

Insurance and Reinsurance Stakeholder Group

DATE: 27 April 2022

TIME: 09:30 – 15:40

LOCATION: VIDEOCONFERENCE

MEETING CONCLUSIONS

AGENDA ITEM 1: Approval of the agenda

1. The IRSG Chairperson welcomed members to the 10th IRSG meeting.

CONCLUSIONS AND ACTION POINTS

2. The draft agenda (IRSG-22-05) was approved.

AGENDA ITEM 2: Update by IRSG Chairperson

3. The IRSG Chairperson presented upcoming deadlines for IRSG deliverables.

CONCLUSIONS AND ACTION POINTS

4. Paul Fox to lead the drafting work in relation to the IRSG advice on [draft Guidelines on integrating the customer's sustainability preferences in the suitability assessment under the IDD.](#)
5. Juan-Ramon Pla to lead the drafting work in relation to the IRSG advice on IDD Regulatory Technical Standards on Professional Indemnity Insurance.
6. Lauri Saraste to lead the drafting work in relation to the IRSG advice on methodology to identify low-value-for-money products for consumers.
7. Desislav Danov to lead the drafting work in relation to the IRSG advice on securitisation.

AGENDA ITEM 3: Update by EIOPA

8. EIOPA's Chairperson provided an update to the group on:
Impact of Russian invasion in Ukraine

The Russian invasion in Ukraine has marked a very sad development from all perspectives, not to mention potential repercussions it may have for the economy. EIOPA/IRSG/OPSG Chairpersons held a call on 3 March to exchange information about the situation and agreed to stay in close contact on this issue. Should any questions arise from the insurance industry regarding the implementation of EU sanctions, they should be channelled through the supervisory community.

9. **ESAP – European Single Access Point**

The ESAP, flagship action from CMU action plan, is a single point of access to EU companies' financial and sustainability-related public information as well as public product data. Its aim is threefold: reduce barriers to investment, increase visibility of investment opportunities for investors, and boost the green transition. EIOPA welcomes these opportunities to be offered by ESAP by 2024 and will further involve the stakeholder groups as legislative proposals develop.

10. **Diversity and Inclusion (D&I)**

The increasing concerns on Environmental, Social and Governance (ESG) issues build momentum for changes and highlight the need for setting clear expectations about D&I in the insurance sector. D&I can be defined as individual uniqueness and variety but also inclusiveness and togetherness – the mosaic of people who bring a variety of cultural, social and historical backgrounds, styles, perspectives, values and beliefs as assets to the groups and organisations with which they interact. In the financial services sector context, firms succeeding at developing diverse and inclusive environments may increase their safety and stability as well as provide better outcome for consumers. EIOPA's four streams of work cover 1) D&I in the management and governance of companies, 2) companies' approach to consumers and policyholders, 3) D&I in EIOPA, and 4) D&I in National Competent Authorities.

11. **EIOPA's Cost & and Past Performance Report was published on 5 April**

CONCLUSIONS AND ACTION POINTS

12. Members took note of the Peer Review on Product Oversight and Governance that is part of the [EIOPA's two Year Peer Review Work plan](#) 2020-2022 and may address any queries in writing to EIOPA.
13. Members to take note that the [ESAs recommended](#) to the Commission to make changes to the PRIIPs key information document to more it more consumer-friendly.

AGENDA ITEM 4: EIOPA's feedback on IRSG advice delivered

14. EIOPA provided an overview of its feedback to the IRSG advice on Supervisory Statement on supervision of run-off undertakings.

CONCLUSIONS AND ACTION POINTS

15. EIOPA to provide feedback by 28 June 2022 regarding the IRSG advice on: Retail Investment Strategy, Application guidance for the inclusion of climate risk scenarios in the ORSA, and PRIIPs.

AGENDA ITEM 05: Update on EIOPA's process towards a review strategy

16. EIOPA explained the process of reviewing and adjusting its strategy by taking into consideration market developments and trends. The aim is to ensure that adequate tools are in place to address the main identified challenges.
17. EIOPA presented the aggregated input received from the Stakeholder Groups members via a survey launched on 24 February -7 March, regarding the challenges ahead for the next 3-4 years. EIOPA thanked IRSG members for their valuable input to the survey, which will also inform the review.
18. Members further discussed how they see EIOPA's challenges for the years to come, e.g. the need for EIOPA to: pay attention to horizontal legislative acts and how they interact with sectoral legislation, and to ensure that the specificities of insurance and pensions are well considered.

CONCLUSIONS AND ACTION POINTS

19. EIOPA to provide further information on its revised strategy to IRSG, once finalised.

AGENDA ITEM 06: Own-initiative report on the Publication of individual Stress Test results by undertakings

20. Marcin Kawiński presented the envisaged scope of this own-initiative report. Members exchanged views on the aim of the Stress Test publication, the differences between banking and insurance prudential frameworks that warrant different treatments by the sectors for stress tests and on the risks of publishing particular parts of the Stress Test's outcome for individual companies. Members expressed doubts about the initiative and its timing given that EIOPA had already issued an opinion. Rather than the IRSG advising on the publication of individual stress test results, there was agreement to monitor the approach to stress tests applied by undertakings, and to follow up on a proposal from Better Finance to look at the SFCR as this is the tool to provide consumers with information about an individual company.

CONCLUSIONS AND ACTION POINTS

21. Guillaume Prache to present during the next IRSG meeting the Better Finance [publication](#) on the interpretation of the results of solvency and financial condition of insurers' disclosures to consumers – Solvency and Financial Condition Report (SFCR).

AGENDA ITEM 07: Own-initiative report on adapting underwriting of non-life insurance to climate change

22. Marcin Kawiński presented the envisaged scope of this own-initiative report: Exchange of climate- and catastrophe-related data among companies, especially the data architecture to be used and the possible conflicts arising from existing competition or data protection standards.

CONCLUSIONS AND ACTION POINTS

23. Marcin Kawinski to further work on a draft report focusing on barriers for adaptation measures (data protection).

24. IRSG to finalise advice by mid-November 2022.
25. Members to send input regarding adaptation measures, identifying any barriers to data sharing.

AGENDA ITEM 08: Insurance Guarantees Scheme and Recovery and Resolution

26. Lauri Saraste presented a case study from June 2020 from the Finnish actuarial Society undertaken in co-operation with the Finnish Financial Supervisory Authority, entitled “What challenges do we face if implementing insurance guarantee schemes and recovery & resolution frameworks?”. EIOPA BoS Member and IRSG Members commented on the study and on the need for minimum harmonization of the schemes across the EU.

CONCLUSIONS AND ACTION POINTS

27. n. a.

AGENDA ITEM 9: Consumer Trends Report

28. EIOPA highlighted the publication of the EIOPA’s [2021 Consumer Trends Report](#) and briefly explained the 2022 request to the OPSG (questionnaire).

CONCLUSIONS AND ACTION POINTS

29. IRSG Members to provide their input by 18 May 2022.

AGENDA ITEM 10: Insurance Distribution Directive (IDD)

30. EIOPA briefly presented its public consultation on the draft Guidelines on integrating the customer’s sustainability preferences in the suitability assessment under the IDD. A [public hearing](#) will be organised on 6 May 2022.
31. EIOPA further informed the group on an upcoming consultation intended to gather IRSG input on market conditions concerning Professional Indemnity Insurance cover.

CONCLUSIONS AND ACTION POINTS

32. Paul Fox to gather comments from members on the [current EIOPA consultation](#) with a view to deliver advice to EIOPA by 27 May 2022.

AGENDA ITEM 11: Own-initiative report on the Digital Operational Resilience Act (DORA)

33. Desislav Danov presented a summary of the [IRSG advice](#) delivered to EIOPA.
34. EIOPA thanked the group for their advice. In particular, it concurred with the assessments that:
 - The ICT risk profile of (re)insurance undertakings/intermediaries/IORPs are different from the one of a bank – However, similar principles and designs of an ICT risk management system may well apply across sectors.
 - The intended benefits for EU consumers should be stressed in the final act, and not-overly prescriptive technical standards should be developed afterwards
 - There should be enough time scheduled for implementation.

In relation to the use of third-party certifications, EIOPA referred to its own work on guidelines on outsourcing to cloud service providers.

CONCLUSIONS AND ACTION POINTS

35. Members were invited to join the EIOPA workshop on cyber incident reporting on 4 May 2022.

AGENDA ITEM 12: Proportionality

36. EIOPA provided an update on the work of the Advisory Committee on Proportionality (ACP) and its Task Forces, and the three areas in the draft ACP advice 2023 based on EIOPA's Annual Work Programme: Diversity and Inclusion, Recovery and Resolution and IORPs role regarding the new sustainability strategy.

37. In addition, members exchanged further views on proportionate Conduct of Business supervision based on comments by Paul Fox, who presented the TF work on IDD, POG and IORPs.

CONCLUSIONS AND ACTION POINTS

38. n.a.

AGENDA ITEM 13: Any other business (AOB)

39. Members suggested topics for next IRSG-only meeting and joint meeting with EIOPA's Board of Supervisors to be held in June 2022.

CONCLUSIONS AND ACTION POINTS

40. Suggestion to discuss at the next meeting: i) Solvency II Review process in 2022, ii) own-initiative report on European database on access to insurance by SMEs, iii) data/status from the national finance inspections about cyber attacks during this year, and if possible for the last year.

Participants

IRSG Chairperson: Michaela Koller, Vice Chairperson: Paul Fox

First Name	Last Name	Country	Member representing	
Mireille	Aubry	France	Industry	Present
Pauline	Azzopardi	Malta	Consumers & Users	Present
Typhaine	Beaupérin	Belgium/France	Professional associations	Present
Monica	Calu	Romania	Consumers & Users	Present
Desislav	Danov	Bulgaria	Consumers & Users	Present
Niko	Daskalakis	Greece	SMEs	Present
Claudia	Donzelmann	Germany	Industry	Present
Paul	Fox	UK	Consumers & Users	Present
Hugh	Francis	UK	Industry	Present
Liisa	Halme	Finland	Employees	Present
Liane	Hirner	Austria	Industry	Present
Benoît	Hugonin	France	Industry	Present
Marcin	Kawiński	Poland	Academics	Present
Michaela	Koller	Germany	Industry	Present
Xavier	Larnaudie Eiffel	France	Industry	Present
Pierpaolo	Marano	Italy	Academics	Present
Stefan	Materne	Germany	Academics	Present
Anthony	O'Riordan	Ireland	Professional associations	Present
Tomas	Paulauskas	Lithuania	Consumers & Users	Present
Juan - Ramón	Plá	Spain	Industry	Present
Patricia	Plas	Belgium	Industry	Present
Guillaume	Prache	France/Belgium	Consumers & Users	Present
Tito	Rodrigues	Portugal	Consumers & Users	Present
Galit	Saar	Sweden	Industry	Present
Lauri	Saraste	Finland	Industry	Present
Bruno	Scaroni	Italy	Industry	Present
Martin	Schmalzried	Czech Republic	Consumers & Users	Present
Antti	Talonen	Finland	Academics	Present
Greg	Van Elsen	Belgium	Consumers & Users	Present
Gisella	van Vollenhoven	Netherlands	Industry	Present

Other participants:

EIOPA's Senior Management and staff members, Member of [EIOPA's Board of Supervisors](#) (contact: Stakeholder.Groups@eiopa.europa.eu).