

**Comments Template on
Draft proposal for Quantitative Reporting Templates**

**Deadline
20 January 2012
12:00 CET**

Name of Company:

AMICE

Disclosure of comments:

Please indicate if your comments should be treated as confidential:

Public

Please follow the following instructions for filling in the template:

- ⇒ Do **not** change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool
- ⇒ Leave the last column empty.
- ⇒ Please fill in your comment in the relevant row. If you have no comment on a paragraph or a cell, keep the row empty.
- ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below.
 - Certain rows represent a group of cells with similar information (ex : TP - E3-cells A17-A31-J16 for a given triangle in TP-E3)
 - Cells that refer to formulas are not mentioned in specific rows; in case you have comments on formulas, please make them in the cell "general" for the given template
 - In spreadsheets & LOGs, certain cell number may seem like they are missing (ex : going directly from cell B1 to cell B3); this is normal, as they may refer to a previously existing cell that has been deleted during informal consultations, and cell numberings have not been changed for internal consistency purposes
 - If your comment refers to multiple cells or paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other cells or paragraphs this also applies.
 - If your comment refers to subparagraphs or specific cells within a group, please indicate this in the comment itself.

**Please send the completed template, in Word Format, to cp009@eiopa.europa.eu.
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The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the accompanying spreadsheets and LOGs, the reference to "General", "Purpose", etc. refers to summary documents.

Reference	Comment	
General Comment	<p>We believe that the proposed reporting templates will put a heavy burden on the undertakings. The costs will not only be the immediate ones for costs of changing IT-systems etc. There will also be a permanent increase in costs for reporting because extra additional human resources will be required in all company functions involved in reporting. The drivers for this additional need of resources are</p> <ul style="list-style-type: none"> • the rather large amount of data that needs to be collected (from different systems/departments), • the necessary controlling of the templates, and • the governance involved at all levels, including the development, documentation and maintenance of policies and procedures. <p>We are not at all sure that the benefits for supervisors and society will outweigh the cost to the undertakings, and thus for policyholders, which will be substantial.</p> <p>We would like to emphasise that the issue is not that undertakings have to have the required information. Our members assure us that the required information is in almost all cases available and even structured and processed in existing management reporting systems. The burden results from the obligation to collate the information in the predefined reporting templates, which many companies do not and would never use for the management of risks etc. because they have their own tailor-made solutions. Therefore, the reporting of information to supervisors in the predefined templates will in most cases be an extra burden on companies. In the end are the policyholders who will have to come up for the extra costs.</p> <p>Aligning reporting better to actual needs: EIOPA should consider requiring some of the</p>	

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more detailed information only on special occasions, such as for the preparation of (or follow-up of) on-site inspections or in times of adverse economic developments.

In any case, we strongly urge EIOPA to assess whether the Assets templates (D1-D6) could be designed in a way that reduces minimises the reporting burden, e.g. by limiting the number of cells reported by the undertakings.

Increasing flexibility in the reporting: Another way of limiting the reporting burden for undertakings would be to make better use of existing information: it would be highly advantageous if EIOPA and/or supervisors could get the same information from a central source, e.g. from the centralised securities database developed and maintained by the statistics department in the European Central Bank with the specific aim of improving the quality of European financial statistics, balance of payments statistics, etc. In general, EIOPA and national supervisors should ensure coordination with Eurostat/national statistical agencies and the ESCB/European System of Central Banks as regards reporting requirements for insurance undertakings.

TP – technical provisions: Our members are deeply concerned by this set of templates. They involve very complex reporting with a much higher level of detail than today. We do not believe that this level of detail is necessary to evaluate an insurance undertaking. For example,

- for non-life templates we do not see the need for the split in cash in-flows and cash out-flows, which is not easy to handle – in our view, a net cash flow approach would suffice (same benefit) and would be much easier to handle by undertakings (lower cost).
- Furthermore, we do not understand the need for triangles based on parts of the measurement.
- A huge effort will be required to find and report salvage and subrogations data. The need for this information for supervisory purposes is not at all clear to us: actuaries commonly estimate Technical Provisions net of salvage and subrogations.
- Finally, undertakings should be given the choice to select the standard to be used for reporting of claims development (i.e. accident year (AY) or underwriting year (UWY)).

Quarterly balance sheet and Asset reporting: Our members disagree with the request for

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quarterly balance sheets at both solo and group levels. To establish these would be tremendously burdensome and in our view without any added-value for neither the supervisor nor the undertaking.

We would assume that the purpose of requesting the submission of quarterly balance sheet information is part of the Supervisory Review process (SRP) and undertakings monitoring of their own internal strategic management needs. We argue, however, that the information needed for the continuous monitoring of undertaking's solvency position will be provided by the ORSA. The ORSA will allow the assessment of own funds and technical provisions on a continuous basis by using proportionate methodologies and proxies but without the need for a recourse to a formal balance sheet that would be very costly to establish.

We find it unnecessary to report detailed information on the asset portfolio on quarterly basis. Therefore, we suggest that under normal circumstances asset templates should only be reported annually. Hence, quarterly asset templates should be abandoned. As a minimum, their application should be restricted to solo undertakings and/or simplified through reporting according to categories rather than on a security by security basis.

Variation analysis templates: We acknowledge that the valuation analysis of changes in basic own funds are of utmost importance for the undertakings themselves as well as for the supervisors. We appreciate the constant dialog with supervisors to find a compromise on the aforementioned templates.

VA – C2C template will not capture, in its current form, the variation in own funds due to changes in technical provisions when undertakings have adopted the accident year standard to monitor their claims development.

VA templates are far too burdensome on a group basis and in our view they do not provide useful information at the same level of granularity as for solo templates, especially for VA C2C.

3.1

We reiterate our position to limit quarterly reporting to MCR and estimated Own Funds and

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	Technical Provisions. It could be considered to report own funds between balance sheet dates on the basis of proxies. We understand this is intended to demonstrate the coverage of the MCR for solos and to feed the SRP process with key information. EIOPA is aware that most processes can only be performed annually, either for methodological reasons (e.g. non life ultimate claims assessments based on annual triangles), for technological reasons (time needed to update all model data and time needed to process stochastic scenarios) and also for risk management reasons (modifications of exposures due to modifications of trends may not be adequately captured on short term periods like a quarter of a year).	
3.2		
3.3		
3.4		
3.5		
3.6		
4.1		
4.2		
4.3		
4.4		
4.5		
4.6		
4.7	The lack of EIOPA decision on the IT-format for the reporting of the quantitative templates is very worrying. We urge EIOPA to decide on the format for the reporting templates.	
4.8		
4.9		

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4.10		
Technical Annex (only for inconsistencies)		
BS-C1 – General	<p>Our members assure us that their systems and processes are not adapted to preparing and submitting comprehensive information on the undertaking's balance sheet situation on a quarterly basis. Gross data is commonly available in the systems. However, data collection (more or less important depending on the granularity required by EIOPA) will require implementing in the systems.</p> <p>More guidance is also needed on where to place mortgage credit bonds (This is relevant for those jurisdictions with large portfolios of mortgage credit bonds) and the money market funds.</p>	
BS-C1 – Purpose		
BS-C1 – Benefits		
BS-C1 – Costs		
BS-C1 – Groups		
BS-C1 – Materiality		
BS-C1 - Disclosure	The publication of a "solvency balance sheet" does not seem appropriate as mutual entities are not listed in the financial markets. In our view, the primarily objective of defining a "solvency balance sheet" is the assessment of the amount of eligible own funds. Only the eligible amount of own funds and major changes made to main elements of equity should be publicly disclosed. Other specific elements such as investments should be subject to limited disclosure.	
BS-C1 – Frequency	EIOPA states that undertakings shall submit a quarterly balance sheet only in cases where the reconciliation reserve cannot be explained sufficiently by the information on assets and liabilities that is reported in other quarterly templates (Assets, TP, OF).	

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	<p>This is the case when a significant part of the reconciliation reserve as reported in OF-B1Q cannot be explained out of the comparison with quarterly information on investments (Assets-D1Q), technical provision (TP-E1Q/F1Q) and specific own fund items (OF-B1Q), together with the most recent annual information on assets and liabilities that are not reported on a quarterly basis (latest annual BS-C1).</p> <p>AMICE members reiterate their opposition to any request for quarterly balance sheets at both solo and group levels. Such publication would be tremendously burdensome and without any value added for either the supervisor or the undertaking. We believe that the purpose of requesting the submission of more frequent than annual information is to support the solvency monitoring as part of the Supervisory Review process (SRP) and (re)insurance undertakings' own internal strategic management needs. The information needed for the continuous monitoring of (re)insurance undertakings' solvency positions will be provided by a new powerful tool, the ORSA. The ORSA will allow the assessment of own funds and technical provisions on a continuous basis by using proportionate methodologies and proxies, hence on a quarterly basis, but without the need for recourse to a formal balance sheet that would be very costly to establish.</p>	
BS-C1 - cell AS1		
BS-C1- cell AS24		
BS-C1- cell A2		
BS-C1- cell AS2		
BS-C1- cell A26	<p>The LOG document should indicate that the Balance Sheet should provide a net position between deferred tax assets and deferred tax liabilities.</p>	
BS-C1- cell AS26		
BS-C1- cell A25B		
BS-C1- cell AS25B		
BS-C1- cell A3		
BS-C1- cell AS3		
BS-C1- cell A5		
BS-C1- cell AS5		

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BS-C1- cell A6	Participations – we assume that this covers participating interests in both related and associated undertakings i.e. both ownership and loans. Could EIOPA provide some guidance on that?	
BS-C1- cell AS6		
BS-C1- cell A7		
BS-C1- cell AS7		
BS-C1- cell A7A		
BS-C1- cell AS7A		
BS-C1- cell A8		
BS-C1- cell AS8		
BS-C1- cell A8A		
BS-C1- cell AS8A		
BS-C1- cell A8C		
BS-C1- cell AS8C		
BS-C1- cell A8D		
BS-C1- cell AS8D		
BS-C1- cell AS9		
BS-C1- cell AS9A	<p>It was questioned whether it was relevant to further split investment funds (<i>defined as undertakings the sole purpose of which is the collective investment in transferrable securities and/or in other financial assets</i>) in A9A-A9E in these investing in equities government bonds, corporate bonds, property, derivatives and other. Any further split is not necessary as the information is already requested in D4.</p> <p>Additionally (and from an accounting point of view), only the investment funds should be registered in the balance sheet of the company as they, and not their underlying assets, compose the assets held by the undertaking. This is also indicated in article 75(1)(a) from the Framework Directive where it says that “<i>assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm’s length transaction</i>”.</p> <p>Their components could not be transferred (by the insurance undertaking) on an stand-alone</p>	

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	basis but only the total value of the investment fund.	
BS-C1- cell AS9B		
BS-C1- cell AS9C		
BS-C1- cell AS9D		
BS-C1- cell AS9E		
BS-C1- cell AS9F		
BS-C1- cell A10A		
BS-C1- cell AS10A		
BS-C1- cell A10B		
BS-C1- cell AS10B		
BS-C1- cell A14		
BS-C1- cell AS14		
BS-C1- cell A11		
BS-C1- cell AS11		
BS-C1- cell A12		
BS-C1- cell AS12		
BS-C1- cell A14A		
BS-C1- cell AS14A		
BS-C1- cell A17		
BS-C1- cell AS17		
BS-C1- cell A18		
BS-C1- cell AS18		
BS-C1- cell A18A		
BS-C1- cell AS18A		
BS-C1- cell A19		
BS-C1- cell AS19		

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BS-C1- cell A19A		
BS-C1- cell AS19A		
BS-C1- cell A13		
BS-C1- cell AS13		
BS-C1- cell A21		
BS-C1- cell AS21		
BS-C1- cell A20		
BS-C1- cell AS20		
BS-C1- cell A23		
BS-C1- cell AS23		
BS-C1- cell A27		
BS-C1- cell AS27		
BS-C1- cell A29		
BS-C1- cell AS29		
BS-C1- cell LS1		
BS-C1- cell L1A		
BS-C1- cell L2		
BS-C1- cell L3		
BS-C1- cell LS4		
BS-C1- cell L4A		
BS-C1- cell L5		
BS-C1- cell L6		
BS-C1- cell LS6B		
BS-C1- cell L6C		
BS-C1- cell L6D		
BS-C1- cell L6E		

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BS-C1- cell LS7		
BS-C1- cell L7A		
BS-C1- cell L8		
BS-C1- cell L9		
BS-C1- cell LS10		
BS-C1- cell L10A		
BS-C1- cell L11		
BS-C1- cell L12		
BS-C1- cell L23		
BS-C1- cell L18		
BS-C1- cell LS18		
BS-C1- cell L22		
BS-C1- cell LS22		
BS-C1- cell L13		
BS-C1- cell LS13		
BS-C1- cell L17	The LOG document should indicate that the Balance Sheet is providing a net position between deferred tax assets and deferred tax liabilities.	
BS-C1- cell LS17		
BS-C1- cell L16		
BS-C1- cell LS16		
BS-C1- cell L19		
BS-C1- cell LS19		
BS-C1- cell L20		
BS-C1- cell LS20		
BS-C1- cell L15A		
BS-C1- cell LS15A		

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BS-C1- cell L15B		
BS-C1- cell LS15B		
BS-C1- cell L15C		
BS-C1- cell LS15C		
BS-C1- cell L15D		
BS-C1- cell LS15D		
BS-C1- cell L25		
BS-C1- cell LS25		
BS-C1- cell L26	The amount of subordinated liabilities that can be computed as basic own funds should not be reported as liabilities but as an own fund element.	
BS-C1B – General	<p>We welcome the EIOPA decision not to request a list of the off-balance sheet items every quarter. However, we reiterate our concerns regarding the demand for a specification of collateral pledged and held, respectively, on whether it originated from loans made, derivative contracts, etc. In addition, collateral held or pledged by undertakings is often made under one agreement which encompass all types of transactions (loans, derivatives) transacted with a counterparty which render a specification meaningless/impossible to make.</p> <p>More guidance should be provided regarding the scope of this template; Members would like to see an indicative list of potential assets that would fall under the scope of this template.</p> <p>Furthermore, the name of this template is misleading as it covers contingent liabilities that are not included in those valued in the Solvency II Balance Sheet.</p>	
BS-C1B – Purpose		
BS-C1B – Benefits		
BS-C1B – Costs		
BS-C1B – Groups		
BS-C1B – Materiality		

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BS-C1B - Disclosure		
BS-C1B - Frequency		
BS-C1B- cell A2		
BS-C1B- cell A3A		
BS-C1B- cell A3C		
BS-C1B- cell B3C		
BS-C1B- cell C3C		
BS-C1B- cell D3C		
BS-C1B- cell A3B		
BS-C1B- cell B3B		
BS-C1B- cell A10		
BS-C1B- cell B10		
BS-C1B- cell A12A		
BS-C1B- cell B12A		
BS-C1B- cell A13		
BS-C1B- cell B13		
BS-C1B- cell A13A		
BS-C1B- cell B13A		
BS-C1B- cell A14		
BS-C1B- cell B14		
BS-C1B- cell A15A		
BS-C1B- cell B15A		
BS-C1B- cell A17		
BS-C1B- cell B17		
BS-C1B- cell A17A		

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BS-C1B- cell B17A		
BS-C1B- cell A18		
BS-C1B- cell A5		
BS-C1B- cell A9A		
BS-C1B- cell A9B		
BS-C1B- cell B9B		
BS-C1B- cell C9B		
BS-C1B- cell A19		
BS-C1B- cell B19		
BS-C1D – General	<p>AMICE General Comments on BS-C1D Balance Sheet are the following</p> <ul style="list-style-type: none"> • How would hedging (with derivatives as hedging instruments) be reflected in the reporting template? Should the net-position be reported? Or should the derivatives be reported separately? It should be considered how hedging should be reflected (this may even depend on whether the hedging is performed by single asset or for a portfolio). • Furthermore, it is not clear how subsidiaries should be reflected in the template. Should the parent company look through the currency positions of the subsidiary or should the subsidiary be included with, for example, the adjusted equity value in the functional currency of the subsidiary? 	
BS-C1D – Purpose		
BS-C1D – Benefits		
BS-C1D – Costs		
BS-C1D – Groups		
BS-C1D – Materiality	<p>We welcome EIOPA ´s decision to simplify the definition of the materiality threshold. Reporting the most important currencies representing up to 95% of both assets & liabilities (in SII value) along with any currency with a currency mismatch (difference between assets and liabilities) would be less onerous.</p>	

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BS-C1D - Disclosure		
BS-C1D - Frequency		
BS-C1D- cell A1		
BS-C1D- cell B1		
BS-C1D- cell C1		
BS-C1D- cell D1		
BS-C1D- cell E1		
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 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 A16		
Country - K1- General	It is particularly burdensome to report the information by class as requested in this template. The branch segmentation required should be replaced by a LoB segmentation.	
Country - K1- Purpose		
Country - K1- Benefits		

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Country - K1- Costs		
Country - K1- Groups		
Country - K1- Materiality		
Country - K1- Disclosure		
Country - K1- Frequency		
Country - K1- cell A1		
Country - K1- cell A2		
Country - K1- cell A3		
Country - K1- cell A4		
Country - K1- cell C1		
Country - K1- cell C2		
Country - K1- cell C3		
Country - K1- cell C4		
Country - K1- cell E1		
Country - K1- cell E2		
Country - K1- cell E3		
Country - K1- cell E4		
Country - K1- cell H1		
Country - K1- cell H2		
Country - K1- cell H3		
Country - K1- cell H1A		
Country - K1- cell H2A		
Country - K1- cell H3A		
Cover - A1A & Q- General	Members raise concerns with regard to the allocation of expenses between different types of portfolio: difficulties in splitting overhead expenses among products. We strongly suggest that EIOPA allow simplifications for these calculations and/or provide examples.	

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Cover - A1A & Q- Purpose		
Cover - A1A & Q- Benefits		
Cover - A1A & Q- Costs		
Cover - A1A & Q- Groups		
Cover - A1A & Q- Materiality		
Cover - A1A & Q- Disclosure		
Cover - A1A & Q- Frequency	It would be too burdensome to produce the information requested on a quarterly basis. Premiums and claims should only be reported on an annual basis.	
Cover - A1A- cell A1		
Cover - A1A- cell A2		
Cover - A1A- cell A3		
Cover - A1A- cell A4		
Cover - A1A- cell A5		
Cover - A1A- cell A6		
Cover - A1A- cell A7		
Cover - A1A- cell A8		
Cover - A1A- cell A9		
Cover - A1A- cell A10		
Cover - A1A- cell A11		
Cover - A1A- cell A12		
Cover - A1A- cell A19		
Cover - A1A- cell A20		
Cover - A1A- cell A21		
Cover - A1A- cell A22		

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Cover - A1A- cell A23		
Cover - A1A- cell B1		
Cover - A1A- cell B2		
Cover - A1A- cell C1		
Cover - A1A- cell A1A		
Cover - A1A- cell B1A		
Cover - A1A- cell C1A		
Cover - A1A- cell E1		
Cover - A1A- cell F1		
Cover - A1A- cell G1		
Cover - A1A- cell E1A		
Cover - A1A- cell F1A		
Cover - A1A- cell G1A		
Cover - A1A- cell E1B		
Cover - A1A- cell F1B		
Cover - A1A- cell G1B		
Cover - A1A- cell E1C		
Cover - A1A- cell F1C		
Cover - A1A- cell G1C		
Cover - A1A- cell E1D		
Cover - A1A- cell F1D		
Cover - A1A- cell G1D		
Cover - A1A- cell E1E		
Cover - A1A- cell F1E		
Cover - A1A- cell G1E		
Cover - A1A- cell I1		

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Cover - A1A- cell I2		
Cover - A1A- cell I3		
Cover - A1A- cell I3A		
Cover - A1A- cell I3B		
Cover - A1A- cell I4		
Cover - A1A- cell I5		
Cover - A1A- cell I6		
Cover - A1A- cell I7		
Cover - A1A- cell I8		
Cover - A1A- cell I9		
Cover - A1A- cell I10		
Cover - A1A- cell I11		
Cover - A1A- cell J1		
Cover - A1A- cell I11A		
Cover - A1A- cell J1A		
Cover - A1A- cell L1		
Cover - A1A- cell M1		
Cover - A1A- cell L1A		
Cover - A1A- cell M1A		
Cover - A1A- cell O1		
Cover - A1A- cell P1		
Cover - A1A- cell O1A		
Cover - A1A- cell P1A		
Cover - A1A- cell O1B		
Cover - A1A- cell P1B		
Cover - A1A- cell O1C		

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Cover - A1A- cell P1C		
Cover - A1Q- cell A1		
Cover - A1Q- cell A2		
Cover - A1Q- cell A3		
Cover - A1Q- cell A4		
Cover - A1Q- cell A5		
Cover - A1Q- cell A6		
Cover - A1Q- cell A7		
Cover - A1Q- cell A8		
Cover - A1Q- cell A9		
Cover - A1Q- cell A10		
Cover - A1Q- cell A11		
Cover - A1Q- cell A12		
Cover - A1Q- cell A19		
Cover - A1Q- cell A20		
Cover - A1Q- cell A21		
Cover - A1Q- cell A22		
Cover - A1Q- cell A23		
Cover - A1Q- cell B1		
Cover - A1Q- cell B2		
Cover - A1Q- cell C1		
Cover - A1Q- cell E1		
Cover - A1Q- cell F1		
Cover - A1Q- cell G1		
Cover - A1Q- cell E1Z		
Cover - A1Q- cell F1Z		

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Cover - A1Q- cell G1Z		
Cover - A1Q- cell I1		
Cover - A1Q- cell I2		
Cover - A1Q- cell I3		
Cover - A1Q- cell I3A		
Cover - A1Q- cell I3B		
Cover - A1Q- cell I4		
Cover - A1Q- cell I5		
Cover - A1Q- cell I6		
Cover - A1Q- cell I7		
Cover - A1Q- cell I8		
Cover - A1Q- cell I9		
Cover - A1Q- cell I10		
Cover - A1Q- cell I11		
Cover - A1Q- cell L1		
Cover - A1Q- cell M1		
Cover - A1Q- cell L1Z		
Cover - A1Q- cell M1Z		
OF - B1A & B1Q – Genera	<p>Providing a detailed overview of solo and group’s own funds’ position and the items the solo or group undertaking are counting as own funds will put a heavy burden on companies. EIOPA is aware that in many entities a full statutory or IFRS balance sheet is not available as of each quarter. Approximations currently used in the market such as roll-forwards of own funds should be allowed as they provide a valuable indication of the evolution of the own fund items.</p> <p>We would object any public disclosure of the item on “<i>Expected Profit in Future Premiums</i>” (EPIFP) as the word “profits” is misleading and would create confusion if used in the public arena.</p>	

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	According to Article 71 POF1 of Draft L2 ("Treatment of participations in the determination of basic own funds"), basic own funds shall be reduced by the full value of participations, in a financial and credit institution that exceeds 10% of items included in own funds (ordinary share capital and the equivalent item for mutual entities, surplus funds and the reconciliation reserve). This cell is not calculated by a formula but data to be entered (cell B28).	
OF - B1A & B1Q - Purpose		
OF - B1A & B1Q - Benefits		
OF - B1A & B1Q - Costs		
OF - B1A & B1Q - Groups		
OF - B1A & B1Q - Materiality		
OF - B1A & B1Q - Disclosure		
OF - B1A & B1Q - Frequency		
OF - B1A- cell C1A		
OF - B1A- cell B5		
OF - B1A- cell C5		
OF - B1A- cell D5		
OF - B1A- cell B6		
OF - B1A- cell B10		
OF - B1A- cell C10		
OF - B1A- cell D10		
OF - B1A- cell B11		

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OF - B1A- cell C11		
OF - B1A- cell B14		
OF - B1A- cell C14		
OF - B1A- cell B17		
OF - B1A- cell C17		
OF - B1A- cell D17		
OF - B1A- cell B18		
OF - B1A- cell C18		
OF - B1A- cell D18		
OF - B1A- cell D14		
OF - B1A- cell D11		
OF - B1A- cell D15		
OF - B1A- cell B25		
	<p><u>Expected profits included in future premiums (EPIFP) - Life business / Non-Life business</u></p> <p>EIOPA is aware that the industry unanimously disagrees on the use of the term "EPIFP" as the word "profits" is misleading and would create confusion if used in the public debate. We would therefore object to any public disclosure of this item.</p> <p>The industry made a proposal to replace the term EPIFP by ENCFAFP which in our view is more appropriate; The industry proposed the following alternative definition of ENCFAFP:</p> <p><i>"Expected net cash flows attributable to future premiums (ENCFAFP) are net cash flows which result from the inclusion in technical provisions of premiums on existing (in-force) business that are expected to be received in the future, but that have not yet been received."</i></p> <p>where "net cash flows" has the meaning of:</p> <ul style="list-style-type: none"> - <i>Net cash flows: The excess of expected future cash inflows over expected future cash</i> 	
OF - B1A- cell B30		

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outflows, taken at a particular point in time. This amount could be either positive or negative. Where the amount is negative, it does not necessarily imply a situation of loss making business but may be an expected occurrence based on the design and cash flow pattern of the product portfolio for these selectively isolated amounts of future cash in-flows which are expected future premiums,..."

OF - B1A- cell B31

OF - B1A- cell C33

OF - B1A- cell C34

OF - B1A- cell C35

OF - B1A- cell D35

OF - B1A- cell C36

OF - B1A- cell D36

OF - B1A- cell C37

OF - B1A- cell C38

OF - B1A- cell D38

OF - B1A- cell C39

OF - B1A- cell C40

OF - B1A- cell D40

OF - B1A- cell C41

OF - B1A- cell D41

OF - B1A- cell C42

OF - B1A- cell D42

OF - B1A- cell A45

OF - B1A- cell A45A

OF - B1A- cell A45B

OF - B1A- cell B60

OF - B1A- cell C60

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OF - B1A- cell B61		
OF - B1A- cell C61		
OF - B1A- cell B62		
OF - B1A- cell C62		
OF - B1A- cell B64		
OF - B1A- cell C64		
OF - B1A- cell B65		
OF - B1A- cell C65		
OF - B1A- cell B70		
OF - B1A- cell C70		
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OF - B1A- cell C71		
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OF - B1A- cell E75		

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OF - B1A- cell F75		
OF - B1A- cell A77.1		
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OF - B1A- cell D77.1		
OF - B1A- cell E77.1		
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OF - B1A- cell K77.n		

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OF - B1A- cell L77.n		
OF - B1A- cell M77.n		
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OF - B1A- cell C79		
OF - B1A- cell D79		
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OF - B1A- cell C80		
OF - B1A- cell D80		
OF - B1A- cell E80		
OF - B1A- cell F80		
OF - B1A- cell B81		
OF - B1A- cell C81		
OF - B1A- cell D81		
OF - B1A- cell E81		
OF - B1A- cell F81		
OF - B1A- cell B83		
OF - B1A- cell C83		
OF - B1A- cell D83		
OF - B1A- cell B84		
OF - B1A- cell C84		
OF - B1A- cell D84		
OF - B1A- cell B85		
OF - B1A- cell C85		

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OF - B1A- cell D85		
OF - B1A- cell A87.1		
OF - B1A- cell B87.1		
OF - B1A- cell C87.1		
OF - B1A- cell D87.1		
OF - B1A- cell E87.1		
OF - B1A- cell F87.1		
OF - B1A- cell G87.1		
OF - B1A- cell H87.1		
OF - B1A- cell I87.1		
OF - B1A- cell J87.1		
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OF - B1A- cell K87.n		

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OF - B1A- cell L87.n		
OF - B1A- cell M87.n		
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OF - B1A- cell C92		
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OF - B1A- cell B96		
OF - B1A- cell C96		
OF - B1A- cell D96		

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OF - B1A- cell B97		
OF - B1A- cell C97		
OF - B1A- cell D97		
OF - B1A- cell E97		
OF - B1A- cell B98		
OF - B1A- cell C98		
OF - B1A- cell D98		
OF - B1A- cell E98		
OF - B1A- cell A100.1		
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OF - B1A- cell C100.n		

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OF - B1A- cell D100.n		
OF - B1A- cell E100.n		
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OF - B1A- cell M100.n		
OF - B1A- cell N100.n		
OF - B1A- cell B102		
OF - B1A- cell C102		
OF - B1A- cell D102		
OF - B1A- cell B103		
OF - B1A- cell C103		
OF - B1A- cell D103		
OF - B1A- cell B104		
OF - B1A- cell C104		
OF - B1A- cell D104		
OF - B1A- cell A106.1		
OF - B1A- cell B106.1		
OF - B1A- cell C106.1		
OF - B1A- cell D106.1		
OF - B1A- cell E106.1		
OF - B1A- cell F106.1		

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OF - B1A- cell G106.1		
OF - B1A- cell H106.1		
OF - B1A- cell I106.1		
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OF - B1A- cell K106.1		
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OF - B1A- cell M106.n		
OF - B1A- cell N106.n		
OF - B1A- cell A108		
OF - B1A- cell B108		
OF - B1A- cell C108		
OF - B1A- cell B109		

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OF - B1A- cell D109		
OF - B1A- cell B110		
OF - B1A- cell C110		
OF - B1A- cell D110		
OF - B1A- cell E110		
OF - B1A- cell B111		
OF - B1A- cell C111		
OF - B1A- cell D111		
OF - B1A- cell E111		
OF - B1A- cell A113.1		
OF - B1A- cell B113.1		
OF - B1A- cell C113.1		
OF - B1A- cell D113.1		
OF - B1A- cell E113.1		
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OF - B1A- cell B113.n		
OF - B1A- cell C113.n		
OF - B1A- cell D113.n		
OF - B1A- cell E113.n		
OF - B1A- cell A115.1		
OF - B1A- cell B115.1		
OF - B1A- cell D115.1		
OF - B1A- cell E115.1		
OF - B1A- cell A115.n		
OF - B1A- cell B115.n		
OF - B1A- cell D115.n		

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OF - B1A- cell E115.n		
OF - B1A- cell B116		
OF - B1A- cell D116		
OF - B1A- cell E116		
OF - B1A- cell F116		
OF - B1A- cell A130.1		
OF - B1A- cell B130.1		
OF - B1A- cell C130.1		
OF - B1A- cell D130.1		
OF - B1A- cell E130.1		
OF - B1A- cell F130.1		
OF - B1A- cell G130.1		
OF - B1A- cell H130.1		
OF - B1A- cell I130.1		
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OF - B1A- cell M130.1		
OF - B1A- cell A130.n		
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OF - B1A- cell D130.n		
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OF - B1A- cell I130.n		
OF - B1A- cell J130.n		
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OF - B1A- cell L130.n		
OF - B1A- cell M130.n		
OF - B1Q- cell C1A		
OF - B1Q- cell B5		
OF - B1Q- cell C5		
OF - B1Q- cell D5		
OF - B1Q- cell B6		
OF - B1Q- cell B10		
OF - B1Q- cell C10		
OF - B1Q- cell D10		
OF - B1Q- cell B11		
OF - B1Q- cell C11		
OF - B1Q- cell B14		
OF - B1Q- cell C14		
OF - B1Q- cell B17		
OF - B1Q- cell C17		
OF - B1Q- cell D17		
OF - B1Q- cell B18		
OF - B1Q- cell C18		
OF - B1Q- cell D18		
OF - B1Q- cell D14		
OF - B1Q- cell D11		
OF - B1Q- cell D15		

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OF - B1Q- cell B30		
OF - B1Q- cell B31		
OF - B1Q- cell C33		
OF - B1Q- cell C34		
OF - B1Q- cell C35		
OF - B1Q- cell D35		
OF - B1Q- cell C36		
OF - B1Q- cell D36		
OF - B1Q- cell C37		
OF - B1Q- cell C38		
OF - B1Q- cell D38		
OF - B1Q- cell C39		
OF - B1Q- cell C40		
OF - B1Q- cell D40		
OF - B1Q- cell C41		
OF - B1Q- cell D41		
OF - B1Q- cell C42		
OF - B1Q- cell D42		
OF - B1Q- cell A45		
OF - B1Q- cell A45A		
OF - B1Q- cell A45B		
VA - C2A- General	The order of calculations is not consistent: in reality, it is not current practice to change the assumptions before the data have been changed. - The changes in the economic assumptions are not isolated from the changes in non-economic assumptions."	
VA - C2A - Purpose		

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VA – C2A – Benefits		
VA – C2A - Costs		
VA – C2A – Groups		
VA - C2A – Materiality		
VA - C2A – Disclosure		
VA – C2A – Frequency		
VA - C2B- General	<p>Investment management charges should not be split between VA C2B and VA C2C but rather be shown in aggregate in cell AA2</p> <p>The reason is that investment management charges are never split between those that relate to assets covering own funds and those related to assets covering technical provisions.</p> <p>VA C2B is intending to track investment performance as a whole, not distinguishing between investment performance on assets covering own funds and assets covering technical provisions.</p> <p>Investment management charges are indeed an item of investment performance, which contributes negatively to the gross of management charges in investment performance.</p>	
VA – C2B – Purpose		
VA – C2B – Benefits		
VA – C2B - Costs		
VA – C2B – Groups		
VA - C2B – Materiality		
VA - C2B – Disclosure		
VA – C2B – Frequency		
VA C2B - cell AA2	Investment management charges should not be split between VA C2B and VA C2C but rather be shown in aggregate in one place: VA C2B cell AA2.	
VA C2B -cell A1		

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VA C2B -cell A2		
VA C2B -cell A3		
VA C2B -cell A4		
VA C2B -cell A6		
VA C2B -cell A7		
VA C2B -cell A8		
VA C2B -cell O1		
VA C2B -cell O2		
VA C2B -cell O3		
VA - C2C- General	<p>For our <u>comments on Investment management charges</u>, please refer to our comments in cell VA - C2B- General.</p> <p><u>Non-Life Business: Underwriting vs Accident Year Standard Approach</u></p> <p>For non life business, VA C2C should be consistent with TP E3 and offer the option to choose between the underwriting or accident year approach to capture the most recent experience; We would like to remind EIOPA how valuable the approach by year of occurrence is in risk management and calculation of technical reserves; The undertaking ´s risk exposure is analyzed by year of occurrence and the majority of undertakings apply the “accident year” standard when computing their technical provisions; We provide some examples to illustrate our position:</p> <ol style="list-style-type: none"> 1) In the case of policies linked to natural catastrophes, the risk is related to the accident year. Thus, it is the frequency and severity of natural catastrophes occurred in accident year N which determines the loss ratio, and not the issue date of the insurance policy. 2) For example, the exposure to the risk for the motor line of business is closely linked to the public policy and to the existing weather conditions (and both elements are attached to the accident year): when a government launches a campaign on road safety, there is a direct effect on the amount of claims, and the information on 	

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increases or decreases in fuel prices is not linked to the date on which the contract was signed but to the accident year.

- 3) In case of disability and morbidity, the risk exposure is characterized by the living and / or working conditions of the insured persons, their individual risk-profile and the cover provided by the statutory social security system and not by the underwriting year.

Having said that, information on the claims per underwriting year could be valuable in some cases, providing additional information useful for short term monitoring of pricing and sales forces but this can not be seen as a substitute to accident year, but rather complementary and of secondary order. Dependant on the duration of the run-off of claims and on the pricing policy of the undertaking, the underwriting year approach might not be useful at all. Note that for very short term risks, u/w or a/y approach can be seen as equivalent.

Non-Life Business: Feasibility of completion

The main difficulty is that the split of claims of year N between

- risks covered in N but related to premiums written in N-1 (renewals or unearned premiums) or to new contracts written in N or
- changes of guarantees (extension...) written in N but related to contracts written prior to N period.

In the case of endorsements, it would be very difficult to decide whether the modifications of the guarantees under the contract provided by the endorsement should be considered as a "*risk accepted during the period*" or as a "*risk accepted prior to period*". In both cases undertakings will face difficulties; if the modification is labelled as "*risk accepted during the period*" the amount of the risk related to the sole modification of the guarantee would have to be isolated, and this will not be possible when the undertaking reports and manages their risks under the accident year approach.

However, a similar problem arises when the modification is considered as a "*risk accepted prior*

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to period" and the undertaking is treating the modifications of guarantees as a cancellation of the initial contract followed by the issuing of a new contract.
Hence, the approach by underwriting year in VA C2C is not suited to the functioning of a non-life contract and would potentially create non-homogeneous situations between undertakings.

The same difficulty occurs for the premiums as the actuarial analysis and methods are based on an accident year.

Please refer to the document "VA C2C_Amended Proposal - AMICE 2012-01-20.xls" where we propose some amendments to the current template in order to be allow the feasibility of the accident year approach. Those changes suggest that the "opening Best Estimate" could be easily divided into three categories:

- 1) BE related to risks covered prior the period: *it may be obtained from the claims provision.*
- 2) BE related to risks covered during the period: *to be obtained from the premium provision.*
- 3) BE related to risks covered *after* the period: *to be obtained from the premium provision.*

On the one hand, the information on "*risks covered during the period*" and "*risks covered after the period*" could be further split in changes due to estimates & assumptions. On the other hand, it should be pointed out that when proxies are used in the premium provision calculation, those elements could have a nil value.

Finally, we acknowledge the relevance of the VA templates in order to understand the changes in basic own funds related to three sources of change.

It seems to us justified to invest in the development of these templates provided they are relevant for supervisory purposes and management purposes. However, these objectives will not be achieved if the underwriting year approach is required and particularly when the undertaking has adopted the accident year standard for filling out the TP- E3 template.

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Life business

A lot of work will be necessary to fill out the VA C2C template for the life business; they are particularly difficult to fill in when technical provisions are calculated with stochastic methods.

A good example of the application of the proportionality principle, in the life business, would be to provide the cells from this template on a net basis in those cases where reinsurance is not material. Another example would consist of submitting the information on an aggregate basis at solo level and not per lob.

Sign Inconsistencies in the template

We found several inconsistencies in the signs in both VA C2B & VA C2C. We provide our proposal for correcting those mistakes.

Group Business

VA templates are far too burdensome on a group basis and in our view they do not provide useful information at the same level of granularity as for solo templates, especially for VA C2C.

VA templates at group level should only retain aggregate results of solo level VA templates. EIOPA should take into account the following:

- 1) The complexity: as the group balance sheet is build up from the adjusted solo - balance sheets, applying these adjustments on every item of solo level VA templates is unnecessarily complex and burdensome. Some of the elements are not relevant; this is the case for VA – C2C template whose nature seems to be lost at group level when entities of different nature are aggregated.
- 2) In relation to intra-group reinsurance contracts, the correspondence between the LoBS from the business ceded and accepted is not possible.

Thus, we believe that the VA templates at group level should not follow the same building blocks as the solo templates and they should be less detailed and be reported at a more

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	aggregated level. VA – C2C templates should be computed net of reinsurance.	
VA – C2C – Purpose		
VA – C2C – Benefits		
VA – C2C – Costs		
VA – C2C – Groups		
VA – C2C – Materiality		
VA – C2C – Disclosure		
VA – C2C – Frequency		
VA C2C -cell AA5		
VA C2C -cell A1		
VA C2C -cell B1		
VA C2C -cell C1		
VA C2C -cell D1		
VA C2C -cell E1		
VA C2C -cell E1A		
VA C2C -cell G1		
VA C2C -cell H1		
VA C2C -cell E1A		
VA C2C -cell A2		
VA C2C -cell B2		
VA C2C -cell D2		
VA C2C -cell E2		
VA C2C -cell G2		
VA C2C -cell A3		

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VA C2C -cell B3		
VA C2C -cell C3		
VA C2C -cell A4		
VA C2C -cell B4		
VA C2C -cell C4		
VA C2C -cell D4		
VA C2C -cell E4		
VA C2C -cell E4A		
VA C2C -cell G4		
VA C2C -cell H4		
VA C2C -cell BB1		
VA C2C -cell CC1		
VA - C2D- General		
VA - C2D - Purpose		
VA - C2D - Benefits		
VA - C2D - Costs		
VA - C2D - Groups		
VA - C2D - Materiality		
VA - C2D - Disclosure		
VA - C2D - Frequency		
VA C2D -cell O2		
VA C2D -cell O3		
VA C2D -cell O4		
VA C2D -cell O6		
VA C2D -cell O7		
VA C2D -cell O8		

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VA C2D -cell O9		
VA C2D -cell O10		
VA C2D -cell O11		
VA C2D -cell O12		
SCR - B2A - General	<p>This template covers the Solvency Capital Requirement for firms calculating their solvency requirements using a Standard Formula or Partial Internal Model. The template should be established according to the specific design of the undertaking's partial internal model in order to capture the appropriate level of the aggregation between the Standard Formula and the components from the Internal Model.</p> <p>AMICE members are not in a position to produce this report on a quarterly basis. In any case, the reporting should be limited to those items where material changes have occurred. Processes and systems which are currently in place are not adapted to quarterly reporting. If EIOPA decides on quarterly reporting of this data (presumably for macro-supervision purposes), estimates will have to be allowed.</p> <p>The information contained in this report should not be publicly disclosed. It must be feared that its publication could worsen the solvency position of the undertaking.</p>	
SCR - B2A - Purpose		
SCR - B2A - Benefits		
SCR - B2A - Costs		
SCR - B2A - Groups		
SCR - B2A - Materiality		
SCR - B2A - Disclosure		
SCR - B2A - Frequency		
SCR - B2A - cell A1		

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SCR - B2A - cell B1		
SCR - B2A - cell A2		
SCR - B2A - cell B2		
SCR - B2A - cell A3		
SCR - B2A - cell B3		
SCR - B2A - cell A4		
SCR - B2A - cell B4		
SCR - B2A - cell A5		
SCR - B2A - cell B5=A5		
SCR - B2A - cell A6		
SCR - B2A - cell B6		
SCR - B2A - cell A7		
SCR - B2A - cell B7=A7		
SCR - B2A - cell A8		
SCR - B2A - cell B8		
SCR - B2A - cell A9		
SCR - B2A - cell B9		
SCR - B2A - cell A11		
SCR - B2A - cell A12		
SCR - B2A - cell A13		
SCR - B2A - cell A14		
SCR - B2A - cell A14A		
SCR - B2A - cell A15A		
SCR - B2A - cell A15B		
SCR - B2A - cell A15C		
SCR - B2A - cell A16		

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SCR - B2A - cell A17		
SCR - B2A - cell A18		
SCR - B2A - cell A19		
SCR - B2A - cell A20		
SCR - B2A - cell A21		
SCR - B2B - General		
SCR - B2B - Purpose		
SCR - B2B - Benefits		
SCR - B2B - Costs		
SCR - B2B - Groups		
SCR - B2B - Materiality		
SCR - B2B - Disclosure		
SCR - B2B - Frequency		
SCR - B2B- cell A1.1		
SCR - B2B- cell A1A.1		
SCR - B2B- cell B1.1		
SCR - B2B- cell A1.n		
SCR - B2B- cell A1A.n		
SCR - B2B- cell B1.n		
SCR - B2B- cell B3		
SCR - B2B- cell B5		
SCR - B2B- cell B6		
SCR - B2B- cell B8		
SCR - B2C - General		

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SCR - B2C – Purpose		
SCR - B2C – Benefits		
SCR - B2C – Costs		
SCR - B2C – Groups		
SCR - B2C – Materiality		
SCR - B2C- Disclosure		
SCR - B2C – Frequency		
SCR - B2C- cell A1.1		
SCR - B2C- cell A1A.1		
SCR - B2C- cell B1.1		
SCR - B2C- cell A1.n		
SCR - B2C- cell A1A.n		
SCR - B2C- cell B1.n		
SCR - B2C- cell B3		
SCR - B2C- cell B5		
SCR - B2C- cell B6		
SCR - B2C- cell B7		
SCR - B2C- cell B7A		
SCR - B2C- cell B8A		
SCR - B2C- cell B8B		
SCR - B2C- cell B8C		
SCR - B2C- cell B9		
SCR - B2C- cell B10		
SCR - B2C- cell B11		

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SCR - B2C- cell B13		
SCR - B2C- cell B14		
SCR - B2C- cell B15		
SCR - B3A – General	<p><u>Market risk</u></p> <p>The net capital charge for currency risk can be adjusted for the loss absorbing capacity of technical provisions. We wonder why the cells corresponding to the « assets » and « liabilities including the loss absorbing capacity of technical provisions ».</p>	
SCR - B3A – Purpose		
SCR - B3A – Benefits		
SCR - B3A – Costs		
SCR - B3A – Groups		
SCR - B3A – Materiality		
SCR - B3A - Disclosure		
SCR - B3A – Frequency		
SCR - B3A- cell CO		
SCR - B3A- cell D0		
SCR - B3A- cell A1	<p>The LOG document states that this cell should be reporting the asset value of the instruments underlying the interest rate down shock, as used to compute the risk. Likewise, cell A2 contains the asset value of the instruments underlying the interest rate up shock.</p> <p>It would be helpful if the LOG document clarifies that cell A1 should be equal to A2.</p>	
SCR - B3A- cell A1A		
SCR - B3A- cell B1		
SCR - B3A- cell B1A		

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SCR - B3A- cell C1		
SCR - B3A- cell B1B		
SCR - B3A- cell D1		
SCR - B3A- cell A2		
SCR - B3A- cell A2A		
SCR - B3A- cell B2		
SCR - B3A- cell B2A		
SCR - B3A- cell C2		
SCR - B3A- cell B2B		
SCR - B3A- cell D2		
SCR - B3A- cell C3		
SCR - B3A- cell D3		
SCR - B3A- cell A4		
SCR - B3A- cell A4A		
SCR - B3A- cell B4		
SCR - B3A- cell B4A		
SCR - B3A- cell C4		
SCR - B3A- cell B4B		
SCR - B3A- cell D4		
SCR - B3A- cell A5		
SCR - B3A- cell B5		
SCR - B3A- cell A6		
SCR - B3A- cell B6		
SCR - B3A- cell A7		
SCR - B3A- cell B7		
SCR - B3A- cell A8		

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SCR - B3A- cell A8A		
SCR - B3A- cell B8		
SCR - B3A- cell B8A		
SCR - B3A- cell B8B		
SCR - B3A- cell D8		
SCR - B3A- cell A9		
SCR - B3A- cell B9		
SCR - B3A- cell A10		
SCR - B3A- cell B10		
SCR - B3A- cell A11		
SCR - B3A- cell B11		
SCR - B3A- cell A12		
SCR - B3A- cell A12A		
SCR - B3A- cell B12		
SCR - B3A- cell B12A		
SCR - B3A- cell C12		
SCR - B3A- cell B12B		
SCR - B3A- cell D12		
SCR - B3A- cell C13		
SCR - B3A- cell D13		
SCR - B3A- cell A14		
SCR - B3A- cell A14A		
SCR - B3A- cell B14		
SCR - B3A- cell B14A		
SCR - B3A- cell C14		
SCR - B3A- cell B14B		

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SCR - B3A- cell D14		
SCR - B3A- cell C15		
SCR - B3A- cell D15		
SCR - B3A- cell A16		
SCR - B3A- cell A16A		
SCR - B3A- cell B16		
SCR - B3A- cell B16A		
SCR - B3A- cell C16		
SCR - B3A- cell B16B		
SCR - B3A- cell D16		
SCR - B3A- cell A17		
SCR - B3A- cell A17A		
SCR - B3A- cell B17		
SCR - B3A- cell B17A		
SCR - B3A- cell C17		
SCR - B3A- cell B17B		
SCR - B3A- cell D17		
SCR - B3A- cell A18		
SCR - B3A- cell A18A		
SCR - B3A- cell B18		
SCR - B3A- cell B18A		
SCR - B3A- cell C18		
SCR - B3A- cell B18B		
SCR - B3A- cell D18		
SCR - B3A- cell A19		
SCR - B3A- cell A19A		

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SCR - B3A- cell C19		
SCR - B3A- cell D19		
SCR - B3A- cell A20		
SCR - B3A- cell A20A		
SCR - B3A- cell C20		
SCR - B3A- cell D20		
SCR - B3A- cell A21	The countercyclical premium as currently defined in the Level 2 Implementing Measures can only be applied to technical provisions. This cell should therefore be deleted.	
SCR - B3A- cell A21A		
SCR - B3A- cell B21		
SCR - B3A- cell B21A		
SCR - B3A- cell C21		
SCR - B3A- cell B21B		
SCR - B3A- cell D21		
SCR - B3A- cell C22		
SCR - B3A- cell D22		
SCR - B3A- cell C23		
SCR - B3A- cell D23		
SCR - B3B – General		
SCR - B3B – Purpose		
SCR - B3B – Benefits		
SCR - B3B – Costs		
SCR - B3B – Groups		
SCR - B3B – Materiality		
SCR - B3B - Disclosure		

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SCR - B3B – Frequency		
SCR - B3B- cell A0		
SCR - B3B- cell B0		
SCR - B3B- cell A1		
SCR - B3B- cell A1A		
SCR - B3B- cell A2		
SCR - B3B- cell A3		
SCR - B3B- cell A4		
SCR - B3B- cell B6		
SCR - B3B- cell A7		
SCR - B3B- cell A8		
SCR - B3B- cell A9		
SCR - B3B- cell B9		
SCR - B3C – General	<p><u>SCR – Life Underwriting Risk</u></p> <p>We do not see the point in reporting the values of the assets before and after the shock in all underwriting risk specific templates, since these values are not affected by the shocks and hence are not part of the calculation.</p> <p>We do not believe that the extra value provided to the supervisor outweighs the cost of producing (including controlling and governance costs) the very detailed information contained in this template.</p>	
SCR - B3C – Purpose		
SCR - B3C – Benefits		
SCR - B3C – Costs		

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SCR - B3C – Groups		
SCR - B3C – Materiality		
SCR - B3C - Disclosure		
SCR - B3C – Frequency		
SCR - B3C- cell A1		
SCR - B3C- cell A1A		
SCR - B3C- cell B1		
SCR - B3C- cell B1A		
SCR - B3C- cell C1		
SCR - B3C- cell B1B		
SCR - B3C- cell D1		
SCR - B3C- cell A2		
SCR - B3C- cell A2A		
SCR - B3C- cell B2		
SCR - B3C- cell B2A		
SCR - B3C- cell C2		
SCR - B3C- cell B2B		
SCR - B3C- cell D2		
SCR - B3C- cell A3		
SCR - B3C- cell A3A		
SCR - B3C- cell B3		
SCR - B3C- cell B3A		
SCR - B3C- cell C3		
SCR - B3C- cell B3B		
SCR - B3C- cell D3		

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SCR - B3C- cell C04		
SCR - B3C- cell D04		
SCR - B3C- cell A4	Could the cells "risk of increase in lapsation"(A4), "risk of decrease in lapsation" (A5) and "mass lapse risk" (A6) be calculated directly to avoid misleading effects?	
SCR - B3C- cell A4A		
SCR - B3C- cell B4		
SCR - B3C- cell B4A		
SCR - B3C- cell C4		
SCR - B3C- cell B4B		
SCR - B3C- cell D4		
SCR - B3C- cell A5	See comments to SCR - B3C- cell A4	
SCR - B3C- cell A5A		
SCR - B3C- cell B5		
SCR - B3C- cell B5A		
SCR - B3C- cell C5		
SCR - B3C- cell B5B		
SCR - B3C- cell D5		
SCR - B3C- cell A6	See comments to SCR - B3C- cell A4	
SCR - B3C- cell A6A		
SCR - B3C- cell B6		
SCR - B3C- cell B6A		
SCR - B3C- cell C6		
SCR - B3C- cell B6B		
SCR - B3C- cell D6		
SCR - B3C- cell A7		
SCR - B3C- cell A7A		

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SCR - B3C- cell B7		
SCR - B3C- cell B7A		
SCR - B3C- cell C7		
SCR - B3C- cell B7B		
SCR - B3C- cell D7		
SCR - B3C- cell A8		
SCR - B3C- cell A8A		
SCR - B3C- cell B8		
SCR - B3C- cell B8A		
SCR - B3C- cell C8		
SCR - B3C- cell B8B		
SCR - B3C- cell D8		
SCR - B3C- cell A9		
SCR - B3C- cell A9A		
SCR - B3C- cell B9		
SCR - B3C- cell B9A		
SCR - B3C- cell C9		
SCR - B3C- cell B9B		
SCR - B3C- cell D9		
SCR - B3C- cell C10		
SCR - B3C- cell D10		
SCR - B3C- cell C11		
SCR - B3C- cell D11		
SCR - B3C- cell A12		
SCR - B3D - General		

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SCR - B3D - Purpose		
SCR - B3D - Benefits		
SCR - B3D - Costs		
SCR - B3D - Groups		
SCR - B3D - Materiality		
SCR - B3D - Disclosure		
SCR - B3D - Frequency		
SCR - B3D- cell A12		
SCR - B3D- cell A12A		
SCR - B3D- cell B12		
SCR - B3D- cell C12		
SCR - B3D- cell D12		
SCR - B3D- cell E12		
SCR - B3D- cell F12		
SCR - B3D- cell A13		
SCR - B3D- cell A13A		
SCR - B3D- cell B13		
SCR - B3D- cell C13		
SCR - B3D- cell D13		
SCR - B3D- cell E13		
SCR - B3D- cell F13		
SCR - B3D- cell A14		
SCR - B3D- cell A14A		
SCR - B3D- cell B14		

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SCR - B3D- cell C14		
SCR - B3D- cell D14		
SCR - B3D- cell E14		
SCR - B3D- cell F14		
SCR - B3D- cell A15		
SCR - B3D- cell A15A		
SCR - B3D- cell B15		
SCR - B3D- cell C15		
SCR - B3D- cell D15		
SCR - B3D- cell E15		
SCR - B3D- cell F15		
SCR - B3D- cell A16		
SCR - B3D- cell A17		
SCR - B3D- cell A18		
SCR - B3D- cell A18A		
SCR - B3D- cell B18		
SCR - B3D- cell B18A		
SCR - B3D- cell C18		
SCR - B3D- cell A19		
SCR - B3D- cell A20		
SCR - B3D- cell A21		
SCR - B3D- cell A22		
SCR - B3D- cell A23		
SCR - B3D- cell A24		
SCR - B3D- cell A25		
SCR - B3D- cell A26		

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SCR - B3D- cell A27		
SCR - B3E - General		
SCR - B3E - Purpose		
SCR - B3E - Benefits		
SCR - B3E - Costs		
SCR - B3E - Groups		
SCR - B3E - Materiality		
SCR - B3E - Disclosure		
SCR - B3E - Frequency		
SCR - B3E- cell A1		
SCR - B3E- cell A1A		
SCR - B3E- cell B1		
SCR - B3E- cell C1		
SCR - B3E- cell D1		
SCR - B3E- cell E1		
SCR - B3E- cell F1		
SCR - B3E- cell A2		
SCR - B3E- cell A2A		
SCR - B3E- cell B2		
SCR - B3E- cell C2		
SCR - B3E- cell D2		
SCR - B3E- cell E2		
SCR - B3E- cell F2		
SCR - B3E- cell A3		

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SCR - B3E- cell A3A		
SCR - B3E- cell B3		
SCR - B3E- cell C3		
SCR - B3E- cell D3		
SCR - B3E- cell E3		
SCR - B3E- cell F3		
SCR - B3E- cell A4		
SCR - B3E- cell A4A		
SCR - B3E- cell B4		
SCR - B3E- cell C4		
SCR - B3E- cell D4		
SCR - B3E- cell E4		
SCR - B3E- cell F4		
SCR - B3E- cell A5		
SCR - B3E- cell A5A		
SCR - B3E- cell B5		
SCR - B3E- cell C5		
SCR - B3E- cell D5		
SCR - B3E- cell E5		
SCR - B3E- cell F5		
SCR - B3E- cell A6		
SCR - B3E- cell A6A		
SCR - B3E- cell B6		
SCR - B3E- cell C6		
SCR - B3E- cell D6		
SCR - B3E- cell E6		

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SCR - B3E- cell F6		
SCR - B3E- cell A7		
SCR - B3E- cell A7A		
SCR - B3E- cell B7		
SCR - B3E- cell C7		
SCR - B3E- cell D7		
SCR - B3E- cell E7		
SCR - B3E- cell F7		
SCR - B3E- cell A8		
SCR - B3E- cell A8A		
SCR - B3E- cell B8		
SCR - B3E- cell C8		
SCR - B3E- cell D8		
SCR - B3E- cell E8		
SCR - B3E- cell F8		
SCR - B3E- cell A9		
SCR - B3E- cell A9A		
SCR - B3E- cell B9		
SCR - B3E- cell C9		
SCR - B3E- cell D9		
SCR - B3E- cell E9		
SCR - B3E- cell F9		
SCR - B3E- cell A10		
SCR - B3E- cell A10A		
SCR - B3E- cell B10		
SCR - B3E- cell C10		

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SCR - B3E- cell D10		
SCR - B3E- cell E10		
SCR - B3E- cell F10		
SCR - B3E- cell A11		
SCR - B3E- cell A11A		
SCR - B3E- cell B11		
SCR - B3E- cell C11		
SCR - B3E- cell D11		
SCR - B3E- cell E11		
SCR - B3E- cell F11		
SCR - B3E- cell A12		
SCR - B3E- cell A12A		
SCR - B3E- cell B12		
SCR - B3E- cell C12		
SCR - B3E- cell D12		
SCR - B3E- cell E12		
SCR - B3E- cell F12		
SCR - B3E- cell A13		
SCR - B3E- cell A14		
SCR - B3E- cell A15		
SCR - B3E- cell A15A		
SCR - B3E- cell B15		
SCR - B3E- cell B15A		
SCR - B3E- cell C15		
SCR - B3E- cell A16		
SCR - B3E- cell A17		

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SCR - B3E- cell A18		
SCR - B3F – General	<p>This template will put a heavy burden on undertakings. This template has been designed not only to allow an understanding of how the catastrophe risk module of the SCR has been calculated and what are the main drivers but also to grant supervisors to compute the module with the information provided.</p> <p>We believe that the application of reinsurance to the catastrophe risk module cannot be standardised in a predefined reporting template to be appropriate to all cases. While specific criteria are defined in the Level 3, a more flexible approach on the required information should be taken.</p>	
SCR - B3F – Purpose		
SCR - B3F – Benefits		
SCR - B3F – Costs		
SCR - B3F – Groups		
SCR - B3F – Materiality		
SCR - B3F - Disclosure		
SCR - B3F – Frequency		
SCR - B3F- cell Summary A1		
SCR - B3F- cell Summary C1		
SCR - B3F- cell Summary A9		
SCR - B3F- cell Summary C9		
SCR - B3F- cell Summary A17		

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SCR - B3F- cell Summary C17		
SCR - B3F- cell Summary A26		
SCR - B3F- cell Summary C26		
SCR - B3F- cell Summary A27		
SCR - B3F- cell Summary C27		
SCR - B3F- cell Windstorm A1		
SCR - B3F- cell Windstorm B1		
SCR - B3F- cell Windstorm C1		
SCR - B3F- cell Windstorm E1		
SCR - B3F- cell Windstorm F1		
SCR - B3F- cell Windstorm G1		
SCR - B3F- cell Windstorm H1		
SCR - B3F- cell Windstorm A2		
SCR - B3F- cell Windstorm B2		
SCR - B3F- cell Windstorm C2		
SCR - B3F- cell Windstorm E2		

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SCR - B3F- cell Windstorm F2		
SCR - B3F- cell Windstorm G2		
SCR - B3F- cell Windstorm H2		
SCR - B3F- cell Windstorm A3		
SCR - B3F- cell Windstorm B3		
SCR - B3F- cell Windstorm C3		
SCR - B3F- cell Windstorm E3		
SCR - B3F- cell Windstorm F3		
SCR - B3F- cell Windstorm G3		
SCR - B3F- cell Windstorm H3		
SCR - B3F- cell Windstorm A20		
SCR - B3F- cell Windstorm B20		
SCR - B3F- cell Windstorm C20		
SCR - B3F- cell Windstorm E20		
SCR - B3F- cell Windstorm F20		
SCR - B3F- cell Windstorm G20		

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SCR - B3F- cell Windstorm H20		
SCR - B3F- cell Windstorm A22		
SCR - B3F- cell Windstorm F22		
SCR - B3F- cell Windstorm G22		
SCR - B3F- cell Windstorm H22		
SCR - B3F- cell Windstorm I22		
SCR - B3F- cell Windstorm F25		
SCR - B3F- cell Windstorm I25		
SCR - B3F- cell Earthquake A1		
SCR - B3F- cell Earthquake B1		
SCR - B3F- cell Earthquake C1		
SCR - B3F- cell Earthquake E1		
SCR - B3F- cell Earthquake F1		
SCR - B3F- cell Earthquake G1		
SCR - B3F- cell Earthquake A2		
SCR - B3F- cell Earthquake B2		

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SCR - B3F- cell Earthquake C2		
SCR - B3F- cell Earthquake E2		
SCR - B3F- cell Earthquake F2		
SCR - B3F- cell Earthquake G2		
SCR - B3F- cell Earthquake A3		
SCR - B3F- cell Earthquake B3		
SCR - B3F- cell Earthquake C3		
SCR - B3F- cell Earthquake E3		
SCR - B3F- cell Earthquake F3		
SCR - B3F- cell Earthquake G3		
SCR - B3F- cell Earthquake A20		
SCR - B3F- cell Earthquake B20		
SCR - B3F- cell Earthquake C20		
SCR - B3F- cell Earthquake E20		
SCR - B3F- cell Earthquake F20		
SCR - B3F- cell Earthquake G20		

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SCR - B3F- cell Earthquake A22		
SCR - B3F- cell Earthquake E22		
SCR - B3F- cell Earthquake F22		
SCR - B3F- cell Earthquake G22		
SCR - B3F- cell Earthquake H22		
SCR - B3F- cell Earthquake E25		
SCR - B3F- cell Earthquake H25		
SCR - B3F- cell Flood A1		
SCR - B3F- cell Flood B1		
SCR - B3F- cell Flood C1		
SCR - B3F- cell Flood E1		
SCR - B3F- cell Flood F1		
SCR - B3F- cell Flood G1		
SCR - B3F- cell Flood H1		
SCR - B3F- cell Flood A2		
SCR - B3F- cell Flood B2		
SCR - B3F- cell Flood C2		
SCR - B3F- cell Flood E2		
SCR - B3F- cell Flood F2		
SCR - B3F- cell Flood G2		
SCR - B3F- cell Flood H2		

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SCR - B3F- cell Flood A3		
SCR - B3F- cell Flood B3		
SCR - B3F- cell Flood C3		
SCR - B3F- cell Flood E3		
SCR - B3F- cell Flood F3		
SCR - B3F- cell Flood G3		
SCR - B3F- cell Flood H3		
SCR - B3F- cell Flood A20		
SCR - B3F- cell Flood B20		
SCR - B3F- cell Flood C20		
SCR - B3F- cell Flood E20		
SCR - B3F- cell Flood F20		
SCR - B3F- cell Flood G20		
SCR - B3F- cell Flood H20		
SCR - B3F- cell Flood A22		
SCR - B3F- cell Flood F22		
SCR - B3F- cell Flood G22		
SCR - B3F- cell Flood H22		
SCR - B3F- cell Flood I22		

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SCR - B3F- cell Flood F25		
SCR - B3F- cell Flood I25		
SCR - B3F- cell Hail A1		
SCR - B3F- cell Hail B1		
SCR - B3F- cell Hail C1		
SCR - B3F- cell Hail E1		
SCR - B3F- cell Hail F1		
SCR - B3F- cell Hail G1		
SCR - B3F- cell Hail H1		
SCR - B3F- cell Hail A2		
SCR - B3F- cell Hail B2		
SCR - B3F- cell Hail C2		
SCR - B3F- cell Hail E2		
SCR - B3F- cell Hail F2		
SCR - B3F- cell Hail G2		
SCR - B3F- cell Hail H2		
SCR - B3F- cell Hail A3		
SCR - B3F- cell Hail B3		
SCR - B3F- cell Hail C3		
SCR - B3F- cell Hail E3		
SCR - B3F- cell Hail F3		
SCR - B3F- cell Hail G3		
SCR - B3F- cell Hail H3		
SCR - B3F- cell Hail A20		
SCR - B3F- cell Hail B20		

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SCR - B3F- cell Hail C20		
SCR - B3F- cell Hail E20		
SCR - B3F- cell Hail F20		
SCR - B3F- cell Hail G20		
SCR - B3F- cell Hail H20		
SCR - B3F- cell Hail A22		
SCR - B3F- cell Hail F22		
SCR - B3F- cell Hail G22		
SCR - B3F- cell Hail H22		
SCR - B3F- cell Hail I22		
SCR - B3F- cell Hail F25		
SCR - B3F- cell Hail I25		
SCR - B3F- cell Subsidence A1		
SCR - B3F- cell Subsidence B1		
SCR - B3F- cell Subsidence C1		
SCR - B3F- cell Subsidence F1		
SCR - B3F- cell Subsidence G1		
SCR - B3F- cell Subsidence H1		
SCR - B3F- cell Subsidence E3		
SCR - B3F- cell Subsidence H3		
SCR - B3F- cell Non-		

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proportional property reinsurance A1		
SCR - B3F- cell Non-proportional property reinsurance B1		
SCR - B3F- cell Non-proportional property reinsurance C1		
SCR - B3F- cell Non-proportional property reinsurance D1		
SCR - B3F- cell Motor Vehicle Liability A1		
SCR - B3F- cell Motor Vehicle Liability A2		
SCR - B3F- cell Motor Vehicle Liability A3		
SCR - B3F- cell Motor Vehicle Liability A4		
SCR - B3F- cell Motor Vehicle Liability A5		
SCR - B3F- cell Marine Tanker Collision A1		
SCR - B3F- cell Marine Tanker Collision B1		
SCR - B3F- cell Marine Tanker Collision C1		
SCR - B3F- cell Marine Tanker Collision A2		
SCR - B3F- cell Marine Tanker Collision B2		
SCR - B3F- cell Marine		

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Tanker Collision C2		
SCR - B3F- cell Marine Tanker Collision A3		
SCR - B3F- cell Marine Tanker Collision B3		
SCR - B3F- cell Marine Tanker Collision C3		
SCR - B3F- cell Marine Platform Explosion A5		
SCR - B3F- cell Marine Platform Explosion B5		
SCR - B3F- cell Marine Platform Explosion C5		
SCR - B3F- cell Marine Platform Explosion D5		
SCR - B3F- cell Marine Platform Explosion E5		
SCR - B3F- cell Marine Platform Explosion A6		
SCR - B3F- cell Marine Platform Explosion B6		
SCR - B3F- cell Marine Platform Explosion C6		
SCR - B3F- cell Marine Platform Explosion D6		
SCR - B3F- cell Marine Platform Explosion E6		
SCR - B3F- cell Marine Platform Explosion A7		
SCR - B3F- cell Marine Platform Explosion B7		
SCR - B3F- cell Marine		

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Platform Explosion C7		
SCR - B3F- cell Marine Platform Explosion D7		
SCR - B3F- cell Marine Platform Explosion E7		
SCR - B3F- cell Marine C9		
SCR - B3F- cell Marine C11		
SCR - B3F- cell Aviation A1		
SCR - B3F- cell Aviation B1		
SCR - B3F- cell Aviation A2		
SCR - B3F- cell Aviation B2		
SCR - B3F- cell Aviation A3		
SCR - B3F- cell Aviation B3		
SCR - B3F- cell Fire A1		
SCR - B3F- cell Fire A2		
SCR - B3F- cell Fire A3		
SCR - B3F- cell Liability A1		
SCR - B3F- cell Liability B1		
SCR - B3F- cell Liability C1		
SCR - B3F- cell Liability		

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D1		
SCR - B3F- cell Liability E1		
SCR - B3F- cell Liability A2		
SCR - B3F- cell Liability B2		
SCR - B3F- cell Liability C2		
SCR - B3F- cell Liability D2		
SCR - B3F- cell Liability E2		
SCR - B3F- cell Liability A3		
SCR - B3F- cell Liability B3		
SCR - B3F- cell Liability C3		
SCR - B3F- cell Liability D3		
SCR - B3F- cell Liability E3		
SCR - B3F- cell Liability A4		
SCR - B3F- cell Liability B4		
SCR - B3F- cell Liability C4		
SCR - B3F- cell Liability D4		
SCR - B3F- cell Liability		

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E4		
SCR - B3F- cell Liability A1		
SCR - B3F- cell Liability A5		
SCR - B3F- cell Liability B5		
SCR - B3F- cell Liability C5		
SCR - B3F- cell Liability D5		
SCR - B3F- cell Liability E5		
SCR - B3F- cell Liability A6		
SCR - B3F- cell Liability B6		
SCR - B3F- cell Liability C6		
SCR - B3F- cell Liability D6		
SCR - B3F- cell Liability E6		
SCR - B3F- cell Liability A8	The frequency scenario has been deleted from the draft EC proposal on the Level 2 Implementing Measures. Further alignment with Level 2 is necessary.	
SCR - B3F- cell Liability B8	Please refer to SCR - B3F- cell Liability A8	
SCR - B3F- cell Liability C8	Please refer to SCR - B3F- cell Liability A8	
SCR - B3F- cell Liability D8	Please refer to SCR - B3F- cell Liability A8	
SCR - B3F- cell Liability	Please refer to SCR - B3F- cell Liability A8	

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E8		
SCR - B3F- cell Liability A9	Please refer to SCR - B3F- cell Liability A8	
SCR - B3F- cell Liability B9	Please refer to SCR - B3F- cell Liability A8	
SCR - B3F- cell Liability C9	Please refer to SCR - B3F- cell Liability A8	
SCR - B3F- cell Liability D9	Please refer to SCR - B3F- cell Liability A8	
SCR - B3F- cell Liability E9	Please refer to SCR - B3F- cell Liability A8	
SCR - B3F- cell Liability A10	Please refer to SCR - B3F- cell Liability A8	
SCR - B3F- cell Liability B10	Please refer to SCR - B3F- cell Liability A8	
SCR - B3F- cell Liability C10	Please refer to SCR - B3F- cell Liability A8	
SCR - B3F- cell Liability D10	Please refer to SCR - B3F- cell Liability A8	
SCR - B3F- cell Liability E10	Please refer to SCR - B3F- cell Liability A8	
SCR - B3F- cell Liability A12		
SCR - B3F- cell Liability B12		
SCR - B3F- cell Liability C12		
SCR - B3F- cell Liability D12		
SCR - B3F- cell Liability E12		
SCR - B3F- cell Liability		

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H12		
SCR - B3F- cell Liability A14		
SCR - B3F- cell Liability B14		
SCR - B3F- cell Liability C14		
SCR - B3F- cell Liability D14		
SCR - B3F- cell Liability E14		
SCR - B3F- cell Liability H14		
SCR - B3F- cell Credit & Suretyship Large Credit Default A1		
SCR - B3F- cell Credit & Suretyship Large Credit Default B1		
SCR - B3F- cell Credit & Suretyship Large Credit Default A2		
SCR - B3F- cell Credit & Suretyship Large Credit Default B2		
SCR - B3F- cell Credit & Suretyship Large Credit Default A4		
SCR - B3F- cell Credit & Suretyship Large Credit Default B4		
SCR - B3F- cell Credit &		

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Suretyship Large Credit Default A5		
SCR - B3F- cell Credit & Suretyship Large Credit Default B5		
SCR - B3F- cell Credit & Suretyship Recession Risk A7		
SCR - B3F- cell Credit & Suretyship Recession Risk A8		
SCR - B3F- cell Credit & Suretyship Recession Risk A9		
SCR - B3F- cell Credit & Suretyship Recession Risk A10		
SCR - B3F- cell Credit & Suretyship C12		
SCR - B3F- cell Credit & Suretyship C14		
SCR - B3F- cell Other non-life catastrophe risk A1		
SCR - B3F- cell Other non-life catastrophe risk B1		
SCR - B3F- cell Other non-life catastrophe risk C1		
SCR - B3F- cell Other non-life catastrophe risk		

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D1		
SCR - B3F- cell Other non-life catastrophe risk E1		
SCR - B3F- cell Other non-life catastrophe risk A2		
SCR - B3F- cell Other non-life catastrophe risk B2		
SCR - B3F- cell Other non-life catastrophe risk C2		
SCR - B3F- cell Other non-life catastrophe risk D2		
SCR - B3F- cell Other non-life catastrophe risk E2		
SCR - B3F- cell Other non-life catastrophe risk H2		
SCR - B3F- cell Other non-life catastrophe risk A4		
SCR - B3F- cell Other non-life catastrophe risk B4		
SCR - B3F- cell Other non-life catastrophe risk C4		
SCR - B3F- cell Other		

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non-life catastrophe risk D4		
SCR - B3F- cell Other non-life catastrophe risk E4		
SCR - B3F- cell Other non-life catastrophe risk H4		
SCR - B3F- cell Mass Accident A1		
SCR - B3F- cell Mass Accident B1		
SCR - B3F- cell Mass Accident C1		
SCR - B3F- cell Mass Accident D1		
SCR - B3F- cell Mass Accident E1		
SCR - B3F- cell Mass Accident F1		
SCR - B3F- cell Mass Accident G1		
SCR - B3F- cell Mass Accident H1		
SCR - B3F- cell Mass Accident I1		
SCR - B3F- cell Mass Accident J1		
SCR - B3F- cell Mass Accident K1		
SCR - B3F- cell Mass Accident L1		

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SCR - B3F- cell Mass Accident M1		
SCR - B3F- cell Mass Accident A2		
SCR - B3F- cell Mass Accident B2		
SCR - B3F- cell Mass Accident C2		
SCR - B3F- cell Mass Accident D2		
SCR - B3F- cell Mass Accident E2		
SCR - B3F- cell Mass Accident F2		
SCR - B3F- cell Mass Accident G2		
SCR - B3F- cell Mass Accident H2		
SCR - B3F- cell Mass Accident I2		
SCR - B3F- cell Mass Accident J2		
SCR - B3F- cell Mass Accident K2		
SCR - B3F- cell Mass Accident L2		
SCR - B3F- cell Mass Accident M2		
SCR - B3F- cell Mass Accident A3		
SCR - B3F- cell Mass Accident B3		

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SCR - B3F- cell Mass Accident C3		
SCR - B3F- cell Mass Accident D3		
SCR - B3F- cell Mass Accident E3		
SCR - B3F- cell Mass Accident F3		
SCR - B3F- cell Mass Accident G3		
SCR - B3F- cell Mass Accident H3		
SCR - B3F- cell Mass Accident I3		
SCR - B3F- cell Mass Accident J3		
SCR - B3F- cell Mass Accident K3		
SCR - B3F- cell Mass Accident L3		
SCR - B3F- cell Mass Accident M3		
SCR - B3F- cell Mass Accident A20		
SCR - B3F- cell Mass Accident B20		
SCR - B3F- cell Mass Accident C20		
SCR - B3F- cell Mass Accident D20		
SCR - B3F- cell Mass Accident E20		

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SCR - B3F- cell Mass Accident F20		
SCR - B3F- cell Mass Accident G20		
SCR - B3F- cell Mass Accident H20		
SCR - B3F- cell Mass Accident I20		
SCR - B3F- cell Mass Accident J20		
SCR - B3F- cell Mass Accident K20		
SCR - B3F- cell Mass Accident L20		
SCR - B3F- cell Mass Accident M20		
SCR - B3F- cell Mass Accident K22		
SCR - B3F- cell Mass Accident N22		
SCR - B3F- cell Concentration Accident A1		
SCR - B3F- cell Concentration Accident B1		
SCR - B3F- cell Concentration Accident C1		
SCR - B3F- cell Concentration Accident D1		

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SCR - B3F- cell Concentration Accident E1		
SCR - B3F- cell Concentration Accident F1		
SCR - B3F- cell Concentration Accident G1		
SCR - B3F- cell Concentration Accident H1		
SCR - B3F- cell Concentration Accident I1		
SCR - B3F- cell Concentration Accident A2		
SCR - B3F- cell Concentration Accident B2		
SCR - B3F- cell Concentration Accident C2		
SCR - B3F- cell Concentration Accident D2		
SCR - B3F- cell Concentration Accident E2		
SCR - B3F- cell Concentration Accident		

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F2		
SCR - B3F- cell Concentration Accident G2		
SCR - B3F- cell Concentration Accident H2		
SCR - B3F- cell Concentration Accident I2		
SCR - B3F- cell Concentration Accident A3		
SCR - B3F- cell Concentration Accident B3		
SCR - B3F- cell Concentration Accident C3		
SCR - B3F- cell Concentration Accident D3		
SCR - B3F- cell Concentration Accident E3		
SCR - B3F- cell Concentration Accident F3		
SCR - B3F- cell Concentration Accident G3		
SCR - B3F- cell		

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Concentration Accident H3		
SCR - B3F- cell Concentration Accident I3		
SCR - B3F- cell Concentration Accident A20		
SCR - B3F- cell Concentration Accident B20		
SCR - B3F- cell Concentration Accident C20		
SCR - B3F- cell Concentration Accident D20		
SCR - B3F- cell Concentration Accident E20		
SCR - B3F- cell Concentration Accident F20		
SCR - B3F- cell Concentration Accident G20		
SCR - B3F- cell Concentration Accident H20		
SCR - B3F- cell Concentration Accident I20		

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SCR - B3F- cell Concentration Accident G22		
SCR - B3F- cell Concentration Accident J22		
SCR - B3F- cell Pandemic A1		
SCR - B3F- cell Pandemic B1		
SCR - B3F- cell Pandemic C1		
SCR - B3F- cell Pandemic D1		
SCR - B3F- cell Pandemic E1		
SCR - B3F- cell Pandemic F1		
SCR - B3F- cell Pandemic A2		
SCR - B3F- cell Pandemic B2		
SCR - B3F- cell Pandemic C2		
SCR - B3F- cell Pandemic D2		
SCR - B3F- cell Pandemic E2		
SCR - B3F- cell Pandemic F2		
SCR - B3F- cell Pandemic A3		

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SCR - B3F- cell Pandemic B3		
SCR - B3F- cell Pandemic C3		
SCR - B3F- cell Pandemic D3		
SCR - B3F- cell Pandemic E3		
SCR - B3F- cell Pandemic F2		
SCR - B3F- cell Pandemic A20		
SCR - B3F- cell Pandemic B20		
SCR - B3F- cell Pandemic C20		
SCR - B3F- cell Pandemic D20		
SCR - B3F- cell Pandemic E20		
SCR - B3F- cell Pandemic F20		
SCR - B3F- cell Pandemic F21		
SCR - B3F- cell Pandemic D22		
SCR - B3F- cell Pandemic G22		
SCR - B3G - General		
SCR - B3G - Purpose		
SCR - B3G - Benefits		

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SCR - B3G – Costs		
SCR - B3G – Groups		
SCR - B3G – Materiality		
SCR - B3G - Disclosure		
SCR - B3G – Frequency		
SCR - B3G- cell A1		
SCR - B3G- cell A2		
SCR - B3G- cell A3		
SCR - B3G- cell A4		
SCR - B3G- cell A5		
SCR - B3G- cell A6		
SCR - B3G- cell A7		
SCR - B3G- cell A8		
SCR - B3G- cell A9		
SCR - B3G- cell A10	The cell “Earned life gross premiums unit-linked (12 months prior to the previous 12 months) - pEarn nl” should be replaced by “Earned non-life gross premiums (12 months prior to the previous 12 months) - pEarn nl”.	
SCR - B3G- cell A11		
SCR - B3G- cell A12		
SCR - B3G- cell A13		
SCR - B3G- cell A14		
SCR - B3G- cell A15		
SCR - B3G- cell A16		
MCR - B4A & B4B – General	We reiterate the need for more guidance on how to split the composite and non-composite business. In particular members wonder whether a non-life company managing annuities should be considered as a composite.	

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	<p>More guidance is also needed on where annuities related to non-life contracts should be placed. A simpler layout, perhaps setting out the input (which is in turn linked to another template for automatic cross-validation), the factor applied and the result, the sum of such results being the MCR, would be easier for supervisory review and –more importantly – will aid management oversight and approval. As currently proposed, this form will not assist management Supervision.</p>	
MCR - B4A & B4B – Purpose		
MCR - B4A & B4B – Benefits		
MCR - B4A & B4B – Costs		
MCR - B4A & B4B – Groups		
MCR - B4A & B4B – Materiality		
MCR - B4A & B4B – Disclosure		
MCR - B4A & B4B – Frequency		
MCR - B4A- cell A1		
MCR - B4A- cell B2		
MCR - B4A- cell C2		
MCR - B4A- cell B3		
MCR - B4A- cell C3		

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MCR - B4A- cell B4		
MCR - B4A- cell C4		
MCR - B4A- cell B5		
MCR - B4A- cell C5		
MCR - B4A- cell B6		
MCR - B4A- cell C6		
MCR - B4A- cell B7		
MCR - B4A- cell C7		
MCR - B4A- cell B8		
MCR - B4A- cell C8		
MCR - B4A- cell B9		
MCR - B4A- cell C9		
MCR - B4A- cell B10		
MCR - B4A- cell C10		
MCR - B4A- cell B11		
MCR - B4A- cell C11		
MCR - B4A- cell B12		
MCR - B4A- cell C12		
MCR - B4A- cell B13		
MCR - B4A- cell C13		
MCR - B4A- cell B14		
MCR - B4A- cell C14		
MCR - B4A- cell B15		
MCR - B4A- cell C15		
MCR - B4A- cell B16		
MCR - B4A- cell C16		

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MCR - B4A- cell B17		
MCR - B4A- cell C17		
MCR - B4A- cell A18		
MCR - B4A- cell B19		
MCR - B4A- cell B20		
MCR - B4A- cell B21		
MCR - B4A- cell B22	Should annuities related to non-life contracts be placed into this cell?	
MCR - B4A- cell C23		
MCR - B4A- cell A24		
MCR - B4A- cell A25		
MCR - B4A- cell A26		
MCR - B4A- cell A27	<u>MCR Cap</u> The LOG document should make clearer that the CAP on the MCR should be based on the latest annual or recalculated SCR without add-on. We acknowledge that this could be a Level 2 issue.	
MCR - B4A- cell A28	<u>MCR Floor</u> The LOG document should make clearer that the FLOOR on the MCR should be based on the latest annual or recalculated SCR without add-on.	
MCR - B4A- cell A29		
MCR - B4A- cell A30		
MCR - B4A- cell A31		
MCR - B4B- cell B1		
MCR - B4B- cell C1		
MCR - B4B- cell D2		
MCR - B4B- cell E2		
MCR - B4B- cell F2		
MCR - B4B- cell G2		

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MCR - B4B- cell D3		
MCR - B4B- cell E3		
MCR - B4B- cell F3		
MCR - B4B- cell G3		
MCR - B4B- cell D4		
MCR - B4B- cell E4		
MCR - B4B- cell F4		
MCR - B4B- cell G4		
MCR - B4B- cell D5		
MCR - B4B- cell E5		
MCR - B4B- cell F5		
MCR - B4B- cell G5		
MCR - B4B- cell D6		
MCR - B4B- cell E6		
MCR - B4B- cell F6		
MCR - B4B- cell G6		
MCR - B4B- cell D7		
MCR - B4B- cell E7		
MCR - B4B- cell F7		
MCR - B4B- cell G7		
MCR - B4B- cell D8		
MCR - B4B- cell E8		
MCR - B4B- cell F8		
MCR - B4B- cell G8		
MCR - B4B- cell D9		
MCR - B4B- cell E9		

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MCR - B4B- cell F9		
MCR - B4B- cell G9		
MCR - B4B- cell D10		
MCR - B4B- cell E10		
MCR - B4B- cell F10		
MCR - B4B- cell G10		
MCR - B4B- cell D11		
MCR - B4B- cell E11		
MCR - B4B- cell F11		
MCR - B4B- cell G11		
MCR - B4B- cell D12		
MCR - B4B- cell E12		
MCR - B4B- cell F12		
MCR - B4B- cell G12		
MCR - B4B- cell D13		
MCR - B4B- cell E13		
MCR - B4B- cell F13		
MCR - B4B- cell G13		
MCR - B4B- cell D14		
MCR - B4B- cell E14		
MCR - B4B- cell F14		
MCR - B4B- cell G14		
MCR - B4B- cell D15		
MCR - B4B- cell E15		
MCR - B4B- cell F15		
MCR - B4B- cell G15		

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MCR - B4B- cell D16		
MCR - B4B- cell E16		
MCR - B4B- cell F16		
MCR - B4B- cell G16		
MCR - B4B- cell D17		
MCR - B4B- cell E17		
MCR - B4B- cell F17		
MCR - B4B- cell G17		
MCR - B4B- cell B18		
MCR - B4B- cell C18		
MCR - B4B- cell D19		
MCR - B4B- cell F19		
MCR - B4B- cell D20		
MCR - B4B- cell F20		
MCR - B4B- cell D21		
MCR - B4B- cell F21		
MCR - B4B- cell D22		
MCR - B4B- cell F22		
MCR - B4B- cell E23		
MCR - B4B- cell G23		
MCR - B4B- cell A24		
MCR - B4B- cell A25		
MCR - B4B- cell A26		
MCR - B4B- cell A27		
MCR - B4B- cell A28		
MCR - B4B- cell A29		

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MCR - B4B- cell A30		
MCR - B4B- cell A31		
MCR - B4B- cell B32		
MCR - B4B- cell C32		
MCR - B4B- cell B33		
MCR - B4B- cell C33		
MCR - B4B- cell B34		
MCR - B4B- cell C34		
MCR - B4B- cell B35	<u>MCR Cap</u> The LOG document should make clearer that the CAP on the MCR should be based on the latest annual or recalculated SCR without add-on.	
MCR - B4B- cell C35	See comment above.	
MCR - B4B- cell B36	<u>MCR Floor</u> The LOG document should make clearer that the FLOOR on the MCR should be based on the latest annual or recalculated SCR without add-on.	
MCR - B4B- cell C36	See comment above.	
MCR - B4B- cell B37		
MCR - B4B- cell C37		
MCR - B4B- cell B38		
MCR - B4B- cell C38		
MCR - B4B- cell B39		
MCR - B4B- cell C39		
Assets - D1- General	The information requested in this template will demand a huge development work. These concerns were highlighted in our comments to the previous consultation. Apart from the information in the identification section, new data sets will have to be formed. The fundamental registrations have to be formed for both the Categorisation Section and the Risk Section .	

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	<p>The requested information will be very costly when the data is required from external service providers Another way of limiting the reporting burden for undertakings would be to make better use of existing information: it would be highly beneficial if EIOPA and/or supervisors could provide some information from a central source. This would require that for the most popular securities in the European market the following "market information" is provided:</p> <ul style="list-style-type: none"> • Security Title • Issuer Name • Issuer Sector • Issuer Group (Code) • Issuer Country • Currency (ISO code) • CIC • External rating • Rating agency • Duration <p>Furthermore, it will be a huge burden to report the Solvency II measurements by ID code. Insurers already make other rather detailed reporting of the assets to supervisors on a regular basis. It is important to decide at a national level which of the present reporting requirements will continue and which will not.</p>	
Assets - D1- Purpose		
Assets - D1- Benefits		
Assets - D1- Costs		
Assets - D1- Groups	<p>EIOPA states that the reporting at group level should only concern assets of the holding entity, non-EEA insurance undertakings and other non-supervised entities within the group.</p> <p>However, it will be very difficult to incorporate the not-consolidated entities belonging to the group. Indeed, this would require including a "line-by-line" list of assets that are not currently considered in the balance sheet; This would create a mismatch between the amount of assets</p>	

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	listed in this template and the assets included in the group balance sheet. The scope should therefore be limited to the consolidated entities within the group.	
Assets - D1- Materiality		
Assets - D1- Disclosure		
Assets - D1- Frequency		
Assets - D1 - Quarterly Exemption	We find it unnecessary to report detailed information on the asset portfolio on a quarterly basis. Therefore, we suggest that, under normal circumstances, this template should only be reported annually. However, when adverse conditions occur on the financial markets, undertakings should be able to report D1, D2 and D4 if required by a supervisory authority	
Assets - D1- cell A1		
Assets - D1- cell A2		
Assets - D1- cell A3		
Assets - D1- cell A4		
Assets - D1- cell A5		
Assets - D1- cell A6		
Assets - D1- cell A7		
Assets - D1- cell A8		
Assets - D1- cell A9		
Assets - D1- cell A10		
Assets - D1- cell A11		
Assets - D1- cell A12		
Assets - D1- cell A13		
Assets - D1- cell A15	More guidance on how to apply to CIC codes will be needed. Classifying the assets according to the CIC code will be very difficult in practice.	
Assets - D1- cell A16		
Assets - D1- cell A17		

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Assets - D1- cell A18		
Assets - D1- cell A19		
Assets - D1- cell A20		
Assets - D1- cell A22		
Assets - D1- cell A23		
Assets - D1- cell A24		
Assets - D1- cell A25		
Assets - D1- cell A26		
Assets - D1- cell A28		
Assets - D1- cell A30		
Assets - D1Q- General		
Assets - D1Q- Purpose		
Assets - D1Q- Benefits		
Assets - D1Q- Costs		
Assets - D1Q- Groups		
Assets - D1Q- Materiality		
Assets - D1Q- Disclosure		
Assets - D1Q- Frequency	We find it unnecessary to report detailed information on the asset portfolio on quarterly basis. Therefore, we suggest that under normal circumstances asset templates should only be reported annually. Hence, quarterly asset templates should be abandoned. As a minimum, their application should be restricted to solo undertakings and/or simplified through reporting according to categories rather than on a security by security basis.	
Assets - D1Q- cell A1 (list)		
Assets - D1Q- cell A2		

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(list)		
Assets - D1Q- cell A3 (list)		
Assets - D1Q- cell A4 (list)		
Assets - D1Q- cell A5 (list)		
Assets - D1Q- cell A6 (list)		
Assets - D1Q- cell A7 (list)		
Assets - D1Q- cell A8 (list)		
Assets - D1Q- cell A9 (list)		
Assets - D1Q- cell A10 (list)		
Assets - D1Q- cell A12 (list)		
Assets - D1Q- cell A13 (list)		
Assets - D1Q- cell A14 (list)		
Assets - D1Q- cell A15 (list)		
Assets - D1Q- cell A16 (list)		
Assets - D1Q- cell A17 (list)		
Assets - D1Q- cell A18 (list)		
Assets - D1Q- cell A20		

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(list)		
Assets - D1Q- cell A22 (list)		
Assets - D1Q- cell A24 (list)		
Assets - D1Q- cell A25 (list)		
Assets - D1Q- cell A28 (list)		
Assets - D1Q- cell A30 (list)		
Assets - D1Q- cell A3		
Assets - D1Q- cell A5		
Assets - D1Q- cell A6		
Assets - D1Q- cell A7		
Assets - D1Q- cell A7A		
Assets - D1Q- cell A8		
Assets - D1Q- cell A8A		
Assets - D1Q- cell A8C		
Assets - D1Q- cell A8D		
Assets - D1Q- cell A9A		
Assets - D1Q- cell A9B		
Assets - D1Q- cell A9C		
Assets - D1Q- cell A9D		
Assets - D1Q- cell A9E		
Assets - D1Q- cell A9F		
Assets - D1Q- cell A10A		
Assets - D1Q- cell A10B		

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Assets - D1Q- cell A14		
Assets - D1Q- cell A11		
Assets - D1Q- cell A12		
Assets - D1Q- cell A13		
Assets - D1Q- cell A27		
Assets - D1Q- cell L16		
Assets - D1S- General	<u>Structured products data – Portfolio list</u> More guidance is required on the type of products to be included in this template.	
Assets - D1S- Purpose		
Assets - D1S- Benefits		
Assets - D1S- Costs		
Assets - D1S- Groups		
Assets - D1S- Materiality		
Assets - D1S- Disclosure		
Assets - D1S- Frequency		
Assets - D1S- cell A1		
Assets - D1S- cell A2		
Assets - D1S- cell A3		
Assets - D1S- cell A4		
Assets - D1S- cell A5		
Assets - D1S- cell A6		
Assets - D1S- cell A7		
Assets - D1S- cell A8		
Assets - D1S- cell A9		

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Assets - D1S- cell A10		
Assets - D1S- cell A12		
Assets - D1S- cell A13		
Assets - D1S- cell A14		
Assets - D1S- cell A15		
Assets – D20- General		
Assets – D20- Purpose		
Assets – D20- Benefits		
Assets – D20- Costs		
Assets – D20- Groups		
Assets – D20- Materiality		
Assets – D20- Disclosure		
Assets – D20- Frequency		
Assets – D20 – Quarterly Exemption		
Assets - D20- cell A1		
Assets - D20- cell A2		
Assets - D20- cell A3		
Assets - D20- cell A4		
Assets - D20- cell A5		
Assets - D20- cell A6		
Assets - D20- cell A7		
Assets - D20- cell A8		
Assets - D20- cell A9		

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Assets - D20- cell A10		
Assets - D20- cell A11		
Assets - D20- cell A13		
Assets - D20- cell A14	The measurement of the rate of change of option value with respect to changes in the underlying asset's price (delta) would require a price derivative tool. We suggest deleting this requirement.	
Assets - D20- cell A15		
Assets - D20- cell A16		
Assets - D20- cell A17		
Assets - D20- cell A19		
Assets - D20- cell A20		
Assets - D20- cell A21		
Assets - D20- cell A22		
Assets - D20- cell A23		
Assets - D20- cell A24		
Assets - D20- cell A25		
Assets - D20- cell A26		
Assets - D20- cell A27		
Assets - D20- cell A28		
Assets - D20- cell A29		
Assets - D20- cell A31		
Assets - D20- cell A32		
Assets - D20- cell A33	The calculation of the residual modified duration in years (i.e sensibility to changes in prices) will only be possible with a price derivative tool. We suggest deleting this requirement.	
Assets - D20- cell A34		
Assets - D20- cell A35		

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Assets - D2T- General		
Assets - D2T- Purpose		
Assets - D2T- Benefits		
Assets - D2T- Costs		
Assets - D2T- Groups		
Assets - D2T- Materiality		
Assets - D2T- Disclosure		
Assets - D2T- Frequency		
Assets - D2T- Quarterly Exemption		
Assets - D2T- cell A1		
Assets - D2T- cell A2		
Assets - D2T- cell A3		
Assets - D2T- cell A4		
Assets - D2T- cell A5		
Assets - D2T- cell A6		
Assets - D2T- cell A7		
Assets - D2T- cell A8		
Assets - D2T- cell A9		
Assets - D2T- cell A10		
Assets - D2T- cell A11		
Assets - D2T- cell A13		
Assets - D2T- cell A14	The measurement of the rate of change of the option value with respect to changes in the underlying asset price will only possible with a price derivative tool. We suggest deleting this requirement.	

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Assets - D2T- cell A15		
Assets - D2T- cell A16		
Assets - D2T- cell A17		
Assets - D2T- cell A18		
Assets - D2T- cell A19		
Assets - D2T- cell A20		
Assets - D2T- cell A21		
Assets - D2T- cell A22		
Assets - D2T- cell A23		
Assets - D2T- cell A24		
Assets - D2T- cell A25		
Assets - D2T- cell A26		
Assets - D2T- cell A27		
Assets - D2T- cell A28		
Assets - D2T- cell A30		
Assets - D2T- cell A31		
Assets - D2T- cell A32		
Assets - D2T- cell A34		
Assets - D2T- cell A35		
Assets – D3- General		
Assets – D3- Purpose		
Assets – D3- Benefits		
Assets – D3- Costs		
Assets – D3- Groups		

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Assets – D3- Materiality		
Assets – D3- Disclosure		
Assets – D3- Frequency		
Assets - D3- cell A1		
Assets - D3- cell A3		
Assets - D3- cell A4		
Assets - D3- cell A6		
Assets - D3- cell A7		
Assets - D3- cell A8		
Assets - D3- cell A15		
Assets – D4- General		
Assets – D4- Purpose		
Assets – D4- Benefits		
Assets – D4- Costs		
Assets – D4- Groups		
Assets – D4- Materiality		
Assets – D4- Disclosure		
Assets – D4- Frequency		
Assets – D4 – Quarterly Exemption		
Assets - D4- cell A1		
Assets - D4- cell A2		
Assets - D4- cell A3		

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Assets - D4- cell A4		
Assets - D4- cell A5		
Assets - D4- cell A6		
Assets - D4- cell A7		
Assets - D4- cell A8		
Assets – D5- General	<p><u>Securities lending repos</u></p> <p>A materiality threshold should be included in the reporting requirements for this template. We propose that this template is only reported if the average total of the near and far leg amount (cell A9-A10) exceeds a certain percentage of total investments.</p>	
Assets – D5- Purpose		
Assets – D5- Benefits		
Assets – D5- Costs		
Assets – D5- Groups		
Assets – D5- Materiality		
Assets – D5- Disclosure		
Assets – D5- Frequency		
Assets - D5- cell A1		
Assets - D5- cell A2		
Assets - D5- cell A3		
Assets - D5- cell A4		
Assets - D5- cell A5		
Assets - D5- cell A6		
	Does EIOPA plan to draft a standard code list?	
Assets - D5- cell A7	If so, we suggest that the list only includes major institutions in the repo market (and let	

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	undertakings use their own registrations for other repo counterparties).	
Assets - D5- cell A8		
Assets - D5- cell A9		
Assets - D5- cell A10		
Assets - D5- cell A11		
Assets - D5- cell A12		
Assets - D5- cell A13		
Assets - D5- cell A14		
Assets – D6- General	<p><u>Assets held as collateral</u></p> <p>It would be a huge burden to report the collaterals on covered bonds. We suggest exempting those collaterals from the scope of this template.</p>	
Assets – D6- Purpose		
Assets – D6- Benefits		
Assets – D6- Costs		
Assets – D6- Groups		
Assets – D6- Materiality		
Assets – D6- Disclosure		
Assets – D6- Frequency		
Assets - D6- cell A2		
Assets - D6- cell A3		
Assets - D6- cell A4		
Assets - D6- cell A5		
Assets - D6- cell A6		
Assets - D6- cell A7		

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Assets - D6- cell A8		
Assets - D6- cell A9		
Assets - D6- cell A10		
Assets - D6- cell A12		
Assets - D6- cell A19		
Assets - D6- cell A20		
Assets - D6- cell A21		
Assets - D6- cell A22		
Assets - D6- cell A24		
Assets - D6- cell A25		
Assets - D6- cell A26		
Assets - D6- cell A27		
Assets - D6- cell A28		
TP - F1 & F1Q- General	<p>Although not all may agree, some AMICE members believe that the data required are useful and relevant for the undertaking and supervisors. However, the implementation of the data collection process and the development of the requested disclosures will be a very burdensome task (the model will have to be run twice to obtain the requested results).</p> <p>The deletion of the requirement to inform on whether Homogeneous risk groups –HRG - are used (according to the risk profile of the obligations) and on the total number of HRGs used in each major LoB is welcomed.</p> <p><u>Segmentation</u> The requested segmentation between “Contracts without options and guarantees” and “Contracts with options and guarantees” needs more attention in the LOG document to avoid Financial Guarantees being included in the item “Contracts with options” In most countries, contractual options have no relevance and the main risk driver is the minimum interest rate guarantee (i.e “Financial Guarantee”).These comments are based on the solo templates but they can also be extended to groups.</p>	

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	<p>Segmentation should be allowed to be based on internal reporting.</p> <p><u>Risk Margin</u> We agree with EIOPA that the allocation/adjustment of the risk margin between different LoBs is not a reporting issue but a calculation issue. However, we reiterate the need to reconsider their position and to analyze the problems raised as to the difficulties encountered in segmenting the risk margin across the different lines of business during the QIS5 exercise.</p> <p><u>Quarterly Reporting</u> We could agree on submitting information other than on an annual frequency provided that they would be based on proxies. As stated by the industry in April last year, these interim reporting should be done using proxies <i>as often some of the (re)insurance undertakings processes can only be annual for methodological reasons, technological reasons (time needed to update all model data and time needed to process stochastic scenarios) and also risk management reasons (modifications of exposures due to modifications of trends may not be adequately captured on short term periods like a quarter of a year).</i></p>	
TP - F1 & F1Q - Purpose		
TP - F1 & F1Q - Benefits		
TP - F1 & F1Q - Costs		
TP - F1 & F1Q - Groups		
TP - F1 & F1Q - Materiality		
TP - F1 & F1Q - Disclosure	We welcome EIOPA's decision to take on board the industry's recommendation on the granularity of the quarterly template for the annual public disclosure of Technical Provisions.	
TP - F1 & F1Q - Frequency	We find it unnecessary to report, on the last quarter of the year, the quarterly and annually "Life and Health SLT Technical Provisions" information. We therefore propose to exempt companies from reporting last quarter's information.	

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	The LOG document states that "For F1Q approximations can be used as no perfect reconciliation is required. For more information on how approximations can be applied, refer Article 88 of L1". There is a typo in the LOG as the article which the application of approximations is the article 82 of the Framework Directive.	
TP - F1- cells A1 – A14		
TP - F1- cell A7A		
TP - F1- cell A7B		
TP - F1- cell A7C		
TP - F1- cells B1 – B14	Are these cells (i.e Gross Best Estimate) the sum of "future guaranteed benefits" (BA1) and "future discretionary benefits" (BB1). If this is the case, these cells should change of colour.	
TP - F1- cells B2 – C2		
TP - F1- cells B4-C1		
TP - F1- cells BA1 – BA13		
TP - F1- cell BB1		
TP - F1- cell BB10		
TP - F1- cell BB13		
TP - F1- cells BC1 – BC13		
TP - F1- cells BD1 – BD13		
TP - F1- cells BF1 – BF13		
TP - F1- cells CB1 – CB14A		
TP - F1- cells CC1 – CC14		
TP - F1- cells CD1 – CD14A		

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TP - F1- cells C1 – C14A		
TP - F1- cells CB9A – C9A		
TP - F1- cells E1 – E13		
TP - F1- cells FB7A		
TP - F1- cells FB7B		
TP - F1- cells FB7C		
TP - F1- cells IA1 – IA 13		
TP - F1- cells J1 – JL13		
TP - F1- cells M1-M13	The purpose of the template is to know whether undertaking used simplified methods and techniques to calculate technical provisions (in line with the proportionality principle). In our view, this information should be provided in the narrative reporting.	
TP - F1- cells N1-N13	The purpose of this template is to understand to which extent simplified methods are used. This information requested only for solo level and not for groups. In our view, this information should be provided in the narrative reporting.	
TP - F1- cells O1-O13		
TP - F1- cells P1-P13		
TP - F1- cells Q1-Q13		
TP - F1Q- cells A1-A13		
TP - F1Q- cell A7A		
TP - F1Q- cell A7B		
TP - F1Q- cell A7C		
TP - F1Q- cells B1-B13		
TP - F1Q- cells C1-C14A		

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TP - F1Q- cell C11		
TP - F1Q- cell C12		
TP - F1Q- cell C13		
TP - F1Q- cell C14A		
TP - F1Q- cell E1-E13		
TP – F2- General	<p>This template aims at giving an overall idea of the duration of liabilities when calculating the Best Estimate gross of reinsurance. However, the requirement to split cash-in and cash-out flows is not possible for accepted reinsurance. Detailed information on the cashflows can only reported for direct insurance business.</p> <p>We welcome that the amounts recoverable from reinsurance and special purpose vehicles can now be calculated at an aggregated level. However, we would like to remind EIOPA that the cash-flow items from reinsurance recoverable are not always known. The recoverables should therefore be reported net of the adjustment for counterparty default risk.</p>	
TP – F2- Purpose	<p>Overall, we understand the purpose of this template. However, the template creates problems for life business in some jurisdictions because Future Discretionary Benefits (FDB) consists of both <i>individual</i> FDB and <i>collective</i> FDB. The individual FDB is composed of buffers created by the differential between the guaranteed yield and the discount rate. These buffers are gradually transformed to guaranteed benefits during the lifetime of the policies and will eventually be paid out as benefits. Therefore, future cash flows associated with this type of buffers should be specified and included in the template.</p> <p>The collective FDB contains investment gains which according to undertakings' profit sharing rules has been distributed to policy holders as a whole but not yet individualized. According to the profit sharing rules the collective FDB can fully absorb investment losses, distributed to policyholders' accounts, etc. at <i>any time</i>. This renders a specification of future cash flows for the collective FDB meaningless and misleading. It would, therefore, not be correct to specify future cash flows for this part of the FDB.</p>	

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	Consequently, we suggest that the template is expanded with one row below the column headings where undertakings can insert buffers for which future cashflows cannot be projected, like collective FDB in some jurisdictions.	
TP – F2- Benefits		
TP – F2- Costs		
TP – F2- Groups		
TP – F2- Materiality		
TP – F2- Disclosure		
TP – F2- Frequency		
TP – F2- cells A1-A34		
TP – F2- cells C1 – C35		
TP -F2- cells D1-D35		
TP -F2- cells F1-F35		
TP -F2- cells AU1 –AU35		
TP -F2- cells CU1 – CU35		
TP -F2- cells DU1 – DU35		
TP -F2- cells FU1 – FU35		
TP -F2- cells I1 –I35		
TP -F2- cells J1 –J35		
TP -F2- cells K1 –K35		
TP -F2- cells L1 –L35		
TP -F2- cells M1 –M35		

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TP -F2- cells N1 -N35		
TP -F2- cells O1 -O35		
TP -F2- cells P1-P35		
TP -F2- cells Q1 -Q35		
TP -F2- cells R1 -R35		
TP -F2- cells S1 -S35		
TP -F2- cells T1 -T35		
TP -F2- cells U1 - U35		
TP -F2- cells CH1 -CH35		
TP -F2- cells DH1 - DH35		
TP -F2- cells FH1 -FH35		
TP -F2- cells V1 -V35		
TP -F2- cells X1 - X35		
TP -F2- cells Y1-Y35		
TP -F2- cells Z1- Z35		
TP -F2- cells GH1 - GH35		
TP - F3- General		
TP - F3- Purpose		
TP - F3- Benefits		
TP - F3- Costs		
TP - F3- Groups		
TP - F3- Materiality		

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TP - F3- Disclosure		
TP - F3- Frequency		
TP - F3- cell A1	The majority of AMICE members classify all statutory information by commercial product. When calculating the best estimate, companies lose track of the commercial product as the models are risk driven and built around model points and homogeneous risks groups. The systems would have to be adapted to allow for stochastic calculations on a policy by policy basis and to produce best estimate results segmented by commercial product.	
TP - F3- cell A2A	More guidance is needed on how the individual contracts should be splitted when covering several LOBs.	
TP - F3- cell A2B	EIOPA deleted from Template F1 the request to submit information by "Homogeneous risk group". For consistency reasons this cell should be also deleted from F3.	
TP - F3- cell A2C		
TP - F3- cell A3		
TP - F3- cell A4		
TP - F3- cell A5		
TP - F3- cell A6		
TP - F3- cell A7		
TP - F3- cell A8		
TP - F3- cell A9	We welcome EIOPA 's decision to request information on the number of contracts As we stated in our previous comments the information on the "Number of insured persons at the end of the year" is not available for certain products (i.e. saving products).	
TP - F3- cell A10		
TP - F3- cell A15		
TP - F3- cell A21		
TP - F3- cell A24	The LOG document should provide a definition of the capital-at-risk for saving products.	
TP - F3- cell A26		
TP - F3- cell A30	EIOPA defines in the LOG document three types of rates: the "guaranteed rate", the "technical rate" and the return rate. Clarification is needed in the LOG document on whether EIOPA is	

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	referring to the technical guaranteed interest rate. If this is the case, we do not see why this rate should not be applicable to profit business.	
TP - F3- cell A34A	The LOG document states that the "Total amount of theoretical claims (according to table) during year" is requested to compare the expected claims (according to the table) and the actual claims <i>as described in A20</i> . There is a typo in the LOG document as there is no cell A20 to compare with.	
TP - F3- cell A41		
TP - F3A- General		
TP - F3A- Purpose		
TP - F3A- Benefits		
TP - F3A- Costs		
TP - F3A- Groups		
TP - F3A- Materiality		
TP - F3A- Disclosure		
TP - F3A- Frequency		
TP - F3A- cell A1		
TP - F3A- cell A2		
TP - F3A- cell A3		
TP - F3A- cell A4		
TP - F3A- cell A5		
TP - F3A- cell A6		
TP - F3A- cell A7		
TP - F3A- cell A8		
TP - F3A- cell A9		

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TP - F3A- cell A10		
TP - F3A- cell A11		
TP - F3A- cell A12		
TP - F3A- cell A13		
TP - F3A- cell A14		
TP - F3A- cell A15		
TP - F3A- cell A16		
TP - F3B- cell A1		
TP - F3B- cell A2		
TP - F3B- cell A3		
TP - F3B- cell A4		
TP - F3B- cell A5		
TP - F3B- cell A6		
TP - F3B- cell A7		
TP - F3B- cell A8		
TP - F3B- cell A9		
TP - F3B- cell A10		
TP – F4- General	<p><u>Information on annuities stemming from Non-Life Insurance obligations</u></p> <p>It will be a huge burden to have to produce historical data for 10 years only for this template. There is a need for a transitional period before reporting a full template.</p> <p>Moreover, companies do not usually produce the information requested by accident year but by underwriting year.</p>	
TP – F4- Purpose		
TP – F4- Benefits		

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TP – F4- Costs		
TP – F4- Groups		
TP – F4- Materiality		
TP – F4- Disclosure		
TP – F4- Frequency		
TP - F4- cell A0		
TP - F4- cell A1		
TP - F4- cell A2		
TP - F4- cell A3		
TP - F4- cell A4		
TP - F4- cell A5		
TP - F4- cell B1		
TP - F4- cell C1		
TP - F4- cell D1		
TP - F4- cell A6		
TP – E1 & E1Q- General	<p><u>Quarterly Reporting</u></p> <p>The LOG document states that approximations, according to article 82 Level 1 text, could be used for quarterly reporting as no perfect reconciliation is required for Technical Provisions Life (F1Q). We question why approximations are not allowed when reporting quarterly information on Non-Life Technical Provisions.</p> <p>Use of approximations should be allowed as it would be very difficult to produce the information requested on technical provisions and risk margin on a quarterly basis.</p> <p>A huge effort will be required to find and report salvage and subrogations data, and we do not</p>	

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	<p>understand the need for this information. Today the actuaries estimate TP net of salvage and subrogations and this is how the statistics are available.</p> <p>We need guidance concerning on how to report the workers compensation annuities, motor annuities and other accident annuities in the templates. For example some annuities will start as claim reported as incurred under "non-annuities" and then as the claims handling proceeds it might be converted to annuities. More guidance is needed on how this should be reflected in the templates.</p> <p>We would prefer a reporting based on accident year as this is how the data is available and reported internally and presented externally.</p> <p>It is of particular importance that the different lines of business are consistently defined throughout the templates. Furthermore, a materiality level for lines of business should be considered.</p>	
TP – E1 & E1Q - Purpose		
TP – E1 & E1Q - Benefits		
TP – E1 & E1Q - Costs		
TP – E1 & E1Q - Groups		
TP – E1 & E1Q - Materiality		
TP – E1 & E1Q - Disclosure		
TP – E1 & E1Q - Frequency		
TP - E1- cells A1-P1		
TP -E1- cells A2-L2		

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TP -E1- cells A3-L3		
TP -E1- cells M4-P4		
TP -E1- cells A5-P5		
TP -E1- cells A6-L6		
TP -E1- cells M7-P7		
TP -E1- cells A9-P9		
TP -E1- cells A10-P10		
TP -E1- cells A11-P11		
TP -E1- cells A12-P12		
TP -E1- cells A14-L14		
TP -E1- cells A15-L15		
TP -E1- cells M16-P16		
TP -E1- cells A18-P18		
TP -E1- cells A19-P19		
TP -E1- cells A20-P20		
TP -E1- cells A21-P21		
TP -E1- cells A25-P25		
TP -E1- cells A29-P29		
TP -E1- cells A30-P30		
TP -E1- cells A31-P31		
TP -E1- cells A32-P32		
TP -E1- cells A33-P33		
TP -E1- cells A34-P34		
TP -E1- cells A35-P35		
TP -E1- cells A36-P36		
TP -E1- cells A37-P37		

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TP -E1- cells A38-P38		
TP -E1- cells A39-P39	<p><u>Use of simplified methods and techniques to calculate technical provisions</u> EIOPA requests undertakings to detail whether a related item in technical provisions was calculated using simplifications. Most cases the risk margin is computed using simplifications.</p> <p>More guidance is needed on the type of requested information with regards to simplifications.</p>	
TP -E1- cells A40-P40		
TP -E1- cells A41-L53		
TP - E1 Q- cells A1-R1		
TP - E1 Q- cells A2-R2		
TP - E1 Q- cells A3-R3		
TP - E1 Q- cells A5-R5		
TP - E1 Q- cells A6-R6		
TP - E1 Q- cells A10-R10		
TP – E2- General	<u>Projection of future cash flows (Best Estimate – Non Life)</u>	
TP – E2- Purpose	EIOPA states that this template aims at giving an overview of the future cash flows expected to be required to settle the insurance obligations. However EIOPA is not providing any guidance as to how the template should be filled out when approximations are used to derive the best estimate of premium and claims provisions. Additionally the structure of the information requested in this template is more appropriate for life business rather than non-life business.	
TP – E2- Benefits		
TP – E2- Costs		
TP – E2- Groups		
TP – E2- Materiality		

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TP – E2- Disclosure		
TP – E2- Frequency		
TP - E2- cells A1-A31		
TP - E2- cells B1-B31		
TP - E2- cells C1-C31		
TP - E2- cells D1-D31	The Contract Boundary definition in Level 2 limits the situations where future premiums will fall within the boundaries of a non-life contract.	
TP - E2- cells E1-E31		
TP - E2- cells F1-F31		
TP – E3- General	<p><u>Non-Life Insurance Claims Information</u></p> <p>LOG document defines the default length of run-off triangle to be 15+1 years for all LoBs but if undertakings' claims development for a specific LoB is shorter they are allowed to report the latter. The default length of 15 years was decided on the basis of the mean length of triangles collected at EU level by the task-force on calibration of the SCR for NL - as part of QIS 5 exercise - using run-off triangles with 20 accident year.</p> <p>In the section 3.4 "Data Availability" from the EIOPA report of the Joint Working Group (JWG-task force on calibration of the SCR - NL) "<i>Calibration of the Premium and Reserve Risk Factors in the Standard Formula of Solvency II</i>". The table presented in the table below shows that the mean length of run-off triangles is significantly lower than 15 years. This table confirms that the "mean length" European average of run-off triangles is approximately 10 years.</p> <p>In paragraph 117 of the report, EIOPA states that a significant proportion of the insurance undertakings responding to the data request <i>have been unable to provide a history of reserve development net of reinsurance</i>. (It can be observed that the sample size is much smaller for Net data than for Gross data). This explains why requesting undertakings to provide a triangle on <i>Reinsurance Recoverables and Salvage and subrogation included within Gross Claims Paid</i> will put an unnecessary burden on companies.</p>	

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NL Calibration - Data availability												
<i>number of companies that submitted valid data</i>												
	Reserve risk											
	Triangle type						Premium methods					
	Gross data			Net data			Gross data			Net data		
	Original sample size	Modified sample size	Mean length	Original sample size	Modified sample size	Mean length	Number	Average size	Mean length	Number	Average size	Mean length
Non-life	-	-	-	-	-	-	-	-	-	-	-	-
Motor TPL	265	255	12.4	120	114	9.8	187	1505	8.9	115	144	8.1
Motor Other	255	249	11.5	117	115	9.4	173	70	8.7	103	27	8.0
MAT	133	129	10.6	72	67	9.7	126	113	8.6	69	70	8.2
Fire	290	282	11.0	133	126	9.6	202	122	8.6	126	119	7.9
General Liability	261	259	12.1	113	111	9.5	191	339	8.4	117	146	7.6
Credit & Suretyship	38	35	9.9	21	19	10.2	52	59	7.8	32	39	7.5
Legal Expenses	104	97	11.5	36	33	9.9	87	97	8.5	44	7	8.5
Assistance	62	60	8.1	37	32	7.6	53	2	7.2	34	1	6.4
Miscellaneous	86	81	9.6	47	46	8.9	84	24	8.2	51	6	7.7
NPRI - property	10	9	8.6	3	2	7.5	13	630	7.6	8	583	7.0
NPRI - casualty	4	1	10.0	4	1	10.0	8	1175	8.1	5	676	8.2
NPRI - MAT	8	7	9.7	5	2	7.0	10	881	7.2	6	797	7.2
Health	-	-	-	-	-	-	-	-	-	-	-	-
Medical Expenses	129	125	8.1	80	78	7.5	117	47	7.1	67	38	6.5
Income Protection	203	202	11.7	82	80	9.6	268	55	6.7	84	47	7.7
Workers Comp	40	36	12.5	17	14	10.2	45	86	9.1	18	99	6.4
NPRI - health	1	0	-	1	0	-	4	367	8.3	3	313	9.0

EIOPA requests information about the inflation hypothesis used in the calculation. It would be useful if EIOPA provides further guidance on how to submit the required information when different inflation assumptions (for attritional and high-severity & low frequency claims) exists. It could be also very difficult to report the requested information when inflation is not modelled explicitly and cannot be isolated from the claim amount.

TP – E3- Purpose

TP – E3- Benefits

TP – E3- Costs

TP – E3- Groups

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TP - E3- Materiality		
TP - E3- Disclosure		
TP - E3- Frequency		
TP - E3- cells A00		
TP - E3- cells A01	We also query about the nature of the information expected in cells A01 (method) and A02 (tail factor). The information on cells A01 (method) and A02 (tail factor) should be reported by homogeneous risk, in the narrative report. EIOPA should also be reminded that the methods applied are not all identical within a LoB.	
TP - E3- cells A02	See paragraph above	
TP - E3- cells A03: N		
TP - E3- cells A04		
TP - E3- cells A1-A15-J0		
TP - E3- cells A17-A31-J16		
TP - E3- cells A33-A47-J32	<p><u>Reinsurance recoveries</u></p> <p>We wonder whether the third set of triangles (Reinsurance recoverable) should be populated with accounting data; Additionally, we do not see the need for providing a triangle for reinsurance recoverables; We agree that recoverables must be calculated following the same approach as of the gross Technical Provisions but undertakings assess the sufficiency of recoverables and the gross-paid triangles on an aggregated basis. This requirement will put an unnecessary burden on companies.</p> <p>The information requested should be submitted on a "best effort basis" starting with the last diagonal as the minimum information.</p> <p>Majority of companies use accident year when building their triangles.</p>	

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TP - E3- cells P1-P15-J0		
TP - E3- cells P33-P47-J32		
TP - E3- cells AE1-AE15-J0		
TP - E3- cells AE17-AE31-J0		
TP - E3- cells AE33-AE47-J0		
TP - E3- cells IH1-IE15B		
TP - E4- General	<p><u>Movements of RBNS Claims</u></p> <p>The aim of this template is to provide an overview about the run-off/movement of non-life claims portfolios, in terms of both claims paid (split by different type of claims) and RBNS claims (as defined in E3). The proposed reporting template will put a rather heavy burden on the undertakings. In our view this template should only be filled in for material Line of Business (LoB) and material currency. Template could also be simplified.</p> <p>EIOPA requires to report LoBs 1-12 (as reported in TP E1) for both direct and accepted proportional reinsurance; As the information requested in this template is not feasible for accepted reinsurance business, we would suggest to report only, LoBs for direct business.</p>	
TP - E4- Purpose		
TP - E4- Benefits		
TP - E4- Costs		
TP - E4- Groups		
TP - E4- Materiality		
TP - E4- Disclosure		

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TP - E4- Frequency		
TP - E4- cells A1-A10		
TP - E4- cells B1-B10		
TP - E4- cells C1-C10		
TP - E4- cells D1-D10		
TP - E4- cells E1-E10		
TP - E4- cells F1-F10		
TP - E4- cells G1-G10		
TP - E4- cells H1-H10		
TP - E4- cells I1-I10		
TP - E4- cells J1-J10		
TP - E4- cells K1-K10		
TP - E4- cells L1-L10		
TP - E4- cells M1-M11		
TP - E4- cells N1-N11		
TP - E4- cells O1-O11		
TP - E4- cells P1-P10		
TP - E4- cells Q1-Q10		
TP - E4- cells R1-R10		
TP - E4- cells S1-S10		
TP - E4- cells T1-T10		
TP - E6- General		
TP - E6- Purpose		
TP - E6- Benefits		

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TP – E6- Costs		
TP – E6- Groups		
TP – E6- Materiality		
TP – E6- Disclosure		
TP – E6- Frequency		
TP – E6- cells A1-A20		
TP – E6- cells B1-B20		
TP – E6- cells C1-C20		
TP – E6- cells D1-D20		
TP – E6- cells E1-E20		
TP – E6- cells F1-F20		
TP – E6- cells G1-G20		
TP – E6- cells H1-H20		
TP – E6- cells I1-I20		
TP – E6- cells J1-J20		
TP – E6- cells K1-K20		
TP – E6- cells L1-L20		
TP – E6- cells AE1-AE20		
TP – E6- cells AF1-AF20		
TP – E7A- General	<p><u>Underwriting risks (peak risks)</u></p> <p>Problem with assessing “peak risks” when applying aggregated reinsurance treaties, stop loss or excess loss type of reinsurance.</p> <p>Could EIOPA confirm that “underwriting” refers to exposure?</p>	

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TP – E7A- Purpose		
TP – E7A- Benefits		
TP – E7A- Costs		
TP – E7A- Groups		
TP – E7A- Materiality		
TP – E7A- Disclosure		
TP – E7A- Frequency		
TP – E7A- cell A1		
TP – E7A- cell B1		
TP – E7A- cell C1		
TP – E7A- cell D1		
TP – E7A- cell E1		
TP – E7A- cell F1		
TP – E7A- cell G1		
TP – E7A- cell H1		
TP – E7A- cell I1		
TP – E7A- cell J1		
TP – E7A- cell K1		
TP – E7A- cell L1		
TP – E7A- cell M1		
TP – E7B- General	Could EIOPA confirm that “underwriting” refers to exposure?	
TP – E7B- Purpose		

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TP - E7B- Benefits		
TP - E7B- Costs		
TP - E7B- Groups		
TP - E7B- Materiality		
TP - E7B- Disclosure		
TP - E7B- Frequency		
TP - E7B- cell A01		
TP - E7B- cell A1		
TP - E7B- cell B1		
TP - E7B- cell C1		
TP - E7B- cell D1		
TP - E7B- cell E1		
Re - J1- General		
Re - J1- Purpose		
Re - J1- Benefits		
Re - J1- Costs		
Re - J1- Groups		
Re - J1- Materiality		
Re - J1- Disclosure		
Re - J1- Frequency		
Re - J1- cell A00		

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Re - J1- cell A1		
	LOG document states the "Reinsurace program code" as an <i>Unique code (undertaking specific) covering all individual reinsurance placements which belong to the same reinsurance program.</i>	
Re - J1- cell B1	We welcome EIOPA 's agreement to introduce entity 's codes to avoid incorrect legal names of involved entities. It would be helpful if EIOPA provides some examples.	
Re - J1- cell C1		
Re - J1- cell D1		
Re - J1- cell E1		
Re - J1- cell F1		
Re - J1- cell G1		
Re - J1- cell H1		
Re - J1- cell I1		
Re - J1- cell J1		
Re - J1- cell K1		
Re - J1- cell L1		
Re - J1- cell M1		
Re - J1- cell N1		
Re - J1- cell P1		
Re - J1- cell Q1		
Re - J1- cell W1		
Re - J1- cell Y1		
Re - J1- cell Z1		
Re - J1- cell AB1		
Re - J1- cell AC1		
Re - J1- cell A01		
Re - J1- cell A11		

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Re - J1- cell B11	We welcome EIOPA ´s agreement to introduce entity ´s codes to avoid incorrect legal names of involved entities. It would be helpful if EIOPA provides some examples.	
Re - J1- cell C11		
Re - J1- cell D11		
Re - J1- cell E11		
Re - J1- cell F11		
Re - J1- cell G11		
Re - J1- cell H11		
Re - J1- cell I11		
Re - J1- cell J11		
Re - J1- cell K11		
Re - J1- cell L11		
Re - J1- cell M11		
Re - J1- cell O11		
Re - J1- cell U11		
Re - J1- cell W11		
Re - J1- cell X11		
Re - J1- cell Z11		
Re - J1- cell AA11		
Re - J2- General	<p>This template requires information which cannot be processed in an automated way.</p> <p>The requested information in some cells</p> <p style="padding-left: 40px;">Cell T1 - Retention or priority (amount) Cell X1 - Maximum cover per risk or event and Cell Y1 - Maximum cover per treaty (cell Y1)</p> <p>Is not available when a reinsurance treaty covers different lines of business or different</p>	

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	entities.	
Re - J2- Purpose		
Re - J2- Benefits		
Re - J2- Costs		
Re - J2- Groups		
Re - J2- Materiality		
Re - J2- Disclosure		
Re - J2- Frequency		
Re - J2- cell A1		
Re - J2- cell B1	We welcome EIOPA ´s agreement to introduce entity ´s codes to avoid incorrect legal names of involved entities. It would be helpful if EIOPA provides some examples.	
Re - J2- cell C1		
Re - J2- cell D1		
Re - J2- cell E1		
Re - J2- cell F1		
Re - J2- cell G1		
Re - J2- cell H1		
Re - J2- cell I1		
Re - J2- cell J1	<p><u>Type of reinsurance treaty</u></p> <p>The LOG document does not cover all types of existing reinsurance contracts. Concatenated reinsurance treaties are not covered either. More guidance should be included in the LOG document.</p>	
Re - J2- cell K1	<u>Inclusion of catastrophic guarantees</u>	

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	<p>It would be helpful if EIOPA could clarify the code for Windstorm. Should it be coded as « C » (hurricane, windstorm...) or « D » (freeze, hail, strong wind etc..).</p> <p>For example, in the French market, gale (coup de vent) is coded as « D ».</p>	
Re - J2- cell L1		
Re - J2- cell M1		
Re - J2- cell N1		
Re - J2- cell O1	<p><u>Type of underwriting model (SI, MPL, PML, EML)</u></p> <p>It would be helpful if more guidance is provided on the information to be reported in this cell and in particular on the following concepts</p> <p>MPL = Maximum Possible Loss PML = Probable Maximum Loss EML = Estimated Maximum Loss OTH = Other</p>	
Re - J2- cell P1	<p><u>Estimated Subject Premium Income (XL – ESPI)</u></p> <p>It is defined by EIOPA as the amount of premium referring to the portfolio protected under Excess of Loss treaties. However, it may not correspond to the underlying risks (i.e. fire treaty where the basis premium is equal to the total amount of premiums of that product).</p>	
Re - J2- cell Q1		
Re - J2- cell R1		
Re - J2- cell S1		

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Re - J2- cell T1		
Re - J2- cell U1		
Re - J2- cell V1		
Re - J2- cell W1		
Re - J2- cell X1		
Re - J2- cell Y1		
Re - J2- cell Z1		
Re - J2- cell AA1		
Re - J2- cell AB1		
Re - J2- cell AC1		
Re - J2- cell AD1		
Re - J2- cell AE1		
Re - J2- cell AF1		
Re - J2- cell AG1		
Re - J2- cell AM1		
Re - J2- cell AO1		
Re - J2- cell AP1		
Re - J2- cell AQ1		
Re - J3- General		
Re - J3- Purpose		
Re - J3- Benefits		
Re - J3- Costs		
Re - J3- Groups		

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Re - J3- Materiality		
Re - J3- Disclosure		
Re - J3- Frequency		
Re - J3- cell A1		
Re - J3- cell B1		
Re - J3- cell C1		
Re - J3- cell D1		
Re - J3- cell E1		
Re - J3- cell F1		
Re - J3- cell G1		
Re - J3- cell H1		
Re - J3- cell I1		
Re - J3- cell J1		
Re - J3- cell L1		
Re - J3- cell M1		
Re - J3- cell O1		
	<u>Guarantees received: Assets pledged by reinsurer</u> Guarantee provided by the state for contracts concluded with some public institutions (i.e with Caisse Centrale de Réassurance in France).	
Re - J3- cell P1		
Re - J3- cell Q1		
Re - J3- cell R1		
SPV - General		
SPV - Purpose		

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SPV - Benefits		
SPV - Costs		
SPV - Groups		
SPV - Materiality		
SPV - Disclosure		
SPV - Frequency		
SPV- cell A1		
SPV- cell B1		
SPV- cell B1A		
SPV- cell C1		
SPV- cell D1		
SPV- cell E1		
SPV- cell F1		
SPV- cell F1A		
SPV- cell G1		
SPV- cell H1		
SPV- cell I1		
SPV- cell J1		
SPV- cell K1		
SPV- cell L1		
SPV- cell M1		
SPV- cell N1		
SPV- cell O1		
SPV- cell P1		

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SPV- cell Q1		
SPV- cell R1		
SPV- cell S1		
SPV- cell T1		
SPV- cell V1		
SPV- cell W1		
SPV- cell X1		
SPV- cell Y1		
SPV- cell Z1		
G01-Purpose	The scope of the template should be limited to the entities belonging to the scope of group supervision. Information on (re)insurance entities which are non-controlled participations should be excluded from this template.	
G01-Benefits		
G01-Costs		
G01-Application		
G01-Materiality		
G01-Disclosure		
G01-Frequency		
G01- cell A1		
G01- cell B1		
G01- cell C1		
G01- cell D1		
G01- cell E1		
G01- cell F1		
G01- cell G1		
G01- cell H1		

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G01- cell I1		
G01- cell J1		
G01- cell K1		
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		
G01- cell V1		
G03 & G04-Purpose		
G03 & G04-Benefits		
G03 & G04-Costs		
G03 & G04-Application		
G03 & G04-Materiality		
G03 & G04-Disclosure		
G03 & G04-Frequency		
G03- cell A1		
G03- cell B1		
G03- cell C1		
G03- cell D1		
G03- cell E1		

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G03- cell F1		
G03- cell G1		
G03- cell H1		
G03- cell I1		
G03- cell J1		
G03- cell K1		
G03- cell L1		
G03- cell M1		
G03- cell N1		
G03- cell O1		
G03- cell P1		
G04- cell A1		
G04- cell A2		
G04- cell B1		
G04- cell C1		
G04- cell D1		
G04- cell E1		
G14-Purpose	This template aims at giving an overview of the Technical provisions (TP) across the undertakings belonging to the group. Template should be populated with details from all insurance undertakings (controlled or not controlled) belonging to the group. In our view, the scope of the template should be limited to the entities belonging to the consolidated balance sheet of the group.	
G14-Benefits		
G14-Costs		
G14-Application		
G14-Materiality		
G14-Disclosure		

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G14-Frequency		
G14- cell A1		
G14- cell B1		
G14- cell C1		
G14- cell D1		
G14- cell E1		
G14- cell F1		
G14- cell G1		
G14- cell H1		
G14- cell I1		
G14- cell J1		
G14- cell K1		
G14- cell L1		
G14- cell M1		
G14- cell N1		
G14- cell O1		
G14- cell P1		
G14- cell Q1		
G14- cell R1		
G20-Purpose		
G20-Benefits		
G20-Costs		
G20-Application		
G20-Materiality		
G20-Disclosure		
G20-Frequency		

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G20- cell A1		
G20- cell B1		
G20- cell C1		
G20- cell D1		
G20- cell E1		
G20- cell F1		
G20- cell I1		
G20- cell J1		
G20- cell K1		
	<p>IGT templates request information about significant transactions between entities within a group. This would put a heavy burden on companies with regards to transactions with entities not included in the consolidation balance sheet of the group.</p> <p>EIOPA states that all significant IGT in-force at the start of the reporting period or occurring during the reporting period have to be reported (This includes all IGT that are in-force at the start of the reporting period; or incepted during the reporting period and outstanding at the reporting date; or incepted and expired/matured during the reporting period). We suggest that IGT on equities and other capital items should only be reported when they have an impact in the year-end balance sheet.</p>	
IGT1 to IGT4-Purpose		
IGT1 to IGT4-Benefits		
IGT1 to IGT4-Costs	It would be very costly to provide information on cost-sharing transactions. We would propose these transactions to be excluded from this template.	
IGT1 to IGT4-Application		
	<p>The materiality thresholds shall be set by the group supervisor in consultation with the other supervisors concerned, the group and where applicable, EIOPA. To ensure threshold levels are harmonized across groups for similar IGT, the threshold values will be set in line with the guidelines in L3G-IGT.</p>	
IGT1 to IGT4-Materiality	We suggest replacing EIOPA 's proposal on materiality by the threshold used in IFRS when	

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	reporting intra-group transactions (i.e. only transactions larger than 500 K Euros should be reported).	
IGT1 to IGT4-Disclosure		
IGT1 to IGT4-Frequency		
IGT1- cell B6		
IGT1- cell C6		
IGT1- cell D6		
IGT1- cell E6		
IGT1- cell F6		
IGT1- cell G6		
IGT1- cell H6		
IGT1- cell I6		
IGT1- cell J6		
IGT1- cell K6		
IGT1- cell L6		
IGT1- cell M6		
IGT1- cell N6		
IGT1- cell O6	This template requests the submission of information about operations of very different nature (reciprocal and non-reciprocal). Some of the cells cannot be provided for the transactions included in the scope of the template. For example, it is difficult to fill out the columns O, P, R for participations, dividends and asset transfers.	
IGT1- cell P6		
IGT1- cell Q6	This cell named "Balance of contractual amount of transaction at reporting date if applicable" is defined as the outstanding amount of the transaction at the reporting date if applicable, e.g. for debt issue.	

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	<p>The information requested is not available except for debts; In particular, more guidance is needed as to which information must be included in the column Q (i.e Contractual Amount of Transaction or Transaction Price). If this value corresponds to the acquisition value, the solvency II amount at the reporting date would not be needed. Should this cell otherwise be limited to increases and decreases in the amount of capital?</p>	
IGT1- cell R6		
IGT1- cell S6		
IGT2- cell B6		
IGT2- cell C6		
IGT2- cell D6		
IGT2- cell E6		
IGT2- cell F6		
IGT2- cell G6		
IGT2- cell H6		
IGT2- cell I6		
IGT2- cell J6		
IGT2- cell K6		
IGT2- cell L6		
IGT2- cell M6		
IGT2- cell N6		
IGT2- cell O6		
IGT2- cell P6		
IGT2- cell Q6		
IGT2- cell R6		
IGT2- cell S6		
IGT2- cell T6		

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IGT2- cell U6		
IGT2- cell V6		
IGT2- cell W6		
IGT3- cell B6		
IGT3- cell C6		
IGT3- cell D6		
IGT3- cell D6		
IGT3- cell E6		
IGT3- cell F6		
IGT3- cell G6		
IGT3- cell H6		
IGT3- cell I6		
IGT3- cell J6		
IGT3- cell K6		
IGT3- cell L6		
IGT3- cell M6		
IGT3- cell N6		
IGT3- cell O6		
IGT4- cell B5		
IGT4- cell C5		
IGT4- cell D5		
IGT4- cell E5		
IGT4- cell F5		
IGT4- cell G5		
IGT4- cell H5		
IGT4- cell I5		

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IGT4- cell J5		
IGT4- cell K5		
IGT4- cell L5		
IGT4- cell M5		
IGT4- cell N5		
IGT4- cell O5		
IGT4- cell P5		
	<p>The LOG document states that the aim of the template is to list the most important exposure (net maximum exposure) by counterparty (group or/and entity) <u>outside the scope of the re/insurance group</u>. However, exposures <u>within the insurance group</u> appear to be incorporated into the initial draft on the Level 3 guidance as <i>material problems resulting from excessive risk concentrations in one entity, either regulated or unregulated, could be transmitted to other entities in the group because the entities are linked by reputation or by intra-group transactions and exposures, or both</i>. This template should be further aligned with the Level 3 guidance on the topic.</p> <p>Only entities included in the scope of group supervision are to be listed as it could be very burdensome to identify exposures from counterparties with regards to the non-consolidated entities.</p>	
RC-Purpose		
RC-Benefits		
RC-Costs		
RC-Application	Would it be necessary to apply the look-through approach to the UCITS? Would also be possible to net receivables with liabilities within an individual undertaking?	
RC-Materiality		
RC-Disclosure		
RC-Frequency		
RC- cell A2		

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RC- cell A3		
RC- cell A4		
RC- cell A5		
RC- cell A6		
RC- cell A7		
RC- cell A8		
RC- cell A9		
RC- cell A10		
RC- cell A11		
RC- cell A12		
RC- cell A13		
RC- cell A14		
RC- cell A15	Should the "Maximum exposure (cell A15)" be equal to the "Maximum amount to be paid by the reinsurer" (cell A16)?	
RC- cell A16		
RC- cell A17	Does the column "Ceded Technical Provisions" refer to the best estimate of technical provisions or to the accounting provision?	
RC- cell A18		