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AI-DS WORKING GROUP MEETING 25 SEPTEMBER 2025

Time: CET 14.00 – 17.00 on Thursday 25 September 2025

Venue: Hôtel Pullman Montparnasse, 19 Rue du Commandant René Mouchotte, 75014 Paris

Format: Only in person

Agenda

1. Opening of the meeting and introduction of new members
2. Minutes of the previous meeting
To approve of the minutes of 5 September 2025.
3. Consultations
 - a) In early September a new consultation was published on transparency requirements under Article 50 of the AI Act, focusing on labelling and disclosure obligations for certain AI systems (e.g. generative AI, deepfakes, emotion recognition). The leadership of the Working Group and Stephanos analysed the consultation and came to the conclusion that actuaries have next to nothing to say on that.
 - b) On 16 September, the EC issued a call for evidence on the digital omnibus package, which covers considerations regarding the application of AI Act rules. A short 4,000 character response is required and an initial draft is included in the agenda pack for discussion and consideration by the working group.
4. Role of the Actuarial Function in the governance of high-risk AI systems
In recent discussions with EIOPA they asked us about the role of the Actuarial Function in the governance of high-risk AI systems in insurance undertakings. They seem to be open to legislative changes in this area. This is a topic that needs careful thinking in the AAE: do we want that role for the AF, what it would mean for the fit&proper requirements of the AF holder (meaning requirements also to existing holders). We will have a memo to help us forward from Gabor on the topic. This will be added to the agenda material ahead of our meeting.
Based on our discussions in the meeting we should be able to report our thoughts on this to the Professionalism Committee on 26 September to ask for guidance how to proceed in case the AAE is interested in taking the idea further.
5. Advisory Forum of the AI Office
The Nominations Panel decided to propose Jonas Hirz, who will now be the AAE nominee based on the decision by the Board. Jonas will need support from others in the AAE. There has been a contact with Commissioner Henna Virkkunen who seems to be sitting on the topic. Members are urged to be in contact in one way or the other with their national delegates in the AI Board, and also other country(women) in Brussels, not forgetting their MEP's. Few of them know what actuaries are: it is important to raise awareness to help us in getting our representative to the Forum (a short text that can be used is attached at the end of this agenda). In a recent call with EIOPA they promised support to us in getting to the Advisory Forum.
In case we manage to get a delegate to the Advisory Forum, this changes the seriousness of the issue of AI in the AAE. It is discussed whether the profile of the AI-DS Working

- Group should be elevated to formalise the process on how the positions of the AAE on the topic are decided.
6. Need for AAE reactions on a couple of topics
 - The AI Office has published the Code of Practice (Anni Hellman participated on behalf of the AAE on the process). The Code has received variable reactions from market participants. The AAE could publish a note on the Code – a draft will be circulated ahead of the meeting for discussion.
 - [EIOPA opinion on AI governance and risk management](#) has been published. The AAE commented on it in the draft phase. We could now consider publishing a note on this – a draft will be circulated ahead of the meeting for discussion.
 7. EIOPA use of data in insurance group
 - update on the work of the EIOPA use of data in insurance group (Jonas, Claudio, Esko). The EIOPA group will have its meeting on the morning of 25 September, meaning fresh news will be available to the meeting
 8. Workstreams based on what was agreed in Budapest
 - leaders (Jonas, Bogdan) to report on progress. Discrimination is also discussed in the EIOPA group and also in the IAA AI Task Force. Probably we will hear something from AAE Board.
 9. General outreach
 - Bogdan presented on the AI Act to the Swiss association, Jonas has a series on AI in Austria, Esko made a presentation to the Finnish MA. Any other activity in the MA's?
 - Podcasts – waiting for Board action
 - Daniel Ramsay has authored a paper on [Agentic Model Office](#), published by the IFoA. He can tell more of it in the meeting.
 - IAA Pension PBSS Webinar on 7 Oct on the AI Act.
 - European Actuarial Day on 3 Nov. Morning session hosted by the AI-DS.
 - ECA 2026 in June and ICA 2026 in November in Tokyo – interest to present?
 10. IAA AI Task Force
 - Bogdan and Esko will update on the IAA AI Task Force.
 - how to make more use of the papers produced in the IAA process?
 11. Next meetings
 - next regular call of the Working Group at 12.00 CET on 3 October, 2025
 - next physical meetings of the AAE will be Limassol, Cyprus, 22-24 April 2026. Do we ask for a slot for this Working Group?
 12. Any other business
 13. Closing of the meeting

The AI Office is setting up the Advisory Forum based on the AI Act – The actuarial profession deserves membership as a responsible user of data and AI

Actuaries are professionals with a mathematical background. Typically they work in insurance and pensions but also elsewhere in the financial sector, and also more widely. The profession is organised on the European level into the Actuarial Association of Europe (AAE). The AAE currently has 38 member associations in 37 European countries, representing over 29,000 actuaries.

Actuaries are heavy users of data and they are adopting AI into their practices. The AAE organises its work on AI around its Artificial Intelligence & Data Science Working Group. It has published a number of publications on the use of AI and the adoption of the AI Act that can be found on its web pages. There are, e.g., papers on [Navigating Europe's AI Act: Insights for Actuaries and the Insurance Sector](#) and [What should an Actuary know about Artificial Intelligence](#). Explainability of AI systems is also important for the AAE and it has published its paper on [Explainable Artificial Intelligence for C-level Executives in Insurance](#). It has also actively participated in consultations touching AI.

The AAE is independent of financial service providers. It has a long history of providing advice on insurance and pensions to the EU Commission and EIOPA. In its advice it obeys a strict [code of conduct](#) and is bound by the [standards of actuarial practice](#). These guarantee that actuaries will adhere to highest professional standards guaranteeing responsible approach also when dealing with the use of AI.

Actuaries have played a key role in implementing Solvency II and other pieces of legislation into insurance and other financial services. Their professional know-how and experience can greatly help in the implementation of the requirements AI Act not only in the financial sector but more generally. Their membership in the Advisory Forum would greatly benefit the EU in guiding the use of AI into a sustainable and responsible direction. The AAE has submitted the application of Jonas Hirz of Austria to the AI Office by the deadline of 14 September 2025.