Dear AMICE member,

This has been a busy year for AMICE. We have been active on new dossiers within the European advocacy agenda, including the REFIT review of the Motor Insurance Director and proposals for a pan-European personal pension product (PEPPS), as well as successfully continuing our work on certain areas of review in Solvency II. We have cemented our already strong relationships with EIOPA and on your behalf successfully advocated for the insurance industry’s European supervisory body to remain separate from the other two European Supervisory Authorities (ESAs). We have had bilateral dialogues with representatives from the European institutions, most recently with Vice President Dombrovkis’s Cabinet, and presentations from experts within those institutions on areas of particular concern for our members, most recently on the General Data Protection Regulation (GDPR). Other significant bilateral relationships included renewing our Memorandum of Understanding (MoU) with Insurance Europe, and interventions with other representative bodies including AIM, SEE and ECIROA. We have met with representatives from various European Member States’ finance ministries, spoken at conferences and events throughout Europe promoting the mutual and cooperative insurance model and our members’ best interests, and appeared in specialist, national and global media. We are currently championing the new #Data4Drivers campaign, and will identify more such activities and opportunities to promote the causes that are close to the heart of our members.

Over the course of the year, we collaborated with our global federation, ICMIF, on three joint events focussing on regulation, reinsurance and communications. More than 200 members of both AMICE and ICMIF joined us to hear from experts and share their experiences. These events were developed as wayposts in the converging of certain activities of the two associations as part of the development of the structural cooperation, which had been approved at AMICE’s AGM in 2016, and which both Secretariats developed over the course of the past year. As part of this programme, AMICE started working closer with ICMIF on members relations, communications activities and back office operations. Specific projects within the programme have included ICMIF providing both core data and analysis for AMICE’s forthcoming Facts & Figures publication, a more European focus in ICMIF’s Voice magazine, and providing expert services for next year’s AMICE Congress in Stockholm. The heads of both associations collaborated closely on developing the structural cooperation business plan, reporting to the AMICE and ICMIF statutory bodies as it developed. We closely analysed all aspects of both organisations to see where we could deliver greater value to our members within a more unified service offering and approach to our activities. This culminated in the publication of the business plan in November, and its presentation to an Extraordinary General Meeting of AMICE members in early December. It became clear during the meeting that our members are strongly in favour of a closer cooperation between the two bodies, but we did not receive a clear mandate on the financial aspects of the programme. We are assessing the implications and options resulting from the outcome of the EGM, and early in 2018 the AMICE Board will examine next steps.

AMICE has learned much from the closer work with ICMIF over the course of this year, and I hope that these will translate into visible benefits for our members. I also hope that we will continue to forge ahead with our closer relationship with ICMIF, which ultimately will strengthen both our organisations.

Thank you for all your support and assistance during the course of 2017, and I look forward to working with and for you in the coming year.

Sarah Goddard, AMICE Secretary General
Promotion

Final opportunity to submit your paper! | European Mutual Insurance Award 2018

As we previously announced, the Belgian association, UAAM-VVOV, ICODA European Affairs and AMICE have jointly launched “The European Mutual Insurance Award”. The award aims to encourage research and analysis in the field of mutual insurance legislation in Europe by the academic community but entries from industry participants are also welcomed. The winner will be awarded €2,500 and a trip to Sweden to be presented with their prize.

Anybody under 40 years of age or a team thereof may submit a research paper on the treatment of mutual insurers under Solvency II until 15 January 2018 (deadline: 24h00 CET).

You can find more information about it on this call for papers and please circulate the document to anyone who may be interested in writing or is currently writing a research paper on our sector.

The award has its own Facebook page, which we encourage everyone to follow and share to your network so we can spread the word and build a community. The first award will be presented at the AMICE Congress in Stockholm on 3-5 June 2018.

AMICE in the news

AMICE has appeared in a number of insurance-related media recently, including Argus de l’Assurance, Reactions, Xprimm, De Tijd, La Tribune de l’Assurance, Inese, Insurance Asset Management, Grupo Aseguranza, Law360, Versicherungsmonitor, Only Strategic, Insurance Business and Mutually Insured. In addition, members of the AMICE Secretariat have taken part in interviews with La Tribune de l’Assurance and AM Best TV, and published an editorial column in Reactions.

Communications Working Group Meetings

AMICE’s Communications Working Group met in Stockholm on 18-19 September to advance preparations for the AMICE Congress 2018. Participants visited congress venues and developed the programme and speakers for the event. Other items considered at the meeting included last June’s communications seminar in Dublin.

Two months later, the working group met again in Brussels to continue work on the Congress and start reviewing AMICE’s communications activities during 2017. The working group also started work on AMICE’s 2018 communications plan and will continue working on these topics at the next meeting in January 2018.

The working group has recently welcomed four new members, Maija Keskinen-ghezaïel of LocalTapiola (FI), Bernard De La Ossa of Seguros Lagun Aro (ES), Clémentine Cahard of the French association AAM, and Carina Bodesand of Länsförsäkringar (SE).

National Associations’ meeting

On 5 October, members of the National Associations Working Group met in Brussels with issues under discussion including:

- Data protection;
- Solvency II implementation across Europe;
- Insurance Distribution Directive;
- Digitalisation;
- Cost of regulation; and
- National developments.

The next meeting is scheduled for summer 2018.

ICMIF biennial conference

Three members of the AMICE Secretariat attended ICMIF’s biennial conference in London on 17-20 October. Several AMICE members and AMICE’s Secretary General presented to the conference on a variety of topics, and the AMICE Secretariat representatives used the event as an opportunity to meet with members, as well as assisting with the conference logistics. Videos of interviews with conference speakers and attendees can be found here.

Facts & Figures publication

Amvrosios Panagasidis has joined the AMICE Secretariat as a legal intern to research and draft the legal aspects of the updated Facts and Figures report, which will be published in early 2018. Amvrosios is a law graduate and holds a Master’s Degree in EU Law from the Netherlands. Until recently, he was a Blue Book trainee at the EU Commission’s Executive Agency for SMEs. He has additionally worked as a trainee lawyer at the Law Office of the Republic of Cyprus.
Advocacy

Prudential Regulation Working Group meetings

The Prudential Regulation Working Group met on several occasions in autumn to prepare for EIOPA meetings and develop responses to consultations, as well as exchanging information about the latest European institutions developments. All the topics addressed by the working group are described in the Solvency II section below.

Solvency II

Review of the Solvency II Standard Formula

First Set of Advice on the review of the Solvency II Standard Formula

On 31 August, AMICE responded to EIOPA’s public consultation on its first set of advice on the Solvency II review. AMICE submitted comments on the simplified calculations, reducing reliance on ECAlS, the treatment of guarantees, exposures guaranteed by a third-party and exposures to regional governments and local authorities (RGLA), risk-mitigation techniques, the look-through approach, investment-related parameters, undertaking specific parameters (USPs), and the loss-absorbing capacity of deferred taxes (LAC DT).

On 30 October, EIOPA submitted its First Set of Advice on the review of the Solvency II Standard Formula to the European Commission. The advice follows EIOPA’s public consultation, to which AMICE submitted its response at the end of August. Following extensive advocacy activity over the last year and a half, AMICE has managed to convince EIOPA on a significant number of amendments in the areas of proportionality, reducing the reliance on credit rating agencies, look-through, treatment of RGLA, and USPs.

Second Set of Advice on the review of the Solvency II Standard Formula

An AMICE delegation attended EIOPA’s SCR Stakeholder Workshop held in Frankfurt on 27 September to discuss with industry stakeholders the topics to be included in EIOPA’s second consultation paper on the SCR review. The topics discussed were the loss absorbing capacity of deferred taxes (LAC DT), the risk margin, the volume measure on premium risk, the recalibration of premium and reserve risk for certain lines of business, the interest rate risk, changes to mortality and longevity risk, and the simplification to the counterparty default risk module.

In November, EIOPA launched the second consultation paper following the European Commission’s 2016 Call for Advice on the Review of the Standard Formula and it will run over eight weeks.

AMICE’s proposals on the recalibration of standard parameters of premium and reserve, volume measure for premium risk, interest rate risk, one of the simplifications of the counterparty default risk, the two simplifications of the look-through approach, the two approaches on the look-through at group level, the no-limitation on the loss absorbing capacity of deferred taxes, the proposals to simplify health catastrophe risk, natural catastrophe risk and man-made catastrophe risk, and proposals on “early redemptions, tax calls and regulatory calls” are all part of EIOPA’s consultation.

EIOPA catastrophe risk workstream

In September, AMICE participated in a two-day meeting organised by EIOPA to discuss and agree the final recalibration for windstorm, earthquake, hail and flood from different countries. The group discussed EIOPA’s advice on health catastrophe issues (accident concentration; mass accident and the maximum benefits payable), amendments to the marine risk sub-module, amendments to the man-made scenario and motor third party liability (MTPL) and proposed new simplifications that would apply to the sub-modules of the natural catastrophe risk sub-module.

EIOPA reporting

EIOPA variation analysis templates

The AMICE Prudential Regulation Working Group met online on 8 September to discuss EIOPA’s call for comments on the explanatory notes of the variation analysis templates (referred to as S.29.01 to S.29.04). The explanatory notes developed by EIOPA provide more granular explanations of the templates and reporting items, examples of reporting particularly directed to non-life insurance undertakings, frequently asked questions and answers, and potential improvements of the instructions on reporting items defined in the reporting ITS.

On 15 September, AMICE sent comments to EIOPA on the explanatory notes of the variation analysis templates (referred to as S.29.01 to S.29.04), on the Template S.29.03.01 – Analysis of changes due to technical provisions and on the Template S.29.02.01 – Analysis of changes due to investments and financial liabilities.

EIOPA Meeting on Solvency II Reporting Package

AMICE attended EIOPA’s stakeholder event on reporting and disclosure held in Frankfurt in October to discuss with industry stakeholders the Explanatory Notes on the Variation Analysis templates and the different proposals as to how the Solvency Financial Condition Report (SFCR) could be improved.

Insurance Europe meeting

In October, the Secretariat attended Insurance Europe’s Solvency II committee meeting where the main discussions focused on EIOPA’s Review of the Solvency II Standard Formula, the EIOPA’s catastrophe
risk workstream, the IFRS 16 impact on Solvency II and the ICS 1.0.

European 2018 stress test
EIOPA has engaged with industry, including AMICE, to start preparations for the 2018 stress test exercise. Following EIOPA’s first workshop held in Frankfurt on 23 October and in which the Secretariat participated online, AMICE submitted oral and written comments to EIOPA on a number of topics related to the exercise. AMICE has been invited to take part in a roundtable organised by EIOPA on 21 November.

European Central Bank & EIOPA joint workshop
On 10 November, AMICE attended a meeting organised by the ECB and EIOPA with the aim of discussing with national authorities’ representatives, EIOPA and industry the current state-of-play on the actual Solvency II reporting and statistical reporting from the central banks’ perspective. Participants discussed data quality issues, dissemination issues and the possible way forward. The Secretariat presented AMICE’s views on each of the topics under discussion and provided concrete examples as to how the reporting package could be simplified.

EIOPA Volatility Adjustment conference call
The Secretariat participated in a conference call organised by EIOPA on 13 November in order to inform selected stakeholders about their work on deriving updated representative portfolios for the calculation of the volatility adjustments. The Secretariat submitted oral comments at the conference call. Next month, EIOPA will decide on the new representative portfolios which should be applied in the calculation of the volatility adjustments for end March 2018.

EIOPA update on internal models project
EIOPA has explained that insurers with an internal model are taking a “by and large consistent” approach to modelling risk in their sovereign and non-sovereign bond holdings; variations in calibrations are now being reviewed by national supervisors. EIOPA is working towards a common view on the modelling the dynamic VA. It will perform annual comparative studies on the modelling of market and credit risk for the next few years, with the next study to be based on year-end 2017 calibrations.

EIOPA statistics
In November, EIOPA published its third quarterly statistics based on Q1 2017 data. The publication also includes the first set of statistics based on solo annual data with the reference to year-end 2016. The statistics are being published on a quarterly basis and include aggregated country-level information on the following information submitted by more than 3,000 firms:

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

EIOPA technical documentation
- EIOPA has published the risk-free rate term structure for Solvency II with reference to October 2017.
- EIOPA has published the technical information on the symmetric adjustment of the equity capital charge for Solvency II with reference to October 2017.

Accounting

EFRAG meeting

In September and November 2017, the Secretariat attended meetings of the Insurance Accounting Working Group at the European Financial Reporting Advisory Group (EFRAG) where discussion items included feedback from EFRAG Technical Expert Group (TEG) and EFRAG Board discussions on insurance contracts and topics related to the insurance contracts project, specific topics for clarification, the first draft of the EFRAG endorsement advice on IFRS 17, the draft results of the EFRAG IA WG questionnaire on current insurance accounting practices, an issues paper on application of the current rate when measuring the contractual service margin under the general model, and a paper on the different issues raised in relation to reinsurance and the draft case study. For the first time, the group discussed the draft case study developed by the EFRAG Secretariat that will be used as supporting tool for developing the endorsement advice on IFRS 17 Insurance Contracts.

IASB IFRS 17 Technical Resource Group (TRG) conference call
On 13 November, the Secretariat participated in the first IASB IFRS technical resource group (TRG) conference call which introduced the TRG members. The next meeting will be held on 6 February 2018.

Regulatory Affairs Working Group meeting

The Regulatory Affairs Working Group met in Brussels in September and November to discuss AMICE’s advocacy heat map, recent developments on IDD, PRIIPs, IAIS application paper on MCCOs, data protection, social economy, sustainable finance, social dialogue, recovery and resolution for insurers and the review of the European Supervisory Authorities (ESAs). At the November meeting, Julian Arevalo, Senior Expert on Financial Innovation at EIOPA, gave an update on
EIOPA’s current and upcoming work on digitalisation and InsurTech.

**Motor Insurance**

**AMICE Motor Task Force**

AMICE’s newly-established Motor Insurance Task Force held several online meetings throughout September and October. The main point of discussion was the preparation of a response to the Commission’s consultation on the review of the Motor Insurance Directive (MID). Members exchanged views on the general evaluation of the functioning of the MID, portability of claims history statements, protection of victims in case of insolvency of a cross-border motor insurer, technological evolution and the scope of the Directive.

On 20 October, the Secretariat submitted AMICE’s response to the Commission consultation on the review of the MID. As a general comment, we stressed that the current systems as set out in MID are functioning well. We also pointed out the importance for insurers to retain the ability to use their own criteria to decide on the level of discount offered and the freedom to set the premium rates for the cover they offer.

The Commission is expected to issue a legislative proposal to review the Directive by the end of the year.

**GEAR 2030 Report automotive competitiveness and sustainability**

The High-Level Group (HLG) GEAR 2030 issued its report on the competitiveness and sustainable growth of the automotive industry in the EU in October. The report concluded that the motor insurance and product liability directives were sufficient at this stage. It acknowledged that the MID ensured a fast, simple and efficient means of compensation by insurers for victims of road traffic accidents, even where an automated vehicle was involved. The report also recommended that fair access to data was provided to establish the circumstances surrounding an accident.

**Distribution**

**Adoption of IDD delegated acts**

In September, the European Commission adopted the implementing rules under the Insurance Distribution Directive (IDD).

The first delegated regulation concerns product oversight and governance rules for insurance undertakings. Insurers and distributors will be obliged to prioritise the interest of consumers when designing, developing and distributing all insurance products from 2018 onwards.

The second delegated regulation sets out new conduct of business rules in relation to insurance-based investment products (IBIPs) such as certain types of life insurance policies. Sellers of insurance products will be required to comply with new standards on preventing and managing conflicts of interest, and on accepting commissions and payments from third parties (so-called “inducements”). The rules also set out the information which sellers must gather from their customers when providing advice and in which cases investment products might be sold with limited advice or without advice.

The rules will enter into force on 23 February 2018 along with the IDD, following scrutiny by the European Parliament and the Council.

**ECON calls for delay of IDD application date**

In mid-October, the European Parliament’s ECON Committee voted in favour of two decisions concerning early non-objections to the Commission delegated regulations on the IDD.

Both decisions call on the Commission to adopt a legislative proposal setting the application date of IDD at 1 October 2018 while the transposition deadline should remain 23 February 2018.

**AMICE’s position on EIOPA’s survey on IDD Q&As**

EIOPA conducted a survey to gather data from stakeholders for its work on developing Questions & Answers (Q&As) on IDD.

In order to facilitate the implementation process, EIOPA is planning to develop a Q&A document focusing on issues of interpretation and application of IDD and its implementing measures.

Following members’ feedback, the Secretariat decided not to submit any questions to EIOPA’s survey. The IDD is a minimum harmonisation directive and implementation is ongoing at Member State level.

Members are encouraged to raise their implementation issues with their national supervisors and competent authorities.
EIOPA’s Guidelines on “execution-only” sales

On 11 October, EIOPA published its Guidelines on “execution-only” sales of insurance-based investment products IBIPs, such as telephone and online sales and where the insurance distributor neither provides advice nor verifies the customer’s knowledge of the product and the risks involved. The guidelines include criteria for identifying product features which are difficult for the customer to understand.

Reports on the cost and performance of insurance products

The European Commission sent a request to the European Supervisory Authorities (ESAs), including EIOPA, to issue recurrent reports on the cost and past performance of the main categories of retail investment, insurance and pension products. It notes that reporting should be based on what is required under key EU legislation (e.g. IDD, IORP and PRIIPs). The main objective of this action is to ensure that the pre-contractual disclosures and reporting are made accessible and support retail investors in their choices. Both qualitative and quantitative comparisons of costs and performance indicators will be provided at Member State and EU level. A first report will be issued by the end of 2018.

EU Supervision | Proposal to review the ESAs

On 20 September, the European Commission issued a package of proposals to review the EU supervisory architecture. The package of measures is significant and seeks to increase the powers of the three European Supervisory Authorities (ESAs), including EIOPA, primarily by transferring certain powers of regulation and supervision from national competent authorities to the ESAs. The Commission has maintained the current structure of the three separate ESAs due to the lack of support from stakeholders on the twin-peaks approach.

The key elements of the proposals cover the following areas:

- **Enhancement of EIOPA’s powers**
  - Internal models: EIOPA will play a role in approving internal models.
  - Breach of Union law: EIOPA will be able to send requests for information directly to companies in cases of breach of Union law.
  - Collection of information: EIOPA can address requests for information directly to a financial institution as a last resort measure. EIOPA will also have the power to impose fines and administrative penalties in case the companies fail to provide adequate information.
  - Stress testing: The proposal allows for the publication of results of individual financial institutions.
  - Guidelines and recommendations: EIOPA’s procedure to issue guidelines and recommendations will be enhanced.
  - Supervisory convergence: EIOPA will have the power to develop a supervisory handbook to further develop a supervisory culture across NCAs.
  - Technological innovation and sustainable finance: EIOPA will be under an obligation to take account of technological innovation and ESG factors when carrying out their supervisory tasks.
  - PEPP: EIOPA will have a stronger role in the authorisation of pan-European personal pension products.

- **Improving EIOPA governance**: The ESAs will have an independent Executive Board with full-time members that will ensure EU-oriented decisions with regard to the coordination of supervisory practices.

- **Funding**: The Commission proposes a partly industry-based funding of the ESAs.

The legislative proposals will now need to be considered by the European Parliament and the Council. The Commission has invited public/industry feedback by January 2018.

Members of the AMICE Secretariat are closely studying the proposals issued to formulate AMICE’s formal policy position. When AMICE responded to the original consultation, we raised several concerns which are not reflected in the proposals, and we are now assessing our next steps.

**ECON Hearing with EIOPA’s Chair Gabriel Bernardino**

The European Parliament’s ECON committee held an exchange of views with EIOPA’s Chair Gabriel Bernardino on 9 October. Mr Bernardino presented EIOPA’s achievements during the past year and the challenges ahead. As regards the achievements, he focused on supervisory convergence, consumer protection and financial stability. In response to MEP Kay Swinburne’s (ECR, UK) question on the IDD
implementation delay, he acknowledged that in the future, there should be more time between concluding regulatory material and implementation.

**EIOPA annual work programme 2018**

EIOPA has published its annual work programme (AWP) for 2018. EIOPA has introduced the cross-cutting theme of InsurTech, and one of the main priorities for next year will be the consistent implementation of the IDD and the PRIIPs Regulation. Level 3 guidance will be issued on professional indemnity insurance, on defining target market for POG and other possible IBIPs-related issues.

**European Commission work programme 2018**

On 24 October, the European Commission launched its 2018 work programme in Strasbourg, confirming it would introduce “a limited number” of draft laws before May to give time for them to be dealt with before the 2019 elections. The following new initiatives which are of relevance to the mutual and cooperative insurance sector include:

- Completing the Capital Markets Union (CMU): an action plan on sustainable finance with regulatory measures (Q1 2018); an initiative on financial technology (FinTech) (Q1 2018).
- Adoption of a reflection paper “Towards a Sustainable Europe by 2030, on the follow-up to the UN Sustainable Development Goals, including on the Paris Agreement on Climate Change” (Q2 2018).

The work programme also outlines some of the priority pending proposals that the Commission intends to deliver before the end of its mandate, including services e-card, PEPP, CCCTB and the ESAs’ review proposals.

**Services e-card | Practical hearing on the European services e-card**

On 8 September, AMICE co-organised a practical hearing on the Commission’s European services e-card with the social partners of three sectors directly affected by the proposal – the construction, cleaning and insurance industries. Strong concerns were expressed about the potential negative impact and far-reaching social consequences of the proposed e-card on these sectors. For further details, please see AMICE’s joint press release.

**Pensions**

**Pensions Working Group meeting**

AMICE’s Pensions Working Group met in October predominantly to discuss the Commission’s proposal for a pan-European personal pension product. Martijn Grevink from the Commission’s Insurance and Pensions Unit answered members’ questions and took note of their concerns and comments regarding the feasibility of a PEPP framework.

**Launch of the 2017 “Pension Savings: The Real Return”**

The Secretariat attended the launch of Better Finance’s annual research on the “real return” of long-term savings. The report concludes that many pension products are massively underperforming capital markets and deliver low or negative long-term real returns, despite good returns for both equity and bond markets since 2011. One of Better Finance’s recommendations is to grant special treatment through prudential regulations (Solvency II in particular) to all long-term and pension liabilities to allow for an adequate asset allocation.

**Insurance Europe Conduct of Business meeting**

On 12 September, the Secretariat attended Insurance Europe’s Conduct of Business Committee meeting where the main discussions focused on IDD, PRIIPs, InsurTechs, Big Data and collective redress.

**Data protection | Article 29 WP guidelines on profiling and data breach notifications**

The Article 29 Working Party has issued a new set of draft guidelines:

- Guidelines on profiling and automated decision-making under the forthcoming General Data Protection Regulation (GDPR).
- Guidelines on personal data breach notifications.

In addition, the Article 29 Working Party has also released the final version of its guidelines on data protection impact assessments.

**ESRB Report on recovery and resolution**

The European Systemic Risk Board (ESRB) published a report on recovery and resolution for the insurance sector. The report advocates for a harmonised recovery and resolution framework across the EU and suggests that such a framework would ensure that failures in the insurance sector could be managed in an orderly way.
Cyber Insurance

European Parliament debate on the role of insurance in building cyber resilience

During October’s European Cybersecurity Month, the European Parliament organised a debate titled “How to Fight Cyber Risk: the role of insurance in building cyber resilience and tackling cybercrime”. The discussions focused on the revision of the EU’s Cybersecurity Strategy, and on the role that the private industry could play in improving Europe’s overall level of cybersecurity and resilience, notably through cyber insurance.

Insurance Europe event on cyber insurance

The AMICE Secretariat attended Insurance Europe’s event “Boosting EU cyber resilience: awareness and information” in October. The panellists acknowledged that insurers play a key role in the cyber resilience process by providing a range of services, such as awareness-raising, assistance, mitigation and financial compensation when attacks occur.

GFIA Cyber Risks Working Group meeting

GFIA’s Cyber Risks Working Group met online on 7 November. Leigh Wolfrom, Policy Analyst, Directorate for Financial and Enterprise Affairs, OECD provided an update on the upcoming publication “Enhancing the Role of Insurance in Cyber Risk Management”. As a follow-up, the OECD will organise a conference on 22-23 February 2018 in Paris.

10th Annual International Insurance Regulatory Dialogue

AMICE’s Secretary General participated in the 10th Annual International Insurance Regulatory Dialogue on 8 September, which included representatives from the global regulatory community, industry CEOs, representative bodies and European policymakers. The event, organised by the Association of Bermuda Insurers & Reinsurers (ABIR), tackled European and global regulatory challenges and looked to areas of increasing activity including bridging the protection gap.

Social Economy

Social Economy Europe strategy development

Social Economy Europe (SEE) held a brief Board meeting in September followed by two half-days of strategy discussion moderated by LKS, part of the consulting and engineering division of Mondragon cooperative group, with the aim of producing a strategy to 2020. LKS has recently helped the Spanish social economy organisation, CEPES, to prepare its strategy and SEE has thus been able to benefit from the background work carried out on this project. Initial conclusions indicate the aim should be for SEE to move from gaining recognition at EU level to influencing stakeholders and for social economy to become truly significant for society. To achieve this, SEE should create alliances with other organisations and reinforce dialogue with key agents – not only the European Commission and Parliament but also national governments – while finding a way to increase its resources.

Plenary debate on a potential EU action plan for the social economy

At its plenary sitting on 5 October, the European Parliament held a debate on a European action plan for the social economy. Commissioner Vĕra Jourová noted that the social economy is part of the wider economy and presented a number of actions currently being developed by the European Commission, such as access to finance, access to markets, better legal frameworks, innovation and the international dimension of the social economy.

European Forum on social and solidarity economy

The Secretariat participated in the second European forum on the social economy which took place at the European Parliament on 9 November. The conference brought together EU policymakers and different actors in the SSE (social and solidarity economy) in Europe, highlighting the problems faced by the sector, as well as its potential in tackling the effects of the crisis.

Cooperative vision for the collaborative economy

The Secretariat attended an event titled “A cooperative vision for the collaborative economy” in November at the European Parliament. The event was hosted by MEP Nicola Danti, EP Rapporteur on collaborative economy, together with Cooperatives Europe. Cooperative representatives
presented some innovative models while making the collaborative economy inclusive, community-led and people-centred. Cooperatives Europe’s 
vision paper on the collaborative economy was released at the event.

Social dialogue | ISSDC Working Group meeting

The Insurance Sectoral Social Dialogue Committee held a working group meeting on 10 October. During the preparatory meeting of the employers’ representatives (AMICE, BIPAR and Insurance Europe), members discussed the EU’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. The ISSDC also heard from the French social dialogue partner on the recent labour reform in France and a presentation of the ILO-Eurofound report on teleworking.

Taxation | Reform of the EU VAT System

In October, the European Commission proposed a far-reaching reform of the EU VAT system. With its package, the Commission proposes to fundamentally change the current VAT system by taxing sales of goods from one EU country to another in the same way as goods sold within individual Member States. This would create a new and definitive VAT system for the EU.

Governance | IAIS final application paper on group corporate governance

Following a public consultation earlier this year, the IAIS has released a final version of its application paper on group corporate governance. The paper aims to provide good supervisory practices and examples to address challenges specific to the governance of insurance groups. It is relevant for all groups, but is particularly useful for the supervisors of insurance groups with more complex structures.

EC Task Force on Subsidiarity and Proportionality

On 14 November, the European Commission established the Task Force on Subsidiarity, Proportionality and “Doing Less More Efficiently”. The Task Force will report to President Jean-Claude Juncker by 15 July 2018, making recommendations on how to better apply the principles of subsidiarity and proportionality, identifying policy areas where work could be re-delegated or definitely returned to Member States, as well as ways to better involve regional and local authorities in EU policymaking and delivery. The Task Force will start its work on 1 January 2018, and it will be chaired by Frans Timmermans, Commission First Vice-President in charge of Better Regulation.

Sustainability

Consultation on HLEG interim report

AMICE responded to the High-Level Expert Group on Sustainable Finance’s questionnaire on its interim report, highlighting diversity in the financial sector and the long-term nature of insurance relationships as crucial factors for the group to consider. Reducing the short-term focus imposed by regulation, for example in the treatment of equity risk under Solvency II, would enable insurers to invest sustainably. In its response to the interim report, AMICE supported the need for a more standardised definition for green bonds and other sustainable assets with a clear classification system for the assets that can be considered as “sustainable”. This would avoid misuse of labels and standards, and address concerns such as “greenwashing”. An EU-level standard/label should be inclusive and should not be overly restrictive since insurers have many assets to invest and the number of sustainable funds is likely to be limited.

High Level Stakeholder Platform to follow up on the UN Sustainable Development Goals

The European Commission has appointed 30 members to a new high-level multi-stakeholder platform to follow up on the United Nations Sustainable Development Goals in the EU. The Platform will support and advise the European Commission on delivering the development goals at EU level and will provide a forum for exchange of best practice at local, regional, national and EU level.

European long-term investment conference

On 26 October, the Secretariat participated in the European long-term investment conference hosted by Confrontations Europe. Participants discussed the obstacles to long-term investment in Europe and the need to have integrated policies.

European Commission consultation on sustainability

The European Commission has launched a public consultation on how institutional investors, including insurers, could include environmental, social and governance factors when taking decisions. The European Commission is considering whether to clarify that institutional investors’ duties include taking into account sustainability risks. As announced in its 2018 Work Programme, the Commission will adopt an action plan on sustainable finance in the first quarter of 2018. The public consultation is open until 28 January 2018. Members are invited to share any comments and views on the consultation.
Assistance

Members’ meetings
In September, AMICE’s Secretary General, Sarah Goddard, and the ICMIF CEO, Shaan Tarbuck, met with German members in Cologne. This follows on from a meeting in early September between the AMICE and ICMIF Secretariat leaders and Italian member Reale Mutua to explain the functions and activities of both associations, explaining the complementary aspects of AMICE’s activities with those of ICMIF, and how the structural cooperation between the two organisations is developing.

CSR Working Group meeting
AMICE’s CSR Working Group met on 21 September at P&V in Brussels during European sustainable mobility week in order for members to exchange best practice in the area of mobility. A representative of Brussels government explained the mobility issues for the city. Members will continue to monitor the implementation of the non-financial reporting directive, which is not yet transposed in all Member States, and to hold a further discussion on integrated reporting at its next meeting which is scheduled to take place on 8 March 2018.

Independent director definition
AMICE’s Secretariat has aided a member seeking information about the definition of an “independent” member of the Board. Any members requiring assistance are welcome to contact the Secretariat and we will either supply information on their queries where we have it available, research the issue on your behalf where it is possible, or connect you with other members who are dealing with similar issues.

Data protection workshop
Initiated by the AMICE Health Working Group, AMICE organised a workshop on 6 November in light of the GDPR (General Data Protection Regulation), which comes into force in May 2018. External speakers included the European Commission (Data Protection Unit, DG for Justice and Consumers) and the Article 29 Working Party Presidency, as well as Digital Europe.

The workshop attracted 16 participants in person from 13 member organisations and a further 10 members online, as well as two non-member mutuals from the UK and two representatives from Insurance Europe’s secretariat. The UK mutuals’ association, AFM, shared the guide to GDPR implementation which it has developed for its members and which AMICE members will find on the AMICE website or on AFM’s website.

Members also shared their experiences of implementing GDPR within their organisations. The Secretariat circulated a follow-up survey to gauge the interest for further activities in this area. If you did not attend the workshop but would like to reply to the survey, please contact the Secretariat.

Other updates

Statutory

AMICE Board and Executive Committee meetings
AMICE’s Board met by phone in September to consider the draft structural cooperation business plan between AMICE and ICMIF and approved the further development of the business plan which was considered by ICMIF’s Board and Executive Committee the following month. AMICE’s Executive Committee discussed certain specific elements further during its meeting in September.

At its September meeting, AMICE’s Executive Committee also considered AMICE’s collaborations with other representative bodies, AMICE membership, Congress organisation, budget and the work of the AMICE Commissions.

Extraordinary General Meeting
At AMICE, we believe that our core role is as a member-focused representative body. With that in mind, we have been pursuing steps towards a structural cooperation with ICMIF over recent years, responding to members’ proposals and statutory decisions, such as at the Annual General Meeting in Ghent last year. Both Secretariats have undertaken extensive work to develop the structural cooperation business plan which was circulated to all members last month, overseen by AMICE’s Executive Committee and Board, as well as those of ICMIF.

Certain aspects of the proposed plan required changes to AMICE’s governance; these changes needed to be agreed by the membership in General Meeting, therefore we called the Extraordinary General Meeting of AMICE which took place in Brussels in early December.

This meeting provided an opportunity for the Secretary General of AMICE and CEO of ICMIF to present the highlights of the plan, and for the members gathered to express their responses, both through dialogue and by voting on specific items comprising amendments to the AMICE Articles of Association, a revised membership fee for 2018, and a revised budget for 2018.

We received strong messages from the members gathered in Brussels that there is strong support for the structural cooperation, but significant reservations remain about its financial aspects. This was confirmed by the results of the vote, which was overwhelmingly in favour of the required amendments to the Articles, but only marginally in favour of the new fees and the resulting new budget.

With changes as fundamental as the ones proposed in the structural cooperation business plan, it is of paramount importance that we receive a clear mandate from our members to proceed, and the results of the vote do not offer full comfort in this respect. We are
currently examining the many implications that the decision at the EGM will have on AMICE, and will consider these at board level in the next few weeks.

The AMICE Board continues to believe that a cooperation with the global federation, ICMIF, is in the best interests of the AMICE membership, but we have listened to the concerns about the programme as it has been designed to date, and are acting on those concerns. We will ensure all members receive clear communications on the next steps to be taken, and the Secretary General and AMICE Board members are eager to hear your reflections on the programme. You can contact the Secretary General here.

**Operations**

**AMICE office and systems upgrade**

AMICE’s office and communications systems upgrades were completed in October 2017.

A new phone and online conferencing system has been installed which allows more members to connect remotely to working group meetings and other events held in the AMICE offices. Each Secretariat member’s phone number remains the same, but we have upgraded our technology for better quality and functionality, and a more cost-effective system. The new conferencing system for remote participation in AMICE meetings is now a clearer and more stable facility.

We are in the process of creating a small collection of significant publications and items relating to the mutual and cooperative insurance sector – and in particular, AMICE members – in Europe. If you have any pieces you would like to share with us, whether books, posters or other items, we’d love to add them to our developing collection of items representing mutual and cooperative insurance in Europe.

**GDPR and AMICE**

In autumn, AMICE’s Secretary General and Deputy Secretary General attended a presentation on GDPR and associations. The output of the seminar is being used to bring AMICE’s data protection practices into line with the forthcoming legislation, and will enable us to better formulate our GDPR-related services such as the recent workshop for our membership.

**Association management**

In November, the Secretariat attended a seminar organised by the Union of International Associations in Brussels which addressed questions around association funding and political strategies, as well as legal issues such as the tax treatment of economic activities and GDPR.

**Collaboration with Insurance Europe**

AMICE Secretary General met with the Director General of Insurance Europe, Michaela Koller, as part of the MoU between the two associations, to exchange on common areas of policy. AMICE’s President attended the Insurance Europe Strategic Board the following day, which focused on high-level strategic activities for Insurance Europe to pursue next year. AMICE will be supporting Insurance Europe’s positions in several of these activities, where it is in our members’ best interests.
## AMICE-ICMIF Calendar 2018

<table>
<thead>
<tr>
<th>Date</th>
<th>Location</th>
<th>Organization</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>January</td>
<td>Brussels or online</td>
<td>AMICE</td>
<td>Board (date tbc)</td>
</tr>
<tr>
<td>1 February</td>
<td>Brussels</td>
<td>AMICE</td>
<td>Communications Working Group</td>
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<tr>
<td>8 February</td>
<td>Brussels</td>
<td>AMICE</td>
<td>Regulatory Affairs Working Group</td>
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<tr>
<td>20 February</td>
<td>Brussels</td>
<td>AMICE</td>
<td>Executive Committee</td>
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<tr>
<td>22 February</td>
<td>Brussels</td>
<td>AMICE</td>
<td>Pensions Working Group</td>
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<tr>
<td>6-8 March</td>
<td>Brussels</td>
<td>ICMIF</td>
<td>High Potential Course</td>
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<tr>
<td>8 March</td>
<td>Brussels</td>
<td>AMICE</td>
<td>CSR Working Group</td>
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<tr>
<td>20 March</td>
<td>Brussels</td>
<td>AMICE</td>
<td>Board</td>
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<tr>
<td>9-10 April</td>
<td>Manchester</td>
<td>ICMIF</td>
<td>Executive Committee Meeting</td>
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<tr>
<td>23-25 April</td>
<td>Montreal</td>
<td>ICMIF</td>
<td>Meeting of Reinsurance Officials (MORO)</td>
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<td>26 April</td>
<td>Brussels</td>
<td>AMICE</td>
<td>Regulatory Affairs Working Group</td>
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<tr>
<td>13-18 May</td>
<td>Manchester</td>
<td>ICMIF</td>
<td>Advanced Management Course (AMC)</td>
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<td>16-18 May</td>
<td>Bologna</td>
<td>ICMIF</td>
<td>Intelligence Committee meeting</td>
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<td>Stockholm</td>
<td>AMICE</td>
<td>Board</td>
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<td>General Meeting</td>
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<td>3-5 June</td>
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<td>AMICE</td>
<td>AMICE Congress 2018</td>
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<td>16 October</td>
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<td>ICMIF Board Meeting</td>
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<tr>
<td>15 November</td>
<td>Brussels</td>
<td>AMICE</td>
<td>Regulatory Affairs Working Group</td>
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## External Events Calendar 2018

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<tr>
<th>Date</th>
<th>Location</th>
<th>Event Description</th>
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<tbody>
<tr>
<td>19 January</td>
<td>Paris</td>
<td>ROAM Annual Conference</td>
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<tr>
<td>24 May</td>
<td>Madrid</td>
<td>10th International Insurance Conference</td>
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<td></td>
<td></td>
<td>Insurance Europe</td>
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