	Comments Template on **Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities**	**Deadline** **19-cze-13** **12:00 CET**
Name of Company:	Powszechny Zakład Ubezpieczeń Spółka Akcyjna Powszechny Zakład Ubezpieczeń na Życie Spółka Akcyjna	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public

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	     o Certain rows represent a group of cells with similar information (ex : TP-E1- cells A43-L43)
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	The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the Technical Annexes II and III.	

Reference	**Comment**	**Resolution**

| General Comments | 1. Timeline for the Guidelines Implementation

The time table for guidelines implementation should to greater degree incorporate proportionality principle. Requirements of "step-by-step" implementation should not be too burdensome and cannot generate costs not proportionate to the aim of the regulations. Moreover the time table and guidelines should not force implicitly (indirectly) earlier, de facto implementation of Solvency II requirements. In other words the information collected by NCAs during implementation phase should not trigger or influence any regulatory action – otherwise there will be no difference between implementation phase and the formal introduction of Solvency II.

Additionally, as we understand, EIOPA intends to publish the guidelines in the areas covered by this consultation in the autumn of this year. According to Article 16(3) of the EIOPA Regulation NCAs 'shall make every effort to comply' with the guidelines. This means in practice, that NCA and insurance undertakings will have limited time of two months, following issuance of the guidelines (the date of issuance of the guidelines is the date on which the guidelines are published in each of the official EU languages) to confirm whether they comply or intend to comply with the guidelines. It is clear that such confirmation should not be automatic but result from a solid analysis of the proposed requirements vis a vis existing capacities (people, IT, infrastructure, budgets) both in NCA and insurance undertakings. And even if in some cases the answer might be positively confirming readiness to comply in other cases, requiring technical preparation, budgets, project, and people, this will not be possible to implement on proposed date. Hence, taking these arguments into account, we have doubt if it is possible for insurance undertakings to prepare for implement the guidelines from 1 January 2014. In our opinion it would be advisable to spend 2014 for local consultations (i.e. based on intensive, technical dialogue between local regulators and local insurance industry) to better prepare for the implementation of the guidelines. Then, it is more realistic that the guidelines could go live starting January 2015.

2. Basis for Guidelines Implementation

We welcome the view, that EIOPA recognises that in a significant number of member states, the NCA does not have the legal competence to enact the relevant financial legislation and is dependent on the powers bestowed upon it. Additionally, special attention should be paid by NCAs to determine how to comply with EIOPA guidelines by incorporating them into their regulatory or supervisory framework in an appropriate manner, especially if they are less | |

stringent or less precise than local legally binding regulations (e.g. in case of outsourcing; fit & proper requirements). Moreover we support the EIOPA view that the guidelines do not require NCAs to take supervisory action, and in our opinion – it should be clearly stated that no such regulatory actions should be taken (e.g.: imposing restriction on dividend payment), as a result of a failure by undertakings to comply with Solvency II requirements, including the pillar one, two and/or three requirements.

3. Reporting Requirements

A. Burdensome Requirements:
In general the level of data disaggregation and the number of details required to be reported during implementation phase (through quantitative reporting templates) is very extensive. Due to the high cost of reporting requirement's implementation (at the level of single undertaking) the regulator is expected to prove that the data in such disaggregation are indeed necessary to report and that each reported position shall be used by the regulator. This is especially the case of data requirements in the assets templates (AS-D1-L, AS-D2O-L) in which for each separate asset unit 26 positions must be reported (33 positions in terms of derivatives – open positions). It is questionable to what extend the requested data are supported by Pillar I requirements and what the purpose is of reporting it to NCA. The reporting burden is not proportionate to the goals assumed for transition (implementation) phase.

Based on the above we would like to propose to exclude reporting templates used of the purpose of financial stability reporting and templates covering detailed list of assets and derivatives (i.e. Assets and liabilities by currency, Life and Health SLT Technical Provisions – Best Estimate by country, Non-life Technical Provisions – Best Estimate by country, Detailed list of assets, Detailed list of derivatives – open positions)

B. Pillar I vs. Pillar III:
We would like to point out our considerations relating to potential inconsistencies between Pillar I and Pillar III. In our opinion the main role of Pillar III is reporting based on data (analysis, calculations) provided by Pillar I. Any additional reporting requirements which cannot be easily supported by Pillar I should be excluded from the final reporting requirements.

C. Data availability:
In many areas of reporting the required data are not readily available. Especially in the areas of assets some of the required data can be obtained only through the third-party (data/information

vendor). In case of some areas the data are available through different IT systems hence the current reporting requirements will probably lead to the need of setting up a special Solvency II data warehouse which will be both costly and time consuming. In some cases the reporting of information (such as for example information obtained from other company based on the agreement) may be treated as braking the property rights and lead to serious legal problems.

D. Cost of implementation:
The application of current shape of reporting requirements would result in high implementation costs especially in the area of IT systems. Solvency II, especially during the implementation phase, is going to be the additional reporting framework apart from IFRS framework and Local GAAP framework. Due to this fact the application phase should be divided into sup-phases during which the separate parts of final reporting requirements would be implemented. Expanding the duration of application phase would, in our opinion, allow to split the implementation costs and to minimize the risk of implementation errors.

4. Implementation Timing

A. Implementation Timing:
The reporting requirements and instructions are not yet finalized. The real implementation process should be started as soon as the final requirements are settled so the undertaking will not overinvest in the IT systems, setting processes etc. The starting point of the overall implementation should be than perceived as the date of final acceptance of reporting requirements (based on current implementation timelines the 1st January 2014 is the deadline for local NCAs to put in place the official local guidelines hence the implementation process should immediately start after the guidelines announcement). In our opinion the preparation and introduction of appropriately precise local guidelines within given deadlines is challenging especially due to the fact that in some areas of guidelines the local consultations of NCA and undertakings are necessary. We would like to propose to dedicate the year 2014 to local pre-application discussions between NCA and undertakings which would lead to preparation of detailed and precise local guidelines and local implementation timeline. Based on our proposal we believe that the real implementation process should take place in 2015 and as a result the first reporting should be performed in 2016.

Moreover in our opinion reporting is the main area in which the changes in local law and regulations are necessary so the local NCAs will be able to fulfil the tasks defined by Solvency II guidelines. As the change of local law does not depend on NCA there is a risk that necessary

changes won't be introduced before the deadline for introduction of local guidelines. We believe that timeline of implementation phase should take into account the potential duration of the process of introduction of changes in local law. Due to this fact we would like to propose to dedicate year 2014 for introduction of necessary changes in local regulations and to move the deadline for introduction of local guidelines from 1st of January 2014 to 1st of January 2015.

B. Duration of implementation process:
Setting up the appropriate processes, agreements with external data vendors, IT systems etc. is expected to take more than 1 year. Based on the current application deadlines the final implementation of interim requirements should be finalized till 2014.12.31 (based on current implementation timelines the first reporting period is 2014.01.01 – 2014.12.31 and the reporting templates and narratives must be submitted within 20 weeks after the end of financial year) while the start of implementation process is expected to be on the day of final reporting requirements announcement (2014.01.01). In our opinion 1 year is not enough for the proper implementation of all reporting requirements.

C. Parallel reporting:
During the interim implementation phase (and probably beyond should Solvency II not be fully implemented in due time again) there is a risk that both SI and Solvency II results shall be reported. In the interim phase Solvency I will remain the legally binding regulatory and supervisory regime, especially with respect to quantitative requirements, as EIOPA was kind to notice. Undertakings will be obliged to continue submitting reports based on Solvency I methodology. Any interim reporting would become an additional/parallel reporting obligation based on a very different valuation and calculation methodology.

5. Impact of Reported Information

A. Solvency II results impact in application phase:
During the application phase of the process there is a risk of double reporting (under SI regime and under partial Solvency II regime). Although during the application phase the results of Solvency II partial reporting cannot be treated as binding (as according to current timeline the Solvency II will be fully applicable starting from 2016.01.01) there is a risk that the information obtained by local NCA during application phase will have an impact on actions and decisions taken by NCA.

B. Internal/Partially-Internal Model vs. Standard Formula:
Based on the current requirements the users of Internal/Partially-Internal Model are required to report both SCR based on Internal/Partially-Internal Model and based on Standard Formula. There is a risk that local NCA will take an action based on the fact that reported SCR based on Standard Formula is higher than SCR based on Internal/Partially-Internal Model. After the pre-application process and IMAP the Internal/Partially-Internal Model users should not be required to report SCR on the basis of Standard Formula.

6. Internal Model Reporting Requirements

A. SCR reporting templates:
The presented SCR templates are mainly applicable for Standard Formula users only. The lack of appropriately flexible templates for Internal/Partially-Internal Model users is an issue which should be solved before the final acceptance of reporting requirements.

B. Scope of reporting:
Based on current reporting requirements the undertaking is expected to calculate and report both SCR on the basis of Internal/Partially-Internal Model and SCR based on Standard Formula. In many cases this means a double reporting which is connected with additional process implementation cost.

7. Annual Progress report

In our opinion the annual progress report prepared by local NCA should not be supplemented by any kind of comply or explain procedure (e.g. local peer review report etc.). Such report would require the analysis of compliance of each undertaking with the interim measures requirements. We believe that the compliance should be tested on the basis of final requirements after the official introduction of Solvency II.

8. XBRL Taxonomy

In our opinion the introduction of XBRL taxonomy should be excluded from implementation phase. The application of XBRL taxonomy will result in additional costs of implementation and, as the reporting in XBLR format is required only in terms of local NCAs, the undertakings should not be required to use XBRL during implementation phase.

Introduction General Comments		
1,1		
1,2		
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1,4		
1,5		
1,6	Please refer to General Comments section (Timeline for the Guidelines Implementation).	
1,7	In our opinion the annual progress report prepared by local NCA should not be supplemented by any kind of comply or explain procedure (e.g. local peer review report etc.). Such report would require the analysis of compliance of each undertaking with the interim measures requirements. We believe that the compliance should be tested on the basis of final requirements after the official introduction of Solvency II.	
1,8	The NCAs are "expected to ensure that insurance and reinsurance undertakings prepare for having appropriate systems and structures in place that would allow an adequate exchange of information with the" NCAs. Are there going to be any specific requirements or restrictions regarding such systems? Sophisticated requirements may result in additional costs of implementation which will be against the proportionality rule (costs vs. benefits). Moreover, these costs may further increase if changes stemming from Omnibus II Directive (e.g. relating to calculation of technical provisions) are introduced to reporting spread sheets at the later stage.	
1,9		
1.10	We have noted that EIOPA intention of preparation phase is to "set up of foster a dialogue around implementation of reporting requirements" between NCA and undertakings. Moreover we welcome the EIOPA remark that NCAs "are expected to consider information provided" but will "not be expected to take enforcement of regulatory action". However during the application phase of the process there is a risk of double reporting (under Solvency I regime and under interim partial Solvency II regime). Although during the application phase the results of Solvency II partial reporting cannot be treated as binding (as according to currently foreseen timeline the Solvency II will be fully applicable starting from 2016.01.01) there is a risk that the information obtained by local NCA during application phase will have an indirect impact on actions and decisions taken by NCA. Our concern is based on the example of Danish NCA which declared that would take into account the information of not meeting the SCR by any of undertaking and that in such case the NCA will take appropriate regulatory actions. Due to this fact we would like to request for change of wording from "not be expected to take enforcement or regulatory action" to "must not take enforcement or regulatory action" - otherwise this would mean de facto the implementation of Solvency II.	

1,11	The reporting requirements and instructions are not yet finalized. The real implementation process should be started as soon as the final requirements are settled so the undertaking will not overinvest in the IT systems, setting processes etc. The starting point of the overall implementation should be than perceived as the date of final acceptance of reporting requirements (based on current implementation timelines the 1st January 2014 is the deadline for local NCAs to put in place the official local guidelines hence the implementation process should start immediately after the guidelines announcement). Setting up the appropriate processes, agreements with external data vendors, IT systems etc. is expected to take more than 1 year. Based on the current application deadlines the final implementation of pre-application requirements should be finalized till 2014.12.31 (based on current implementation timelines the first reporting period is 2014.01.01 – 2014.12.31 and the reporting templates and narratives must be submitted within 20 weeks after the end of financial year) while the start of implementation process is expected to be on the day of final reporting requirements announcement (2014.01.01). In our opinion 1 year is not enough for the proper implementation of all reporting requirements. We would treat 2014 as the preparation period and implement reporting requirements starting from 2015. Moreover in our opinion the 1st annual reporting period for the implementation phase should refer to period one year ahead of the date of introduction of Solvency II (based on current deadlines this is the date of 1st of January 2016 hence the first reporting period should cover year 2014). In case of change of the date of Solvency II introduction the first annual reporting period during implementation phase should be also changed (moved according to the change of date of introduction of Solvency II). The same approach should be used in case of quarterly reporting - the first quarterly reporting may cover period 2015Q3 but it should not be introduced more than a year ahead of the date of introduction of Solvency II. In case of change of the date of Solvency II introduction the first quarterly reporting period during implementation phase should be also changed.	
1,12		

1,13	Also with reference to point 1.10: Based on the current requirements the users of Internal/Partially-Internal Model are required to report both SCR based on Internal/Partially-Internal Model and based on Standard Formula. There is a risk that local NCA will take an action based on the fact that reported SCR based on Standard Formula is higher than SCR based on Internal/Partially-Internal Model. In our opinion after the pre-application process and IMAP the Internal/Partially-Internal Model users should not be required to report SCR on the basis of Standard Formula. However according to wording of point 1.13 "when Solvency II is applicable the reporting requirements should include figures provided at the most granular level for the approved internal models". There is no clear statement that the undertakings with approved Internal Model are not going to report SCR on the basis of Standard Formula at all; based on the current wording one can only deduct that SCR on the basis of Standard Formula might be required but on less granular level than SCR on the basis of Internal Model.	
1,14		
1,15	We welcome EIOPA idea of excluding part of full reporting package from requirements of preparation phase. However in our opinion the proposed list of information required during preparation phase is still regarded as very challenging and excessive. The application of current shape of reporting requirements would result in high implementation costs especially in the area of IT systems. Solvency II, especially during the preparation phase, is going to be the additional reporting framework apart from IFRS framework and Local GAAP framework. Due to this fact we would like to propose to split the preparation phase sub-phases during which the separate parts of final reporting requirements would be implemented. Expanding the duration of preparation phase would, in our opinion, allow to split the implementation costs and to minimize the risk of implementation errors.	
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1,23	Please refer to point 1.13.	
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1,25	Please refer to point 1.11.	
Section I. General Comments		
1,26	Please refer to point 1.11.	
1,27	Please refer to point 1.8.	
1,28	In our opinion the annual progress report prepared by local NCA should not be supplemented by any kind of comply or explain procedure (e.g. local peer review report etc.). Such report would require the analysis of compliance of each undertaking with the interim measures requirements. We believe that the compliance should be tested on the basis of final requirements after the official introduction of Solvency II.	
Section II. General Comments		
1,29		
1.30		

1,31	With reference to point 1.33 and 1.34: According to point 1.31 the NCA "should calculate the national market share (…) based on the data submitted by insurance (…) undertakings for the purpose of supervisions on the annual reporting period ending during 2012". Points 1.33 and 1.34 state that the market share of undertaking should be based on the undertaking's level of gross technical provisions for life business and gross premium written for non-life business. In our opinion there is a potential risk that 2012 year end information will not be representative for 2014 reporting or 2015 reporting according to our proposal especially in terms of fast growing markets. For example in terms of Poland the 2012 data might not be representative for life business due to large number of short term investment products which had a strong impact on the balance sheet position of technical provisions. The local NCA should have an ability to base on most recent data available (as far as the data are complete and accurate and refer to all market players), but within the timeline defined in point 1.35 (the NCA must notify the undertaking of falling into defined thresholds no later than 11 months before the initial submission reference dates).	
1,32		
1,33	Please refer to point 1.31.	
1,34	Please refer to point 1.31.	
1,35	According to point 1.35 the NCAs are required to notify undertakings falling into defined thresholds no later 11 months before the initial submission reference dates. In our opinion the period of 11 month is too short as part of the information used in annual reporting has to be collected during the whole year. Moreover the falling of the undertaking into defined threshold would result in the necessity of introduction or further development of reporting systems which might be also time consuming. Due to those the period of 18 months is regarded by us as minimum.	
1,36		
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1.40	Please refer to point 1.35.	
1,41		

1,42		
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1,44		
1,45	There is an inconsistency in this point – the Guideline 10 refers to quarterly reporting while point 1.45 refers to annual quantitative information.	
1,46		
1,47	This point is in Section III, not Section II.	
1,48	This point is in Section III, not Section II. Based on current reporting requirements the undertaking is expected to calculate and report both SCR on the basis of Internal/Partially-Internal Model and SCR based on Standard Formula. In many cases this means a double reporting which is connected with additional implementation cost. Additionally in our opinion the presented SCR templates are mainly applicable for Standard Formula users only. Based on the point 1.48 the undertakings which use Internal/Partially Internal Model are required to report the results in templates predefined for Standard Formula users. In many cases the predefined templates do not give the possibility to appropriately report the final results. For example in terms of life underwriting risk (template SCR-B3C) there is no place where the undertaking can present the result of shock of base case assumptions regarding take-up rates of different options embedded in insurance contracts (e.g. take-up rate of premium indexation). It is possible for Internal Model owners to define undertaking specific risks which are not covered by Standard Formula (e.g. risk of change of product charges, legislation risk etc.) hence the lack of appropriately flexible templates for Internal/Partially-Internal Model users is an issue which should be solved before the final acceptance of reporting requirements. Please refer also to point 1.13.	
Section III. General Comments		

1,49	With reference to point 1.48: There is a risk that the specific templates (mentioned in point 1.49) will be defined by NCA and agreed with undertaking too late to be entirely implemented by the undertaking. The first reporting period is 2014 which means that the templates should be defined already at the beginning of 2014 so the undertaking will have more or less one year to introduce appropriate processes in order to meet local reporting requirements. In our opinion, due to timeline of pre-application/IMAP process there is a material risk that local NCA won't be able to introduce local templates for Internal Model users till the end of 2014. Therefore, reporting should be binding for insurers starting from 2015 according to our proposal.	
1.50		
1,51		
1,52	We believe that some of the proposed quarterly reporting templates/information should be excluded from quarterly reporting as they do not bring any additional value. The main issue is with assets and derivatives information (AS-D1, AS-D20) - as the required information is very detailed and some of the information is not readily available (for example asset rating) we believe that, due to potential operational constrains, this type of information should be required once a year.	
1,53		
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1,55	Please refer to point 1.48.	
1,56	Please refer to point 1.49.	
1,57		
1,58		
1,59	Please refer to point 1.52.	

1.60	This point is in Section IV, not Section III. In our opinion the local NCAs should defined the list of required information based on which it will be able to understand and assess the appropriateness of system of governance of the undertaking. Otherwise there is a risk that the information provided by undertaking won't be regarded by NCA as sufficient. We believe that lack of predefined detailed requirements in this area of reporting may result in extension of potential duration of reporting process during implementation phase, as the local NCA may, in each reporting iteration, request for additional information.	
1,61	This point is in Section IV, not Section III.	
1,62	This point is in Section IV, not Section III.	
Section IV. General Comments	In general the list of required information in the narrative is very extensive. We would like to suggest limiting the required information to some sort of executive summary with reference to appropriate procedures and other undertaking's internal documents.	
1,63	In terms of a description of the undertaking's internal control system in our opinion it is necessary to define the list of information which will be required to be reported to NCA. Otherwise there is a risk that the information provided by undertaking won't be regarded by NCA as sufficient. We believe that lack of predefined detailed requirements in this area of reporting may result in extension of potential duration of reporting process during implementation phase, as the local NCA may, in each reporting iteration, request for additional information.	
1,64		
1,65		
1,66		
1,67		
1,68	This point is in Section V, not Section IV. In our opinion the phrase "material differences" requires precise definition. Moreover EIOPA should define the benchmark for the "material differences" (e.g. level of Own Funds, SCR etc.) based on which the undertaking will be able to decide whether the considered difference can be classified as material or not-material. Additionally we would like to request for explanation how the "quality of own funds" should be interpreted and described by undertaking.	
1,69	This point is in Section V, not Section IV.	

1.70	This point is in Section VI, not Section IV.	
Section V. General Comments		
1,71	This point is in Section VI, not Section V.	
1,72	This point is in Section VI, not Section IV.	
Section VI. General Comments	In general the list of required information in the narrative is very extensive. We would like to suggest limiting the required information to some sort of executive summary with reference to appropriate procedures, methodology documents and other undertaking's internal documents.	
1,73		
1,74		
1,75		

1,76	According to IAS 1 standard the undertaking is required to disclose the "sources of estimation uncertainty". Should the "assessment of the valuation uncertainty of assets and liabilities" under Solvency II be understood and reported in the similar way as the description of "source of estimation uncertainty" under IAS 1? If not we would like to request for explanation how the "assessment of the valuation uncertainty of the assets and liabilities" should be interpreted and described by undertaking.	
1,77		
1,78	This point is in Section VII, not Section VI.	
1,79	This point is in Section VIII, not Section VI.

For comments to timeline please refer also to point 1.11.

In our opinion the 1st annual reporting period for the implementation phase should refer to period one year ahead of the date of introduction of Solvency II (based on current deadlines this is the date of 1st of January 2016 hence the first reporting period should cover year 2014). In case of change of the date of Solvency II introduction the first annual reporting period during implementation phase should be also changed (moved according to the change of date of introduction of Solvency II). | |
| 1.80 | This point is in Section VIII, not Section VI.

In our opinion the 1st quarterly reporting may cover period 2015Q3 but it should not be introduced more than a year ahead of the date of introduction of Solvency II. In case of change of the date of Solvency II introduction the first quarterly reporting period during implementation phase should be also changed. | |
Section VII. General Comments		
1,81	This point is in Section VIII, not Section VII.	
Section VIII. General Comments		
1,82		
1,83	This point is in Section IX, not Section VIII.	
1,84	This point is in Section IX, not Section VIII.	

1,85	This point is in Section IX, not Section VIII. In our opinion both the final reporting templates and the means of reporting should be defined by NCAs before the start of the implementation phase in order to avoid the potential risk of setting inappropriate reporting processes by undertakings. In our opinion the information which will be provided by undertaking to NCA is going to be of very sensitive nature hence the local NCA is expected to set up an appropriate system providing security of data during the data transfer process. We believe that the system should be established and tested before the date of the beginning of first reporting process in order to decrease the potential risk of not fulfilling the reporting requirements regarding reporting deadlines by the undertaking due to potential issues connected with data transfer process.	
1,86	This point is in Section IX, not Section VIII.	
Section IX. General Comments		
1,87	In our opinion the quantitative data should be submitted in thousands of units rather than in single units. It will be consistent with previous reporting standards.	
1,88		
1,89	This point is in Section "Compliance and Reporting Rules General Comments", not Section IX.	
1.90	This point is in Section "Compliance and Reporting Rules General Comments", not Section IX.	
1,91	This point is in Section "Compliance and Reporting Rules General Comments", not Section IX.	
1,92	This point is in Section "Compliance and Reporting Rules General Comments", not Section IX.	
Compliance and Reporting Rules General Comments		
1,93	There is no such point in the document "Consultation Paper on the Proposal for Guidelines on submission of information to national competent authorities" (EIOPA-CP-13/010; 27 March 2013).	

1,94	There is no such point in the document "Consultation Paper on the Proposal for Guidelines on submission of information to national competent authorities" (EIOPA-CP-13/010; 27 March 2013).	
1,95	There is no such point in the document "Consultation Paper on the Proposal for Guidelines on submission of information to national competent authorities" (EIOPA-CP-13/010; 27 March 2013).	
1,96	There is no such point in the document "Consultation Paper on the Proposal for Guidelines on submission of information to national competent authorities" (EIOPA-CP-13/010; 27 March 2013).	
Technical Annex I General Comments		
BI–1		
BS-C1-2		
BS-C1-3		
BS-C1D-4		
AS-D1-5		
AS-D1-6		
AS-D2O-7		
AS-D2O-8		
TP-F1-9		
TP-E1-10		
TP-F1Q-11		
TP-E1Q-12		
OF-B1Q-13		
SCR-B2A-14		
SCR-B2A-15		
SCR-B2B-16		
SCR-B2B-17		
SCR-B2C-18		
SCR-B2C-19		
SCR-B3A-20		
SCR-B3A-21		

SCR-B3B-22		
SCR-B3B-23		
SCR-B3C-24		
SCR-B3C-25		
SCR-B3D-26		
SCR-B3D-27		
SCR-B3E-28		
SCR-B3E-29		
SCR-B3F-30		
SCR-B3F-31		
SCR-B3G-32		
SCR-B3G-33		
MCR-B4A-34		
MCR-B4B-35		
G01-36		
G03-37		
G03-38		
G03-39		
G04-40		
G14-41		
Technical Annex II General Comments		
Technical Annex III General Comments	1. Burdensome Requirements: In general the level of data disaggregation and the number of details required to be reported during implementation phase (through quantitative reporting templates) is very extensive. Due to the high cost of reporting requirement's implementation (at the level of single undertaking) the regulator is expected to prove that the data in such disaggregation are indeed necessary to report and that each reported position shall be used by the regulator. This is especially the case of data requirements in the assets templates (AS-D1-L, AS-D2O-L) in which for each separate asset unit 26 positions must be reported (33 positions in terms of derivatives – open positions). It is questionable to what extend the requested data are supported by Pillar I requirements and what the purpose is of reporting it to NCA. The reporting burden is not proportionate to the goals assumed for transition (implementation) phase.	

	Based on the above we would like to propose to exclude reporting templates used of the purpose of financial stability reporting and templates covering detailed list of assets and derivatives (i.e. Assets and liabilities by currency, Life and Health SLT Technical Provisions – Best Estimate by country, Non-life Technical Provisions – Best Estimate by country, Detailed list of assets, Detailed list of derivatives – open positions) 2. Pillar I vs. Pillar III: We would like to point out our considerations relating to potential inconsistencies between Pillar I and Pillar III. In our opinion the main role of Pillar III is reporting based on data (analysis, calculations) provided by Pillar I. Any additional reporting requirements which cannot be easily supported by Pillar I should be excluded from the final reporting requirements. Examples of inconsistencies: A. Treatment of property. Under Pillar I the whole property is treated as an investment while under Pillar III there is a split of property between property for own use and investment property. 3. Data availability: In many areas of reporting the required data are not readily available. Especially in the areas of assets some of the required can be obtained only through the third-party (data/information vendor). In case of some areas the data are available thorough different IT systems hence the current reporting requirements will probably lead to the need of setting up a special Solvency II data warehouse which will be both costly and time consuming. In some cases the reporting of information (such as for example information obtained from other company based on the agreement) may be treated as braking the property rights and lead to serious legal problems. 4. Cost of implementation: The application of current shape of reporting requirements would result in high implementation costs especially in the area of IT systems. Solvency II, especially during the implementation phase, is going to be the additional reporting framework apart from IFRS framework and Local GAAP framework. Due to this fact the application phase should be divided into sup-phases during which the separate parts of final reporting requirements would be implemented. Expanding the duration of application phase would, in our opinion, allow to split the implementation costs and to minimize the risk of implementation errors.	
BI - General Comments		
BI- cell A1		
BI- cell A2		

BI- cell A3		
BI- cell A4		
BI- cell A5		
BI- cell A6		
BI- cell A7		
BI- cell A8		
BI- cell A9		
BI- cell A10		
BS-C1 - General Comment		
BS-C1- cell AS1		
BS-C1- cell AS24		
BS-C1- cell A2		
BS-C1- cell A26		
BS-C1- cell A25B		
BS-C1- cell A3	Also with reference to cell A5: Under Pillar I the whole property is treated as an investment while under Pillar III there is a split of property between property for own use (cell A3) and investment property (cell A5). This inconsistency is an example of inconsistent requirements of Pillar I and Pillar III (for further details please refer to "Technical Annex III General Comments").	
BS-C1- cell A4		
BS-C1- cell A5		
BS-C1- cell A6		
BS-C1- cell A7B		
BS-C1- cell A7		
BS-C1- cell A7A		
BS-C1- cell A8E		
BS-C1- cell A8		
BS-C1- cell A8A		
BS-C1- cell A8C		
BS-C1- cell A8D		
BS-C1- cell A9		

BS-C1- cell A10A		
BS-C1- cell A10B		
BS-C1- cell A11		
BS-C1- cell A12		
BS-C1- cell A14		
BS-C1- cell A14B		
BS-C1- cell A14C		
BS-C1- cell A14A		
BS-C1- cell A16		
BS-C1- cell A17A		
BS-C1- cell A17		
BS-C1- cell A18		
BS-C1- cell A19B		
BS-C1- cell A18A		
BS-C1- cell A19		
BS-C1- cell A19A		
BS-C1- cell A13		
BS-C1- cell A21		
BS-C1- cell A20		
BS-C1- cell A23		
BS-C1- cell A28A		
BS-C1- cell A28B		
BS-C1- cell A27		
BS-C1- cell A29		
BS-C1- cell A30		
BS-C1- cell LS0		
BS-C1- cell L1		
BS-C1- cell L1A		
BS-C1- cell L2		
BS-C1- cell L3		
BS-C1- cell L4		

BS-C1- cell L4A		
BS-C1- cell L5		
BS-C1- cell L6		
BS-C1- cell LS6F		
BS-C1- cell L6B		
BS-C1- cell L6C		
BS-C1- cell L6D		
BS-C1- cell L6E		
BS-C1- cell L7		
BS-C1- cell L7A		
BS-C1- cell L8		
BS-C1- cell L9		
BS-C1- cell L10		
BS-C1- cell L10A		
BS-C1- cell L11		
BS-C1- cell L12		
BS-C1- cell LS14		
BS-C1- cell L23		
BS-C1- cell L18		
BS-C1- cell L22	Regarding pension benefit obligations this position is calculated once a year hence it is not available for quarterly reporting. The possible solution here is to report some sort of approximation.	
BS-C1- cell L13		
BS-C1- cell L17		
BS-C1- cell L16		
BS-C1- cell L19		
BS-C1- cell L20		
BS-C1- cell L15A		
BS-C1- cell L15B		
BS-C1- cell L15C		
BS-C1- cell L15E		

BS-C1- cell L15D		
BS-C1- cell L26		
BS-C1- cell L25		
BS-C1- cell L25A		
BS-C1- cell L27		
BS-C1D – General Comments		
BS-C1D- cell A1		
BS-C1D- cell B1		
BS-C1D- cell A3		
BS-C1D- cell A4		
BS-C1D- cell A5		
BS-C1D- cell A5A		
BS-C1D- cell A6		
BS-C1D- cell A7		
BS-C1D- cell A7A		
BS-C1D- cell A8		
BS-C1D- cell A9		
BS-C1D- cell A10		
BS-C1D- cell A11		
BS-C1D- cell A12		
BS-C1D- cell A13		
BS-C1D- cell A14		
BS-C1D- cell A15		
AS-D1- General Comment	Please refer to comments to "Technical Annex III General Comments". In our opinion the list of required information in terms of assets is very extensive. Some of information are not readily available and require additional agreements with external data vendors (e.g. assets ratings). Moreover we do not believe that quarterly reporting of such detailed list of information is necessary. The investment portfolios of large undertakings are usually quite stable hence the quarterly reporting is not expected to bring additional value while it will definitely result in additional work and cost.	

AS-D1- cell A1		
AS-D1- cell A2		
AS-D1- cell A3		.
AS-D1- cell A4		
AS-D1- cell A5		
AS-D1- cell A6		
AS-D1- cell A7		
AS-D1- cell A8	In our opinion there is a risk that the information on the ultimate parent will not be available from one source (data vendor), for all securities. In such situation the additional costs of data capture may occur.	
AS-D1- cell A9	In our opinion, from the operational point of view, it might be difficult to obtain and handle this kind of information.	
AS-D1- cell A10	In terms of the issuer group this type of information is not always available in standard data set delivered by the asset data vendors hence the requirement of such will probably result in increase of implementation cost.	
AS-D1- cell A11		
AS-D1- cell A12		
AS-D1- cell A13		
AS-D1- cell A15		
AS-D1- cell A16		
AS-D1- cell A17	This information is usually not readily available and requires additional agreements with external data vendors. Moreover there is a risk that based on standard agreements the undertaking won't be allowed by external vendors to report / present/ disclose externally the received data. The special licences will be probably necessary to be purchased from external data vendors which will generate extra cost.	
AS-D1- cell A18		
AS-D1- cell A20		
AS-D1- cell A22		
AS-D1- cell A23		
AS-D1- cell A24		

AS-D1- cell A25	In our opinion the acquisition price of each asset should be excluded from reporting requirements as it is not used in under the Solvency II regime (assets are priced on the basis of fair value). Moreover this information is not required in Pillar I calculations hence to keep the consistency between pillars it should not be required in Pillar III reporting.	
AS-D1- cell A26		
AS-D1- cell A28		
AS-D1- cell A30		
AS-D1- cell A50		
AS–D2O- General Comments		
AS-D2O- cell A1		
AS-D2O- cell A2		
AS-D2O- cell A3		
AS-D2O- cell A4		
AS-D2O- cell A5		
AS-D2O- cell A6		
AS-D2O- cell A7		
AS-D2O- cell A8		
AS-D2O- cell A9		
AS-D2O- cell A10		
AS-D2O- cell A11		
AS-D2O- cell A13		
AS-D2O- cell A14	This information is usually not readily available for complex derivatives and requires stochastic modelling. In our opinion the requirement of quarterly reporting of this information will generate additional unnecessary costs to undertaking.	
AS-D2O- cell A15		
AS-D2O- cell A16		
AS-D2O- cell A17		
AS-D2O- cell A19		
AS-D2O- cell A20		
AS-D2O- cell A21		
AS-D2O- cell A22		

AS-D2O- cell A23		
AS-D2O- cell A24		
AS-D2O- cell A25		
AS-D2O- cell A26		
AS-D2O- cell A27		
AS-D2O- cell A28		
AS-D2O- cell A29		
AS-D2O- cell A31		
AS-D2O- cell A32		
AS-D2O- cell A33	Please refer to AS-D1- cell A20.	
AS-D2O- cell A34	Please refer to AS-D1- cell A17.	
AS-D2O- cell A35		
AS-D2O- cell A50		
TP-F1- General Comments		
TP-F1- cell J1,J2,J4,J6,J7,J9,J10,J12,J13,J14		
TP-F1- cell JA1,JA2,JA4,JA6,JA7,JA9,JA10,JA12,JA13,JA14		
TP-F1- cell JE1,JE2,JE4,JE6,JE7,JE9,JE10,JE12,JE13,JE14		
TP-F1- cell JF1,JF2,JF4,JF6,JF7,JF9,JF10,JF12,JF13,JF14		
TP-E1- General Comments		
TP-E1- cells A43-L43		
TP-E1- cells A44-L44		
TP-E1- cells A45-L45		

TP-E1- cells A46-L46		
TP-E1- cells Q43-Q46		
TP-F1Q- General Comments		
TP-F1Q- cells A1		
TP-F1Q- cells A3		
TP-F1Q- cells A5		
TP-F1Q- cells A6		
TP-F1Q- cells A7		
TP-F1Q- cells A7A		
TP-F1Q- cells A7B		
TP-F1Q- cells A7C		
TP-F1Q- cells A9		
TP-F1Q- cells A10		
TP-F1Q- cells A12		
TP-F1Q- cells A13		
TP-F1Q- cells A14		
TP-F1Q- cells B1		
TP-F1Q- cells B2		
TP-F1Q- cells B3		
TP-F1Q- cells B4		
TP-F1Q- cells B5		
TP-F1Q- cells B6		
TP-F1Q- cells B7		
TP-F1Q- cells B9		
TP-F1Q- cells B10		
TP-F1Q- cells B11		
TP-F1Q- cells B12		
TP-F1Q- cells B13		
TP-F1Q- cells B14		
TP-F1Q- cells C1		
TP-F1Q- cells C2		

TP-F1Q- cells C3		
TP-F1Q- cells C4		
TP-F1Q- cells C5		
TP-F1Q- cells C6		
TP-F1Q- cells C7		
TP-F1Q- cells C9		
TP-F1Q- cells C10		
TP-F1Q- cells C11		
TP-F1Q- cells C12		
TP-F1Q- cells C13		
TP-F1Q- cells C14		
TP-F1Q- cells E1		
TP-F1Q- cells E2		
TP-F1Q- cells E4		
TP-F1Q- cells E6		
TP-F1Q- cells E7		
TP-F1Q- cells E9		
TP-F1Q- cells E10		
TP-F1Q- cells E12		
TP-F1Q- cells E13		
TP-F1Q- cells E14		
TP-F1Q- cells F1		
TP-F1Q- cells F2		
TP-F1Q- cells F4		
TP-F1Q- cells F6		
TP-F1Q- cells F7		
TP-F1Q- cells F9		
TP-F1Q- cells F10		
TP-F1Q- cells F12		
TP-F1Q- cells F13		
TP-F1Q- cells F14		

TP-E1Q- General Comments		
TP-E1Q- cells A1-P1		
TP-E1Q- cells Q1		
TP-E1Q- cells A5-P5		
TP-E1Q- cells A12-P12		
TP-E1Q- cells A13-P13		
TP-E1Q- cells Q5-Q13		
TP-E1Q- cells A14-P14		
TP-E1Q- cells A21-P21		
TP-E1Q- cells A22-P22		
TP-E1Q- cells Q14-Q22		
TP-E1Q- cells A23-P23		
TP-E1Q- cells A24-P24		
TP-E1Q- cells A25-P25		
TP-E1Q- cells Q23		
TP-E1Q- cells Q24		
TP-E1Q- cells Q25		
TP-E1Q- cells A26-P26		
TP-E1Q- cells A27-P27		
TP-E1Q- cells A28-P28		
TP-E1Q- cells Q26		
TP-E1Q- cells Q27		
TP-E1Q- cells Q28		
OF-B1Q – General Comments		
OF-B1Q- cell A1		
OF-B1Q- cell B1		
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OF-B1Q- cell A1A		
OF-B1Q- cell C1A		
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OF-B1Q- cell D5		
OF-B1Q- cell A6		
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OF–B1Q- cell A42		
OF–B1Q- cell C42		
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OF–B1Q- cell A45C		
OF–B1Q- cell A45D		
OF–B1Q- cell B45D		
OF–B1Q- cell C45D		
OF–B1Q- cell D45D		
OF–B1Q- cell E45D		
OF–B1Q- cell A45E		
OF–B1Q- cell B45E		
OF–B1Q- cell C45E		
OF–B1Q- cell D45E		
OF–B1Q- cell E45E		
OF–B1Q- cell A48		
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OF–B1Q- cell A50A		
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OF–B1Q- cell D50A		
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OF–B1Q- cell C51A		
OF–B1Q- cell D51A		
OF–B1Q- cell A52A		
OF–B1Q- cell A53A		
OF–B1Q- cell A53B		
OF–B1Q- cell B23		
OF–B1Q- cell B24		
OF–B1Q- cell B25		
OF–B1Q- cell B26		
OF–B1Q- cell B27		
OF–B1Q- cell B28		
OF–B1Q- cell B29		
OF–B1Q- cell B29A		
OF–B1Q- cell A30		
OF–B1Q- cell A31		
OF–B1Q- cell A32		
SCR - B2A – General Comment		
SCR - B2A - cell A1		
SCR - B2A - cell B1		

SCR - B2A - cell A01		
SCR - B2A - cell A2		
SCR - B2A - cell B2		
SCR - B2A - cell A02		
SCR - B2A - cell A3		
SCR - B2A - cell B3		
SCR - B2A - cell A03		
SCR - B2A - cell A4		
SCR - B2A - cell B4		
SCR - B2A - cell A04		
SCR - B2A - cell A5		
SCR - B2A - cell B5		
SCR - B2A - cell A05		
SCR - B2A - cell A6		
SCR - B2A - cell B6		
SCR - B2A - cell A7		
SCR - B2A - cell B7		
SCR - B2A - cell A07		
SCR - B2A - cell A10		
SCR - B2A - cell B10		
SCR - B2A - cell A11		
SCR - B2A - cell A12		
SCR - B2A - cell A13		
SCR - B2A - cell A013		
SCR - B2A - cell A14A		
SCR - B2A - cell A14C		
SCR - B2A - cell A8		
SCR - B2A - cell A9		
SCR - B2A - cell A17		
SCR - B2A - cell A15		
SCR - B2A - cell A15A		

SCR - B2A - cell A15B		
SCR - B2A - cell A15C		
SCR - B2A - cell A16		
SCR - B2A - cell A18		
SCR - B2A - cell A20		
SCR - B2A - cell A21		
SCR - B2A - cell A14B		
SCR - B2A - cell A14		
SCR - B2A - cell A11A		
SCR - B2A - cell A11B		
SCR - B2B – General Comment		
SCR - B2B- cell A1		
SCR - B2B- cell A1A		
SCR - B2B- cell A1B		
SCR - B2B- cell A1C		
SCR - B2B- cell B1		
SCR - B2B- cell C1		
SCR - B2B- cell B2		
SCR - B2B- cell C2		
SCR - B2B- cell B3		
SCR - B2B- cell C3		
SCR - B2B- cell B4		
SCR - B2B- cell C4		
SCR - B2B- cell B5		
SCR - B2B- cell B6		
SCR - B2B- cell B7		
SCR - B2B- cell C5		
SCR - B2B- cell C6		
SCR - B2B- cell B8		
SCR - B2B- cell B8AA		
SCR - B2B- cell B8A		

SCR - B2B- cell A11A		
SCR - B2B- cell A11B		
SCR - B2C – General Comment		
SCR - B2C- cell A1		
SCR - B2C- cell A1A		
SCR - B2C- cell A1B		
SCR - B2C- cell A1C		
SCR - B2C- cell B1		
SCR - B2C- cell C1		
SCR - B2C- cell B2		
SCR - B2C- cell C2		
SCR - B2C- cell B3		
SCR - B2C- cell C3		
SCR - B2C- cell B4		
SCR - B2C- cell C4		
SCR - B2C- cell B5		
SCR - B2C- cell B6		
SCR - B2C- cell B7		
SCR - B2C- cell B7A		
SCR - B2C- cell B7B		
SCR - B2C- cell B7C		
SCR - B2C- cell B8		
SCR - B2C- cell B9		
SCR - B2C- cell B10		
SCR - B2C- cell B12		
SCR - B2C- cell B13		
SCR - B2C- cell C5		
SCR - B2C- cell C6		
SCR - B2C- cell B14		
SCR - B2C- cell B14AA		
SCR - B2C- cell B14A		

SCR - B2C- cell A11A		
SCR - B2C- cell A11B		
SCR - B3A – General Comment		
SCR - B3A – cell A00		
SCR - B3A – cell AA01		
SCR - B3A – cell AA02		
SCR - B3A – cell AA03		
SCR - B3A – cel A30		
SCR - B3A- cell C0		
SCR - B3A- cell D0		
SCR - B3A- cell A1		
SCR - B3A- cell A2		
SCR - B3A- cell A1A		
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SCR - B3A- cell C8		
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SCR - B3A- cell B9		
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SCR - B3A- cell B10		
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SCR - B3A- cell A16A		
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SCR - B3A- cell A20A		
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SCR - B3A- cell D23		
SCR - B3B – General Comment		
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SCR - B3B – cell A001		
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SCR - B3B- cell B1		
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SCR - B3C – General Comment		
SCR - B3C – cell A01		
SCR - B3C – cell A02		
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SCR - B3F – General Comment		
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SCR - B3F- cell KF7		

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SCR - B3F- cell KA10		
SCR - B3F- cell KB10		
SCR - B3F- cell KC10		
SCR - B3F- cell LA1-LB1		
SCR - B3F- cell LC1		
SCR - B3F- cell LA2-LB2		
SCR - B3F- cell LC2		
SCR - B3F- cell LA3-LB3		
SCR - B3F- cell LC3		
SCR - B3F- cell LA4-LB4		
SCR - B3F- cell LC4		
SCR - B3F- cell LA5-LB5		
SCR - B3F- cell LC5		
SCR - B3F- cell LA6-LB6		
SCR - B3F- cell LC6		
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SCR - B3F- cell LA11		
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SCR - B3F- cell LC12		
SCR - B3F- cell LA13		
SCR - B3F- cell LB13		

SCR - B3F- cell LC13		
SCR - B3F- cell LA14		
SCR - B3F- cell LB14		
SCR - B3F- cell LC14		
SCR - B3F- cell MA1-ME1		
SCR - B3F- cell MA2-ME2		
SCR - B3F- cell MF2		
SCR - B3F- cell MG2		
SCR - B3F- cell MH2		
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SCR - B3F- cell MG3		
SCR - B3F- cell MH3		
SCR - B3F- cell MF4		
SCR - B3F- cell MG4		
SCR - B3F- cell MH4		
SCR - B3F- cell NA1,NC1,NE1,NG1,NI1		
SCR - B3F- cell NB1,ND1,NF1,NH1,NJ1		
SCR - B3F- cell NK1		
SCR - B3F- cell NK32		
SCR - B3F- cell NK33		
SCR - B3F- cell NK34		
SCR - B3F- cell NL1		
SCR - B3F- cell NL32		
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SCR - B3F- cell NN1		
SCR - B3F- cell NN32		
SCR - B3F- cell NN33		
SCR - B3F- cell NN34		

SCR - B3F- cell OA1		
SCR - B3F- cell OB1,OC1,OD1,OE1,OF1		
SCR - B3F- cell OG1		
SCR - B3F- cell OG21		
SCR - B3F- cell OG22		
SCR - B3F- cell OG23		
SCR - B3F- cell OH1		
SCR - B3F- cell OH21		
SCR - B3F- cell OI1		
SCR - B3F- cell OI21		
SCR - B3F- cell OJ1		
SCR - B3F- cell OJ21		
SCR - B3F- cell OJ22		
SCR - B3F- cell OJ23		
SCR - B3F- cell PA21		
SCR - B3F- cell PB21		
SCR - B3F- cell PC1		
SCR - B3F- cell PD1,PF1,PH1		
SCR - B3F- cell PE1, PG1, PI1		
SCR - B3F- cell PJ1		
SCR - B3F- cell PJ21		
SCR - B3F- cell PK21		
SCR - B3F- cell PL21		
SCR - B3F- cell PM21		
SCR - B3G – General Comments		
SCR - B3G- cell A30		
SCR - B3G- cell A1		
SCR - B3G- cell A2		
SCR - B3G- cell A3		

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SCR - B3G- cell A14		
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SCR - B3G- cell A16		
MCR - B4A – General Comments		
MCR - B4A- cell A1		
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MCR - B4A- cell C2		
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MCR - B4A- cell A28		
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MCR - B4A- cell A30		
MCR - B4B – General Comments		
MCR - B4B- cell B1		

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G01- cell A1		
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G01- cell C1		
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G01- cell H1a		

G01- cell H1b		
G01- cell H1c		
G01- cell I1a		
G01- cell I1b		
G01- cell J1		
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G01- cell L1		
G01- cell M1		
G01- cell N1		
G01- cell O1		
G01- cell P1		
G01- cell Q1		
G01- cell R1		
G01- cell S1		
G01- cell T1		
G01- cell U1		
G03 – General Comments		
G03- cell A1		
G03- cell A2		
G03- cell B1		
G03- cell B2		
G03- cell B3		
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G03- cell N1		
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G04 – General Comments		
G04- cell A1		
G04- cell A2		
G04- cell A3		
G04- cell B1		
G04- cell C1		
G04- cell D1		
G04- cell E1		
G14- General Comments		
G14- cell A1		
G14- cell B1		
G14- cell S1		
G14- cell C1,F1,I1,L1,O1		
G14- cell D1,G1,J1,M1,P1		
G14- cell E1,H1,K1,N1,Q1		
G14- cell R1		
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Question 1 – Option 2	
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Question 2 – Option 1	
Question 2 – Option 2	
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Question 3 – Option 1	

Question 3 – Option 2		
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Question 6 – Option 1		
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Question 7 – Option 1		
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2,27	In our opinion the introduction of XBRL taxonomy should be excluded from implementation phase. The application of XBRL taxonomy will result in additional costs of implementation and, as	

	the reporting in XBLR format is required only in terms of local NCAs, the undertakings should not be required to use XBRL during implementation phase.	
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Appendix 1		
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