

BIPAR Szemle

2025. április

A BIPAR Szemlében április hónapban a BIPAR-tól érkezett levelek vezetői összefoglalói találhatóak.

Az alábbiakban kiemeltük a legfontosabb témákat:

- **Krónikus betegségek méltányos kezelése a biztosítási szektorban – EIOPA felülvizsgálat**
Az EIOPA április 28-án online megbeszélést szervez a biztosítási szektorban érintett krónikus betegséggel élők (pl. HIV, cukorbetegség, terhesség) méltányos kezeléséről. A BIPAR szakértők részvételét kéri, jelentkezési határidő: április 11.
- **Retail Investment Strategy (RIS) – Egyeztetések és további lépések**
A RIS trilógus során megállapodás született arról, hogy a Bizottság új egyszerűsítési javaslatokat készít a tárgyalások folytatásához, várhatóan hat héten belül. A BIPAR kéri a tagokat, hogy osszák meg álláspontjukat a nemzeti pénzügyminisztériumokkal és az EP ECON bizottsági tagjaival.
- **Open Finance/FIDA – Első trilógus egyeztetés**
Április 1-jén a lengyel elnökség alatt megtartották az első trilógus tárgyalást, ahol az EP és a Tanács az egyszerűsítést és a terhek csökkentését szorgalmazta. A Bizottság négy héten belül nem hivatalos javaslatot készít, a következő egyeztetés várhatóan májusban lesz.
- **Fenntartható pénzügyek – Omnibus I frissítés: A "stop-the-clock" javaslat elfogadása az Európai Parlamentben**
Az Európai Parlament megszavazta a "stop-the-clock" javaslatot, amely két évvel elhalasztja a vállalatokra vonatkozó fenntarthatósági jelentéstételi kötelezettségeket. A végleges jóváhagyás a Tanács döntésétől függ.
- **BIPAR 2026-os találkozók időpontjai**
A BIPAR 2026-ban januárban Bécsben tartja középtávú találkozóját, az éves ülésre pedig júniusban kerül sor, a pontos helyszín még egyeztetés alatt áll.
- **EIOPA fogyasztói trendek – BIPAR visszajelzés kérése**
A BIPAR április 22-ig várja a tagok válaszait az EIOPA fogyasztói trendekkel kapcsolatos kérdéseire.
- **Mesterséges intelligencia szabályozása a biztosítási szektorban**

Az EIOPA véleménytervezetet tett közzé a mesterséges intelligencia (MI) irányításáról és kockázatkezeléséről, amely az MI rendszerek felelős alkalmazására ad útmutatást a biztosítók és közvetítők számára; a BIPAR április 25-ig várja a tagok észrevételeit a választervezethez.

- **Draghi-jelentés – egyeztetés ECON képviselőkkel**
A BIPAR módosítási javaslataihoz április 30-ig kéri a kapcsolatfelvételt az ECON bizottsági képviselőkkel Lalucq EP-képviselő saját jelentéstervezete kapcsán.
- **EU tőkepiaci integráció – Bizottsági konzultáció**
Az Európai Bizottság április 15-én célzott konzultációt indított az uniós tőkepiacok integrációját akadályozó tényezőkről; a BIPAR néhány releváns kérdésre választ küld, a visszajeléseket május 2-ig várják.
- **DORA – Friss fejlemények**
Az európai felügyelet (EBA, EIOPA, ESMA) új lépéseket tettek a DORA-rendelet alkalmazásának előmozdítására: május 14-én workshopot tartanak az IKT-szolgáltatók számára, újabb kérdés-válasz dokumentumokat és iránymutatásokat tettek közzé, valamint kötelezettség-szegési eljárások indultak több tagállam ellen a nem megfelelő átültetés miatt.
- **EIOPA jelentés a lakossági befektetési termékek költségeiről és hozamairól (2020–2023)**
Az EIOPA elemzése szerint a biztosítási befektetési termékek, nyugdíjcélú termékek és foglalkoztatói nyugdíjrendszerek pozitív hozamokat értek el az elmúlt négy évben, különösen 2023-ban, elsősorban a pénzpiacok jó teljesítményének köszönhetően.
- **EIOPA megközelítése az egyszerűsítésről és versenyképességről**
Az EIOPA áprilisban közzétette állásfoglalását, amely a szabályozási terhek csökkentését, a Solvency II iránymutatások egyszerűsítését, valamint a fenntarthatósági jelentéstételi kötelezettségek átláthatóbbá tételét szorgalmazza az uniós felügyeleti hatékonyság erősítése érdekében.
- **Kiberbiztonsági törvény felülvizsgálata – Európai Bizottsági konzultáció**
Az Európai Bizottság áprilisban társadalmi konzultációt indított a 2019-es Kiberbiztonsági Törvény felülvizsgálatáról, amely az ENISA mandátumára, az európai tanúsítási keretrendszerre és az IKT-ellátási lánc biztonságára fókuszál. A hozzászólások beküldési határideje: május 9.
- **EIOPA titkos vásárlási gyakorlat az IBIP értékesítésről – BIPAR/EIOPA workshop, 2025. május 6.**
Az EIOPA által koordinált titkos vásárlási gyakorlat eredményeit hamarosan közlésezzik, amely az IBIP termékek értékesítési folyamatát vizsgálta nyolc tagállamban. Jelen workshop zárt körben, szigorú titoktartási szabályok mellett kerül megrendezésre, és az EIOPA által előzetes betekintést nyújtanak az eredményekbe.

A teljes, eredeti levelek a feltüntetett dátumok alapján beazonosíthatók, vagy a FBAMSZ Titkárságtól beszerezhetők.

FBAMSZ Titkárság

2025. április

Fair treatment in case of chronic disease/medical conditions in the insurance sector – EIOPA thematic review – BIPAR asked to participate in meeting on 28 April – Please let us know if you have experts/relevant information by 11 April – thanks

2025. April 1.

EXECUTIVE SUMMARY:

*EIOPA has requested a call with BIPAR Secretariat and experts from our membership to discuss on this issue on **Monday 28 April (14.00-15.00h Brussels' time – in English)**.*

Please let us know if you have experts in this domain (fair treatment of individuals with chronic diseases or medical conditions in the insurance sector, specifically HIV, diabetes and pregnancy) ***who would be willing and available to take part in this call.***

RIS - UPDATE and renewed call for action

2025. April 1.

EXECUTIVE SUMMARY:

RIS trilogue update: *It was agreed to include the Commission's new simplification agenda into the RIS trilogue discussions. The Commission is now tasked to review the text in this light and to get back to the co-legislators within 6 weeks with some "non-papers" (value for money, disclosures and consumer journey).*

The Commission is expected to produce another discussion paper on how to simplify the rules. The date for the next trilogue between the co-legislators will be set once the paper is out - likely after Easter (tbc).

The RIS discussions are impacted by the Commission's Communication on a Savings and Investments Union (SIU), where the Commission stated that it will: "facilitate trilogue agreement on RIS. However, it will not hesitate to withdraw the proposal if the negotiations fail to meet the intended objectives of the Strategy".

Proposed action as soon as possible:

Please contact your Ministry and EP ECON national members with whom you have a good relationship and share your views on the way forward (see attached BIPAR papers for inspiration). Please keep us briefed.

Open Finance/FIDA – Short update on first trilogue

2025. April 2.

EXECUTIVE SUMMARY:

- *A first trilogue meeting on FIDA – under the Polish Presidency - took place on 1st April*
- *EP and Council call for simplification and burden reduction*

- *No discussion yet on the proposal title/provisions by title/provisions*
- *Commission tasked with the drafting of a non-paper on simplification to be handed out in 4 weeks (see flashnote attached)*
- *Next trilogue meeting expected to take place in May (or later) to allow co-legislators to sufficiently analyse the Commission non-paper*

Sustainable finance - update Omnibus I - The stop-the-clock proposal approved by the European Parliament

2025. April 4.

EXECUTIVE SUMMARY:

- *Yesterday, the European Parliament voted the “stop-the-clock” proposal, i.e., to postpone the application dates for EU laws on due diligence and sustainability reporting requirements (the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CS3D))*
- *Some companies (aka wave 2 & 3) (some intermediaries may fall under the scope) will have two extra years to report under CSRD.*
- *The proposal must now be approved by the Council to enter into force.*
- *Other simplification proposals under the Omnibus I (such as the scope, thresholds,...), must still be adopted by the co-legislators.*

SAVE-THE-DATE - BIPAR 2026 mid-term and annual meetings

2025. April 9.

Dear Members,

We are pleased to inform you about our next 2026 meetings:

Our mid-term meeting will be held on Thursday 22 and Friday 23 January in Vienna, with a welcome dinner on Wednesday 21 January.

Our annual meeting will take place on Thursday 18 and Friday 19 June, with an welcome dinner on Wednesday 17 June. The venue has yet to be confirmed.

Please do make a note of these dates in your diary.

KIND REMINDER - EIOPA’s work on Consumer Trends – Your input requested for EIOPA’s questions to BIPAR by Tuesday 22 April

2025. April 11.

Dear Members,

We refer to our mail below of 26 March regarding EIOPA’s work on Consumer Trends. We would be grateful if you could send us your input by Tuesday 22 April.

Many thanks.

AI - EIOPA's consultation on its opinion on Artificial Intelligence governance and risk management - BIPAR draft response for your comments by 25 April - Thanks

2025. April 14.

EXECUTIVE SUMMARY:

- *EIOPA's consultation on its draft opinion on "Artificial Intelligence governance and risk management"*
- *The draft opinion aims to provide insurance intermediaries and insurers with guidance on how to interpret insurance sector existing provisions - such as IDD provisions (level 1 and 2 on POG) - regarding the use of AI systems in the insurance sector.*
- *But the draft Opinion is mainly focused on insurers/manufacturers and its scope is unclear and could have unintended consequences*
- *The draft opinion sets high level supervisory expectations towards the governance and risk-management principles that insurance intermediaries and insurers should apply to ensure a responsible use of AI systems such as applying a risk-based and proportional approach throughout the AI systems lifecycle, acting based on fairness and ethical principles, in the best interest of consumers, clearly defining the roles and responsibilities of relevant staff, being able to meaningfully explain the outcomes of AI systems, implementing sound data governance policies, and maintaining adequate and orderly documentation and records (the opinion covers systems and situations in the insurance sector that are not prohibited or not considered as high risk by the AI Act)*
- *BIPAR draft response for your comments by 25 April – Thanks*

Savings and Investments Union/Capital Markets Union: call for action with your ECON MEPs regarding own initiative report on the Draghi report

2025. April 15.

EXECUTIVE SUMMARY:

- *Call for action with your ECON MEPs regarding MEP Lалуca's draft own initiative report on the Draghi report*
- *Draft report calls for use of Regulations rather than Directives in future and calls for an EU label for simple investment products suitable for retail investors based on common criteria or features such as product simplicity, low costs, asset allocation and risk mitigation techniques*
- *Please contact your MEPs with BIPAR proposed amendments before the 30 April deadline for amendments – Thanks.*

SIU/CMU - European Commission's targeted consultation on integration of EU capital markets

2025. April 15.

EXECUTIVE SUMMARY:

- *On 15 April, the Commission launched its consultation on the integration of EU capital markets.*

- *Aim of the targeted consultation is to obtain feedback on obstacles to financial market integration across the EU and on barriers linked to supervision.*
- *The Commission is looking for views of a wide range of stakeholders: market participants, supervisors, consumers, users of financial services,...*
- *Potential outcome of this consultation: legislative and non-legislative measures.*
- *Simplification will be part of the consultation.*
- *Extensive consultation, BIPAR will respond to some relevant questions of the consultation.*
- *Please do not hesitate to already share any views, comments or concerns regarding this consultation, by 2 May.*

DORA Update

2025. April 17.

EXECUTIVE SUMMARY:

- *ESAs' online workshop for ICT third-party providers on 14 May*
- *European Commission's RTS on subcontracting ICT services supporting critical or important functions*
- *EIOPA's Q&As on DORA - How to determine for group structures (intermediaries) whether they are in scope of DORA*
- *EBA's Q&As on the register of information*
- *Infringement procedures against Member States for failing to transpose the DORA Directive*
- *Translation of the ESAs' guidelines on the estimation of aggregated annual costs and losses caused by major ICT-related incidents under DORA.*

EIOPA's report on costs and past performance of retail investment products (2020- 2023) - Comments welcome

2025. April 17.

EXECUTIVE SUMMARY:

- *On 15 April, EIOPA published its report that analyses the costs, charges and value for money characteristics of retail investment products within EIOPA's remit over the period 2020 to 2023.*
- *The report covers insurance-based investment products (IBIPs), Personal Pension Products (PPP) and Occupational Retirement Provision (IORPs)*
- *IBIPs showed an increase in net returns in 2023, as well as for the four-year period monitored, largely driven by the good performance of financial markets. PPP largely followed the trends observed in IBIPs regarding positive net returns. Meanwhile, defined contribution schemes of Institutions for IORPs in the EEA saw growth in active members, total assets and income ratios.*
- *In terms of distribution channels, banks were the most predominant distributors of IBIPs in more than half of the Member States . The report also includes some distribution related market shares.*
- *Below we give an overview of some findings in the EIOPA report (link).*

EIOPA's approach - Simplification and competitiveness

2025. April 17.

EXECUTIVE SUMMARY:

- *On 8 April, EIOPA published its approach to simplification and burden reduction*
- *EIOPA calls for smarter, more harmonized regulation alongside more effective supervision at the EU level.*
- *EIOPA supports regulatory initiatives that foster a more competitive EU economy in a balanced and sustainable way.*
- *EIOPA is already proposing simplifications in its ongoing work, for e.g., shortening of the Solvency II (=SII) guidelines, reducing stress test for insurers and IORPs and promoting the streamlining of requirements related to product disclosures and sales processes.*
- *On sustainability, EIOPA will support the EC in simplifying the reporting rules while ensuring concerned stakeholders can access reliable and standardized data to manage climate risks.*
- *According to EIOPA, supervisory convergence and simplification at early stage of the legislative process is key. On cross-border supervision, EIOPA is pleading for more consistency in enforcement across jurisdiction, in order to strengthen the supervision effectiveness. Please find below the highlights. The EIOPA note is available [here](#).*

Cybersecurity Act - EC call for evidence & consultation - For your feedback by 9 May

2025. April 18.

EXECUTIVE SUMMARY:

- *On 11 April, the Commission published its call for evidence for an impact assessment on the revision of the 2019 Cybersecurity Act (=CSA).*
- *In parallel, the EC also published a consultation on the review of the CSA. The Commission is looking for stakeholders' input to evaluate and revise the Act. The review will focus on the mandate of the ENISA, on the European Cybersecurity Certification Framework (=ECCF) and on ICT supply chain security challenges.*
- *Potential outcome of this consultation: legislative and non-legislative measures.*
- *Simplification will be part of the consultation, as the EC wants to facilitate the implementation, cut the red tape and streamline reporting obligations.*
- *BIPAR intend to respond to both the call for evidence and to the consultation.*
- *Please do not hesitate to already share any views, comments or concerns regarding this call for evidence and consultation, by 9 May.*

EIOPA mystery shopping exercise regarding IBIP sales – BIPAR/EIOPA workshop on 6 May – strictly confidential – meeting link in mail

2025. April 29.

As presented to us by EIOPA during our BIPAR mid-term meeting in Frankfurt, EIOPA has coordinated mystery shopping in 8 Member States on the sales process of Insurance-Based Investment Products (IBIPs).

The publication of the results is now imminent and will be entitled: "Uncovering the IBIP sales process: Results from EIOPA's first coordinated Mystery Shopping Exercise on Insurance-Based Investment Products".

You may remember that in Frankfurt some first general statements were made about the results. We contacted EIOPA in this respect and called for a nuanced public report and we asked for a possibility to have a kind of "preview" of it .

In this respect, we are pleased to invite you to an online workshop on a strictly confidential basis. Please delegate maximum one or two persons per association and in the interest of the procedure and the relationship of trust we kindly ask you not to make this meeting nor the results that will be presented public.

This online workshop will take place on Tuesday 6 May, from 14:30 Brussels' time until 16:00.

You will appreciate that this is very exceptional, and we would like to stress that the workshop takes place under strict confidentiality rules and participation is limited to BIPAR member delegates – please do not forward this email, nor the meeting link any further.

We would appreciate it if you could confirm by email whether or not you will be attending this event.

BIPAR 2025 annual meeting in June in Copenhagen – Draft programme
2025. April 30.