



To: Petra Hielkema, Chairperson, EIOPA

CC: John Berrigan, Director General, DG FISMA

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

Brussels, 23-02-2026

Dear Petra,

The European Commission's work on the potential minimum harmonisation of Insurance Guarantee Schemes (IGS) within the EU could have significant impact on the European insurance sector. As such, we believe European insurers should be appropriately consulted during the preparatory phases of the work. It is in this regard that we are contacting you to express our concerns around the current stakeholder engagement process being followed.

In our view, the three-week period foreseen by EIOPA for stakeholders to respond to its latest public survey on IGS is not sufficient and does not provide the necessary time to respond to the lengthy and complicated questions being asked of stakeholders. While EIOPA itself has recognised the challenges of responding to the Commission's Call for Advice and requested extra time to complete its own work, it should be recognised that similar challenges exist for all stakeholders. Advance notice of the survey and earlier publication of the Commission's Call for Advice may have helped stakeholders prepare in advance.

We are also concerned that there appears to be little emphasis on evidencing the justification for, and the potential economic impact of, any minimum harmonisation requirements. This includes the additional costs to the industry, which will ultimately be borne by policyholders. These costs were specifically included in the Call for Advice to EIOPA in order to allow the Commission to balance different angles on IGS harmonisation. New legislation should not be considered without such analysis and information, especially given the EU's commitment to regulatory simplification and only introducing new regulatory requirements which are truly necessary so as not to undermine the sector's competitiveness. As part of its work, we request that EIOPA carries out a systematic and quantitative assessment of the costs of any proposals, and considers the impact on policyholders, particularly where they result in higher insurance premiums. This assessment should explicitly consider the option of not introducing a minimum baseline.

The insurance industry continues to support the Commission's Better Regulation Framework, which places meaningful stakeholder consultation at its heart and emphasises the importance of structured engagement with stakeholders over the lifecycle of a policy. We remain fully committed to engaging constructively on this important matter, clearly demonstrated by the industry's attendance and participation in the recent EIOPA webinar on the topic. While we recognise that an additional consultation is foreseen later in the year, we consider these initial discussions to be very important, and we will endeavour to respond to this survey to the best of our ability. However, given the short timeframe, it is not possible to analyse each question with the depth such a broad exercise requires. We would appreciate if the survey could be adjusted to allow the submission of a cover note of overarching comments.



We would welcome the opportunity to discuss these issues further, noting that strengthening the timing, transparency, and depth of engagement with stakeholders, alongside a thorough impact assessment, will significantly support the aim of achieving effective protection of policyholders within a robust insurance sector.

Yours sincerely,

A handwritten signature in black ink, appearing to read "F.C.", with a horizontal line underneath.

Frédéric de Courtois  
President