

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19-Jun-13 12:00 CET
Name of Company:	AMICE	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> - Do not change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool - Please do not insert or delete any row. If you have no comment on a paragraph or a cell, keep the row empty. - Leave the last column empty. - Please fill in your comment in the relevant row. - Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <ul style="list-style-type: none"> o Certain rows represent a group of cells with similar information (ex : TP-E1- cells A43-L43) o 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. o If your comment refers to subparagraphs or specific cells within a group, please indicate this in the comment itself. <p>Please send the completed template, in Word Format, to CP-13-010@eiopa.europa.eu. Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the Technical Annexes II and III.</p>		
Reference	Comment	Resolution
General Comments	<p>AMICE members oppose any requirement to implement any element of these guidelines which may need to be changed as a result of the outcome of the political negotiations. It would not be proportionate to oblige undertakings to incur costs to implement a regulation which might be subject to changes.</p> <p>AMICE members disagree with the request that firms should provide reporting to</p>	

	<p>national competent authorities during the interim phase should there be no agreement on Omnibus II. Additionally, we are concerned that the proposed requirements are too detailed and will constitute an unreasonable burden on the industry. The costs will not only be the immediate ones 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.</p> <p>It is absolutely necessary to avoid overburdening undertakings in general, particularly smaller and medium-sized insurers, with unnecessary obligations. Requesting processes for the establishment of quarterly templates to be closer in terms of the level of accuracy and granularity to those for annual reporting at both solo and group levels is clearly going too far. It is clearly neither proportionate nor consistent with the aim of the preparatory guidelines to request such far-reaching reporting processes on an infra-annual basis.</p>	
Introduction		
General		
Comments		
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1.11	AMICE members oppose any requirement to submit quarterly information during the interim period.	
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1.19	During the interim phase and as example of the proportionality principle, undertakings applying the accounting-consolidation method should be allowed to use the solvency capital requirements and eligible own funds of related third country undertakings.	
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Section I. General Comments		
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Section II. General Comments		
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1.30	We oppose any requirement to submit quarterly information during the interim phase.	
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1.33	Guideline 6 – Calculation of market share for life business	

	<p>We oppose any requirement to submit quarterly information during the interim period.</p> <p>Paragrah c should be amended as follows: Identify the insurance and reinsurance undertakings for which the accumulated market share calculated in the previous paragraph reaches at least 80% for the purpose of Guideline 3 and 50% for the purpose of Guideline 4, classifying them from the one with the highest amount of gross life technical provisions to the one with the smallest.</p>	
1.34	<p>Guideline 7 – Calculation of market share for non-life business</p> <p>See comment above.</p>	
1.35	<p>Guideline 8 – Notification by NCAs to insurance and reinsurance undertakings</p> <p>NCAs should notify insurance and reinsurance undertakings long before 11 months the initial submission date. We would propose 18 months before the initial submission as notification date.</p>	
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1.41	<p>Guideline 10 – Groups’ quarterly quantitative reporting thresholds</p> <p>We oppose any requirement to submit quarterly information for groups. This guideline should be deleted.</p>	
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Section III.		

General Comments		
1.47	Guideline 12 – Solo quantitative annual information Information about technical provisions (TP-E1, TP-F1), solvency capital requirements (SCR-B2, SCR-B3) and minimum capital requirements (MCR-B4) should be only submitted to the supervisory authorities provided there is an agreement on Pillar I issues.	
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1.52	Guideline 15 – Solo quantitative quarterly information We oppose any requirement to submit information on a quarterly basis. We suggest this guideline to be deleted.	
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1.58	Guideline 19 – Groups’ quantitative quarterly information We oppose any requirement to submit information on a quarterly basis. We suggest this guideline to be deleted.	
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Section IV. General Comments	Narrative Reporting We believe there is no need to invest resources on a narrative reporting that will try to describe a temporary situation. We suggest the whole section is deleted.	
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Section V. General Comments		
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Section VI. General Comments		
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Section VII. General Comments		
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Section VIII. General Comments	Dates of initial application and deadlines	
1.79	Undertakings will be subject to double reporting as Solvency I and Solvency II will be running in parallel. Some flexibility from the national supervisory authorities is requested. We would suggest an extended period for the submission of the annual reporting selected templates in 2015 and 2016. The deadlines are extended by 5 weeks.	

	<p>This paragraph should be amended as follows: In accordance with Articles 35 and 254 of Solvency II, national competent authorities should ensure that insurance and reinsurance undertakings submit the annual quantitative information referred to in Section III, regarding the annual quantitative information related to the financial year of the undertaking ending on or after 31 December 2014, no later than 20 25 weeks after the undertaking's financial year end.</p>	
1.80	See comment above.	
1.81	See comment above.	
1.82	See comment above	
Section IX. General Comments		
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1.84	<p>Guideline 35 – Lines of Business and Complementary Identification Code More guidance on how to apply the CIC codes will be needed. Classifying the assets according to the CIC code will be very difficult in practice. We appreciate if EIOPA can publish a mapping exercise.</p>	
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Compliance and Reporting Rules General Comments		
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Technical Annex I General Comments		
BI-1	Balance Sheet We oppose any requirement to report Balance Sheet information should there be no agreement on Omnibus II before the end of 2013.	
BS-C1-2	See comment above.	
BS-C1-3	See comment above.	
BS-C1D-4	See comment above.	
AS-D1-5		
AS-D1-6		
AS-D20-7		
AS-D20-8		
TP-F1-9	We oppose any requirement to submit information related to technical provisions there should be no agreement on Omnibus II before the end of 2013.	
TP-E1-10	See comment above.	
TP-F1Q-11	See comment above.	
TP-E1Q-12	See comment above.	
OF-B1Q-13		
SCR-B2A-14		
SCR-B2A-15		
SCR-B2B-16		
SCR-B2B-17		
SCR-B2C-18		
SCR-B2C-19		
SCR-B3A-20	Market Risk We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	
SCR-B3A-21	We oppose any requirement to report group SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	
SCR-B3B-22	Counterparty Default Risk	

	We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	
SCR-B3B-23	We oppose any requirement to report group SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	
SCR-B3C-24		
SCR-B3C-25		
SCR-B3D-26	Health Underwriting Risk We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	
SCR-B3D-27	We oppose any requirement to report group SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	
SCR-B3E-28	Non-Life Underwriting Risk We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	
SCR-B3E-29	We oppose any requirement to report group SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	
SCR-B3F-30	Catastrophe Risk Underwriting Risk This template will put a heavy burden on undertakings. This template has been designed not only to allow an understanding of how the SCR catastrophe risk module has been calculated and what are the main risk drivers but also to grant supervisors the computation of this module with the information provided. We believe that the application of reinsurance to the catastrophe risk module cannot be standardised in a predefined reporting template so that it is appropriate in all cases. While specific criteria are defined in the EIOPA Level 3 guidelines, a more flexible approach on the required information should be taken.	
SCR-B3F-31		
SCR-B3G-32	Operational Risk We oppose any requirement to report solo SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	
SCR-B3G-33	We oppose any requirement to report group SCR related information if Omnibus II has not been agreed at political level before the end of 2013.	
MCR-B4A-34		
MCR-B4B-35		

G01-36		
G03-37		
G03-38		
G03-39		
G04-40		
G14-41		
Technical Annex II General Comments	We are aware EIOPA has not published any of the changes agreed as from the publication of the stabilised reporting package in July 2012. It is not clear either whether undertakings will have to resort to the LOG files published in July 2012 or they would have to stick to the instructions to QRTs in Annexes I and II.	
Technical Annex III General Comments		
BI - General Comments		
BI- cell A1		
BI- cell A2		
BI- cell A3		
BI- cell A4		
BI- cell A5		
BI- cell A6		
BI- cell A7		
BI- cell A8		
BI- cell A9		
BI- cell A10		
BS-C1 - General Comment		
BS-C1- cell AS1		
BS-C1- cell AS24		
BS-C1- cell A2		

BS-C1- cell A26		
BS-C1- cell A25B		
BS-C1- cell A3		
BS-C1- cell A4		
BS-C1- cell A5		
BS-C1- cell A6		
BS-C1- cell A7B		
BS-C1- cell A7		
BS-C1- cell A7A		
BS-C1- cell A8E		
BS-C1- cell A8		
BS-C1- cell A8A		
BS-C1- cell A8C		
BS-C1- cell A8D		
BS-C1- cell A9		
BS-C1- cell A10A		
BS-C1- cell A10B		
BS-C1- cell A11		
BS-C1- cell A12		
BS-C1- cell A14		
BS-C1- cell A14B		
BS-C1- cell A14C		
BS-C1- cell A14A		
BS-C1- cell A16		
BS-C1- cell A17A		
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BS-C1- cell A18		
BS-C1- cell A19B		
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BS-C1- cell A19		
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BS-C1- cell A23		
BS-C1- cell A28A		
BS-C1- cell A28B		
BS-C1- cell A27		
BS-C1- cell A29		
BS-C1- cell A30		
BS-C1- cell LS0		
BS-C1- cell L1		
BS-C1- cell L1A		
BS-C1- cell L2		
BS-C1- cell L3		
BS-C1- cell L4		
BS-C1- cell L4A		
BS-C1- cell L5		
BS-C1- cell L6		
BS-C1- cell LS6F		
BS-C1- cell L6B		
BS-C1- cell L6C		
BS-C1- cell L6D		
BS-C1- cell L6E		
BS-C1- cell L7		
BS-C1- cell L7A		
BS-C1- cell L8		
BS-C1- cell L9		

BS-C1- cell L10		
BS-C1- cell L10A		
BS-C1- cell L11		
BS-C1- cell L12		
BS-C1- cell LS14		
BS-C1- cell L23		
BS-C1- cell L18		
BS-C1- cell L22		
BS-C1- cell L13		
BS-C1- cell L17		
BS-C1- cell L16		
BS-C1- cell L19		
BS-C1- cell L20		
BS-C1- cell L15A		
BS-C1- cell L15B		
BS-C1- cell L15C		
BS-C1- cell L15E		
BS-C1- cell L15D		
BS-C1- cell L26		
BS-C1- cell L25		
BS-C1- cell L25A		
BS-C1- cell L27		
BS-C1D – General Comments		
BS-C1D- cell A1		
BS-C1D- cell B1		
BS-C1D- cell A3		
BS-C1D- cell A4		

BS-C1D- cell A5		
BS-C1D- cell A5A		
BS-C1D- cell A6		
BS-C1D- cell A7		
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BS-C1D- cell A10		
BS-C1D- cell A11		
BS-C1D- cell A12		
BS-C1D- cell A13		
BS-C1D- cell A14		
BS-C1D- cell A15		
AS-D1- General Comment		
AS-D1- cell A1		
AS-D1- cell A2		
AS-D1- cell A3		
AS-D1- cell A4		
AS-D1- cell A5		
AS-D1- cell A6		
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AS-D1- cell A10		
AS-D1- cell A11		
AS-D1- cell A12		
AS-D1- cell A13		
AS-D1- cell A15	More guidance on how to apply the CIC codes will be needed. Classifying the	

	assets according to the CIC code will be very difficult in practice.	
AS-D1- cell A16		
AS-D1- cell A17		
AS-D1- cell A18		
AS-D1- cell A20		
AS-D1- cell A22		
AS-D1- cell A23		
AS-D1- cell A24		
AS-D1- cell A25		
AS-D1- cell A26		
AS-D1- cell A28		
AS-D1- cell A30		
AS-D1- cell A50		
AS-D20- General Comments		
AS-D20- cell A1		
AS-D20- cell A2		
AS-D20- cell A3		
AS-D20- cell A4		
AS-D20- cell A5		
AS-D20- cell A6		
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AS-D20- cell A33		
AS-D20- cell A34		
AS-D20- cell A35		
AS-D20- cell A50		
TP-F1- General Comments		
TP-F1- cell J1,J2,J4,J6,J7,J9,J 10,J12,J13,J14		
TP-F1- cell JA1,JA2,JA4,JA6,J A7,JA9,JA10,JA12 ,JA13,JA14		

TP-F1- cell JE1,JE2,JE4,JE6, E7,JE9,JE10,JE12, JE13,JE14		
TP-F1- cell JF1,JF2,JF4,JF6,JF 7,JF9,JF10,JF12,J F13,JF14		
TP-E1- General Comments		
TP-E1- cells A43- L43		
TP-E1- cells A44- L44		
TP-E1- cells A45- L45		
TP-E1- cells A46- L46		
TP-E1- cells Q43- Q46		
TP-F1Q- General Comments		
TP-F1Q- cells A1		
TP-F1Q- cells A3		
TP-F1Q- cells A5		
TP-F1Q- cells A6		
TP-F1Q- cells A7		
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TP-F1Q- cells F10		
TP-F1Q- cells F12		
TP-F1Q- cells F13		
TP-F1Q- cells F14		
TP-E1Q- General Comments		
TP-E1Q- cells A1- P1		
TP-E1Q- cells Q1		
TP-E1Q- cells A5-		

P5		
TP-E1Q- cells A12-P12		
TP-E1Q- cells A13-P13		
TP-E1Q- cells Q5- Q13		
TP-E1Q- cells A14-P14		
TP-E1Q- cells A21-P21		
TP-E1Q- cells A22-P22		
TP-E1Q- cells Q14-Q22		
TP-E1Q- cells A23-P23		
TP-E1Q- cells A24-P24		
TP-E1Q- cells A25-P25		
TP-E1Q- cells Q23		
TP-E1Q- cells Q24		
TP-E1Q- cells Q25		
TP-E1Q- cells A26-P26		
TP-E1Q- cells A27-P27		
TP-E1Q- cells A28-P28		
TP-E1Q- cells Q26		
TP-E1Q- cells Q27		

TP-E1Q- cells Q28		
OF-B1Q – General Comments		
OF-B1Q- cell A1		
OF-B1Q- cell B1		
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OF-B1Q- cell D45D		
OF-B1Q- cell E45D		
OF-B1Q- cell A45E		
OF-B1Q- cell B45E		
OF-B1Q- cell C45E		
OF-B1Q- cell D45E		
OF-B1Q- cell E45E		
OF-B1Q- cell A48		

OF-B1Q- cell B48		
OF-B1Q- cell C48		
OF-B1Q- cell D48		
OF-B1Q- cell E48		
OF-B1Q- cell A49		
OF-B1Q- cell B49		
OF-B1Q- cell C49		
OF-B1Q- cell D49		
OF-B1Q- cell A50A		
OF-B1Q- cell B50A		
OF-B1Q- cell C50A		
OF-B1Q- cell D50A		
OF-B1Q- cell E50A		
OF-B1Q- cell A51A		
OF-B1Q- cell B51A		
OF-B1Q- cell C51A		
OF-B1Q- cell D51A		
OF-B1Q- cell A52A		
OF-B1Q- cell A53A		
OF-B1Q- cell A53B		

OF-B1Q- cell B23		
OF-B1Q- cell B24		
OF-B1Q- cell B25		
OF-B1Q- cell B26		
OF-B1Q- cell B27		
OF-B1Q- cell B28		
OF-B1Q- cell B29		
OF-B1Q- cell B29A		
OF-B1Q- cell A30		
OF-B1Q- cell A31		
OF-B1Q- cell A32		
SCR - B2A – General Comment	<p>This template covers the Solvency Capital Requirement for firms calculating their solvency requirements using a Standard Formula or Partial Internal Model.</p> <p>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 Internal Model components.</p>	
SCR - B2A - cell A1		
SCR - B2A - cell B1		
SCR - B2A - cell A01		
SCR - B2A - cell A2		
SCR - B2A - cell B2		
SCR - B2A - cell A02		

SCR - B2A - cell A3		
SCR - B2A - cell B3		
SCR - B2A - cell A03		
SCR - B2A - cell A4		
SCR - B2A - cell B4		
SCR - B2A - cell A04		
SCR - B2A - cell A5		
SCR - B2A - cell B5		
SCR - B2A - cell A05		
SCR - B2A - cell A6		
SCR - B2A - cell B6		
SCR - B2A - cell A7		
SCR - B2A - cell B7		
SCR - B2A - cell A07		
SCR - B2A - cell A10		
SCR - B2A - cell B10		
SCR - B2A - cell		

A11		
SCR - B2A - cell A12		
SCR - B2A - cell A13		
SCR - B2A - cell A013		
SCR - B2A - cell A14A		
SCR - B2A - cell A14C		
SCR - B2A - cell A8		
SCR - B2A - cell A9		
SCR - B2A - cell A17		
SCR - B2A - cell A15		
SCR - B2A - cell A15A		
SCR - B2A - cell A15B		
SCR - B2A - cell A15C		
SCR - B2A - cell A16		
SCR - B2A - cell A18		
SCR - B2A - cell A20		
SCR - B2A - cell A21		

SCR - B2A - cell A14B		
SCR - B2A - cell A14		
SCR - B2A - cell A11A		
SCR - B2A - cell A11B		
SCR - B2B - General Comment		
SCR - B2B- cell A1		
SCR - B2B- cell A1A		
SCR - B2B- cell A1B		
SCR - B2B- cell A1C		
SCR - B2B- cell B1		
SCR - B2B- cell C1		
SCR - B2B- cell B2		
SCR - B2B- cell C2		
SCR - B2B- cell B3		
SCR - B2B- cell C3		
SCR - B2B- cell B4		

SCR - B2B- cell C4		
SCR - B2B- cell B5		
SCR - B2B- cell B6		
SCR - B2B- cell B7		
SCR - B2B- cell C5		
SCR - B2B- cell C6		
SCR - B2B- cell B8		
SCR - B2B- cell B8AA		
SCR - B2B- cell B8A		
SCR - B2B- cell A11A		
SCR - B2B- cell A11B		
SCR - B2C – General Comment		
SCR - B2C- cell A1		
SCR - B2C- cell A1A		
SCR - B2C- cell A1B		
SCR - B2C- cell A1C		

SCR - B2C- cell B1		
SCR - B2C- cell C1		
SCR - B2C- cell B2		
SCR - B2C- cell C2		
SCR - B2C- cell B3		
SCR - B2C- cell C3		
SCR - B2C- cell B4		
SCR - B2C- cell C4		
SCR - B2C- cell B5		
SCR - B2C- cell B6		
SCR - B2C- cell B7		
SCR - B2C- cell B7A		
SCR - B2C- cell B7B		
SCR - B2C- cell B7C		
SCR - B2C- cell B8		
SCR - B2C- cell B9		
SCR - B2C- cell		

B10		
SCR - B2C- cell B12		
SCR - B2C- cell B13		
SCR - B2C- cell C5		
SCR - B2C- cell C6		
SCR - B2C- cell B14		
SCR - B2C- cell B14AA		
SCR - B2C- cell B14A		
SCR - B2C- cell A11A		
SCR - B2C- cell A11B		
SCR - B3A – General Comment		
SCR - B3A – cell A00		
SCR - B3A – cell AA01		
SCR - B3A – cell AA02		
SCR - B3A – cell AA03		
SCR - B3A – cel A30		

SCR - B3A- cell C0		
SCR - B3A- cell D0		
SCR - B3A- cell A1		
SCR - B3A- cell A2		
SCR - B3A- cell A1A		
SCR - B3A- cell A2A		
SCR - B3A- cell B1		
SCR - B3A- cell B2		
SCR - B3A- cell B1A		
SCR - B3A- cell B2A		
SCR - B3A- cell C1		
SCR - B3A- cell C2		
SCR - B3A- cell B1B		
SCR - B3A- cell B2B		
SCR - B3A- cell D1		
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		
SCR - B3A- cell A8A		

SCR - B3A- cell B8		
SCR - B3A- cell B8A		
SCR - B3A- cell C8		
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		
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		
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 C22		
SCR - B3A- cell D22		
SCR - B3A- cell C23		
SCR - B3A- cell D23		
SCR - B3B – General Comment		
SCR - B3B – cell A00		
SCR - B3B – cell A001		

SCR - B3B - cell A30		
SCR - B3B - cell A10		
SCR - B3B- cell A1		
SCR - B3B- cell B1		
SCR - B3B- cell C0		
SCR - B3B- cell C1		
SCR - B3B- cell A2		
SCR - B3B- cell A3		
SCR - B3B- cell C3		
SCR - B3B- cell D4		
SCR - B3B- cell C4		
SCR - B3C - General Comment		
SCR - B3C - cell A01		
SCR - B3C - cell A02		
SCR - B3C - cell A03		
SCR - B3C - cell A04		

SCR - B3C - cell A05		
SCR - B3C - cell A06		
SCR - B3C - cell A001		
SCR - B3C - cell A30		
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		
SCR - B3C- cell C04		
SCR - B3C- cell D04		
SCR - B3C- cell A4		
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		
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		
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		
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 - B3D - General Comment		
SCR - B3D - cell A01		
SCR - B3D - cell A02		
SCR - B3D - cell A03		
SCR - B3D - cell A04		
SCR - B3D - cell A05		
SCR - B3C - cell A001		
SCR - B3C - cell A30		
SCR - B3D- cell A1		

SCR - B3D- cell A1A		
SCR - B3D- cell B1		
SCR - B3D- cell B1A		
SCR - B3D- cell C1		
SCR - B3D- cell B1B		
SCR - B3D- cell D1		
SCR - B3D- cell A2		
SCR - B3D- cell A2A		
SCR - B3D- cell B2		
SCR - B3D- cell B2A		
SCR - B3D- cell C2		
SCR - B3D- cell B2B		
SCR - B3D- cell D2		
SCR - B3D- cell A3		
SCR - B3D- cell A3A		
SCR - B3D- cell B3		
SCR - B3D- cell		

B3A		
SCR - B3D- cell C3		
SCR - B3D- cell B3B		
SCR - B3D- cell D3		
SCR - B3D- cell C04		
SCR - B3D- cell D04		
SCR - B3D- cell A4		
SCR - B3D- cell A4A		
SCR - B3D- cell B4		
SCR - B3D- cell B4A		
SCR - B3D- cell C4		
SCR - B3D- cell B4B		
SCR - B3D- cell D4		
SCR - B3D- cell A5		
SCR - B3D- cell A5A		
SCR - B3D- cell B5		
SCR - B3D- cell B5A		

SCR - B3D- cell C5		
SCR - B3D- cell B5B		
SCR - B3D- cell D5		
SCR - B3D- cell A6		
SCR - B3D- cell A6A		
SCR - B3D- cell B6		
SCR - B3D- cell B6A		
SCR - B3D- cell C6		
SCR - B3D- cell B6B		
SCR - B3D- cell D6		
SCR - B3D- cell A7		
SCR - B3D- cell A7A		
SCR - B3D- cell B7		
SCR - B3D- cell B7A		
SCR - B3D- cell C7		
SCR - B3D- cell B7B		
SCR - B3D- cell		

D7		
SCR - B3D- cell A8		
SCR - B3D- cell A8A		
SCR - B3D- cell B8		
SCR - B3D- cell B8A		
SCR - B3D- cell C8		
SCR - B3D- cell B8B		
SCR - B3D- cell D8		
SCR - B3D- cell C9		
SCR - B3D- cell D9		
SCR - B3D- cell C10		
SCR - B3D- cell D10		
SCR - B3D- cell C12		
SCR - B3D- cell D12		
SCR - B3D- cell E12		
SCR - B3D- cell F12		
SCR - B3D- cell C13		

SCR - B3D- cell D13		
SCR - B3D- cell E13		
SCR - B3D- cell F13		
SCR - B3D- cell C14		
SCR - B3D- cell D14		
SCR - B3D- cell E14		
SCR - B3D- cell F14		
SCR - B3D- cell C15		
SCR - B3D- cell D15		
SCR - B3D- cell E15		
SCR - B3D- cell F15		
SCR - B3D- cell A16		
SCR - B3D- cell F16		
SCR - B3D- cell A17		
SCR - B3D- cell A18		
SCR - B3D- cell A18A		
SCR - B3D- cell		

B18		
SCR - B3D- cell B18B		
SCR - B3D- cell D18		
SCR - B3D- cell D19		
SCR - B3D- cell D20		
SCR - B3D- cell B21		
SCR - B3D- cell A21		
SCR - B3D- cell B22		
SCR - B3D- cell A22		
SCR - B3D- cell B23		
SCR - B3D- cell A23		
SCR - B3D- cell B24		
SCR - B3D- cell A24		
SCR - B3D- cell B25		
SCR - B3D- cell A25		
SCR - B3D- cell B26		
SCR - B3D- cell A26		

SCR - B3D- cell B27		
SCR - B3D- cell A27		
SCR - B3E – General Comment		
SCR - B3E- cell A001		
SCR - B3E- cell A30		
SCR - B3E- cell C1		
SCR - B3E- cell D1		
SCR - B3E- cell E1		
SCR - B3E- cell F1		
SCR - B3E- cell C2		
SCR - B3E- cell D2		
SCR - B3E- cell E2		
SCR - B3E- cell F2		
SCR - B3E- cell C3		
SCR - B3E- cell D3		
SCR - B3E- cell E3		

SCR - B3E- cell F3		
SCR - B3E- cell C4		
SCR - B3E- cell D4		
SCR - B3E- cell E4		
SCR - B3E- cell F4		
SCR - B3E- cell C5		
SCR - B3E- cell D5		
SCR - B3E- cell E5		
SCR - B3E- cell F5		
SCR - B3E- cell C6		
SCR - B3E- cell D6		
SCR - B3E- cell E6		
SCR - B3E- cell F6		
SCR - B3E- cell C7		
SCR - B3E- cell D7		
SCR - B3E- cell E7		
SCR - B3E- cell		

F7		
SCR - B3E- cell C8		
SCR - B3E- cell D8		
SCR - B3E- cell E8		
SCR - B3E- cell F8		
SCR - B3E- cell C9		
SCR - B3E- cell D9		
SCR - B3E- cell E9		
SCR - B3E- cell F9		
SCR - B3E- cell C10		
SCR - B3E- cell D10		
SCR - B3E- cell E10		
SCR - B3E- cell F10		
SCR - B3E- cell C11		
SCR - B3E- cell D11		
SCR - B3E- cell E11		
SCR - B3E- cell F11		

SCR - B3E- cell C12		
SCR - B3E- cell D12		
SCR - B3E- cell E12		
SCR - B3E- cell F12		
SCR - B3E- cell A13		
SCR - B3E- cell F13		
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		
SCR - B3E- cell A18		
SCR - B3F - General Comment		

SCR - B3F- cell A1		
SCR - B3F- cell A2-A6		
SCR - B3F- cell A7		
SCR - B3F- cell B1		
SCR - B3F- cell B2-B6		
SCR - B3F- cell B7		
SCR - B3F- cell C1		
SCR - B3F- cell C2-C6		
SCR - B3F- cell C7		
SCR - B3F- cell A8		
SCR - B3F- cell B8		
SCR - B3F- cell C8		
SCR - B3F- cell A9		
SCR - B3F- cell A10-A15		
SCR - B3F- cell A16		
SCR - B3F- cell B9		
SCR - B3F- cell		

B10-B15		
SCR - B3F- cell B16		
SCR - B3F- cell C9		
SCR - B3F- cell C10-C15		
SCR - B3F- cell C16		
SCR - B3F- cell A17		
SCR - B3F- cell A18		
SCR - B3F- cell B17		
SCR - B3F- cell B18		
SCR - B3F- cell C17		
SCR - B3F- cell C18		
SCR - B3F- cell A19		
SCR - B3F- cell A20		
SCR - B3F- cell A21		
SCR - B3F- cell B19		
SCR - B3F- cell B20		
SCR - B3F- cell B21		

SCR - B3F- cell C19		
SCR - B3F- cell C20		
SCR - B3F- cell C21		
SCR - B3F- cell A22		
SCR - B3F- cell A23-A25		
SCR - B3F- cell A26		
SCR - B3F- cell B22		
SCR - B3F- cell B23-B25		
SCR - B3F- cell B26		
SCR - B3F- cell C22		
SCR - B3F- cell C23-C25		
SCR - B3F- cell C26		
SCR - B3F- cell AA1-AA20		
SCR - B3F- cell AA21		
SCR - B3F- cell AA22-AA35		
SCR - B3F- cell AA36		
SCR - B3F- cell		

AA37		
SCR - B3F- cell AB1-AB20		
SCR - B3F- cell AB21		
SCR - B3F- cell AB22-AB35		
SCR - B3F- cell AB36		
SCR - B3F- cell AB37		
SCR - B3F- cell AC1-AC20		
SCR - B3F- cell AC21		
SCR - B3F- cell AD1-AD20		
SCR - B3F- cell AD21		
SCR - B3F- cell AE1-AE20		
SCR - B3F- cell AF1-AF20		
SCR - B3F- cell AF21		
SCR - B3F- cell AF36		
SCR - B3F- cell AF37		
SCR - B3F- cell AF38		
SCR - B3F- cell AF39		

SCR - B3F- cell AG1-AG20		
SCR - B3F- cell AG21		
SCR - B3F- cell AG36		
SCR - B3F- cell AG37		
SCR - B3F- cell AH1-AH20		
SCR - B3F- cell AH21		
SCR - B3F- cell AH36		
SCR - B3F- cell AH37		
SCR - B3F- cell AI1-AI20		
SCR - B3F- cell AI21		
SCR - B3F- cell AI36		
SCR - B3F- cell AI37		
SCR - B3F- cell AI38		
SCR - B3F- cell AI39		
SCR - B3F- cell BA1-BA20		
SCR - B3F- cell BA21		
SCR - B3F- cell		

BA22-BA35		
SCR - B3F- cell BA36		
SCR - B3F- cell BA37		
SCR - B3F- cell BB1-BB20		
SCR - B3F- cell BB21		
SCR - B3F- cell BB22-BB35		
SCR - B3F- cell BB36		
SCR - B3F- cell BB37		
SCR - B3F- cell BC1-BC20		
SCR - B3F- cell BC21		
SCR - B3F- cell BD1-BD20		
SCR - B3F- cell BD21		
SCR - B3F- cell BE1-BE20		
SCR - B3F- cell BE21		
SCR - B3F- cell BE36		
SCR - B3F- cell BE37		
SCR - B3F- cell BE38		

SCR - B3F- cell BE39		
SCR - B3F- cell BF1-BF20		
SCR - B3F- cell BF21		
SCR - B3F- cell BF36		
SCR - B3F- cell BF37		
SCR - B3F- cell BG1-BG20		
SCR - B3F- cell BG21		
SCR - B3F- cell BG36		
SCR - B3F- cell BG37		
SCR - B3F- cell BH1-BH20		
SCR - B3F- cell BH21		
SCR - B3F- cell BH36		
SCR - B3F- cell BH37		
SCR - B3F- cell BH38		
SCR - B3F- cell BH39		
SCR - B3F- cell CA1-CA14		
SCR - B3F- cell		

CA15		
SCR - B3F- cell CA16-CA29		
SCR - B3F- cell CA30		
SCR - B3F- cell CA31		
SCR - B3F- cell CB1-CB14		
SCR - B3F- cell CB15		
SCR - B3F- cell CB16-CB29		
SCR - B3F- cell CB30		
SCR - B3F- cell CB31		
SCR - B3F- cell CC1-CC14		
SCR - B3F- cell CC15		
SCR - B3F- cell CD1-CD14		
SCR - B3F- cell CD15		
SCR - B3F- cell CE1-CE14		
SCR - B3F- cell CF1-CF14		
SCR - B3F- cell CF15		
SCR - B3F- cell CF30		

SCR - B3F- cell CF31		
SCR - B3F- cell CF32		
SCR - B3F- cell CF33		
SCR - B3F- cell CG1-CG14		
SCR - B3F- cell CG15		
SCR - B3F- cell CG30		
SCR - B3F- cell CG31		
SCR - B3F- cell CH1-CH14		
SCR - B3F- cell CH15		
SCR - B3F- cell CH30		
SCR - B3F- cell CH31		
SCR - B3F- cell CI1-CI14		
SCR - B3F- cell CI15		
SCR - B3F- cell CI30		
SCR - B3F- cell CI31		
SCR - B3F- cell CI32		
SCR - B3F- cell		

CI33		
SCR - B3F- cell DA1-DA9		
SCR - B3F- cell DA10		
SCR - B3F- cell DA11-DA24		
SCR - B3F- cell DA25		
SCR - B3F- cell DA26		
SCR - B3F- cell DB1-DB9		
SCR - B3F- cell DB10		
SCR - B3F- cell DB11-DB24		
SCR - B3F- cell DB25		
SCR - B3F- cell DB26		
SCR - B3F- cell DC1-DC9		
SCR - B3F- cell DC10		
SCR - B3F- cell DD1-DD9		
SCR - B3F- cell DD10		
SCR - B3F- cell DE1-DE9		
SCR - B3F- cell DF1-DF9		

SCR - B3F- cell DF10		
SCR - B3F- cell DF25		
SCR - B3F- cell DF26		
SCR - B3F- cell DF27		
SCR - B3F- cell DF28		
SCR - B3F- cell DG1-DG9		
SCR - B3F- cell DG10		
SCR - B3F- cell DG25		
SCR - B3F- cell DG26		
SCR - B3F- cell DH1-DH9		
SCR - B3F- cell DH10		
SCR - B3F- cell DH25		
SCR - B3F- cell DH26		
SCR - B3F- cell DI1-DI9		
SCR - B3F- cell DI10		
SCR - B3F- cell DI25		
SCR - B3F- cell		

DI26		
SCR - B3F- cell DI27		
SCR - B3F- cell DI28		
SCR - B3F- cell EA1		
SCR - B3F- cell EB1		
SCR - B3F- cell EC1		
SCR - B3F- cell ED1		
SCR - B3F- cell EE1		
SCR - B3F- cell EE2		
SCR - B3F- cell EE3		
SCR - B3F- cell EF1		
SCR - B3F- cell EG1		
SCR - B3F- cell EH1		
SCR - B3F- cell EH2		
SCR - B3F- cell EH3		
SCR - B3F- cell FA1		
SCR - B3F- cell FB1		

SCR - B3F- cell FC1		
SCR - B3F- cell FD1		
SCR - B3F- cell FE1		
SCR - B3F- cell GA1		
SCR - B3F- cell GA2		
SCR - B3F- cell GA3		
SCR - B3F- cell GA4		
SCR - B3F- cell GA5		
SCR - B3F- cell GA6		
SCR - B3F- cell HA1		
SCR - B3F- cell HB1		
SCR - B3F- cell HC1		
SCR - B3F- cell HD1		
SCR - B3F- cell HE1		
SCR - B3F- cell HF1		
SCR - B3F- cell HG1		
SCR - B3F- cell		

HH1		
SCR - B3F- cell HA2-HE2		
SCR - B3F- cell HF2		
SCR - B3F- cell HG2		
SCR - B3F- cell HH2		
SCR - B3F- cell HI2		
SCR - B3F- cell HJ2		
SCR - B3F- cell HA3		
SCR - B3F- cell HB3		
SCR - B3F- cell HC3		
SCR - B3F- cell HA4		
SCR - B3F- cell HB4		
SCR - B3F- cell HC4		
SCR - B3F- cell HA5		
SCR - B3F- cell HB5		
SCR - B3F- cell HC5		
SCR - B3F- cell IA1-IB1		

SCR - B3F- cell IC1		
SCR - B3F- cell ID1		
SCR - B3F- cell IE1		
SCR - B3F- cell IF1		
SCR - B3F- cell JA1		
SCR - B3F- cell JA2		
SCR - B3F- cell JA3		
SCR - B3F- cell JA4		
SCR - B3F- cell KA1-KE1		
SCR - B3F- cell KA2-KE2		
SCR - B3F- cell KA3-KE3		
SCR - B3F- cell KA4-KE4		
SCR - B3F- cell KA5-KE5		
SCR - B3F- cell KA6-KE6		
SCR - B3F- cell KA7-KE7		
SCR - B3F- cell KF1		
SCR - B3F- cell		

KF4		
SCR - B3F- cell KF5		
SCR - B3F- cell KF6		
SCR - B3F- cell KF7		
SCR - B3F- cell KA8		
SCR - B3F- cell KB8		
SCR - B3F- cell KC8		
SCR - B3F- cell KA9		
SCR - B3F- cell KB9		
SCR - B3F- cell KC9		
SCR - B3F- cell KA10		
SCR - B3F- cell KB10		
SCR - B3F- cell KC10		
SCR - B3F- cell LA1-LB1		
SCR - B3F- cell LC1		
SCR - B3F- cell LA2-LB2		
SCR - B3F- cell LC2		

SCR - B3F- cell LA3-LB3		
SCR - B3F- cell LC3		
SCR - B3F- cell LA4-LB4		
SCR - B3F- cell LC4		
SCR - B3F- cell LA5-LB5		
SCR - B3F- cell LC5		
SCR - B3F- cell LA6-LB6		
SCR - B3F- cell LC6		
SCR - B3F- cell LA7		
SCR - B3F- cell LA8		
SCR - B3F- cell LA9		
SCR - B3F- cell LA10		
SCR - B3F- cell LA11		
SCR - B3F- cell LA12		
SCR - B3F- cell LB12		
SCR - B3F- cell LC12		
SCR - B3F- cell		

LA13		
SCR - B3F- cell LB13		
SCR - B3F- cell LC13		
SCR - B3F- cell LA14		
SCR - B3F- cell LB14		
SCR - B3F- cell LC14		
SCR - B3F- cell MA1-ME1		
SCR - B3F- cell MA2-ME2		
SCR - B3F- cell MF2		
SCR - B3F- cell MG2		
SCR - B3F- cell MH2		
SCR - B3F- cell MF3		
SCR - B3F- cell MG3		
SCR - B3F- cell MH3		
SCR - B3F- cell MF4		
SCR - B3F- cell MG4		
SCR - B3F- cell MH4		

SCR - B3F- cell NA1,NC1,NE1,NG 1,NI1		
SCR - B3F- cell NB1,ND1,NF1,NH 1,NJ1		
SCR - B3F- cell NK1		
SCR - B3F- cell NK32		
SCR - B3F- cell NK33		
SCR - B3F- cell NK34		
SCR - B3F- cell NL1		
SCR - B3F- cell NL32		
SCR - B3F- cell NM1		
SCR - B3F- cell NM32		
SCR - B3F- cell NN1		
SCR - B3F- cell NN32		
SCR - B3F- cell NN33		
SCR - B3F- cell NN34		
SCR - B3F- cell OA1		

SCR - B3F- cell OB1,OC1,OD1,OE 1,OF1		
SCR - B3F- cell OG1		
SCR - B3F- cell OG21		
SCR - B3F- cell OG22		
SCR - B3F- cell OG23		
SCR - B3F- cell OH1		
SCR - B3F- cell OH21		
SCR - B3F- cell OI1		
SCR - B3F- cell OI21		
SCR - B3F- cell OJ1		
SCR - B3F- cell OJ21		
SCR - B3F- cell OJ22		
SCR - B3F- cell OJ23		
SCR - B3F- cell PA21		
SCR - B3F- cell PB21		
SCR - B3F- cell PC1		

SCR - B3F- cell PD1,PF1,PH1		
SCR - B3F- cell PE1, PG1, PI1		
SCR - B3F- cell PJ1		
SCR - B3F- cell PJ21		
SCR - B3F- cell PK21		
SCR - B3F- cell PL21		
SCR - B3F- cell PM21		
SCR - B3G - General Comments		
SCR - B3G- cell A30		
SCR - B3G- cell A1		
SCR - B3G- cell A2		
SCR - B3G- cell A3		
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		
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 - General Comments		
MCR - B4A- cell A1		
MCR - B4A- cell B2		
MCR - B4A- cell C2		
MCR - B4A- cell B3		
MCR - B4A- cell C3		
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		
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		
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 - B4B – General Comments		
MCR - B4B- cell B1		
MCR - B4B- cell C1		
MCR - B4B- cell D2		
MCR - B4B- cell E2		
MCR - B4B- cell F2		
MCR - B4B- cell G2		
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		
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		
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		
MCR - B4B- cell A30		
G01-General Comments		
G01- cell A1		
G01- cell B1		
G01- cell C1		
G01- cell D1		
G01- cell E1		

G01- cell F1		
G01- cell G1		
G01- cell H1a		
G01- cell H1b		
G01- cell H1c		
G01- cell I1a		
G01- cell I1b		
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		
G03 – General Comments		
G03- cell A1		
G03- cell A2		
G03- cell B1		
G03- cell B2		
G03- cell B3		
G03- cell B4		
G03- cell B5		
G03- cell B6		

G03- cell B7		
G03- cell C1		
G03- cell D1		
G03- cell F1		
G03- cell G1		
G03- cell H1		
G03- cell N1		
G03- cell O1		
G03- cell P1		
G04 – General Comments		
G04- cell A1		
G04- cell A2		
G04- cell A3		
G04- cell B1		
G04- cell C1		
G04- cell D1		
G04- cell E1		
G14- General Comments		
G14- cell A1		
G14- cell B1		
G14- cell S1		
G14- cell C1,F1,I1,L1,O1		
G14- cell D1,G1,J1,M1,P1		
G14- cell E1,H1,K1,N1,Q1		
G14- cell R1		

Technical Annex IV General Comments		
Technical Annex V General Comments		
Technical Annex VI General Comments		
Technical Annex VII General Comments		
CAS1		
CAS2		
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CQS61		
CQS62		
CQS63		
CGS1		
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QCGS1		

Instructions		
Impact Assessment – General Comments		
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Question 1	Should EIOPA issue Guidelines for preparation of submission of information to NCAs?	
Question 1 – Option 1		
Question 1 – Option 2	We agree EIOPA should issue guidelines for the preparatory phase.	
Question 2	What should be the scope of the information submitted in the preparatory phase?	

	The scope should be limited to some annual templates on the condition there is an agreement on Omnibus II and the Level II Implementing Measures are published by the end of this year. Quarterly templates and narrative reporting should be excluded.	
Question 2 – Option 1		
Question 2 – Option 2		
Question 2 – Option 3		
Question 2 – Option 4		
Question 3	What should be the information frequency during the preparatory phase?	
Question 3 – Option 1		
Question 3 – Option 2		
Question 3 – Option 3	We would favour Option 3.	
Question 4	Should application thresholds be used in the preparatory phase?	
Question 4 – Option 1		
Question 4 – Option 2	We would favour this option. We oppose any proposal based on minimum thresholds.	
Question 4 – Option 3		
Question 4 – Option 4		
Question 4 – Option 5		
Question 5		
Question 5 – Option 1		

Question 5 - Option 2		
Question 6		
Question 6 - Option 1		
Question 6 - Option 2		
Question 6 - Option 3		
Question 6 - Option 4		
Question 7	What should be the approach on items requiring approval i.e. ancillary own funds, undertaking specific parameters and diversification between ring-fenced funds?	
Question 7 - Option 1	We would favour this option.	
Question 7 - Option 2		
Question 7 - Option 3		
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Appendix 1		
Appendix 2		
Appendix 3		