

Frédéric de Courtois
President
Insurance Europe

Via email: deCourtois@insuranceeurope.eu

Subject: Stakeholder engagement for EIOPA's work on Insurance Guarantee Schemes

Dear Frédéric,

Thank you for your letter and for sharing your reflections on EIOPA's recent stakeholder engagement activities related to Insurance Guarantee Schemes (IGS). We appreciate the time and effort invested in providing input under challenging circumstances to a technically challenging call for advice.

We acknowledge your observation that the timeframe for the recent stakeholder workshop and survey was demanding. Both EIOPA and the insurance sector are facing pressing deadlines in the context of the ongoing work comprising several subtopics which call for detailed analysis. Within these constraints, we endeavour to work as efficiently and effectively as possible to ensure that stakeholders are able to contribute meaningfully at early stage during the ongoing preparatory phase of EIOPA's advice.

As stakeholder engagement is essential to the quality and legitimacy of our work, we have planned multiple interactions throughout the process starting with the publication of the Call for Advice in October and several bilateral meetings with national associations until end 2025, including a call with Insurance Europe and EIOPA on 19 December, informing about our envisaged process and the overall time challenges. Public interactions with stakeholders include the February workshop and survey held, followed by the upcoming public consultation during the second quarter of 2026 and, potentially, a consultation workshop in May/June. Alongside these events, EIOPA continues to engage actively through bilateral meetings to ensure that a diverse range of perspectives is heard and considered.

You also highlighted the importance of a systematic and quantitative assessment of the economic impact of potential IGS harmonisation options, including the cost implications for policyholders and the consideration of a "no minimum baseline" scenario. An assessment of the economic impact of covering eligible policies in terms of increased protection for policyholders and additional costs for the insurance sector is part of the Call for Advice. However, a comprehensive quantitative impact assessment and justification for harmonisation would fall primarily within the remit and mandate of the European Commission at a later stage. EIOPA's advice will include a cost / benefit comparison for each potentially envisaged policy option for IGS which will as well reflect upon stakeholders' feedback submitted via the online survey.

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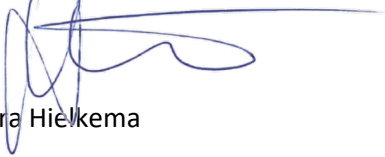
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We have taken note of your point that the timeframe did not allow you to analyse the survey in the depth you would have wished. The overarching comments you submitted are nonetheless valuable, and we welcome your intention to engage further as the work progresses. We share the goal of strengthening the quality of stakeholder involvement and will continue to ensure that there are accessible opportunities to contribute. In this regard, we are happy to receive your input at any time, particularly with regard to your assessment of the economic impact of minimum harmonized IGS.

We thank you again for your constructive engagement and look forward to continued dialogue on this important topic.

If you require any further information, we remain at your disposal.

Yours sincerely,



Petra Hielkema

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