

## Insurance Europe response to EIOPA's consultation on revised guidelines on undertaking-specific parameters

Our reference:	ECO-SLV-25-094	Date:	26-02-2025
Referring to:	<a href="#">Consultation on revised guidelines on undertaking-specific parameters</a>		
Related documents:	<a href="#">Consultation Paper</a>		
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### Introduction

#### Q1. Do you have general comments on the consultation document?

While the rationale for updating the guidelines is understandable, some of the proposed deletions by EIOPA may not be fully appropriate considering the differences in what might be considered an "obvious" interpretation.

More specifically, regarding deletions, there may be a loss of clarity for future users who do not have the explanatory text. Aspects that seem self-evident to EIOPA today may not always have been in the past or be in the future. **To maintain usability and legal certainty, it may be preferable to retain these guidelines, incorporating some of the explanatory text rather than removing them entirely.** This approach would ensure that the guidelines remain logically deducible from the Delegated Regulation while preserving necessary clarifications.

#### Q2. Do you have comments on Section 'Consultation paper overview and next steps'?

N/A

#### Q3. Do you have comments on Sub-section 'Introduction'?

N/A

#### Q4. Do you have comments on 'Guideline 1 - Role of expert judgement' and the corresponding explanatory text?

N/A

#### Q5. Do you have comments on 'Guideline 2 - Materiality' and the corresponding explanatory text?

N/A

#### Q6. Do you have comments on 'Guideline 3 - Adjustments to increase the level of appropriateness in data'?

N/A

**Q7.** Do you have comments on 'Guideline 4 - Adjustment of historical data to eliminate the effect of catastrophe events and to reflect the current reinsurance arrangements'?

N/A

**Q8.** Do you have comments on 'Guideline 5 - Calculation of non-proportional reinsurance adjustment in the scope of premium risk' and the corresponding explanatory text?

N/A

**Q9.** Do you have comments on 'Guideline 6 - Continuous compliance' and the corresponding explanatory text?

N/A

**Q10.** Do you have comments on 'Guideline 7 - Remedial of non-compliance' and the corresponding explanatory text?

N/A

**Q11.** Do you have comments on 'Guideline 8 - Requirement from the supervisory authority to use undertaking-specific parameters' and the corresponding explanatory text?

N/A

**Q12.** Do you have comments on 'Guideline 9 - Significant deviation' and the corresponding explanatory text?

N/A

**Q13.** Do you have comments on 'Guideline 10 - Application for approval of the use of group-specific parameters' and the corresponding explanatory text?

N/A

**Q14.** Do you have comments on 'Guideline 11 - Scope of the group using group-specific parameters' and the corresponding explanatory text?

N/A

**Q15.** Do you have comments on 'Guideline 12 - Data quality requirements at group level' and the corresponding explanatory text?

N/A

**Q16.** Do you have comments on 'Guideline 13 - Consultation within the college of supervisor'?

N/A

**Q17.** Do you have comments on 'Guideline 14 - Information for the college of supervisors'?

N/A

**Q18.** Do you have comments on Sub-section 'Compliance and reporting rules'?

N/A

**Q19.** Do you have comments on Sub-section 'Final provision on review'?

N/A

**Q20.** Do you have any other comments on Section 'Guidelines on undertaking-specific parameters' and on Section 'Explanatory text'?

N/A

**Q21.** *Do you have any comments on the proposals to simplify and shorten the Guidelines and/or any other suggestions for simplifying and shortening the Guidelines, taking into account the relevance of the individual Guidelines?*

N/A

**Q22.** *Do you have any other comments?*

N/A

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