

**Comments Template on EIOPA-CP-14-051
 Consultation Paper on the draft proposal for Implementing Technical Standards with
 regard to the templates and structure of the disclosure of specific information by
 supervisory authorities**

**Deadline
 02.Mar.2015
 23:59 CET**

Company name:	Insurance and Reinsurance Stakeholder Group	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential. Please indicate if your comments on this CP should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.	Public
<p>Please follow the instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ <u>Do not change the numbering</u> in column "Reference". ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph, keep the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below. <ul style="list-style-type: none"> ○ If your comment refers to multiple paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other paragraphs this also applies. ○ If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment itself. <p>Please send the completed template to Consultation_Set2@eiopa.europa.eu, in MSWord Format, (our IT tool does not allow processing of any other formats).</p> <p>The paragraph numbers below correspond to Consultation Paper No. EIOPA-CP-14-051.</p>		
Reference	Comment	
General Comment	It is paramount that for the purposes of exchanging aggregate data, supervisory authorities only use information that is already provided by the undertakings in the Public Disclosure Reporting Templates (SFCR), such that this does not create additional reporting burdens for undertakings. The Annexes of this ITS should only refer to the public disclosure templates (SFCR) and not those	

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	<p>submitted to the supervisory authorities (RSR), as this is confidential, since Article 317(1) of the Delegated Acts states that aggregate statistical data should be made available to the public through a website of the national supervisory authority.</p> <p>A reference to the Delegated Acts would be helpful, specifically Annex XXI, as this provides the background for Annex I and II in this ITS.</p> <p>In terms of drafting, there are reference errors in the Annexes, for example, Annex I and II are not consistent. The cell references are not consistent between the tables referring to the same items.</p> <p>Overall this ITS seems not to raise strong concerns for undertakings as this ITS is addressed to supervisory authorities only and considering that it does not add further requirements for undertakings on top of current reporting templates.</p>	
Recital 1		
Recital 2		
Recital 3		
Recital 4		
Article 1		
Article 2 (1)	Change the title of the Article: "Disclosure of information on the supervisory review process"	
Article 2 (2)		
Article 3		
Article 4		
Article 5	Change the title of the Article: "Disclosure of information on supervisory objectives and activities"	
Article 6	Under b): "Information on the supervisory review process"	
Article 7		
Annex I		
Annex I (AS1)		

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Annex I (AS2)		
Annex I (AS3)		
Annex I (AS4)		
Annex I (AS5)	Last sentence: "This number is based on the information exchange between the supervisory authorities of the home and host Member States "	
Annex I (AS6)	...undertakings falling within the scope of...	
Annex I (AS7)		
Annex I (AS8)		
Annex I (AS9)		
Annex I (AS10)		
Annex I (AS11)		
Annex I (AS12)		
Annex I (AS13)		
Annex I (AS14)		
Annex I (AS15)		
Annex I (AS16)		
Annex I (AS17)		
Annex I (AS18)		
Annex I (AS19)		
Annex I (AS20)		
Annex I (AS21)		
Annex I (AS22)	"The total amount of the market risk concentration of those insurance...."	
Annex I (AS23)		
Annex I (AS24)		
Annex I (AS25)		

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Annex I (AS26)		
Annex I (AS27)		
Annex I (AS28)		
Annex I (AG1)		
Annex I (AG2)		
Annex I (AG3)		
Annex I (AG4)		
Annex I (AG5)		
Annex I (AG6)		
Annex I (AG7)		
Annex I (AG8)		
Annex I (AG9)		
Annex I (AG10)		
Annex I (B1)		
Annex I (B2)	B2a first sentence: "The number of regular inspections undertaken both at..." B2b second sentence second last line: "address an issue..."	
Annex I (B3)		
Annex I (B4)		
Annex I (B5)		
Annex I (B6)		
Annex I (B7)		
Annex I (B8)		
Annex I (B9)		
Annex I (B10)	Last three lines: "because of a significant deviation between the undertaking's risk profile and the assumptions underlying the standard formula"	

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Annex I (B11)		
Annex I (B12)	Under B12: same as under B10 Under B12a: "...or the relevant risk modules when the risk profile of the insurance..."	
Annex I (B13)	"The number of cases...the free disposal of an undertaking's assets when the undertaking did not comply with the rules relating to technical provisions"	
Annex I (B14)	"... when the undertaking did not comply with the Minimum Capital Requirement"	
Annex I (B15)	"disposal of the assets of the undertaking when the undertaking did not comply with the Solvency Capital Requirement"	
Annex I (B16)		
Annex I (B17)		
Annex I (B18)		
Annex I (B19)	"The number of new authorisations granted..."	
Annex I (B20)		
Annex I (B21)	...(where Member States have chosen to require prior approval for the use of this adjustment) B21a: same change as under B21	
Annex I (B22)		
Annex I (B23)		
Annex I (B24)	Add after Directive 2009/138/EC in brackets: (duration approach)	
Annex I (B25)		
Annex I (B26)		
Annex I (B27)		
Annex I (B28)		
Annex I (B29)		
Annex I (H1)		
Annex I (H2)		

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Annex I (H3)		
Annex I (H4)		
Annex I (H5)		
Annex I (H6)		
Annex I (H7)		
Annex I (H8)		
Annex II (template A)		
Annex II (template B)		
Annex II (template C)		
Annex III		
Annex IV general		
3.1		
3.2		
3.3		
3.4		
3.5		
3.6		
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3.11		
3.12		
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