

PUBLIC

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Petra Hielkema
Chairperson

John Berrigan, Director General, DG FISMA

Roberto Viola, Director General, DG CNECT

Subject: Exclusion of GLMs and GAMs from the AI Act high-risk classification – EIOPA's further input

Dear Mr. Berrigan, dear Mr. Viola

EIOPA welcomes the objectives of Regulation (EU) 2024/1689 on Artificial Intelligence (“AI Act”), which lays down harmonised rules on artificial intelligence. EIOPA remains committed to support the European Commission’s work to ensure a coordinated and consistent implementation of the AI Act across the EU insurance sector, taking into account existing sectoral rules and supervisory frameworks, including through its role as observer in the EU AI Board’s Subgroup on Financial Services.

On 14 April 2026, EIOPA sent a letter¹ to the co-legislators and the European Commission calling for the exclusion of generalised linear models, including linear and logistic regression (“GLMs”), and generalised additive models (“GAMs”) from the scope of high-risk AI systems under Annex III paragraph 5, point (c) to the AI Act.

In that letter, EIOPA explained that GLMs and GAMs used for risk assessment and pricing in life and health insurance do not pose a significant risk of harm to the health, safety, or fundamental rights of natural persons. EIOPA substantiated this position by referring to several criteria set out in Article 7(2) of the AI Act, which the Commission must assess when considering amendments to Annex III by means of delegated acts adopted in accordance with Article 97 of the AI Act.

Following EIOPA’s letter, the Commission asked EIOPA to provide further context and concrete examples to support its assessment of whether Annex III should be amended to exclude GLMs and GAMs from the list of high-risk AI systems in relation to risk assessment and pricing in life and health insurance.

Against this background, the attached technical annex provides a point-by-point assessment of the criteria set out in Article 7(2) of the AI Act, with a view to assessing whether the conditions under Article 7(3) are met for a targeted amendment of Annex III, point 5(c). The assessment focuses specifically on systems relying solely on GLMs, including linear or logistic regression, and GAMs, where they are used in life and health insurance under human supervision.

¹ [EIOPA Letter to co-legislator on AI Act 14 April 2026](#)

The outcome of EIOPA's assessment is that such human-supervised GLMs and GAMs do not pose the type of significant AI-specific risk that justifies their classification as high-risk AI systems under Annex III, point 5(c). While EIOPA recognises that life and health insurance pricing and risk assessment are important processes that may affect natural persons' access to and enjoyment of insurance products, the assessment shows that the relevant risks arise primarily from data selection, data governance and underwriting or pricing policies, rather than from the GLM/GAM model architecture as such.

The assessment also confirms that these risks are already addressed through existing Union insurance, conduct, prudential, data-protection and operational-resilience frameworks. These frameworks provide safeguards for governance, risk management, consumer protection, data protection, operational resilience, supervision and redress. In addition, insurance law itself recognises that insurance is based on the assessment, pricing and pooling of risks, and that sound prudential risk management requires appropriate actuarial and statistical methods and risk-sensitive segmentation.

On this basis, EIOPA considers that the conditions set out in Article 7(3) of the AI Act are met for a targeted exclusion from Annex III, point 5(c), of systems relying solely on GLMs, including linear or logistic regression, and GAMs under human supervision. Keeping these models within the high-risk classification would not materially increase the protection of health, safety or fundamental rights. It would instead risk creating overlapping compliance obligations and diverting finite supervisory and industry resources away from more opaque, adaptive or genuinely novel AI systems that may raise more specific AI-related risks.

The attached technical annex sets out EIOPA's assessment in detail, following the structure of Article 7(2) of the AI Act and explaining the basis for EIOPA's conclusion.

EIOPA and the European insurance supervisory community remain fully committed to supporting a regulatory framework that enables the safe and responsible use of artificial intelligence, while maintaining a proportionate, risk-based, and innovation-friendly approach aligned with the Union's broader financial services acquis.

Yours sincerely,

[signed]

Petra Hielkema

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