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Press Release

The AAE supports EIOPA's call to clarify the application of the AI Act in insurance

Brussels, 15 April 2026

The Actuarial Association of Europe (AAE) welcomes and fully supports the letter sent on 13 April 2026 by EIOPA Chairperson Petra Hielkema to the European Parliament, the Council of the EU, and the European Commission, calling for targeted clarifications to the EU Artificial Intelligence Act ("AI Act") as it applies to the insurance sector. This letter, agreed at the EIOPA Board of Supervisors meeting of 24 March 2026, reflects and reinforces positions that the AAE has consistently advocated across multiple European consultations and publications.

The AI Act (Regulation (EU) 2024/1689) classifies AI systems used for risk assessment and pricing in life and health insurance as high-risk use cases under Annex III. A key concern — raised by EIOPA and consistently supported by the AAE — is that this classification risks capturing well-established, transparent and standalone actuarial techniques such as generalised linear models (GLMs) and generalised additive models (GAMs), which do not present the opaque, autonomous characteristics that the high-risk classification was designed to address. EIOPA's letter proposes two concrete amendments to the Digital Omnibus on AI: first, to formally enable the European Supervisory Authorities to contribute to AI Office guidelines on the application of the AI Act in financial services; and second, to explicitly exclude GLMs and GAMs under human supervision from the scope of high-risk AI systems when used for risk assessment and pricing in life and health insurance.

The AAE has consistently supported this direction. GLMs, GAMs and related actuarial models have been used reliably in insurance for decades. They are transparent, interpretable, and embedded within rigorous actuarial governance frameworks. They are not autonomous systems — they require human intervention for calibration and any material modification — and their outputs can be readily understood, validated, and challenged using established statistical methods. Imposing high-risk AI obligations on such models would create unnecessary and disproportionate compliance burdens for insurers and supervisors alike, without materially reducing consumer risks that are already well managed under Solvency II, the Insurance Distribution Directive, and EIOPA's existing supervisory frameworks. Moreover, an overly broad classification would divert finite supervisory resources away from genuinely novel and less well-understood AI applications, which warrant closer scrutiny.

The AAE also notes, consistent with the [guidelines issued by the European Commission in February 2025 on the definition of an AI system](#), that GLMs and similar optimisation methods fall outside the core definition of an AI system, as they do not transcend basic data processing. Today's letter by EIOPA reinforces the need to make this principle explicit in the legislative text and to extend it to the high-risk classification framework.

Notes:

1. For further information please contact Monique Schuilenburg, Operations Manager (tel. +32 2 274 06 61), moniques@actuary.eu
2. Copies of all AAE press releases are available on the AAE website (www.actuary.eu)
3. The Actuarial Association of Europe (AAE) was established in 1978 under the name Groupe Consultatif to represent actuarial associations in Europe. Its primary purpose is to provide advice and opinions to the various organisations of the European Union - the Commission, the Council of Ministers, the European Parliament, the European Supervisors and their committees – on actuarial issues in European legislation. The AAE currently has 38 member associations in 37 European countries, representing circa 30,000 actuaries. Advice and comments provided by the AAE on behalf of the European actuarial profession are totally independent of industry interests. The Actuarial Association of Europe is registered in the EU Transparency Register under number 550855911144-54.

The AAE has engaged actively on these issues through a series of consultation responses and publications, all publicly available on the [AAE website](#). Key contributions include:

- **AAE’s Note on EIOPA’s Opinion on AI Governance and Risk Management in Insurance (November 2025)** — welcoming EIOPA’s proportionate, risk-based approach to AI governance, and advocating for recognition of the actuarial profession’s existing model oversight frameworks ([link](#) to the publication).
- **AAE’s Response to the European Commission’s Call for Evidence on the Digital Simplification Package (Digital Omnibus)** — explicitly calling for regulatory clarity on the boundary between traditional actuarial models and AI systems, proportionality in classification, and the avoidance of duplication with existing sectoral frameworks ([link](#) to the consultation response).
- **AAE’s Response to the European Commission’s Targeted Stakeholder Consultation on the Classification of AI Systems as High-Risk** — arguing that GLMs and similar actuarial tools, which are non-autonomous, transparent, and professionally overseen, should not be classified as high-risk AI systems unless they produce direct, significant impacts on individuals’ rights without human review ([link](#) to the consultation response and [link](#) to the summary of key messages).
- **AAE’s Discussion Paper titled “Navigating Europe’s AI Act: Insights for Actuaries and the Insurance Sector” (March 2025)** – providing a comprehensive analysis of the AI Act’s risk-based framework and its implications for actuarial practice and the insurance sector ([link](#) to the publication).

Actuaries have long been stewards of data-driven modelling in the public interest. The profession operates under rigorous codes of conduct and professional standards that require transparency, accountability, and the ability to explain model workings to a wide range of stakeholders. This professional framework already delivers many of the governance objectives that the AI Act seeks to achieve for more complex, autonomous systems.

The AAE therefore wholeheartedly endorses EIOPA’s call for targeted legislative clarification and encourages the European institutions to consider and act on EIOPA’s advice and recommendations.

Getting the scope of the AI Act right — focusing its requirements where genuine risks lie, and avoiding regulatory overlap with mature actuarial governance — is essential to preserve Europe’s competitiveness, protect consumers effectively, and support responsible innovation in financial services.

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