

# AMICE feedback on the Commission's roadmap on European partnership for safe and automated road transport

AMICE welcomes the opportunity to provide feedback on the European Commission's roadmap on a European partnership for safe and automated road transport.

We believe that Option 2 – Institutionalised partnership, pursuant to Article 187 TFEU, as outlined in the inception impact assessment is the most suitable option because of the financial scope and the coordinated approach. Working in an institutionalised partnership will be an efficient way to tackle the fragmentation hurdles identified in the roadmap. The challenges would be best addressed at EU level by means of a common strategic research agenda and coordinated public and private R&I activities. The institutionalised partnership should also enable the participation of the largest spectrum of stakeholders, including the insurance sector. In this regard, AMICE members are willing to assist in discussions related to access to in-vehicle data, as well as to risk management. An institutional partnership will also foster the long-term commitment of all the actors involved.

---

## About AMICE (Association of Mutual and Cooperative Insurers in Europe)

AMICE is the voice of the mutual and cooperative insurance sector in Europe. The Brussels-based association advocates for appropriate and fair treatment of all mutual and cooperatives insurers in a European Single Market. It also encourages the creation and development of innovative solutions for the benefit of European citizens and society.

Mutual and cooperative insurance follows the principles of solidarity and sustainability and is characterised by customer-membership and a democratic governance. The mutual business model, with its focus on using surpluses for the benefit of its members, is the natural way to provide insurance.

Mutual and cooperative insurers have a market share of more than 30% of the European insurance sector, with more than €420 billion in premiums written and over 410 million policyholders across Europe.