

Comments on draft European Commission Implementing Regulation on high-value datasets

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Insurance Europe welcomes the possibility to comment on the European Commission [draft Implementing Regulation](#) laying down a list of specific high-value datasets and the arrangements for their publication and re-use. The draft Regulation would ensure that a common EU-wide layer of public sector datasets is easily and freely available for re-use, which could lead to significant benefits for society, the environment and the economy.

Public institutions can provide invaluable sources of data due to the comprehensiveness and the quality of the datasets. However, one of the major challenges faced by insurance companies when developing their artificial intelligence (AI) systems, for example, is restricted or limited access to data from the public sector.

Very few countries in Europe have a regulatory framework for sharing data with companies, while some jurisdictions are further limiting access to the data stored by their public institutions with a consequent negative impact on innovation. Insurance Europe therefore shares the Commission's view that the establishment of a list of high-value datasets to be made available free of charge and without restrictions is a good way to ensure that public sector data has a positive impact on the EU's economy and society.

Another challenge in this context is the methodology used by public institutions to compile and share data. Insurance Europe welcomes the fact that the defined high-value public datasets would be made available via application programming interfaces (APIs), in machine-readable format and downloadable in bulk, where possible. The availability of these datasets via APIs and in this format would facilitate their subsequent use in a variety of data-driven applications.

In addition to the relevant datasets described in the Annex to the draft Regulation, Insurance Europe invites the Commission to also consider making available the following data:

- **Companies and company ownership:** non-financial information that is essential for strengthening the database of sustainable finance (published non-financial information should be consistent with the requirements of the renewed Non-Financial Reporting Directive (NFRD), the Sustainable Financial Disclosures Regulation (SFDR), and the Taxonomy Regulation to help companies and their investors comply with their data requirements).
- **Mobility:** road traffic analysis, modes of travel used, intermodality. Access to the datasets of public sector bodies in EU member states related to the safety and security of road traffic and the historic development of safety and security on public roads.



To provide reliable insurance cover, insurers must carry out sophisticated risk assessments and calculations, using various types of information. In particular, insurers carry out statistical analysis of past events to estimate the probability of such events reoccurring. This data analysis is carried out at the product design stage, allowing insurers to learn and manage the risks of offering a new insurance policy. Therefore, for insurers, greater availability of data could lead to improved risk monitoring and assessment, meaning insurance products can be better tailored to each consumer's risks and needs. Developing new, or more sophisticated, risk models can enable insurers to offer more competitive rates or to offer insurance for risks that were previously uninsurable, due to information gaps that today can be filled in by the increased availability of data.

Insurance Europe therefore invites the Commission to encourage the re-use of such public sector databases as this will bring concrete societal benefits and help to unleash the hidden potential of the EU data economy.

Insurance Europe is the European insurance and reinsurance federation. Through its 36 member bodies — the national insurance associations — it represents all types and sizes of insurance and reinsurance undertakings. Insurance Europe, which is based in Brussels, represents undertakings that account for around 95% of total European premium income. Insurance makes a major contribution to Europe's economic growth and development. European insurers pay out over €1 000bn annually — or €2.8bn a day — in claims, directly employ more than 920 000 people and invest over €10.6trn in the economy.