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EIOPA Discussion Paper on Integrated Data Collection Summary of AAE Key Messages



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What was the consultation about?

EIOPA's Discussion Paper, under Article 35(12) of Solvency II, addressed overlaps and inefficiencies across insurance and IORP reporting. It covered:

- Overlaps and gaps across insurance and IORP reporting, disclosure and sustainability rules.
- Reporting of derivatives and Collective Investment Undertaking look-through data.
- The reporting chain, data dictionaries, identifiers, automation and cost.

Why does it matter?

This report feeds directly into EIOPA's advice to the Commission on an integrated EU data collection system. Insurers and IORPs currently prepare largely duplicative data for Solvency II, ORSA, CSRD, SFDR and national regimes, generating reconciliation cost without improving supervisory insight.

What were our key messages?

- 1. Adopt “Report Once, Use Many Times”:** Build an integrated architecture with harmonised definitions so data need not be resubmitted across frameworks.
- 2. Prioritise Stability Over Novelty:** Modernisation such as DPM 2.0 must deliver simpler, more stable templates, not added technical complexity.
- 3. Develop a Comprehensive Data Dictionary:** A single, well-maintained data dictionary should be prioritised and used for simplification, not scope expansion.
- 4. Address Recurring, Not Just One-Off Costs:** Recurring costs — licensing, reconciliation, validation — are often as material as implementation costs.
- 5. Fill the Forward-Looking Sustainability Gap:** Sustainability datapoints are largely backward-looking; extend them to forward-looking climate effects on claims and lapse.
- 6. Apply Proportionality Throughout:** Calibrate reporting so supervisory benefit is proportionate to burden, with regard for smaller IORPs.



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