From the minutes of the Officers' call on 3 February 2016

Procedure for tracking consultations and AAE responses

Philip referred to the need to establish a more formal approach for dealing with EIOPA/ Commission consultations and requests for input, in order to –

- decide quickly at Officer level whether we should respond or not
- inform member associations if we are going to respond or not and, if so, a timeline for receiving their comments and issuing a draft for consideration/approval
- set up a group to draft the response (probably within an existing committee or task force) with clear timelines and procedures
- monitor progress against schedule and ensure sign-off and delivery

He commended an Excel spreadsheet which Ad and Michael L have drafted for this purpose, and it was agreed that they will now populate this with current and recent consultations and include, where it was decided not to make an AAE submission, why this decision was reached. It was also agreed that this spreadsheet should also be used to record and monitor other papers which we initiate ourselves for publication or submission to external organisations.

Whilst we have been following this practice in general, the outcome in recent cases has been that a (small) number of associations submit a response to the lead very close to the deadline, and he then has to endeavour to draft a consensus response from AAE, which has been challenging as there have been diverging views. This is not optimal because

- the submission cannot express a consensus view on an issue, but must either give no response or say "some associations say black, and some say white" which begs the question why submit an AAE view at all?
- there is no time for discussion which might identify common views/compromises and lead to an improved input
- there is a lot of work for the lead in a short timescale

A more effective approach might be to identify a small group (1-3) at outset who would be tasked with drafting an initial response – they could of course seek direction from their own associations but would not be required to wait until the association had finalised their position. Ideally this would lead to a draft being available in time for a conference call to be set up to discuss and refine, leaving final review for the lead/Officers before submission.

So the process might become (assume t=0 is the date of issue and there are 13 weeks to the deadline for submission (t+13))

t+1: Officers decide whether to respond and advise MAs, giving deadline of t+8 for submission of comments, asking which MAs are likely to respond (either via AAE or directly) and calling for volunteers for drafting group

t+2: small group identified and begin drafting: MAs informed and reminded to submit comments ASAP to facilitate inclusion in draft response

t+6: initial draft available to Committee members for consideration

t+9: conference call (after receipt of any MA inputs)

t+11: final draft available for MAs and Officers to review

t+13: sign off by Officers and submission