was invited to participate in a roundtable organised by the European Commission’s Insurance Unit on the upcoming review of the directive, where we provided oral comments.

As a follow-up to the roundtable, on 24 July, the European Commission published its revised inception impact assessment on the MID review.

The review focuses on four specific issues:
- the portability of claims history statements;
- the role and the functioning of guarantee funds;
- the adequacy of the minimum amounts of cover laid down in the Directive; and
- possible divergent applications of the Directive regarding the scope, in terms of types of vehicles, uses of vehicles and places for which third party liability insurance is mandatory.

The following issues will also be considered:
- the necessity of electronic checks on insurance to reduce uninsured driving;
- the functioning of the system of protection of visiting victims;
- consistency of terminology and definitions;
- the suitability of the Directive in the light of technological developments (electric bicycles, semi-automated or automated vehicles) and on whether the liability system it provides will suit future needs; and
- the functioning of insurance of exported vehicles.

The inception impact assessment outlines a number of options which are being considered in terms of the specific topics identified for focus in the review.

European Commission consultation on Motor Insurance Directive

The public consultation has been launched, and is open until 20 October 2017. The AMICE Taskforce is in the process of developing AMICE’s response, and has already met to review the proposals. On the basis of the consultation results, the Commission will prepare a formal legislative proposal for amendment of MID by the end of 2017.

CMU | Council conclusions on the CMU

In mid-July, the Council of the EU adopted its conclusions on the Commission’s communication on the mid-term review of the Capital Markets Union (CMU) Action Plan. European finance ministers reaffirmed their commitment to the EU’s CMU plan, while acknowledging that several challenges have emerged since the CMU was launched in September 2015. Ministers endorsed the new regulatory initiatives proposed, such as the pan-European personal pensions proposal, and welcomed the Commission's focus on introducing reforms to prioritise sustainable finance and improve access to financial technology.

Distribution

Joint ESAs’ Consumer Protection Day

At the end of June, the Secretariat participated at the Joint ESAs’ Consumer Protection Day which brought together national supervisors, consumer representatives and the financial services industry.

MEP Sven Giegold (Greens, DE) delivered the keynote speech and focused on the Brexit consequences, the retail financial services action plan and the future of the ESAs. Three main topics addressed on the day covered retail conduct supervision, consumer protection and supervision in a digital world, and product oversight and governance rules.

Structured dialogue with VP Dombrovskis

At the end of June, the European Parliament’s Economic and Monetary Committee (ECON) held a structured dialogue with Valdis Dombrovskis, Vice-President for the Euro and Social Dialogue, also in charge of Financial Stability, Financial Services and Capital Markets Union. In his remarks, VP Dombrovskis noted that the delegated acts under the Insurance Distribution Directive (IDD) were being prepared based on EIOPA’s technical advice and would be adopted in the coming weeks. In response to
MEPs’ critical comments on the tight implementation timeframe, he said that it would be the wrong signal to postpone the entry into force of the IDD given that the timetable was decided by the legislators and is reasonable.


The first Delegated Regulation concerns information requirements and conduct of business rules applicable to the distribution of insurance-based investment products (IBIPs). The Delegated Regulation aims to specify the criteria and practical details for the application of the rules on:

- conflicts of interest;
- inducements; and
- the assessment of suitability and appropriateness.

The second Delegated Regulation concerns product oversight and governance ("POG") requirements for insurance undertakings and insurance distributors. The Delegated Regulation specifies the criteria and practical details for the application of the POG rules introduced by IDD, which are intended to ensure that all insurance products for sale to customers meet the needs of their specific target market. The Delegated Regulation requires manufacturers to maintain, operate and review appropriate governance arrangements for all newly developed insurance products and for existing insurance products which have undergone significant adaptations. Distributors are required to obtain from the manufacturer all information required to understand the product and the identified target market, and to distribute the product in accordance with the best interests of the customers.

At the end of the feedback period in August, the delegated regulations were submitted to the European Parliament and Council for scrutiny. The IDD implementation deadline is 23 February 2018.

**Commission Implementing Regulation on the Insurance Product Information Document**

In August, the Commission Implementing Regulation (EU) 2017/1469 laying down a standardised presentation format for the insurance product information document (IPID or PID) under the IDD was published in the Official Journal. The Implementing Regulation, which is based on EIOPA’s draft implementing technical standards, has been developed under Article 20(9) of the IDD. It entered into force 20 days after publication, on 1 September.

**PRIIPs Guidelines and Q&As**

In July, the European Commission adopted its Communication “Guidelines on the application of PRIIPs Regulation” which provides further clarity on the questions raised by AMICE members on the practical implementation of the level 1 text. The European Supervisory Authorities (ESAs – EIOPA, EBA and ESMA) also issued their Q&A on PRIIPs key information document (KID) on the same day. The Q&A document deals with a number of level 2 issues, such as credit risk for insurers and calculation of costs.

**Additional Q&A on PRIIPs KID**

In August the ESAs published additional guidance on the Key Information Document (KID) requirements for PRIIPs.

In order to clarify the application of the rules and promote common supervisory approaches and practices in the implementation and supervision of the KID, the ESAs issued a second set of Questions and Answers (Q&A) to supplement those already published on 4 July 2017.

The guidance also includes diagrams explaining the risk and reward calculations required to prepare the KID, and including example calculations.

Further questions will continue to be answered by the ESAs resulting in updates to the Q&A document. If members have any additional questions, they are invited to contact the Secretariat.

**ESAs’ technical advice on PRIIPs with environmental and social objectives**

The European Supervisory Authorities (ESAs), including EIOPA, submitted their technical advice to the European Commission to set minimum requirements which manufacturers of packaged retail and insurance-based investment products with environmental or social objectives (EOS PRIIPs) should comply with to ensure that they offer products that meet the retail investors’ needs.

The technical advice addresses the three areas highlighted by the mandate of the European Commission – establishment of clear environmental or social objectives by the PRIIP manufacturer, setting clear investment strategy for achieving these objectives, and ongoing monitoring. In their advice, the ESAs make the following recommendations:

- the PRIIP manufacturer targeting environmental or social objectives has to clearly specify these objectives, together with an appropriate and proportionate strategy on how to achieve them;
- the PRIIP manufacturer should clearly disclose to the retail investors the objectives and how these will be achieved;
- governance and monitoring measures should be put in place, be proportionate to the objectives and strategy, and be well documented; and
- regular reviews should be undertaken on progress.

Regarding the next steps, the European Commission is expected to prepare the delegated acts on
environmental or social objective (EOS) PRIIPs pursuant to Article 8(4) of PRIIPs Regulation. The PRIIPs rules will apply on 31 December 2017.

**IAIS consultation on conduct of business ICPs**

On 30 June, the IAIS launched a public consultation on its revised Insurance Core Principles (ICPs) related to conduct of business: ICP 18 (Intermediaries) and ICP 19 (Conduct of Business). AMICE worked with ICMIF to ensure that the perspective of European mutual and cooperative insurers was taken into account when ICMIF was developing its response to the consultations. The consultation closed on 29 August.

**Public hearing on European services e-card**

The European Parliament’s Internal Market and Consumer Protection Committee (IMCO) held a public hearing on the European services e-card in June. The hearing was organised into two panel discussions with invited experts. The first panel of experts exchanged views on "Tackling administrative and regulatory barriers in the Services market" with a focus on whether there is a case for the Services e-card, whether the European Commission’s proposal is the appropriate measure to tackle persisting problems, and whether it will lower the existing barriers. The second panel provided a more detailed and critical look at the Services e-card proposal. Nicolas Jeanmart from Insurance Europe presented the insurance industry’s perspective on the proposal. He disagreed with the Commission’s view that insurance is a barrier to cross-border service provision. He also noted that the insurance provisions of the Commission’s proposal won’t help service providers and should be deleted.

**Prudential Regulation working group meeting**

AMICE’s Prudential Regulation working group met in Brussels, hosted by Fédérale, on 28 July to discuss EIOPA’s consultation paper on its first set of advice on the review of the Solvency II standard formula. It also provided an update on EIOPA’s catastrophe risk workstream and on the latest publications from the European institutions, as well as developing positions on the challenges related to the application of the volatility adjustment.

The following month, the working group met again, this time hosted by Covéa at its offices in Paris, to further develop AMICE’s positions and responses to EIOPA’s first set of advice and the catastrophe risk workstream, in particular to provide advice on the non-life catastrophe risk and health catastrophe risk submodule. The working group also considered the EIOPA call for comments on the explanatory notes of the Variation Analysis Templates.

The members were also updated on the latest EIOPA and European Commission publications.

**Solvency II**

**EC’s CMU Mid-Term Review: insurance and Solvency II-related elements**

The European Commission published a Communication on the mid-term review of the capital markets union (CMU) action plan where it lists the supporting legislative and non-legislative actions. The key initiatives for our sector are:

- Assess the drivers of equity investments by insurance companies and pension funds (Q4 2018).
- Amend the prudential treatment of private equity and privately placed corporate debt in Solvency II (Q3 2018).
- Report on whether the accounting treatment of equity instruments in IFRS 9 is sufficiently conducive to long term financing (Q2 2018).
- Review calibration of risk charges for infrastructure corporates in Solvency II (Q2 2017).
- Amendments to Commission Delegated Regulation to introduce a specific prudential treatment STS securitisation in Solvency II (ongoing).
- Propose amendments to the functioning of ESMA and the other ESAs to promote the effectiveness of consistent supervision across the EU and beyond (Q3 2017).
- Monitor progress on IASB commitment to improve disclosure, usability and accessibility of IFRS (ongoing).

These links take you to all related documents:

- European Commission Press Release
- Commission staff working document: Economic analysis accompanying the mid-term review of the capital markets union action plan
Delegated Regulation amended
The European Commission has amended the Solvency II Delegated Regulation (EU) 2015/35 to recognise infrastructure corporates as a new asset class. The Commission had adopted an amendment to the Delegated Regulation concerning infrastructure projects, which entered into force in April 2016. Following that adoption, the European Commission requested further advice to EIOPA on the “identification and calibration of infrastructure corporates”. EIOPA launched a public consultation on the topic and delivered its Final Advice in June 2016. The European Commission has also published the Impact Assessment and an Executive Summary Impact Assessment on the new set of Delegated Acts.

EIOPAs amends ITS on Reporting Package
EIOPA has submitted its Implementing Technical Standards on reporting and disclosure and has published the final Taxonomy version 2.2.0. The package with the amendments is available on EIOPA's website and includes the following documents:

- Draft amendment of the ITS on reporting
- Draft amendment of the ITS on disclosure
- Impact assessment of the draft amendment of the ITS on reporting
- Revised annex 1, 2 and 3 of the ITS on reporting
- Amendment of the guidelines on reporting for financial stability purposes and revised annexes
- Amendment of the guidelines on the supervision of branches of third-country insurance undertakings and revised annexes
- Publication of taxonomy version 2.2.0

EIOPA technical documentation
EIOPA published the risk-free rate term structure for Solvency II:

- with reference to the end of May 2017

EIOPA published the technical information on the symmetric adjustment of the equity capital charge for Solvency II:

- with reference to the end of May 2017

EIOPA public consultation on Reporting Package
EIOPA has updated the list of validations on which data submitted in the quantitative reporting templates (QRTs) should comply.

EIOPA has also launched a public consultation on the Data Point Modelling (DPM) and the Public Working Draft Document (PWD) on the taxonomy 2.2.0. Comments could be submitted to EIOPA until the beginning of July 2017.

EIOPA catastrophe risk workstream
At the end of June, AMICE participated and submitted oral comments in a meeting organised by EIOPA to discuss the way forward on the recalibration scenarios and the documentation foreseen, the EIOPA draft paper on the pros and cons of the different options for nat cat simplifications, the potential need for guidance on the “maximum benefits payable” on the mass accident and pandemic risk sub-module, the 10-year disability scenario issue and the proposed simplification on the exposure measure for the fire risk sub-module.

Since July AMICE has been an active participant in all the related meetings organized by EIOPA. In mid-July, we discussed the way forward on the recalibration scenarios, and the EIOPA draft paper on the pros and cons of the different options for natural catastrophe simplifications.

An EIOPA-organised meeting at the end of July considered the current status of the recalibration scenarios and the document describing the recalibration process. The meeting also considered EIOPA's draft paper on the pros and cons of the different options for natural catastrophe simplifications to which AMICE submitted comments.

The August EIOPA meeting considered the remaining topics for the recalibration process, a new proposal to improve the implementation of the motor vehicle liability risk sub-module (MTPL), the simplifications on the fire risk sub-module, the different proposed simplifications on the allocation of the sums insured, a new proposal to take into account contractual limits, an amendment to the marine risk sub-module and some proposed changes to the man-made catastrophe scenarios.

AMICE equity investments proposal
AMICE submitted a paper on a proposition for a reduced capital charge for equity investments when insurance undertakings comply with specific qualitative and quantitative requirements to the European Commission on 23 June. The proposal aims to restore a sound hierarchy between risks in the Solvency II framework while protecting policyholders and the financial system from damages in downturns.

EIOPA risk-free interest rate term structures
EIOPA changed the peer country for Luxembourg from France to the Netherlands ahead of the calculation of the risk-free interest rates for end-June 2017. The fundamental spreads are derived from long-term average spreads of the government bond yields over
the risk-free interest rates. For EEA countries without sufficient government bond data, the government bond yields of a peer country are used to calculate the long-term average spread. EIOPA reviews the country peers on a regular basis.

The change affects yields for reference dates from 1 June 2017 onwards. The immediate impact on the fundamental spread is expected to be immaterial. No material impact is expected on the volatility adjustments.

**EIOPA first set of advice on Solvency II review**

EIOPA launched a public consultation on its first set of advice on the Solvency II review. The Prudential Regulation Working Group met several times during the summer to prepare AMICE’s response. AMICE’s analysis of the consultation content identified the following issues:

1. Simplified calculations:
   - EIOPA confirms that there is no need to compute the model error when applying simplifications (AMICE request)
   - A simplification for non-life lapse risk (AMICE’s request)
   - A simplification for life lapse risk (shock can be applied to HRG)
   - A new simplification for the mortality risk sub-module and health mortality risk sub-module

2. Reducing reliance on external credit ratings in the standard formula:
   - AMICE put forward two proposals which were considered in EIOPA’s advice
     - Firms will not be required to nominate more than one ECAI when calculating its spread risk sub-module and its market risk concentration sub-module as if the assets not covered would be of CQS 3 provided some conditions are met.
     - AMICE’s proposal to reduce reliance on external credit ratings is described in paragraphs 100 and 101 of EIOPA’s consultation paper.

3. Treatment of guarantees, exposure guaranteed by a third-party and exposures to regional governments and local authorities (RGLA)
   - EIOPA proposed the following changes:
     - Alignment of the treatment of guarantees by Member States’ central government and RGLA with the same risk in the market risk module
     - Introduction of an intermediate treatment for Member States’ RGLA with a risk different from Member States’ central governments

4. Risk-mitigation techniques

5. Look-through approach: investment related vehicles
   - The look-through should be extended to investment related undertakings (AMICE request)
   - The application of the look-through should be mandatory (AMICE request)

6. Undertaking specific parameters
   - EIOPA advised a new standardised method for the calculation of the adjustment factor for non-proportional reinsurance treaties (a new USP method for stop-loss should be defined)
   - No USPs were proposed for mortality, longevity and lapse risks.
   - No new methods on USPs for non-life underwriting risk were put forward (in line with AMICE position)

7. Loss-absorbing capacity of deferred taxes (LAC DT)
   - In this section EIOPA provided figures on the LAC DT numbers across the EAA and explained the supervisory practices regarding the LAC DT.

**EIOPA updates**

EIOPA updated the following Q&A on the Regulation:

1. on ITS on the templates for the submission of information to the supervisory authorities:
   - June Q&A
   - August Q&A

2. June Q&A on ITS on Regional Governments and Local Authorities

3. August Q&A on Delegated Regulation

At the beginning of August, EIOPA published:

- the risk-free rate term structure for Solvency II with reference to the end of July 2017.
- the technical information on the symmetric adjustment of the equity capital charge for...
Solvency II with reference to the end of July 2017.

EIOPA also published its updated Risk Dashboard based on the first-quarter 2017 data.

The results show that the risk exposure of the insurance sector in the European Union remained stable overall in the first quarter 2017 with Solvency II ratios remaining strong and stable for groups whereas a slight deterioration has been observed particularly for solo non-life insurance undertakings. Volatility has decreased and global inflation rates are fluctuating near the 2% medium-term inflation target. EIOPA explained that despite these positive signs, the continuing low-yield environment and the observation that market fundamentals might not properly reflect that underlying credit risks are still important concerns for the European insurance industry.

Nevertheless, market perception is relatively stable with some signs of improvement in the Credit Default Swap spreads.

EIOPA has published its first statistics which are based on Q3 2016 data. The statistics will be published on a quarterly basis and include aggregated country-level information on the following information submitted by more than 3000 firms

- balance sheet,
- own funds / SCR & MCR ratios per country
- capital requirements,
- premiums,
- claims and expenses

**Accounting**

**IFRS 17 Webcast**

At the end of May, AMICE joined a webcast on IFRS17 organised by PwC to discuss the recently published Insurance Contracts Standard - IFRS 17. The PwC panel of experts was joined by Darrel Scott, IASB Board member responsible for IFRS 17, and PwC representatives who provided an overview of the accounting requirements, highlighted some practical issues and discussed the expected implementation challenges.

**IAES webinar on IFRS 17 recording**

A recorded webinar is now available introducing the recently issued IFRS 17.

The webinar presenters are Joanna Yeoh and Andrea Pryde, insurance contracts team members at the IASB. The IASB explained that this webinar is one of a series of implementation and educational materials being produced on IFRS 17.

See the IFRS 17 Implementation page for more information.

**EFRAG Meeting**

In July 2017, the Secretariat attended a meeting of the Insurance Accounting Working Group meeting at the European Financial Reporting Advisory Group (EFRAG) where discussion items included: level of aggregation in IFRS 17; measurement of insurance contracts; performance of insurance business; the presentation in the statement of comprehensive income; contracts with direct participation features; sharing of risks; and disclosures.

**IAIS | ICP 13 consultation on reinsurance and other forms of risk transfer**

AMICE liaised with ICMIF on the current IAIS consultation on ICP 13 (Reinsurance and Other Forms of Risk Transfer) to ensure that European mutual and cooperative insurers were represented appropriately in any responses. The consultation period ran until the end of July and the document can be accessed here.

**Pensions**

**Adoption of European Commission’s personal pension proposal**

On 29 June, the European Commission adopted its long-awaited legislative proposal for a Pan-European Personal Pension Product (PEPP) framework. This proposal comprises a complementary voluntary scheme alongside national regimes, enabling different providers to create personal pension products on a pan-European scale. The Commission also published a recommendation on the tax treatment of personal pension products, encouraging Member States to grant the same tax treatment to PEPPs as is currently granted to similar existing national products.

AMICE has been closely involved in the development of this initiative and some of our proposals have been taken on board. On the occasion of the adoption of the PEPP proposal, the Secretariat issued a press release welcoming the initiative.

For further details on the proposal, you can consult the following link.

**Workshop Insurance and Pensions**
AMICE participated at the III Workshop on Pensions and Insurance at the University of Barcelona in July. Almost 30 experts and practitioners in the field of pensions, insurance and solvency presented their latest research and opinions in this area.

The present edition of the workshop included an open monographic session focused on the Spanish pension system. Mr Joan Castells, president of FIATC and member of AMICE, chaired the session in which two invited lecturers provided an overview of the current situation of the public and private Spanish pension system and the future challenges arising from the new demographic trends. The president of UNESPA, Pilar González de Frutos, gave a speech on insurance proposals for the future of pensions.

The session ended with a roundtable about the importance of communication in pensions, moderated by Mr Joan Castells, which featured renowned economic journalists and representatives of the insurance sector.

AMICE’s Silvia Herms gave a keynote address on the review of the Solvency II standard formula.

EIOPA/eba consultations on occupational pensions’ data

At the end of July, EIOPA launched a public consultation regarding the collection of information about pension funds on a quarterly and annual basis. The objective of the initiative is to increase efficiency and to further strengthen the monitoring and analysis of the European occupational pensions sector through a single framework for EIOPA’s regular information requests for the provision of occupational pensions’ information. The consultation period will end on 27 October.

The European Central Bank also published a similar consultation on statistical reporting requirements, in partnership with EIOPA. The ECB consultation ran until 21 September, when the ECB held a public hearing by teleconference.

Data protection | AMICE Letter to Vice-President Timmermans on GDPR

AMICE co-signed a joint letter on GDPR-related issues with nine other European industry associations addressed to the European Commission’s First Vice-President Frans Timmermans. The letter raised concerns about the ongoing work of the Article 29 Working Party on the guidelines under the General Data Protection Regulation (GDPR) which will have a wide-ranging impact on the insurance industry. We called on the Commission to ensure an efficient and representative consultation process on the GDPR guidelines. Moreover, the letter stressed the need to provide the industry with guidance in a timely manner prior to the entry into force of the GDPR on 25 May 2018. AMICE will be holding a GDPR workshop for members on 6 November, see earlier article.

Workshop on liability in the area of autonomous systems

On 13 July, the Secretariat attended a workshop on liability which was organised by the European Commission. The objective of the workshop was to discuss questions regarding liability in the area of autonomous systems and advanced robotics. The workshop mainly explored the specificities of autonomous systems compared to "traditional" machinery, discussed these specificities in relation to liability schemes and the role of insurance companies. Several participants underlined the importance of ensuring the access of insurance companies to data in order to establish the circumstances of an accident. This data access is a main concern for AMICE members which we are highlighting in other areas of advocacy where appropriate.

Insurance Europe’s Conduct of Business meeting

The Secretariat attended a meeting organised by Insurance Europe’s Conduct of Business Unit during the summer. The participants discussed issues related to distribution (IDD), InsurTechs, Single Market Information Tool (SMIT), data protection and collective redress.

EIOPA’s Opinion on recovery and resolution framework for (re)insurers

On 17 July, EIOPA adopted its opinion calling for a minimum harmonised recovery and resolution framework for (re)insurers in the European Union. The justification put forward is the current fragmented landscape and facilitation of cross-border cooperation. EIOPA proposes four building blocks for the minimum harmonised recovery and resolution framework: preparation and planning; early intervention; resolution; and cross-border cooperation and coordination. EIOPA suggests that the harmonised recovery and resolution framework should be aligned with the Solvency II framework and be applied in a proportionate manner. AMICE submitted its position earlier this year arguing that there is no rationale for a harmonised recovery and resolution framework.

Social Economy

European Parliament Intergroup hearing on taxation

The European Parliament’s social economy intergroup organised a hearing on the impact of EU tax policies on the social economy earlier in the summer. Maria Teresa Fabregas Fernandez, Director for indirect taxation and tax administration at DG TAXUD,
presented the European Commission’s VAT Action Plan and the links between the VAT framework and social economy enterprises. Participants agreed that it is fundamental to recognise the diversity of forms of enterprises in EU tax policies.

European Day of Social Economy Enterprises

On 28 June, the Secretariat attended the European day of social economy enterprises which was organised for a second consecutive year by the European Economic and Social Committee. The objective was twofold: on the one hand, to review the progress made in building an ecosystem for social economy enterprises and on the other hand, to see what the next steps are for this enterprise model to be recognised and more widely disseminated.

Roundtable on the challenges for the insurance sector

The Secretariat joined a roundtable on the challenges for the insurance sector with Jim Wrynn, a former New York insurance regulator and IAIS executive. He presented his views on the ongoing EU-US Covered Agreement negotiations as well as the challenges for insurance companies with the upcoming Brexit negotiations.

Sustainability

Non-financial reporting guidelines

At the end of June, the European Commission adopted its guidelines on the disclosure of environmental and social information. The aim is to boost corporate transparency and performance, as well as encourage companies to embrace a more sustainable approach. The disclosure requirements for non-financial information apply to certain large companies with more than 500 employees. However, all companies preparing a non-financial statement can rely on the guidelines, if they so choose.

Interim report on sustainable finance

In mid-July, the European Commission’s High-Level Expert Group on Sustainable Finance published its first report setting out concrete steps to create a financial system that supports sustainable investments. The report is part of broader efforts to map out an EU strategy on sustainable finance, a priority action of the Capital Markets Union (CMU) Action Plan. The report notes that the business model of the insurance sector is particularly suited to supporting sustainability, and the EU has “probably the world’s most advanced” framework for risk management. However, the expert group suggests amending Solvency II to enable greater investment by insurance companies in sustainable equity and long-term assets. The interim report proposes quick action on:

- a classification system for sustainable assets;
- a European standard and label for green bonds;
- clarifying that fiduciary duty encompasses sustainability;
- better disclosure from financial institutions and companies on how sustainability is factored into decision-making; and
- a 'sustainability test' for relevant EU financial legislation.

The expert group presented its initial recommendations during a public hearing in July in Brussels. The final report is expected at the end of the year. The Commission will explore some key early recommendations to take further steps towards a low carbon, more resource-efficient and sustainable economy.

The public hearing was accompanied by the launch of a questionnaire by the High-Level Expert Group on the sustainable finance interim report. AMICE worked with ICMIF to respond to the consultation on 21 September.

Social dialogue | ISSDC working group meeting

The Insurance Sectoral Social Dialogue Committee held a working group meeting on 9 June. During the preparatory meeting of the employers’ representatives (AMICE, BIPAR, Insurance Europe), members discussed Uni Europa’s proposals for follow up to the declaration on digitalisation signed last year, which were then transmitted to the employees’ representatives during the joint meeting. While some proposals such as training to adapt to the new skills required are appropriate, others such as compensation in the case of job losses are not in the remit of the ISSDC. The ISSDC also heard from the Finnish social dialogue partners on their 'Healthy Financial Sector project’ which looked at the jobs likely to become obsolete, customer behaviour and what this means for new sets of skills, and identified good practices in Finnish companies. In 2017 the project will examine the new ways of work and in 2018 it will focus on digitisation and robotics.
Other updates

AMICE-ICMIF structural cooperation

Newsletter

AMICE members have been sent the first AMICE-ICMIF structural cooperation newsletter. Senior management and directors met at ICMIF’s offices in Manchester during the summer to develop ICMIF’s future strategy and to advance the cooperation format and details.

General Meeting & Board | June 2017

The draft minutes from last month’s General Meeting are available for download from the AMICE website together with all related meeting documents.

Members of the Board can also download the draft conclusions of the Board meeting of 6 June here.

ICMIF Strategy | Workshop

AMICE’s President and senior management participated in a two-day workshop as part of the development of ICMIF’s strategy 2019-2022. This was the first time the regional associations had participated, and gave an excellent opportunity for AMICE representatives to meet with their counterparts in other regions, as well as actively contribute and represent AMICE members’ views of future direction at a global level.
AMICE-ICMIF Calendar 2017-2018

<table>
<thead>
<tr>
<th>Date</th>
<th>Location</th>
<th>Meeting/Event Description</th>
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</thead>
<tbody>
<tr>
<td>5 October</td>
<td>Brussels</td>
<td>AMICE National Associations meeting</td>
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<tr>
<td>5 October</td>
<td>Brussels</td>
<td>AMICE Prudential Regulation working group</td>
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<tr>
<td>6 October</td>
<td>Brussels</td>
<td>AMICE Pensions working group</td>
</tr>
<tr>
<td>16 October</td>
<td>London</td>
<td>ICMIF ICMIF Executive Committee</td>
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<tr>
<td>17 October</td>
<td>London</td>
<td>ICMIF ICMIF Board Meeting</td>
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<tr>
<td>17-20 October</td>
<td>London</td>
<td>ICMIF ICMIF Biennial Conference: Redesigning Insurance</td>
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<tr>
<td>5-10 November</td>
<td>Singapore</td>
<td>ICMIF ICMIF Advanced Management Course</td>
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<tr>
<td>6 November</td>
<td>Brussels</td>
<td>AMICE Data protection workshop</td>
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<tr>
<td>6 November</td>
<td>Brussels</td>
<td>AMICE Health working group</td>
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<tr>
<td>7-8 November</td>
<td>Bern</td>
<td>ICMIF ICMIF Intelligence Committee Meeting</td>
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<tr>
<td>10 November</td>
<td>Brussels</td>
<td>AMICE Communications working group</td>
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<tr>
<td>14 November</td>
<td>Manchester</td>
<td>AMICE Board</td>
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<tr>
<td>17 November</td>
<td>Brussels</td>
<td>AMICE Prudential Regulation working group</td>
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<tr>
<td>29 November</td>
<td>Brussels</td>
<td>AMICE Regulatory Affairs working group</td>
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<tr>
<td>7 December</td>
<td>Brussels</td>
<td>AMICE Pension working group (date to be confirmed)</td>
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<tr>
<td>18 December</td>
<td>Brussels</td>
<td>AMICE Prudential Regulation working group</td>
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<tr>
<td>20 February</td>
<td>Brussels</td>
<td>AMICE Executive Committee</td>
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<tr>
<td>8 March</td>
<td>Brussels</td>
<td>AMICE CSR working group</td>
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<tr>
<td>20 March</td>
<td>Brussels</td>
<td>AMICE Board</td>
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<tr>
<td>23-25 April</td>
<td>Montreal</td>
<td>ICMIF Meeting of Reinsurance Officials (MORO)</td>
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<tr>
<td>13-18 May</td>
<td>Manchester</td>
<td>ICMIF ICMIF Advanced Management Course</td>
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<tr>
<td>3 June</td>
<td>Stockholm</td>
<td>AMICE Board</td>
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<td>4 June</td>
<td>Stockholm</td>
<td>AMICE General Meeting</td>
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<tr>
<td>3-5 June</td>
<td>Stockholm</td>
<td>AMICE AMICE Congress 2018</td>
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External Events Calendar 2017

<table>
<thead>
<tr>
<th>Date</th>
<th>Location</th>
<th>Event Description</th>
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<tbody>
<tr>
<td>11-13 October</td>
<td>Cannes</td>
<td>28è congrès REAVIE - rendez-vous international des assureurs et réassureurs vie et de personnes l'Argus</td>
</tr>
<tr>
<td>2-3 November</td>
<td>Kuala Lumpur</td>
<td>IAIS Annual Conference 2017 - &quot;Insurance Supervision: Looking Beyond...&quot;</td>
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<tr>
<td>13-14 November</td>
<td>Bordeaux</td>
<td>18. MutRé Meeting Prevention and the mutual model</td>
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<tr>
<td>4-5 December</td>
<td>London</td>
<td>Managing Insurance Contracts under IFRS 17</td>
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<td></td>
<td></td>
<td>Marcus Evans</td>
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<td></td>
<td></td>
<td>Special offers for AMICE members, please contact Tatiana Paraskeva</td>
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<tr>
<td></td>
<td></td>
<td>• 2 day conference: £200</td>
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<tr>
<td></td>
<td></td>
<td>• 2 day conference &amp; 1 workshop: £250</td>
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<tr>
<td></td>
<td></td>
<td>• 2 day conference &amp; 2 workshops: £350</td>
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<tr>
<td>13 December</td>
<td>Paris</td>
<td>ESG strategies for responsible investors</td>
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