

## 1. Who are AMICE and who are your members?

AMICE is the short-form name of the Association of Mutual Insurers and Insurance Cooperatives in Europe. We are the voice of the mutual and cooperative insurance sector in Europe; we have a small secretariat based in Brussels which coordinates the association's activities, keeps in constant contact with European bodies and assists our membership, ensuring that the mutual/cooperative voice is heard clearly.

Our main focus is ensuring that the European institutions and policymakers understand mutual/cooperative insurance and properly reflect it when they develop policy and draw up legislation and regulation which affects our members. There are two insurance industry representative bodies operating at a European level: Insurance Europe, which is an association of national insurance associations, and ourselves. Because our membership comprises mutual/cooperative insurers and their representative bodies only, we believe we are in a unique position to understand and represent the needs and challenges of our members as operating insurers, and represent them with this deep knowledge. This means that they are only one step away from the people and bodies responsible for formulating, developing and amending the European infrastructure at the heart of how the industry operates.

Another important aspect of our work is to act as a “hub” for our members, providing an environment in which they can combine resources and expertise, exchange experiences including across national borders, and discuss key issues and concerns relating to planned legislative and regulatory changes and developments.

Our members come from across Europe, and comprise all different types and sizes of mutual insurers and reinsurers. This variation in nature, scale and complexity means that we have reputation for being able to bring the voice of the SME insurers, as well as the largest mutual, to discussions and positions as they are developed in Europe. Not every European country currently recognises the “mutual” or “cooperative” status in their national law, and part of our job is to encourage more countries to understand how legal recognition of the structure can help their markets.

## 2. What are AMICE's priorities for the next year or so?

This is an incredibly important year for Europe, and one in which we will see massive change. The fixed dates in the 2019 calendar are the European Parliamentary elections in May and a new European Commission for the autumn, so one of our main priorities will be educating the incoming MEPs and Commissioners about mutual insurance and the value it brings. There is very mixed knowledge country-to-country, so it's critical that we can show the importance of the sector to those who have little or no experience of it, as well as those who are well versed.

As not all European countries allow mutual insurers, we will also continue promoting the business model across the continent and hopefully see other jurisdictions understand the benefits and adapt their systems. Last year the Romanian government approved new legislation to establish mutual insurers in the country, and currently Estonia is in the final stages of a change to the insurance law to allow mutual insurers; there are still, however, significant gaps in legal recognition, and we will continue to try to plug them in the coming years.

AMICE's core role is our focus on advocacy, and this will carry on at the same pace as previous years, despite the changes we are going to see in the European Commission and Parliament. The insurance regulatory agenda has been transitioning from one of development to one of implementation, and it's in this area that we will be focussing on Solvency II – in particular the forthcoming 2020 review – and the Insurance Distribution Directive. Ongoing work on the Motor Insurance Directive, the planned introduction of the Pan-European Personal Pension Product (PEPP), IFRS 17 and the high-profile work around the action plan on financing sustainable growth which is directly tackling insurance

issues, are all part and parcel of our advocacy work this year. As for further into the future, we'll have a better idea once the new Parliament is in place.

3. To what extent are you able to influence EIOPA's understanding of mutuals, and the proportionality within EU Directives?

We have a close and respectful relationship with EIOPA. We have cooperated closely with EIOPA since its creation and are one of the principal stakeholders consulted by EIOPA along with Insurance Europe, the CRO Forum and the CFO Forum. The AMICE Secretariat is in frequent direct contact with EIOPA staff who regularly take part in AMICE's events and members of the AMICE Secretariat have spoken at EIOPA conference, sat on working groups and remain in constant contact with EIOPA staff at all levels. Furthermore, the EIOPA regulation provides for mutual and cooperative seats on the Insurance and Reinsurance Stakeholder Group and the two AMICE members there coordinate closely with AMICE's relevant working groups to ensure our voice is heard. We certainly believe EIOPA is aware of the mutual insurance sector, and respects its value!

That does not always translate into proportionality being correctly rendered into European law, but we remain vigilant and take every opportunity to put forward AMICE's position on proportionality and to provide examples of where it works well – or not. Our unique position within the European mutual insurance industry means that we can direct EIOPA towards tangible and practical programmes of recognising proportionality at national level, and encourage EIOPA to bring these into their current aim of supervisory convergence.

4. What are the most interesting ways AMICE's members are responding to the changing needs of their customers?

With such a wide range of members, there is a commensurate wide range of ways they are responding to their customers. For some, there are ever-evolving insurtech initiatives, others have implemented prevention or training programmes; each member has a unique relationship with their customers, and therefore their responses to the changing needs are unique as well. What is fascinating to us in the Secretariat is to see just how responsive, innovative and collaborative those activities are, and we are able to bring members together to share them and help each other enhance their customer relationships by learning from each other.

5. How can AFM and its members best support your work today?

The UK has a strong and well-established mutual sector with excellent experience and insights; mutuals in other countries can really benefit from that, as, hopefully, can their experience assist AFM members in their business. In AMICE, we believe that collaboration and exchange help educate and raise everyone's knowledge – including that of the Secretariat – and we are delighted that AFM and its members can now be part of that. AFM has gone from strength to strength in recent years, and been very successful in influencing UK legislation, so we're really looking forward to a new dialogue where we can all learn from each other.

6. With Brexit looming, how might AFM's membership of AMICE be most beneficial in the future?

Whatever Brexit finally looks like, we anticipate that the UK will remain a close partner for the rest of Europe. In this scenario, maintaining links between mutual and cooperative insurers in Europe, not just the EU, will be even more important for the sector, particularly as we may see increasing political disruption in other countries. Keeping a strong regional voice is imperative, and the respect in which the UK mutual insurance sector is held will be a good contribution to keeping that voice loud and clear.

Despite all this uncertainty, it is likely that the EU will continue to be the main influencer of regional policy and we don't see many signs that there would be a marked divergence between the UK's future approach to insurance mutuals and that of the European institutions, which will continue to have regulatory issues high on their agenda. So we expect that AFM's membership of AMICE will be able to provide UK insurance mutuals with opportunities to contribute to the European debate and regulatory developments, and for us to support them in initiatives towards the UK institutions.

We've been lucky to have had a good relationship with AFM in the past, and to have AFM now as a member of AMICE gives us all greater opportunities to support each other for the overall benefit of all our members.