

From: Col·legi d'Actuaris de Catalunya <actuaris@actuaris.org>
Sent: Tuesday, July 29, 2025 11:22 AM
To: Info | AAE <info@actuary.eu>
Subject: Comments on the Draft Statutes and Internal Regulations of the AAE

Dear Birgit Kaiser
Chairperson of the AAE Professionalism Committee
Actuarial Association of Europe

On behalf of the **Col·legi d'Actuaris de Catalunya**, and in response to your request, we are pleased to submit our comments on the **draft Statutes and Internal Regulations** of the Actuarial Association of Europe. We value the ongoing efforts to strengthen the AAE's governance framework and appreciate the opportunity to contribute to this important consultation process.

While we support many of the proposed revisions, we would like to raise a specific concern regarding the **representation of Full Member Associations** in European States where more than one such association exists.

In the current draft, the mechanism for resolving disagreements over the composition of national delegations has been removed from the Statutes and transferred to the Internal Regulations. According to the new wording, the **AAE Board of Directors would determine the allocation of delegates**, subject to ratification by the General Assembly. While we understand the intent to streamline procedural matters, this change creates a potential risk: **smaller Full Member Associations could be left without any representation**, depending on how the Internal Regulations evolve in the future.

We would like to emphasize that, as a Full Member Association, we fully comply with the obligations set out in the Statutes — including adherence to the Code of Professional Conduct, fulfilment of educational and CPD standards, maintenance of a formal disciplinary process, and payment of membership contributions. We therefore believe that we should also enjoy **equal rights of representation**, consistent with all other Full Member Associations.

To ensure that this fundamental principle is upheld, we respectfully propose that the following clause be incorporated directly into **Article 13.4 of the Statutes**:

"If no agreement is possible, then, subject to ratification by the General Assembly, the AAE Board of Directors will decide, while respecting the principle that no Full Member Association shall be entirely excluded from representation in the General Assembly."

In our view, omitting such a safeguard not only risks structural underrepresentation, but also undermines the spirit of several core provisions of the Statutes — in particular:

- **Article 20**, which promotes the goal of **unanimous decision-making** on matters of professional importance (e.g. the Code of Conduct, education guidelines, Mutual Recognition Agreement, etc.), and which presumes the meaningful participation of **all Full Member Associations** in order to reflect the diversity of professional views.

Moreover, the commitment — now articulated in the Internal Regulations — to transparently convey not only majority but also minority positions in the absence of consensus can only be fulfilled if **all associations are represented in the General Assembly**.

We therefore encourage the AAE to reflect more broadly on whether the current State-based representation model remains fit for purpose. Moving towards a framework where

representation is directly assigned to Full Member Associations — as is the case in the IAA, where each Full Member Association currently appoints its own delegate to the Council, regardless of whether other associations exist in the same country — could offer a more equitable, transparent, and adaptable model, particularly in countries where the actuarial profession is represented by more than one association.

We remain fully committed to the values and mission of the AAE, and to constructive dialogue with all member associations. We trust that these concerns will be carefully considered during the finalisation of the governance documents, and we remain at your disposal should you wish to discuss them further.

Kind regards,

Marisa Galán | President

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