



To: Mr. Aurel Schubert
Mr. Jean-Marc Israël
ECB
Kaiserstrasse 29
D-60311 Frankfurt am Main

Our
reference: ECO-SLV-13-293
Subject: ECB Regulation on Insurance Corporations Statistics

Brussels, 10 September 2013

Dear Mr Aurel Schubert,
Dear Mr Jean-Marc Israël,

Insurance Europe wants to express its appreciation for the constructive dialogue that has developed between the European Central Bank (ECB) and the insurance industry over the course of the past year.

Insurance Europe understands the importance for the ECB to have appropriate and timely data in order to meet its objectives, such as the conduct of monetary policy, economic analysis, financial stability analysis and macro-economic oversight. It is, however, also important to give due consideration to the specificities of the different sectors when defining the requirements for insurance corporations statistics.

The statistics requirements on insurance corporations need to consider the insurance business model where projections of future cash-flows are made using stochastic models, which often need to be run in sequence and, therefore, take time to perform, validate and present in a report. Due to the significant resources and time needed to perform this calculation, as well as due to the fact that insurance liabilities are often long-term and stable, it is typically done on an annual basis.

The Solvency II reporting requirements reflect the insurance specificities and have been designed to meet Europe's supervisory objectives not only in terms of micro prudential oversight but also in terms of financial stability, as stated in the EIOPA Regulation.

Therefore, it should be possible to meet the ECB's objectives via the Solvency II reporting requirements avoiding a situation of additional and double reporting, which will be burdensome and entail very high costs.

In the specific cases where this is not possible, simplifications or practical solutions should be allowed. In follow up to this objective and to our offer to cooperate and provide expert support during the cost assessment and thereafter, Insurance Europe has compiled a set of possible practical solutions to address the key ECB reporting requirements not covered by Solvency II reporting. We attach the letter sent to Mr. Lasse Nordquist describing our proposals for possible practical solutions.

We remain at your disposal to provide further input where required and to discuss the practical solutions proposed in that letter at an expert level. We believe that it would be very useful to hold a meeting, as previously discussed, to discuss technical issues as well as the outcome of the cost assessment exercise.

Looking forward to hearing from you on this issue at your convenience.

Yours sincerely,