	Comments Template on **Draft proposal for Quantitative Reporting Templates**	**Deadline** **20 January 2012** **12:00 CET**
Name of Company:	German Insurance Association (GDV)	
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
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  - 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 integral consistency purposes
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formats.

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	GDV would like to thank EIOPA for the opportunity to consult on this draft consultation paper for quantitative reporting templates. The GDV appreciates the need to develop a common approach to reporting across the EU and we agree that standardised templates are a preferable solution. However, the starting point of European countries with respect to the new reporting system differs based on the current accounting system in place, so that the adoption to the new reporting requirements will cause different burden amoung the European insurance industry. Such differences should be considerd by defining an **appropriate transitional process from the old into the new reporting system**. Generally, all industry participants have expressed serious concerns with regard to the scope of the information and the level of detail in the templates, also with respect to the intented supervisory purpose. For a large number of undertakings, reporting at this level of detail will be a first time requirement. Thus, it should only be asked for information which will actually be used for supervisory purposes. Furthermore, there is still a **high umbiguity how to fill in certain template cells**. For many reporting requirements the respective LOG-files do not include sufficient explanations. The instructions are still unclear and incomplete, much is left to interpretation and own assumptions. Mixed with the issue of frequency and lack of clarity when the finanlised templates will be available, the industry is facing severe challenges in terms of preparation and complying with the new reporting requirements. Since, the quality of the current proposal of quantitative reporting templates is not sufficient to adequately adjust the reporting systems of the undertakings, **we ask**	

	EIOPA to clarify the open questions as soon as possible. The respective LOG-files need to be adjusted accordingly. It would also be helpfiul to include – where appropriate - a reference to the level 1 or 2 text. Furthermore, we suggest to establish a **dialog between EIOPA and the industry** to clarify open questions and deal with industry concerns. Only in this case the industry will be able to successfully enter the new reporting system. Further, we urge EIOPA not to introduce additional or deviating reporting requirements as it done by the **QRT consulation for financial stability purposes**. Here, some information (which are based on a subset of Solvency II-reporting requirements) which have to be reported additionaly on a quarterly basis are not in line with this proposal on quantitative reporting templates (e.g. Template SCR B2C cells B7, B7A, B14). Furthermore, we disagree with the new development of shorter deadlines for group reporting through the additional reporting requirements for financial stability purposes. We have welcomed the fact that EIOPA has excempted groups from quarterly reporting of technical provision (F1, F2, E1, E2) but due to the new reporting requirements groups are again required to report about technical provisons and moreover in less time than before. Additionally, we would like to highlight the following **major concerns** of the German insurance industry, where clarification is urgently needed: **Application of materiality and proportionality principle** The principles of proportionality and materiality were not adequately considered in the general reporting requirements as well as in the amount of information to be reported. Clear proposals to apply both principles are missing. For example, there are no clear proposals how to identify and deal with non material risks or under which circumstances undertakings might be able to reduce the amount and frequency of information to be reported. To allow for a harmonsied application of the materiality principle in the EU, EIOPA could define respective guidelines (including general thresholds) as done by the	

	European audit organisation (FEE). This would facilitate the implementation of both principles in the reporting process of individual undertakings. <u>For example:</u> As we understand materiality not all information of the individual template should be reported in the requested granularity, if those information only have a minor explanatory quality with respect to the overall information value of the template. For example 100-x% of the information must be exact and the remaining x% may be provided using one or both of the following approaches: 1. Simplification rules 2. Less granular reporting for non material information through summaries With respect to proportionality, we suggest that companies with a stable risk profile should be allowed to provide certain information only in case of significant changes in their risk profile, i.e. they should also be excempted from quarterly reporting. It might be helpful if EIOPA would provide an index how to define a stable risk profile. **Regular versus ad hoc reporting** Reporting requirements under Solvency II are more onerous than under Solvency I. Moreover, Solvency II reporting will be an additional area of accounting (besides IFRS, local GAAP, Taxation) which requires the implementation of new reporting processes. The implementation of a new area of accounting-like reporting system as well as its maintenance are costly. Thus, it must be ensured that the overall costs do not outweigh the benefits of reporting. Information requirements without an actual supervisory purpose should not be asked for. Especially quarterly reporting will add a tremendous burden for the industry without an additional benefit for the undertaking itself. . For example, it is expected that SMEs will need to hire on average 3-4 new staff members to fulfill their reporting requirements. The additional benefit for the company is questionable. Frankly an increase in insurance premiums can be expected.	

	We suggest reducing reguar reporting requirements in favour of ad hoc reporting. **Less reporting requirements with a supplementary ad hoc reporting** or inspections seem more appropriate than extensive regular reporting requirements. The supervisor requests many details in order to understand or reproduce the insurers' calculations. This seems reasonable because there are many company specific parameters. However, complete information is not possible. Despite the granularity of data there are still missing information which influence the solvency ratio. Our proposal is to condense the information to be delivered and not to aim to build up a (not efficient) data store covering all the information that could be relevant in the future. It might be sufficient just to define a set of parameters as used for the standard model. **Consistency between Pillar I and Pillar III requirements** The granularity of data is in parts higher for reporting than for SCR calculation in Pillar I, e.g. for technical provisions life and cat risk module. It is questioned why the granularity should be higher for reporting than for SCR calculation. This leads to inaccurate allocation procedures. It should be ensured that permitted solutions and calculations methods for Pillar I can be also applied for reporting in Pillar III. The structure of the QIS-spreadsheet should be the same as in the reporting templates. Otherwise certain templates can not be filled with data because of the missing granularity. The materiality principle for the same situation should be applicable through all pillars of Solvency II. If the fact/information is not used for pillar 1 requirements it should not be relevant for reporting either. As a consequence, we recommend eliminating all inconsistencies between pillars 1 and 3. **Comparison of Solvency II balance sheet and local GAAP or IFRS financial statement should not be required**	

Reconciliation between Solvency II values and the local statutory accounting basis («HGB») or IFRS is too complex. Mapping SII balance sheet items to statutory accounts without further information may not be very informative. The valuation methods are very different, so that a direct reconciliation will be very burdensome. Especially for undertakings, which are planning a bottom up approach for generating the SII Balance sheet the reconciliation doesn't exist automatically. Information on reconciliation could or should only be reported in a general, qualitative way.

Moreover, the comparison of balance sheet items according to S II and to statutory accounts valuation basis is not demanded by the Level 1-Text.

Reporing requirements which cause major problems and concerns:

Quarterly reporting and the 4th quarter

Quaterly reporting is on of the greatest concerns of the industry. It will involve a considerable increase in costs given the high costs of implementing this reporting cycle while the benefit for the insurer is limited. Sub-annual figures (e.g. technical provisions and reinsurance data) can often only be provided (if at all) with significant additional costs. Moreover, for many templates we don't expect significant changes during the year. For example, many one-year composite contracts have a "long-tail" settlement character (e.g. professional liability insurance), but the risk exposure in such contracts does not change from quarter to quarter. Additionally, most of the companies – especially SMEs – do not manage their company on a quarterly cycle.

National regulatory authorities should be given the flexibility of excempting companies with a stable risk profile from quarterly reporting in accordance with the principle of proportionality. Otherwise, there is a certain risk that insurance prices will increase due to additional reporting costs, without a comparable benefit for policyholders.

Addionally, we **speak out against the 4th quarterly report**. Reporting the Q4 template will be very burdensome as it duplicates a process which must be done at a later point again. It is questioned why the supervisory authority request parts of the information already 9 weeks before the annual report will be submitted. What will be

	the benefit of this early information keeping in mind the addional costs this will cause to the industry. Such a requirement does not even exist within the IFRS framework nor in the national statutory accounting world. Further, this requirement might lead to the following problems: 1. Reporting the Q4 template may lead to additional pressure from the capital market (e.g., analysts) to disclose those quarterly templates. 2. Data quality between 4th quarter and annual report might differ due to application of simplification rules and estmates for quarterly reporting. Moreover, new information or changing market conditions between the two reporting dates will cause inconsistency of information. This has to be explained by the industry and causes addional burden. It is also questioned how those differences will be analysed or interpreted by the supervisor. We propose to delete the requirement of Q4-reporting. **Variation analysis** Undertakings have major problems fulfilling the requirements of variation analysis.The implementation effort of VA-template will be very high, especially for template C2C. For example, the presentation by lines of business in C2C is too granular and the allocation of overall effects to lines of business is not always free from discretion. The template C2C should be consistent to the other templates, i.e. this template should be shown only on entity level. Further, the detailed reporting requirement of cash flows for risk accepted during and prior to the reporting period seems very problematic. The split of risk prior to and accepted during the reporting period cause further trouble to undertakings since it indirectly requires undertakings to perform calculations on an underwriting year basis. Thus, we suggest a more principles based approach which would be more valuable for the undertaking instead of formalising it. Further, it should be thought of to apply the principle of proportionality, i.e. undertakings with a stable risk profil might be excempted from regular annual reporting.	

	Since the variation analysis needs to be revised bevor this requirement becomes legally binding we suggest to EIOPA to start a dialog with the industry developing an adaquate solution for both the industry and supervisors. For detailed comments please see our comments below. **Public disclosure** We welcome EIOPAs approach that public disclosure should be done at a less granular level than supervisory reporting. However, for some public disclosure requirements we still ask EIOPA to reduce the level of detail, for example disclosure requirements concerning own funds item and risk concentration information.	
3.1		
3.2	We query some of the definitions in the LOG documents and have commented on these points alongside the cell to which they relate.	
3.3	1) Applicability at group level should not de facto apply at the level of sub-groups. Article 215-217 of the Framework Directive deals with the issue of reporting at different levels of the group. The GDV understands that sub-group reporting should only be applied in exceptional cases. Sub group supervision at the national level will in particular be burdensome for undertakings and result in duplicate reporting. Overall, the GDV believes that group reports should be submitted only once to the group supervisor by the ultimate parent. 2) The motivation behind introducing mixed financial holding company to Solvency II (via review of the financial conglomerates directive) was to increase supervisory oversight from the very top level of the organisation's structure. By dealing with sub-group supervision and mixed financial holding companies in the same guideline, EIOPA risks introducing a reverse effect. The Framework Directive deals clearly with sub-group supervision therefore there is no need for EIOPA to refer beyond "the ultimate parent undertaking as determined by the group supervisor".	

3.4	We support that QRTs subject to public disclosure are less detailed than the annual templates themselves however the term "annual template" could be misleading. We propose instead the following wording, "Undertakings and groups should publicly disclose annually in their Solvency and Financial Condition Report the templates as set out in the Technical Annex". Transparency is important for the market and information should be presented in a way so it is easily understood and not misinterpreted. EIOPA propose that template BS-C1 is disclosed which would mean that statutory accounting figures are published alongside Solvency II valuations. When National GAAP is used as the basis for accounting valuations, the two sets of figures will not directly correspond and therefore cannot be compared from one undertaking to another and on a cross border basis. We believe it would be more meaningful to disclose only the Solvency II valuation column accompanied by a narrative explanation of any differences that may have arisen. Commercially sensitive information such as performance related data or data used for internal management purposes should not be subject to public disclosure requirements. This is in line with Article 53 of the Framework Directive.	
3.5		
3.6	EIOPA should monitor the uptake and reasoning for the use of national specific templates and make public these details on their website. In general, the harmonised reporting package established by EIOPA should replace all templates at national level. We disagree with such extensive requirements per country. There will be no level playing field within the EU.	
4.1	The GDV supports that group templates are an aggregated illustration of the group based on solo data. The scope of the group should be based on the scope of group supervision; EIOPA should clarify this in their text.	

	Clarification would be helpful on whether to include subsidiaries in non-EEA countries and non-insurance units or just undertakings that fall under the scope of group supervision. We presume it is the latter.	
4.2	The principle of proportionality should be applied to reporting and in particular quarterly reporting. It may be the case that there is no material change for parts of an undertaking's business over the course of one year therefore quarterly reporting should not be a systematic requirement for all. We disagree with a mandatory fourth quarter reporting. It should be sufficient to prepare the annual report a short period later.	
4.3	The GDV supports EIOPA's clarification on this matter however we would request that this wording is inserted in the guideline itself to provide additional certainty. We query whether some form of agreement would be necessary between the undertaking and the authorising supervisor.	
4.4	Please refer to section 3.3 for comments on sub-group supervision.	
4.5	Clarification would be helpful that IGT templates are not required at the insurance parent level. It should not be required to repeatedly submit the same templates at multiple levels of the group.	
4.6	Ad hoc reporting of IGT should be limited to 'significant IGTs', EIOPA's text should clarify this. As a general comment, the definition of significant IGTs should be limited to exceptional movements of capital (other than dividends and transactions that fall within the general definition) and other significant transactions (for example above a threshold set relative to SCR group). In practice, for the group under IFRS, only the transactions giving rise to agreement by the Board and which are subject to a review by the auditors should be considered as significant.	
4.7	The issue, "harmonisation of format", is outstanding. EIOPA are due to consult	

	separately on the exact technical format to be used for reporting templates and it may be the case that industry do not have sufficient time to fully implement a new system before entry into force of Solvency II. If XBRL is chosen as the new technical format for reporting templates, industry may require up to 2 years to implement and test the necessary systems. **EIOPA should communicate their decision on the format of reporting templates as soon as possible to allow sufficient time for industry preparation**. For this reason, EIOPA should not expect a fully harmonised format as of 'day-1-reporting'.	
4.8		
4.9	Please refer to sections 3.6 and 4.7 for our comments on national specific information and harmonised format of templates.	
4.10	Please refer to sections 3.6 for our comments on national specific information. We disagree with such extensive requirements per country. There will be no level playing field within the EU.	
4.11	Please refer to sections 3.6 for our comments on national specific information.	
Technical Annex (only for inconsistencies)	Template TP L - F3B: Application to groups: yes for those entities that underwrite Variable Annuities products. Technical Annex : applicable only for solo undertakings	
BS-C1 – General	A full accounting reconciliation between the Solvency II valuation and statutory accounts valuation columns will be incredibly difficult to achieve, particularly when the statutory accounts valuation is based on national GAAP. Differences between the two columns should be explained to supervisors in a narrative statement rather than requiring a full quantitative reconciliation. The GDV queries whether undertakings will have the choice of substituting national GAAP figures with internal IFRS valuations. For group figures in particular, Solvency II	

vs. national GAAP differences will be problematic, particularly for the following items:

- Deferred tax assets/liabilities;
- Intangible assets;
- Pension benefit surplus;
- Property, plant and equipment for own use;
- Participations;
- Equities;
- Derivatives;
- Loans and mortgages.

Some groups use the D&A method for consolidation when dealing with assets and liabilities coming from OFS, this means that a single line item is created under assets and liabilities. Guidance from EIOPA would be helpful in terms of how solo templates should be completed from a group perspective.

Investment data should be consistent with the CIC codes outlined in the Assets' template. Clarification would be helpful on EIOPA's comment relating to granularity, in terms of applying a simplified balance sheet.

The GDV believes that contingent liabilities should **not** appear on the Solvency II Balance Sheet. For accounting purposes, many contingent liabilities are treated as off balance sheet items, please refer to cell L23 for additional comments.

Reporting on technical provisions should consist of a simple aggregation exercise of more detailed underlying reporting templates. It should be noted that a full calculation of technical provisions will be calculated once per year corresponding to the respective accounting year. Any requirements for more frequent presentation of this data should allow for the use of approximations.

We support that EIOPA has aligned the LOG definitions for the Solvency II value and Statutory Accounts value of technical provisions, this provides clarification that both are to be reported gross of reinsurance, for comparison purposes it would be misleading to display gross technical provisions in the Solvency II column and

	technical provisions net of reinsurance in the statutory account column. The GDV understands that the dotted lines in this template allows for aggregation of statutory accounting information. However we note that EIOPA's proposal has aggregations both above and below the dotted lines an we query what the expected result is in such cases. Regarding the application of this template to RFF, we question EIOPA's intention. It is not a requirement of the framework directive and as such, there is no balance sheet, SCR or own funds calculation for RFF. **Further clarification required** In template BS-C1 the carrying amounts according to Solvency II are compared with the corresponding IFRS and local GAAP values. Does a reclassification of those local GAAP and IFRS values take place according to the classification of the Solvency II balance sheet items? Is it possible that there is a classification different from the provisions under Solvency II? In QRT BS-C1 it is required to state local GAAP and IFRS values for insurance groups. What kind of scope of consolidation should be used? The corresponding scope under IFRS or Solvency II?	
BS-C1 – Purpose	A quantitative reconciliation against statutory accounting valuations will be incredibly difficult. This will be further complicated for undertakings that submit financial reports according to national GAAP, we anticipate that smaller undertakings may especially be affected by this. We propose instead to provide a narrative explanation of any differences that arise between the Solvency II value and statutory accounts valuation columns. Clarification needed if the purpose with this reconciliation is to show only valuation differences.	
BS-C1 – Benefits	The benefits to the public in understanding the solvency position of an undertaking can be gained from the Solvency II value column. A quantitative reconciliation with	

	statutory accounting may not be easily understood and would therefore be better presented in the form of a narrative explanation.	
BS-C1 – Costs	We imagine that significant costs will be required to set up the necessary systems and procedures to support all Solvency II reporting. This in particular relates to IT costs as incredibly sophisticated systems will be required collect data from its original source, store and match it to the various reporting templates. Reporting requirements must be determined well in advance of the entry into force date. Please refer to section 4.7 for GDV comments on the time required for implementation. For the Solvency II balance sheet, additional costs might be incurred to report the balance sheet in a fast close timeframe.	
BS-C1 – Groups	It may be the case that the scope of entities under consolidated accounts is larger than that of the scope of entities under Solvency II group supervision. A direct comparison between Solvency II value and statutory accounts valuation columns will therefore not be possible. For public disclosure, it would mean that the Solvency II balance sheet is misleading and for this reason, we propose not to disclose the statutory accounts valuation column and provide a narrative explanation of the differences arising between the two columns.	
BS-C1 – Materiality	We support EIOPA's efforts to introduce materiality thresholds however at present, it is unclear how the exemption for quartery reporting of this template would apply: a. The term "significant part" is not specific and while we appreciate it allows for flexibility, it could be difficult to define. b. The term "explained sufficiently" also infers that a judgement is made by supervisors when assessing if the Revaluation Reserve in Own Funds is adequately explained by differences in the valuation of investments and technical provisions. This lack of certainty is concerning. c. It is not clear, but we assume that the deferred tax element of any Revaluation Reserve is irrelevant in arriving at the decision on whether to submit BS-C1 quarterly. Please refer to BS-C1 – Frequency, where this point is explained further by example.	

	EIOPA's description of situations when the reconciliation reserve cannot be fully explained should appear in the Guidelines paper, as should all explanations regarding proportionality/materiality.	
BS-C1 - Disclosure	As previously mentioned differences in scope and national accounting methodologies and will have a large impact on this template and EIOPA's requirement to perform a quantitative reconciliation. Only the Solvency II value column should be publically disclosed along with a narrative statement explaining differences that have arisen between the two. This would continue to fulfil EIOPA's envisaged benefits in terms of market transparency.	
BS-C1 – Frequency	We generally welcome EIOPA's proposal to only report on a quarterly basis if the change on the reconciliation reserve cannot be explained by changes in assets and liabilities. Reporting of the balance sheet is very much reliant on data from other templates which are not calculated/reported to the same frequency therefore to require quarterly reporting on a systematic basis will be problematic. However, we think that the quarterly information about technical provision, own funds and assets should be sufficient for supervisory purposes. This information should explain the largest elements of the reconciliation reserve. We therefore ask EIOPA to waive the requirement of quarterly reporting of the full balance sheet completely. The quarterly balance sheet will be very burdensome for the industry for limited regulatory benefit. In case the requirement remains, a simplified threshold should be defined, for example: The threshold for quarterly reporting could be defined by comparing the changes in assets and liabilities with the change in total available own funds. If the delta of market value of assets + the delta of technical provision between two reporting periods would be higher than x% (e.g. 90%) of the change in total available own funds a quarterly report should be submitted to the supervisor. Otherwise no quarterly	

	report should be necessary. In other words if the change in market value of assets and liabilities can explain x% (e.g. 90%) of the change in total available own funds no quarterly reporting should occur.	
BS-C1 – cell AS1		
BS-C1- cell AS24		
BS-C1- cell A2	This comment applies to A2 and AS2. It would be helpful to have examples of intangible assets under national GAAP, in some countries intangible assets consist mainly of internally developed software and acquired portfolios, clarification of interpretations would be helpful in this respect.	
BS-C1- cell AS2		
BS-C1- cell A26		
BS-C1- cell AS26		
BS-C1- cell A25B		
BS-C1- cell AS25B		
BS-C1- cell A3	This comment applies to A3 and AS3. The reporting templates should reflect results of other discussions on Solvency II. For example, “properties for own use” are not considered as an investment in the Solvency II balance sheet yet they are regarded as an investment in the SCR calculation SCR.5.44). Consistency should be ensured. In some countries, the national GAAP balance sheet does not differentiate between property which is held for own use or is held other than own use. In some cases, undertakings indicated difficulties in performing fair value valuations due to the need for constantly update third-party estimates. In relation to this, the frequency of revaluation for such items should be clarified. ***Further clarification required:*** • Is the definition for own use property and investment property the same under	

	SII and IFRS? For example if a building is used for own use and by third parties. How does the apportioning work in Solvency II?	
BS-C1- cell AS3		
BS-C1- cell A5	This comment applies to A5 and AS5. The reporting templates should reflect results of other discussions on Solvency II. For example, "properties for own use" are not considered as an investment in the Solvency II balance sheet yet they are regarded as an investment in the SCR calculation SCR.5.44). Consistency should be ensured. In some countries, the national GAAP balance sheet does not differentiate between property which is held for own use or is held other than own use. We query if this cell would include buildings held for resale ?	
BS-C1- cell AS5		
BS-C1- cell A6	This comment applies to both A6 and AS6. We assume that "participations" covers participating interests in both related and associated undertakings i.e. both ownership and loans. Further guidance should be given on how an "organised and officially recognised market" should be interpreted for participations. Supervisory guidance would be helpful on whether the Solvency II valuation should also be used in Assets – D1.	
BS-C1- cell AS6		
BS-C1- cell A7	***Further clarification required:*** • Should the definition in the LOG read "when cell A16 of Assets D1 is ~~not~~ "N"?	
BS-C1- cell AS7		

BS-C1- cell A7A	No split should be made between listed and unlisted. This comment applies to A7A and AS7A.	
BS-C1- cell AS7A		
BS-C1- cell A8	This comment applies to cells A8 – AS8 In the LOGs issued in the informal consultation carried out in summer 2010, the definition of Government bonds was as follows: *Government bonds as defined in the CEIOPS L2 advice on structure and design of market risk module (ex-CP 47) for spread risk sub-module : bonds issued "by or demonstrably guaranteed by national government of an OECD or EEA state, issued in the currency of the government, or issued by a multilateral development bank as listed in Annex VI, Part 1, Number 4 of the Capital Requirements Directive (2006/48/EC) or issued by an international organisation listed in Annex VI, Part 1, Number 5 of the Capital Requirements Directive (2006/48/EC)."* The definition used in this consultation is different from the one above as it does not seem to include … *"bonds demonstrably guaranteed by national government…"* We propose that the definition of government bonds to be included in the balance sheet should be clarified. ***Further clarification required:*** • The condition that these borrowings need to be issued in the currency of the government needs clarification. • No split should be made between listed and unlisted – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell AS8		
BS-C1- cell A8A	This comment applies to A8A – AS8C.	

	Only in this case the industry will be able to successfully enter the new reporting system In some cases, structured notes do not appear separately on national GAAP balance sheets. As it currently stands, the CIC does not seem to adequately distinguish between different types of risk categories, primarily with bonds. Financials and Corporates as well as Covered Bonds are all put into one asset group (Bonds- Corporate bonds); subordinated bonds are not addressed as a single category.	
BS-C1- cell AS8A		
BS-C1- cell A8C		
BS-C1- cell AS8C		
BS-C1- cell A8D		
BS-C1- cell AS8D		
BS-C1- cell AS9	It is unclear how to deal with currency effects in this section, for example a fund is booked in EUR but the underlying instruments are in a number of different currencies. It is not clear in accounting how this would be broken down as far as underlying instruments. ***Further clarification required:*** • Further guidance is required on how to classify investments in collective investment vehicles and other investments packaged as funds. For example, it is not clear whether a 100% bond fund should be classified as 'Investment funds' or 'bonds' for reporting purposes. • Clarification would be helpful on the treatment of consolidated special funds, mutual funds, funds of funds. • We query if remaining private equity commitments should be reported under this section and if so, where the corresponding liability would appear. It could be that this is reported under contingent liabilities?	

BS-C1- cell AS9A	Applies to A9A-A9F Do investment funds in which the undertaking holds more than 20% (including special funds) constitute a "participation", because they meet the definiton of undertakings or do they have to be recognized as seperate assets (Sondervermögen) in the balance sheet independent from the percentage interest held by the undertaking? If the latter applies the consequence is that all investment funds listed as "investment funds" (and not as "participations") in QRT BS-C1 and Assets-D1 shouldl be recognized. Moreover, for all funds in which the undertaking holds more than 20% of interest the look-through-approach should be provided. Remark: It is our view, that investment funds (including special funds) as seperate assets (Sondervermögen) do not meet the definition of undertakings, i.e. those funds should always be disclosed as "investment funds" and a look-through should be carried out in QRT Assets-D4. What is the procedure for funds where the insurance undertaking cannot look through (e.g. mutual funds) Again at this point, the idea expressed in template D4 should be pointed out for, that a standard procedure agreed by all associations and in analogy with the annex "funds" is considered appropriate in order to ensure a consistent filling. This question is also relevant and important for the new template D1Q, which contains a classification of funds based on the one given in template BS-C1. To that extent, specific questions on that issue for the template D1Q are not necessary	
BS-C1- cell AS9B		
BS-C1- cell AS9C		
BS-C1- cell AS9D		
BS-C1- cell AS9E		
BS-C1- cell AS9F	Clarification would be helpful on whether ‘mixed funds’ would be reported here.	
BS-C1- cell A10A	This comment applies to A10A-AS10B. In application of IFRS, only the net profit or loss position is provided on the assets side	

	for derivatives. It should be clarified that this is also the case here. In some cases, national GAAP does not value derivatives at fair value and the data requested will therefore be hard to retrieve. Long term bank deposits and short term bank deposits are not differentiated on national GAAP balance sheets. Guidance provided in the LOG refers to 'bank deposits with a term of more than one year'. Clarification would be welcome on whether this refers to the original or remaining term of the deposit. Also, on whether the maturity of deposits is determined by the original term, or from the days to maturity as at the reporting date. ***Further clarification required:*** • We understand that deposits up to one year have to be shown under the position cash equivalents. • The definition of this term (Deposits Other Than Cash Equivalents) in association with cell A27 (Cash and Cash Equivalents) is confusing. The description explicitly states "Deposits other than transferable deposits, with remaining maturity superior to 1 year" but includes CIC category 73 (short term deposits with residual maturity of less than 1 year) – where should CIC category 73 deposits be disclosed? • The description also includes CIC category 72 (Transferable deposits) although the description for A27 (Cash and Cash Equivalents) implies that investments within CIC 72 should be disclosed there instead. • Furthermore, where residual maturity of term deposits fall within the undertaking's accounts payable cycle should those investments be re-categorised to 71 or 72 and be disclosed within Cash & Cash Equivalents?	
BS-C1- cell AS10A		
BS-C1- cell A10B		
BS-C1- cell AS10B		
BS-C1- cell A14	This comment applies to A14 – AS14. It was questioned whether it was relevant to mix different items such as mortgage	

	loans and reverse repos, their maturity is normally very different (long term vs. short term). As a general comment, we consider loans on policies to be immaterial.	
BS-C1- cell AS14	We query why this item appears on both the assets and liabilities side of the balance sheet. For assets, it is entered in the accounting valuation column as "loans and mortgages (except loans on policies". On the liability side, it is entered in the accounting valuation column as "other technical provisions". We presume that on the liabilities side, the entry should have the code LS14 however there is no corresponding row to provide feedback or definition in the LOG document. Other technical provisions will cover the equalisation provision and reserve and as such, should only be reported on the liability side of the balance sheet.	
BS-C1- cell A11		
BS-C1- cell AS11		
BS-C1- cell A12	This comment applies to A12 – AS12. Confirmation is required that is it no longer required to separately split out assets held to cover linked assets. This is not required by IFRS.	
BS-C1- cell AS12		
BS-C1- cell A14A	In some cases, this item is not reported separately in the IAS/IFRS balance sheet, but instead is incorporated with "other loans". We query whether this would include other collateral such as cash pooling.	
BS-C1- cell AS14A		
BS-C1- cell A17	A17-A19A: Reinsurance recoverable should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell AS17		
BS-C1- cell A18		

BS-C1- cell AS18		
BS-C1- cell A18A	long-term care pension insurance: health or live???	
BS-C1- cell AS18A	long-term care pension insurance: health or live???	
BS-C1- cell A19		
BS-C1- cell AS19		
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	This comment applies to A20 – AS20. The definition in the LOG for "reinsurance receivables" is as follows, "amounts due by reinsurers and linked to reinsurance business, but that are not reinsurance recoverable. Since reinsurance recoverables are not defined in this context, supervisory guidance and examples would be of help. Should cell A20 (Reinsurance receivables) really be included in the sum showed in this field? It is not in line with reinsurance report J3 cell N1 (Total reinsurance recoverables).	
BS-C1- cell AS20		
BS-C1- cell A23	This comment applies to A23 – AS23; A29 – AS29. ***Further clarification required:*** • Where should intra-group insurance receivables be reported: A23 or A29? • It is also whether prepayments are to be included here also. There is a typo in the LOG, this cell is referred to as A25 – AS25, whereas the	

	corresponding cell in the template is numbered A23 – AS23.	
BS-C1- cell AS23		
BS-C1- cell A27	This comment applies to A27 – AS27. We propose to merge "cash" and "debts owed to credit institutions" (Cells A27 and L19) in order to report only the net exposure.	
BS-C1- cell AS27		
BS-C1- cell A29	Please refer to BS-C1- cell A23. We assume this category would include prepayments and accrued income. More guidance in the LOG would be helpful to determine what would be included here. **The meaning of 'regularisation accounts' is unclear.**	
BS-C1- cell AS29		
BS-C1- cell LS1	Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
BS-C1- cell L1A	This comment applies to L1A – L12. This should consist of a simple aggregation exercise of more detailed underlying reporting templates. Further comments on the segmentation into life, non-life and health, which will be performed at a more granular level, can be found in the templates on Technical Provisions. It should be noted that a full calculation of technical provisions will be calculated once per year corresponding to the respective accounting year. Any requirements for more frequent presentation of this data should allow for the use of approximations. For comparison purposes, it would be misleading to display gross technical provisions in the Solvency II column and technical provisions net of reinsurance in the statutory account column. Also displaying gross technical provisions in the statutory accounts	

	column would interfere with the financial statements: the sum accounting items would be not identical with the balance sheet sum reported for accounting purposes. This links to the general comment made that any publication of the Solvency II balance sheet should be without the column of statutory accounting figures. In addition, differences between the two columns for supervisory purposes should be presented as a narrative explanation as opposed to a full accounting reconciliation. Information on the BE and risk margin should be only reported to the Supervisor. Technical Provisions should not be divided between life, non-life and health – too many details will decrease the overview of the Balance sheet.	
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		
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	Many contingent liabilities are treated for accounting purposes as off-balance sheet because it is not clear that they actually are liabilities at a balance sheet date. These should only be valued as liabilities in the context of the sale of a business as a whole. Other contingent liabilities may have very low probabilities of a future outflow of funds and so would be likely to be immaterial, and many (particularly, as the IASB has acknowledged in its project to revise IAS 37, those with binary outcomes) would be difficult to value with the required degree of robustness – particularly as a risk adjustment is also to be made, for which no guidance is given. Lastly, this requirement may generally be too onerous to satisfy a cost-benefit test for Solvency II purposes. **Therefore we believe that contingent liabilities should not be recognised in the Solvency II-balance sheet. But they should nevertheless be reported on a consistent basis.**	
BS-C1- cell L18	What is to be understood by "Deferred Income Reserve"?	
BS-C1- cell LS18		
BS-C1- cell L22	This comment applies to L22 – LS22. Approximations should be allowed in order to calculate the Solvency II value for pension benefit obligations. A respective guideline should be included in the general reporting requirements.	
BS-C1- cell LS22		
BS-C1- cell L13	***This comment applies to L13 – LS13.*** ***Further clarification required:***	

	• Should this include all deposits with reinsurers i.e. not just cash? • Cash deposits from reinsurers: The amount of this balance item value might be of minor relevance for some undertakings.	
BS-C1- cell LS13		
BS-C1- cell L17		
BS-C1- cell LS17		
BS-C1- cell L16	This comment applies to L16 – LS16. ***Further clarification required:*** • We query whether structured notes should be categorised as derivatives, since there is no specific row for structured notes on the liability side?	
BS-C1- cell LS16		
BS-C1- cell L19	This comment applies to L19 – LS19. We don't understand why, on a frequent basis, it is important to split amounts due from credit institutions separately from non-credit institutions, or banks deposits due in less than one year separately from those that are greater than one year. This is not part of IFRS accounts and it is unclear what benefit this information would provide.	
BS-C1- cell LS19		
BS-C1- cell L20		
BS-C1- cell LS20		
BS-C1- cell L15A		
BS-C1- cell LS15A		
BS-C1- cell L15B		
BS-C1- cell LS15B		
BS-C1- cell L15C		
BS-C1- cell LS15C		

BS-C1- cell L15D	This comment applies to L15D – LS15D. Regarding the Template BS-C1 cell L15D and the related LOG description, the following problem will result from this approach: In cases when the undertaking issues subordinated debt (which will be considered as equity), reporting only "subordinated liabilities not in BOF", would result in the amount of the issue being significantly reduced by a deferred tax liability amount. The difference between the Solvency II balance sheet and the tax balance sheet must be considered in the calculation of the deferred taxes in general. This is the result of not being included in the line item subordinated liabilities primarily and therefore the check of the equity requirements have to be fulfilled in the moment of building up the balance sheet. This mechanism could be avoided if the subordinated liabilities will be shown in the line item subordinated liabilities in the first step. In a further step (after calculation of deferred taxes) this securities would be adjusted to the equity position. Calculating deferred taxes on subordinated liabilities which are treated as equity must be avoided and have to be clarified in the LOG.	
BS-C1- cell LS15D		
BS-C1- cell L25	In the absence of any further guidance it is assumed that this category will include all other liabilities not picked up elsewhere e.g. creditors arising out of direct insurance operations, preference shares, accruals and deferred income. Guidance needs to be made more explicit as to what can be included here. More definitions on the different items would be helpful to allow more accurate matching of the different balance sheet items.	
BS-C1- cell LS25		
BS-C1- cell L26	As per the definition, "subordinated liabilities in BOF", this item is part of BOF and as such should not be viewed as a standalone item. Any comparisons can be performed against template OF-B1 and we do not see the benefit of including it as part of the	

	balance sheet.	
BS-C1B – General	**This template contains information that is quite difficult to obtain in an automated way; off-balance sheet items in general remain unclear.** Since financial guarantees as well as collateral pledged is of minor relevance to many undertakings, this would mean substantial effort for circumstantial information. “Guarantees received” is taken into account when assets are valued therefore we do not fully understand the rational for including this information in BS-C1B. Also, we see no need to split collateral pledged and collateral held, dependent on whether it originated from loans made/received and derivative contracts. In some countries, collateral held or pledged are often made under <u>one</u> agreement which encompasses all types of transactions (loans, derivatives) transacted with a counterparty which render a specification meaningless/impossible to make. More detailed descriptions or explanations of the input data is required to avoid confusion and incorrect entries, for example we query whether it is necessary to report information on collateral used to back real estate loans in this template. **Also, the LOG explanation of “Maximum value of guarantee received” and “Value of guaranteed liabilities” would benefit from more detail.** **Further clarification required** • Have there already been considerations how to address the issue of German Pharmapools or the German Nuclear Insurance pools? Should they be considered as contingent liabilities which need to be disclosed as "unlimited guarantees" without having any valuation carried out? The valuation and calculation of a "maximum value" for the Pharmapool and the Nuclear Insurance pool poses a certain challenge. In our view, these contingent liabilities should be considered as "unlimited". Thus, they should be disclosed	

	without carrying out a valuation.If this not the case, a harmonized procedure of the undertaking should be aimed at. Else the information disclosed by the undertakings are of limited value for the BaFin. Have there been any discussions or provisions concerning valuation? • Are there any additional comments what kind of information to disclose under the items listed in QRT BS-C1B? • The English term "guarantee" provides a broad definiton. Thus, the distinction of the reporting requirement remains unclear. Are there any examples or is there an exhaustive list that helps to understand what needs to be disclosed under the item "guarantees received"? • It is unclear what is meant by the term "guarantees". - Does the term include letters of intent (Patronatserklärungen)? - Does the term include rent deposits? - How to treat guarantees for property projects currently under construction? - How to treat rent guarantees or letters of intent (if included), in particular in view of contracts nearing expiration? • Many contingent liabilities cannot be quantified. Are there any considerations or discussions how to quantify contingent liabilities for related undertakings at a reasonable cost in order to fulfill the Solvency II requirements? • It is unclear, how to differentiate between on-balance sheet and off-balance sheet contigent liabilities. Are there any specific considerations in this regard? For example, are there any ideas how to interpret the reference to the principle of materiality when considering contingent liabilities? • We have the view that in QRT BS-C1B only those issues have to be disclosed which are not disclosed somewhere else in the balance sheet. In particular, only off-balance sheet collaterals should be disclosed The only exceptions constitute A19 and B19 (contigent liabilities in SII BS). This would mean that on-balance sheet deposit claims would not have be disclosed. Does the BaFin share this	

	view? • Where to disclose mortgages for mortgage loans? • Securities account agreement (Securities account is on the balance sheet of the reinsurer, but right of disposal on the part of the primary insurer). Should this item be disclosed under the item "Assets pledged to cedants for technical provisions"? • We assume that a complete stochastic process is not necessary to value "guarantees". Instead, simplified valuation methods may be used. Are there any specific considerations or provisions how to proceed when valuing "guarantees"? • In the LOG-file attached to the QRT the following wording can be found under General Comments: "Have an overview of off-balance sheet items, which could impact the financial position of the undertaking, if realized". In our view, the item "collateral held and collateral pledged" may also include on-balance sheet items. Is our assessment correct?	
BS-C1B – Purpose		
BS-C1B – Benefits		
BS-C1B – Costs	Please refer to BS-C1 – Costs for general comments. EIOPA acknowledge that it is unlikely the information requested in this template will be held by undertakings at present in this current form. Costs in establishing new reporting systems will be large.	
BS-C1B – Groups	In the situation where an entity has a non-insurance subsidiary which is party to a guarantee that would affect its parent, we presume that this would not be reported by the parent but only in a consolidated report of the ultimate group parent. Double counting must be prevented and therefore intra-group guarantees should not	

	be reported in the group template (cells A3A and A9A). The group template should reflect situation after elimination of IGT.	
BS-C1B – Materiality	It is our opinion that some of these items do not add much value to regular reporting and should only be reported when there are large different or exceeds a certain threshold compared to the reporting of contingent liabilities.	
BS-C1B - Disclosure		
BS-C1B – Frequency		
BS-C1B- cell A2	This comment applies to A2 – A3A. ***Further clarification required:*** • Should the maximum value of guarantees exclude any unlimited guarantees listed in A3C? • With mortgages, it is the building that represents a guarantee for the loan made. Are mortgages to be included? An evaluation of costs and efforts cannot be made without this information. We question whether this is in fact a business line of insurance.	
BS-C1B- cell A3A		
BS-C1B- cell A3C	This comment applies to A3C – C3C. Data on unlimited guarantees is competitor sensitive information, disclosing this information could give a misleading picture of relationships with guarantors. It should not be subject to public disclosure.	
BS-C1B- cell B3C		
BS-C1B- cell C3C		
BS-C1B- cell D3C		
BS-C1B- cell A3B	This comment applies to A3B – B3B.	

	Further clarification required: • Should the maximum value of guarantees exclude any unlimited guarantees listed in A3C? • Should covered bonds be reported here?	
BS-C1B- cell B3B		
BS-C1B- cell A10	This comment applies to A10 – B10. ***Further clarification required:*** • Should mortgage loans be reported here? • We understand that this position is the market value of the loan made or bond purchased, for which the collateral is received. Clarification in the LOG would be helpful.	
BS-C1B- cell B10		
BS-C1B- cell A12A	This comment applies to A12A – B12A. ***Further clarification required:*** • We understand that this position is the market value of the derivative, for which the collateral is received. Clarification in the LOG would be helpful.	
BS-C1B- cell B12A		
BS-C1B- cell A13	This comment applies to A13 – B13. In some countries, life insurers receive cash deposits for ceded technical provisions which they invest themselves and which are not separated from their other investments that cover their technical provisions. The reinsurer receives a contractually fixed rate of return on the cash deposits. We query how the above mentioned position should be reported? It is our understanding that this position is the market value of the ceded technical provision, for which the collateral is received. Clarification on this point would be helpful.	

BS-C1B- cell B13		
BS-C1B- cell A13A	This comment applies to A13A – B13A. We understand that this position is the market value of the loan received and the bond issued, for which the collateral is given. Clarification in the LOG would be helpful.	
BS-C1B- cell B13A		
BS-C1B- cell A14	This comment applies to A14 – B17A. ***Further clarification required:*** • Should the collateral held be valued at fair value every quarter? For example, revaluation of the FV of property pledge for a mortgage loan every quarter? • The revaluation of property pledged, if any, does not seem practical on a quarterly basis. Additional guidance would be helpful.	
BS-C1B- cell B14		
BS-C1B- cell A15A		
BS-C1B- cell B15A		
BS-C1B- cell A17	What is to be disclosed under the items "Assets pledged by reinsurers for ceded technical provisions" and "Assets pledged to cedants for technical provisions (reinsurance accepted)"?	
BS-C1B- cell B17		
BS-C1B- cell A17A		
BS-C1B- cell B17A		
BS-C1B- cell A18	This comment applies to A18 – B19. A decision should be made as to whether contingent liabilities should be reported in the balance sheet or as an off-balance sheet item. Otherwise the value in the corresponding cell will always be nil. Contingent liabilities should only be reported once.	

	What kind of materiality threshold holds for the recognition of "contingent liabilities" in the SII BS?	
BS-C1B- cell A5		
BS-C1B- cell A9A		
BS-C1B- cell A9B		
BS-C1B- cell B9B	What to disclose under the item "triggering events of guarantee"?	
BS-C1B- cell C9B		
BS-C1B- cell A19	What kind of materiality threshold holds for the recognition of "contingent liabilities" in the SII BS?	
BS-C1B- cell B19		
BS-C1D – General	In general, the purpose of requesting this information is not clear. It is often the case that liabilities are mainly covered by assets of the same currency and the net currency risk as a result is low. For undertakings operating on an international basis it will not be possible to report on every currency, for example one legal entity may deal with 116 different currencies. Instead it should be allowed to focus on main currencies, for example the five largest by transaction volume. The corresponding LOG contains following statement, "*Risk margin included in Technical provisions (by currencies) should be calculated on a best effort basis".* This statement is confusing and not fully consistent with terms in other texts regarding technical positions. ***Further clarification required:*** • **It is not explicitly stated (e.g. in the LOG) how reinsurance is to be treated, especially for multi-risk, multi-territory policies. The same**	

	applies to technical provisions. • 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). • Further at group level, 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? • Not all assets/liabilities part of BS-C1 are incorporated in BS-C1D. For example BS-C1 A28A, A28B. • Cell A20 from BS-C1 will be reported twice in BS-C1D. Once as part of Reinsurance recoverables and once as part of Deposits to cedants	
BS-C1D – Purpose	We do not believe that conclusions about currency matching of assets and liabilities can be assessed by looking at the balance sheet figures of assets and liabilities. **<u>Currency mismatches</u>** To use an example, if the undertaking has hedged currency risks with derivatives this template does not give the full picture. There should be, for example, a row stating the amount of assets / liabilities that are hedged with derivatives / nominal value of derivatives. **<u>Currency Risks</u>** To use an example, there might be currency derivatives contained within the assets that will show greater volatility concerning changes in exchange rates than normal assets. If the intention is to draw conclusions on currency exposures, we would suggest using the respective SCR and risk disclosure and thus currency risk information. There is a specific currency risk module within SCR calculations. Also, to identify currency mismatches and potential currency risks, EIOPA should take into account maturity dates which is not possible in this template.	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
BS-C1D – Benefits		
BS-C1D – Costs		
BS-C1D – Groups	**This template will be almost impossible to report at group level in its current form.** There will be major problems in the consolidation process to split assets and liabilities by currency. We assume EIOPA's intention is to require reporting in the currency of the subsidiary in which case, adjustment to Group consolidation systems will be substantial and costly. **There is a question here over how to assess the currency module at group level.** It may be possible to report total assets and total liabilities. There is also the issue that not all entities within the Solvency II group scope will be (re)insurance entities. **We propose to delete this template from group reporting requirements or introduce simplifications for the group template.**	
BS-C1D – Materiality		
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	We assume that for dual listed investments, the undertaking can choose the currency denomination.	

	Further clarification required: • Where derivatives are held and these are for example, cross currency basis swaps, how should these be reported? Also, would it not be preferable to report them based on their economic effect so as to show the hedging impact of the transaction? • Should Collective Investment Schemes (CIS) be done on a 'look through' basis? How should CIS that are not sufficiently transparent be treated, where currency information of the underlying assets is not available or cannot be quantified?	
BS-C1D- cell A4	The LOG states that A27A from template BS-C1 should map into this cell, however A27A has since been removed from the balance sheet. The LOG should be updated to reflect this.	
BS-C1D- cell A5	The level of detail available on currency exposure from underlying unit linked funds remains an open issue. **We believe this issue should be revisited and that unit linked funds should be reported in the currency of investment rather than looking through to the underlying currency of the various assets and liabilities of the funds. This would be incredible burdensome for undertakings operating on a cross border basis.** This information will be difficult to obtain and in addition we would question its meaningfulness. We are of the opinion that this would be more appropriately looked at on a qualitative basis in terms of how the funds manage such risks. ***Further clarification required:*** • Should Collective Investment Schemes (CIS) be done on a 'look through' basis? • How should CIS that are not sufficiently transparent be treated, where currency information of the underlying assets is not available or cannot be quantified?	
BS-C1D- cell A5A		
BS-C1D- cell A6		

BS-C1D- cell A7		
BS-C1D- cell A8	Please also refer to comments on A6. **This template appears to require that the risk margin be split by currency. We propose that the risk margin be reported at entity level.**	
BS-C1D- cell A9	Please refer to comments on A6 and A9.	
BS-C1D- cell A10	We query whether the item in the LOG should read, "deposits from reinsurers and insurance <u>intermediaries</u> and reinsurance payables".	
BS-C1D- cell A11		
BS-C1D- cell A12		
BS-C1D- cell A13	Contingent liabilities' have to be regarded as 'Any other liabilities'.	
BS-C1D- cell A14		
BS-C1D- cell A16	Please refer to A16.	
Country - K1– General	This template requires information by class and not by LOB, we understand that this is due to drafting in the Level 1 text and we would urge EIOPA to support the industry in changing this via the Omnibus II proposal. Information on risk location is not easily provided or relevant for all contracts, eg. motor insurance. With regards to "Frequency of claims for Motor Vehicle Liability" and "Average cost of claims for Motor Vehicle Liability" (except carrier's liability the information requested is different from the premium information, the 2 are not related. Article 159 of the Framework Directive requires "the amount of premiums, claims and commissions, without deduction of reinsurance". Therefore this template should be restricted to direct business only. (Direct) insurance undertakings might also accept reinsurance business, but as the template is not applicable for reinsurance	

	undertakings, the information should exclude accepted reinsurance business. Templates Country K1 and A1 are consistent in many ways but inconsistent in others, for example, K1 refers to “commission” and A1A/Q refers to “expenses”. Clarification from EIOPA would be helpful on this matter. Some items will be difficult to allocate to countries – especially some corporate partnerships business or reinsurance covers. We would propose to include a column dealing only with business entirely written on a pan-European basis. Claims information is not be homogeneous across the EU. The scope of coverage is different and countries will identify claims and undertakings in different ways. Since data will not be comparable, we query the added value of this information for supervisory purposes. What is required in the single lines, i.e. for « premiums written », « claims paid », and « commissions » ? P&L information (i.e. including deferrals) or cash flows ? More concrete definitions are required (e.g. « branch », « freedom to provide services » ; see also comments below). Does long-term care pension insurance belongs to health or life?	
Country - K1– Purpose	EIOPA has indicated that the benefit of this template as “describing activity carried out abroad, as required by Article 159 of the Level 1 text.” Article 159 refers only to analysis by member state – analysis by non-member states is not required. We believe that this template goes beyond the stated purpose of EIOPA and for this reason; information requirements relating to non-EEA member states should not be required.	
Country - K1– Benefits	Currently no complementation to A1 as definitions are not yet fully aligned (see Country – K1 – General).	
Country - K1– Costs		

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
Country - K1– Groups		
Country - K1– Materiality	This template should not require information from non-EEA member states. We propose that EIOPA delete these columns completely. We would propose a materiality threshold for EEA-jurisdictions. Undertakings whose FOS activities are immaterial (mainly serving local companies that have established foreign activities) have not built their systems to deliver this kind of detailed information.	
Country - K1– Disclosure		
Country - K1– Frequency		
Country - K1- cell A1	Applies to K1 cells A1; C1; D1; E1; H1; H1A. ***Further clarification required:*** • How are the "average cost of claims" to be calculated? Are nil cost claims included or excluded? • How should the "number of claims" determined? There is a double segmentation. (LOBs and classes) used in the various templates, please refer to our general comments on this template. What do « premiums written » represent ? In theory there are three different concepts : - pure cash flows already received - ultimate cash flows, representing **<u>all</u>** expected cash inflows from an insurance contract for the total insurance coverage P&L view including not only actual cash flows but also premiums' receivable	
Country - K1- cell A2	• see A1 • More detailed definition required for branch (also including a clear distinction to FPS).	
Country - K1- cell A3	• see A1 • More detailed definition required for FPS (also including a clear distinction to branch).	

Country - K1- cell A4		
Country - K1- cell C1	This comment applies to K1 – cells C1 – C3. Sometimes the term “claims paid” is used without salvage & subrogation, the title of this cell should be changed to “Claims paid incl. salvage & subrogation”. ***Further clarification required:*** • It was also questioned how to calculate claims i.e. whether they should refer to an event or open claims?	
Country - K1- cell C2	see C1 • More detailed definition required for branch (also including a clear distinction to FPS).	
Country - K1- cell C3		
Country - K1- cell C4		
Country - K1- cell E1	This comment applies to K1 cells E1 – E4. There will be difficulties in untangling commission data against specific components of premiums, depending on whether or not the data is reported by LOB or Class (to clarify). We presume ‘Costs arising from the conclusion of insurance contracts’ is meant to read ‘Costs arising from the **acquisition** of insurance contracts’. ***Further clarification required:*** • Under VA C2B and C2C the term “commission” is not mentioned before. Should all operating expenses be included under commissions, for example, policy administration and maintenance expenses, acquisition costs and profit commissions? • We query how acquisition costs should be defined, for example should the acquisition costs include allocated overheads? Should this be gross or net of commissions received from reinsurers for ceded business? It seems unclear whether the definition used by EIOPA is consistent with IFRS, it appears	

	deferred acquisition costs are treated differently. •	
Country - K1- cell E2		
Country - K1- cell E3		
Country - K1- cell E4		
Country - K1- cell H1	• Frequency should not – as done in the instructions - reflect a simple claims count: Instead it should be related to the overall exposure size, it should be calculated as the ratio between - the number of the reported accident year claims incurred and - the mean between the number of risks in-force in the current reporting period and the number of risks in-force at the end of the previous reporting period. The KPI should be annualized.	
Country - K1- cell H2		
Country - K1- cell H3		
Country - K1- cell H1A	What is exactly included in « average claim paid » ? See also C 1. • In our opion, this KPI should be calculated as the ratio between - the gross volume of the accident year claims that incurred and were reported in the respective reporting period (paid and reserved; including claims management expenses as well as recoveries/salvages/subrogations) and the number of these claims .	
Country - K1- cell H2A		
Country - K1- cell H3A		
Cover - A1A & Q- General	We think that the template is a mix of statutory accounts accounting principles (premiums written and premiums earned) and SII cash flow basis of claims and expenses. Although premiums and claims can easily be divided into product types, “expenses paid” are not always precisely allocated to contracts or parts of the portfolio. There is room for judgement, especially in relation to overhead expenses. Thus this template	

	may require changes in the data source extraction and judgment on how to present/allocate “expenses paid” between different types of portfolio (contracts). Examples of simplifications which might be used for the “expenses paid” allocation to different parts of the portfolio would be a useful support for the undertakings. Please note that for gross business and for the reinsurers’ share there might be some distortions because of different LOBs for primary insurance gross business/assumed proportional reinsurance and non-proportional ceded business. As the recoverable from reinsurance contracts have to be segmented into homogeneous risk groups (Art.81 of the Directive), this would imply, and that proportional ceded business is separated from non-proportional ceded business. Therefore a primary company will show the reinsurer’s share - proportional business - within the same segment as the gross business. Whereas the reinsurer’s share - non-proportional business - will be shown within the respective non-proportional segment. In cases where the insurer accepts some non-proportional business, this has to be interpreted carefully. In addition, for reinsurers the retro-ceded part of their business could be even more problematic regarding segmentation; assumed business could be non-proportional, whereas ceded part could be retro-ceded as proportional business. As mentioned below (see comment on “Cover – A1 – cell A19”), the split by country where the risk is located is not applicable, at least in some cases. This split should be dropped as no benefit can be seen. For example reinsurers could only provide most of these figures by location of cedant. Settlement of reinsurance may only take place twice a year (some treaties only once per year). Usually the first settlement during the year is based an approximation and only the final settlement at year end is based on real experience. Therefore net values could not be calculated quarterly. The specification of countries does not help to identify risks because exposure to catastrophe risks is not identical to exposure to country.	

	Some treaties with construction companies do not specify the location of the insured construction site but refer to any construction in a given year. Consequently data about localisation of risks (and premiums) is not available. The same applies to the actual residence of insured persons (Life). It looks like this template has been designed with general insurance companies in mind rather than life assurance undertakings. We refer to our general comments made previously about creating a process for ensuring the reports agree with each other. We assume that premiums relating to Workmen Compensation are not split between SLT and NSLT as premium risk is in NSLT for that product line. As a general comment, there should be more guidance on where elements relating to WorkCom have to be reported as under technical specifications it is split into Health SLT and heath NSLT ***Further clarification required:*** **<u>Written Premiums</u>** The definition provided in the LOG is that written premiums should be defined as “all amounts due during the financial year in respect of insurance contracts regardless of the fact that such amounts may relate in whole or in part to a later financial year”. Clarification would be helpful as to whether this means all premiums received or just premiums received on insurance contracts and not investment contracts. Additional points are raised below. What is not clear is whether this should take into consideration the undertaking’s credit arrangements i.e. should this include premiums from contracts entered into in the financial year regardless of whether they are not due because of insurer allowing a credit period to the insured. Also, we query how to treat written premiums paid in instalments, for example if it should follow pre-IFRS deposit accounting reporting, i.e. all premiums received, or is it just premiums received on insurance contracts and not investment contracts.	

	We propose that the definition of written premiums should be as follows: *Premiums due from the insurance contracts written in the financial year regardless of the fact that such amounts may relate in whole or in part to a later financial year.* • *The requirement to do this quarter to date and not from the start of the* reporting year is only stated for A1, therefore are all other templates e.g. K1 on a year to date basis? Or are they all to cover the latest quarter. Clear direction for each template is required. • If based on localisation of risk, for re-insured business, will the gross premiums, claims and expenses follow where the re-insurer's home country is? However, the re-insurer may have a different localisation of risk that is not its home country - this information would prove hard to get from the third party. • The template requests premiums “written”, but claims and expenses “paid”, indicating a mismatch. We ask EIOPA to clarify this situation. • How is the location of risk defined in cargo insurance? • Only premiums and claims paid are mentioned. Should not commissions paid also be reported? • It was requested to add benefits to “claims & benefits paid” • **Split “Line of business for: life obligations”-** Not all rows can be split easily per line of business. Is it any guidelines with info which drivers are applicable for cost allocation e.g. split of “claims management expenses” per line of business? Is it expected that regulator will review methodology of cost allocation? • It seems that detailed definitions of all **expense categories** are required. It seems quite difficult to make distinction among listed type of expenses. • Data regarding **gross, reinsurers’ share and net** – if it is required to make split of each categories of expense with info about reinsurers’ share then it will be difficult to cover such requirements. Such data are not available in financial systems. It means that new approach to booking transaction with reinsurer should be implemented or manual review of contracts and transactions will be required.	

	• To what extend should cash flows to calculate technical provisions be consistent to cash flows to be reported in the cover-template?
	• A clear definition of the template positions are missing. Are cash flow or accounting figures to be reported under each position?
	• The labelling of the major lines (premiums written, claims and expenses paid) would still point more to a cash flow rather than a P&L view, but:
	  ○ What is then the intention of the line "premiums earned"? This would be more fitting for an overall P&L perspective. But then also the change in reserves and the deferral of acquisition costs should be included.
	  ○ The level 2 guidance for the SFCR (Article 296 SRS 3) still requires "[…] qualitative and quantitative information of their undertaking's underwriting performance by material line of business and material geographical area of business […] as shown in the undertaking's financial statements." To allow for a consistent reporting and reconciliation between the quantitative data provided in the QRTs to the narratives in the SFCR, only the P&L view would be meaningful. Now expenses are split in administrative, investment management, claims management, acquisition, overhead, and other expenses.
	• What is the purpose of the inclusion of more detailed information on the expense line?
	  ○ Investment management expenses are not part of the "underwriting performance". Why should they be included here?
	  ○ Why should overhead expenses been shown separately from the administrative expenses?
	  ○ What are other expenses? Should they only comprise expenses related to the underwriting activities are something else? What is the purpose of their inclusion?
	
	High implementation costs are expected because of the required split of expenses (administrative, investment management, claims management etc. expenses) per LOB and countries. The required breakdown deviates from the current accounting approach.
	Information about expenses should be provided on a less granular way.	

	A split in expenses in sub categories does not enhance the insight in activities per line of business or per country. We consider the quarterly template quite sufficient for supervisory purposes. We note that many of the cells in this schedule referring to expenses use the term 'paid'. We do not feel that this is a helpful term, as it may indicate that we are to include expenses on a cash basis (i.e., where physical payment has been made). If this is the case, accounting systems may not directly support this method and to complete the schedule on this basis would be unduly onerous. We would seek confirmation if this is really the case, or is an 'accruals basis' acceptable (which would be consistent with the published accounts and balance sheet). As there is only a Balance Sheet in Solvency II, we assume that this information is based on the financial accounts but LoB is as defined for SII purposes. This is an additional burden to compile for undertakings. Is it really needed as we have in the financial statements result by group of EU insurance classes that is quite similar to this? Couldn't find a proper cell for this comment: What is the definition of overhead expenses compared to administrative expenses? This kind of information doesn't exist in systems as it is not required according to accounting rules. All cost is allocated to activities stated above in the template. Furthermore the required allocation of cost differs from the one usually used. We do the bookkeeping based on accrual concept – not cash basis. Therefore our book keeping system does not keep track of expenses paid. Premiums, claims & cost for countries where risk is located could not be found in the GL. If this is going to be reported it has to be based on internal assumptions. Do such assumptions fulfil any supervisory purpose? There are premiums written, premiums earned and claims paid, but not claims incurred – so the template gives partial information? Should the premiums earned be	

	left out as the premium earned is not included in template A1Q? For example reinsurers could only provide most of these figures by location of cedant	
Cover - A1A & Q- Purpose	Please refer to Cover – A1 – General.	
Cover - A1A & Q- Benefits	Please refer to Cover – A1 – General.	
Cover - A1A & Q- Costs	Please refer to Cover – A1 – General.	
Cover - A1A & Q- Groups	This template should be manageable at group level however we would suggest removing the split by country (cells A19-A23); at group level this is an unnecessary requirement. We query if it is required to eliminate Group internal business or if it is sufficient to sum-up all of the subsidiaries within the group. For example: A direct insurer writes EUR 100mn premiums externally ("Gross - Direct Business": EUR 100mn). Of this EUR 100mn 30% is ceded internally of the Group ("Gross - Reinsurance accepted": EUR 30mn; and "Reinsurer's share": EUR -30mn). The screen-shot below shows the aggregation alternative. The advantages being that no sophisticated consolidation process is required and on a net basis, the profit contribution is correct.	

<table>
<tr><td></td><td>
<table>
<tr><td>Non-life</td><td>Line of Business for: non-life obligations</td></tr>
<tr><td></td><td>Accident insurance (1)</td></tr>
<tr><td>Premiums written</td><td></td></tr>
<tr><td>Gross - Direct Business</td><td>100</td></tr>
<tr><td>Gross - Reinsurance accepted</td><td>30</td></tr>
<tr><td>Reinsurers' share</td><td>-30</td></tr>
<tr><td>Net</td><td>100</td></tr>
<tr><td>Claims paid</td><td></td></tr>
<tr><td>Gross - Direct Business</td><td>E1</td></tr>
<tr><td>Gross - Reinsurance accepted</td><td>F1</td></tr>
<tr><td>Reinsurers' share</td><td>G1</td></tr>
<tr><td>Net</td><td>H1=E1+F1-G1</td></tr>
<tr><td>Expenses paid</td><td></td></tr>
<tr><td>Gross - Direct Business</td><td>E1A</td></tr>
<tr><td>Gross - Reinsurance accepted</td><td>F1A</td></tr>
<tr><td>Reinsurers' share</td><td>G1A</td></tr>
<tr><td>Net</td><td>H1A=E1A+F1A-G1A</td></tr>
</table>
</td><td></td></tr>
<tr><td>Cover - A1A & Q-Materiality</td><td>If the top five “locations” are not material, we believe there would be very little value added in reporting such information. We support EIOPA’s additional materiality threshold of requiring information up until 90% of written premiums is covered but would like to stress that the threshold for data by country is very important for undertakings whose foreign activities are immaterial (mainly serving local companies that has established foreign activities).</td><td></td></tr>
<tr><td>Cover - A1A & Q-Disclosure</td><td>GDV supports EIOPA’s move towards developing a simplified template for public disclosure however the definitions used must be consistent with IFRS. To disclose similar information with different definitions does not add transparency and could be misleading for readers. We propose to keep definitions in line with IFRS. Please also see our comments on VA templates.</td><td></td></tr>
</table>

Cover - A1A & Q-Frequency	Quarterly reporting should allow for the use of approximations. For reinsurance especially for non-proportional business, payments for ceded business are are often accounted for only on a yearly basis. Quarterly reporting on the reinsurer's share would be incomplete therefore an annual frequency for reporting this information should be required. Here a materiality thereshold could be applied, e.g. if the reinsurance share accounts only for x% of total TP, no quarterly reporting of reinsurance business would be necessary.	
Cover - A1A- cell A1	Applies to cells A1-H23. **It would be helpful to clarify if proportionality applies to the reporting of premiums and claims by LOB, especially where activity is small.** Otherwise, providing such data would become unduly onerous.	
Cover - A1A- cell A2		
Cover - A1A- cell A3	Please refer to Cover A1 – General. In some countries, reporting of workers compensation insurance may prove problematic where it is split by HSLT and HNSLT.	
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	Please refer to Cover - A1- cell A1.	
Cover - A1A- cell A19	This comment applies to cells Cover - A19 – A23. The business split according countries where the risk is located is, for some non-life business, not applicable. For Marine/ Transport, aircraft and goods in transit, a country cannot be specified and only worldwide exposure could be shown. For Health insurance, the insured person might also be insured on travelling; therefore no country could be assigned. The same holds for Life Reinsurance. Due to the fact, that worldwide coverage is provided, and that risks located in different countries are often reinsured under one treaty, local loss events (e.g. Tsunami in Thailand or catastrophe of the funicular in Kaprun) affect risks located in different countries and treaties underwritten in different countries. Hence the proposed split is not useful. Regarding accepted non-life business from reinsurers, the split on countries where the risk is located, is much more difficult than for direct business. These examples might show how difficult it could be to define “the country where the risk is located”.	
Cover - A1A- cell A20		
Cover - A1A- cell A21		
Cover - A1A- cell A22		
Cover - A1A- cell A23		
Cover - A1A- cell B1	includes both proportional Group externally assumed reinsurance business as well as internally assumed reinsurance business (see example in section Cover - A1A & Q-Groups)	
Cover - A1A- cell B2	• Cell only contains Group <u>external</u> non-proportional reinsurance business. Group	

	internal reinsurance business (both proportional and non-proportional), has to be reported in the same LoB as the cedent, i.e. in the non-life obligations area with in total 12 LoBs. This ensures that the profitability of these LoBs is corrected stated as intra-group transactions are either netted or eliminated (question on consolidation vs. simple summing up pls. refer to Cover - A1A & Q- Groups).	
Cover - A1A- cell C1	• includes both proportional Group externally ceded reinsurance as well as internally ceded reinsurance business (see example in section Cover - A1A & Q- Groups)	
Cover - A1A- cell A1A	This comment applies to Cover AIA cells – A1A – C1A. The labelling of the major lines (premiums written, claims and expenses paid) would still point more to a cashflow rather than a P&L view (pls. refer to Cover - A1A & Q-General), but: - What is then the intention of the line “premiums earned”? This would only be meaningful for an overall P&L perspective (incl. deferrals required by the matching principle). But then also the change in reserves and the deferral of acquisition costs must be included in the subsequent lines « claims paid » and « expenses paid ». Currently the picture of requirements shows a mix of P&L and a potential cash flow view . Earned premiums contradict concept of cash flows	
Cover - A1A- cell B1A	Earned premiums contradict concept of cash flows	
Cover - A1A- cell C1A	Earned premiums contradict concept of cash flows	
Cover - A1A- cell E1	This comment applies to cells Cover A1A cells - E1 – H1 and L1 – N1. By excluding salvage and subrogation makes reporting substantially more difficult for most EEA entities. ***Further clarification required:*** • Does this template follow pre IFRS deposit accounting reporting, i.e. all claims made, or is just claims made on insurance contracts and not investment contracts?	
Cover - A1A- cell F1		

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
Cover - A1A- cell G1		
Cover - A1A- cell E1A	***Further clarification required:*** • We query if this cell will follow the classification used by the undertaking in their IFRS accounts of Operating Expenses? • The term used in the reporting template is now Expenses – defined in the summary as "acquisition costs + administration expenses" but in the LOG as 'operating expenses'. Clarification would be helpful on this. • We would also ask for clarification on the definition for "operating expenses": for instance, whether claims handling costs are operating expenses or claims costs? The item's name seems to suggest all expenses, however the definition states it is just operating expenses.	
Cover - A1A- cell F1A		
Cover - A1A- cell G1A		
Cover - A1A- cell E1B	• What do « claims paid » represent ? Concept needs to be consistent with the premium concept (i.e. pure cash flows, ultimates vs. P&L view ; see also Country - K1- cell A1). If a P&L perspective is required then the deferral « change in reserves » (no cashflows) have to be included as well • What is the scope of « claims paid » ? Current and prior year claims ? Why are salvages and subrogations excluded? In some LoBs the concept of salvages and subrogations is an essential part of the business model (e.g. credit insurance).	
Cover - A1A- cell F1B		
Cover - A1A- cell G1B		
Cover - A1A- cell E1C		
Cover - A1A- cell F1C		
Cover - A1A- cell G1C		
Cover - A1A- cell E1D	This comment applies to Cover – A1A – cells E1D – G1D. We query how are Acquisition expenses are to be defined? Is this similar to commissions as defined in Country K1 cells E1-E4?	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
Cover - A1A- cell F1D		
Cover - A1A- cell G1D		
Cover - A1A- cell E1E	more precise definition which loss statement items is meant	
Cover - A1A- cell F1E		
Cover - A1A- cell G1E	Aplies to H1F: • What are other expenses? Should they only comprise expenses related to the underwriting activities are something else? • What is the purpose of their inclusion? If they are not part of the profitability assessment of single LoBs, then they could also be deleted. Applies to H1H: • Why is it not required to deliver expenses split by country ? How should an profitability assessment per country be possible without the expense split ?	
Cover - A1A- cell I1		
Cover - A1A- cell I2		
Cover - A1A- cell I3		
Cover - A1A- cell I3A		
Cover - A1A- cell I3B	The required split into premiums written,premium earned etc. for annuities cannot be fulfilled by all insurers, especially by SMEs. Here, we propose to use aggregates instead.	
Cover - A1A- cell I4		
Cover - A1A- cell I5		
Cover - A1A- cell I6	To allow for analysis at the level of major LOB, systems mapping changes will be required.	
Cover - A1A- cell I7	Please refer to Cover - A1- cell A19.	
Cover - A1A- cell I8	Please refer to Cover - A1- cell A19.	

Cover - A1A- cell I9	Please refer to Cover - A1- cell A19.	
Cover - A1A- cell I10	Please refer to Cover - A1- cell A19.	
Cover - A1A- cell I11	Please refer to Cover - A1- cell A19.	
Cover - A1A- cell J1	The non-proportional reinsurance cannot be allocated to this cell. Please refer to Cover A1A – General Comments.	
Cover - A1A- cell I11A	The comments in this cell refer to Cover - A1A – I1A for which there is no corresponding feedback cell in this template. Earned Premiums are not currently calculated for life business. This is a new requirement as TP-E5, which originally carried this information, referred to non-life only. Clarification on our interpretation would be helpful. The LOG document provides for 2 types of earned premiums - Earned premiums in any 12 month period and Earned premiums. The first is for risk exposure and part of written premium and the latter, due to be received in the period and also for all expenses and commissions, but excluding the charges. It is very unclear to us what is required. The cell should specifically refer to one requirement otherwise there will be confusion over the amount reported.	
Cover - A1A- cell J1A		
Cover - A1A- cell L1		
Cover - A1A- cell M1		
Cover - A1A- cell L1A	Clarification is required on what is meant by “expenses paid” for life business?	
Cover - A1A- cell M1A		
Cover - A1A- cell O1		
Cover - A1A- cell P1		

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
Cover - A1A- cell O1A		
Cover - A1A- cell P1A		
Cover - A1A- cell O1B		
Cover - A1A- cell P1B		
Cover - A1A- cell O1C	more precise definition which loss statement items is meant	
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	See Cover - A1A- cell B1	
Cover - A1Q- cell B2	See Cover - A1A- cell B2	
Cover - A1Q- cell C1	See Cover - A1A- cell B13	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
Cover - A1Q- cell E1	See Cover - A1A- cell C1	
Cover - A1Q- cell F1	See Cover - A1A- cell E1	
Cover - A1Q- cell G1	See Cover - A1A- cell F1	
Cover - A1Q- cell E1Z	• What do « expenses paid » represent ? Concept needs to be consistent with the premium concept (i.e. pure cash flows, ultimates vs. P&L view ; see also Country - K1- cell A1). If a P&L perspective is required then the deferrals (e.g. deferred acquisition costs, no cashflows) have to be included as well.	
Cover - A1Q- cell F1Z	See Cover - A1A- cell E1Z	
Cover - A1Q- cell G1Z	See Cover - A1A- cell E1Z	
Cover - A1Q- cell I1	Applies to H2G: Why is it not required to deliver expenses split by country ? How should an profitability assessment per country be possible without the expense split ?	
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 – General | **The reporting requirement for Basic Own funds as proposed in template OF – B1 is mixing statutory (IFRS) and economic principles.** It appears that accounting balance sheets are to be used as a basis for this template to which Solvency II items are added as reconciliation items. Instead, we believe that the Solvency II balance sheet should be used as a basis for reporting on own funds.

As currently proposed, these templates would require feeds from to two different sources of data: financial reporting basis (profit and loss) and Solvency II basis, hence increasing the complexity of the completion process and a design of automated reporting.
The templates should be designed to enable completion by using direct links to the Solvency 2 Balance sheet. The design of the template should allow for components of Basic own funds to be taken directly from Solvency II database and allow reconciliations with template BS-C1; this would help to better understand the information.

The template appears to be weighted more towards lower tiers and ancillary capital which are required only to make up the smaller proportion of the capital.

The notion of the reconciliation reserve in this template is confusing and counter intuitive – it is also an issue which is raised in VA templates. The reconciliation reserve is the adjusted excess of assets over liabilities and will already include share capital and share premium. The templates have become unnecessary complex because of the way the reconciliation reserve has become entangled in the formula.

We propose to report the reconciliation reserve as just "excess of assets over liabilities" (cell B23) and delete cells B24-B29. This would show a build up of own funds, the basic own funds and then a reconciliation between assets over liabilities.

e do not understand why EPIFP is reported separately and not as a total of BOF. While we acknowledge the importance of liquidity risk management, we do not | |

| | understand the rationale behind monitoring EPIFP separately from other cash inflows and cash outflows. Insurers have already gathered experience in managing liquidity risk. In addition, liquidity risk management will be assessed through the supervisory review process under Solvency II.

Please refer to OF - B1A- cell B30 for further comments on EPIFP.

We query EIOPA's intention to analyse movements in preference shares and ancilliary OF. A worked example might be helpful to envisage EIOPA's intention here.

The eligibility judgements and the tiering should not be a part of the ordinary balance sheet process. If we are going to report opening/closing balances per tier then this should be done via the general ledger to keep track of movements in the underlying items, including any currency effects. This will be burdensome and does not add any value for supervisory purposes. (See example cell A102 – E10).

Further clarification required:
• Is it possible to reconcile basic own funds according to statutory accounts (cell A1-A6) with cell LS27 in BS-C1 and total BOF according to cell A21 with the corresponding cell in BS-C1?
• It should be clarified, that the undertaking can decide, according to which GAAP "the retained earnings or other reserves" are presented. However see also our comment on the starting point of the calculations (financial reporting or the economic balance sheet).
• What is the difference between "total eligible own funds to meet the SCR" and "total available own funds to meet the SCR (solo)?
• Feedback would be welcomed on the treatment of Eligible Own Funds, in terms of how own funds are compared to the SCR with reference to the limits for eligible own funds. Tiering limits on Own Funds as detailed in Article 98 SII-Directive and Article 72 EOF1 delegated acts give room for interpretation. In our view it should be clarified that all available own funds are eligible as long as they are conform with Article 98 SII-Directive, i.e. if tier 1-capital is at least | |

	50% of the SCR and tier 3-capital is not exceeding 1/3 the SCR all other own funds are completely eligible. Limiting own funds (i.e. own funds are not allowed to use to cover the SCR) is not in line with the directive. In addition to this, an incomplete description of the risk, finance and result situation of an undertaking will be given. We oppose this especially since this might lead to wrong steering incentives.
	• We disagree with the calculation of « Total available own funds to meet the minimum group SCR (group) -Tier 2 » ; the ancillary ofwn funds must be considered as available. I.e. Change : D49=C21 in D49=D48 (same for solo-> D47 = D46). Or is it just another formula error (see below)?
	• We disagree with the calculation of Tier 2 and Tier 3 eligible own funds to meet the SCR (cell D50 and E50): To put a »eligible-limit» based on the SCR make no sence, since the result does not consider the capitalisation of the reporting entity. Instead T1 must be the basis for the calculation of the total eligible T2 and T3. i.e. T2 + T3 ≤ T1.
	• QRTs includes formula errors. Concidering that this is the second QRT-draft , it is alarming that this elementary function in the QRT is not correct. Here some examples :
	  ○ Group: B12A, which is derived from B29 A and A 21-> double elimination fom non available items (B28A)
	  ○ B48 : Cell B12 doesn't apply for group
	  ○ N130.1: Not clear why the sum-position doesn't include the cells D130-F130? It must be clear in the QRT what is the total amount to be deducted.
	• Multiple data entries for the same value/issue must be deleted. This is the case for example IGT 1 and OF - B1A (group) concerning subordinated liabilities resp. subordinated MMAs -> Cells : Investor/Issuer/Issue date/Maturity date/Amount/buy back etc. It has to be made sure that these values in IGT 1 are imported from OF - B1A (group).
	• Cells A52 and A53 concerning SCR and MCR: In our opinion it mus be a « cell to be entered » and « cell calculated by a formula », or it must be clarified from where these values come from.	

	• Cell A53 and A55 : Definition of « minimum Group SCR » unclear.
	• Cells A54 and A55 : Note « *For groups, the ratio is computed for the insurance part of the group. Capital requirements of other financial sectors are not included*. » misleading. Clarification on which basis the ratio should be calculated is required .Our understading :
	    ○ OF = OF for all group entities, i.e. also OF from entities listed in A45C included.
	    ○ For groups : Under A52 and A53 clarification that capital requirements for entities listed in A45C should not be considered.
	• Should the loss reserve of mutual insurance companies be attributed to the subordinated mutual accounts or to the capital reserves?
	• Is it clarified if equalization reserves are classified as "restricted reserves"?	

OF - B1A & B1Q – Purpose	We find the new Own-Funds reporting requirements to be incredibly complex and believe they will create a costly, burdensome and hard-to-handle process for the European insurance industry. We also query how EIOPA will manage to extract meaningful information from this large data set in a way that can ensure Solvency II is easily enforGDVble. We believe that the current proposals will make this a difficult task. Own-fund reporting should be revised in such a way that will allow supervisory authorities to derive "quality and quantity as stated in the framework directive. All add on and unnecessary data which do do fulfil this purposeshould be deleted for example, movement data, split from reconciliation reserve, information concerning: EPIFP, nominal values, buy back during the year.	
OF - B1A & B1Q – Benefits		
OF - B1A & B1Q – Costs	Full Quarterly reporting will result in an increase in the necessary activities. Similar to the calculation of the MCR we would stress the importance of the use of simplifications in the various needed calculations. The proportionality principle should also apply here based on triggers and level of capitalisation e.g. risk profile.	
OF - B1A & B1Q – Groups	To be useful for groups this template needs some adjustment like "non-transferable	

	own funds" and treatment of participations". A link should be made with the OF group specific templates. We query whether proportionality would be applied in terms of group size. For many groups this will be excessive, smaller groups. B1Q is generally considered manageable at group level whereas B1A is more complex and care should be taken not to introduce areas where double counting may be an issue. For non-listed groups and in general, those who do not compile their financial accounts according to IFRS, these own funds templates will be more problematic. The ability to report	
OF - B1A & B1Q – Materiality		
OF - B1A & B1Q - Disclosure	**Annual statements are already disclosed by companies, Solvency II should refrain from becoming a form of accounting disclosure.** These templates could be greatly simplified to enhance overall understanding of an undertaking's own funds and should include information on: • Basic own funds; • Subordinated liabilities; • Ancillary own funds; • The above 3 items split by tier – similar to a double entry table; • High level basic own funds/subordinated liabilities reconciliation. This could be supplemented by a narrative explanation as to how the undertaking reached these results. If the information is presented in an overly complex manner, and the reader requires professional skills to interpret them e.g. statistical, then the benefits of disclosing the templates will be negligible. We disagree with the detailed level of the public disclosure requirements : Public disclosure should - as a maximum - only include the **cells A48 until A55** (and the correspondingly for solo). This is inline and congruent to the Directive 2009/138 art. 51. Further disclosure concerning BoF and AoF as intended in OF B1 would be disadvantageous compared to other insurance groups, which are not subject to SII	

	regulations. In particulary we don't agree to the idea of public disclosure the EPIFP (also see comment below, cell B30 & B31). Additionally, we have a number of concerns around both the definition and calculation methodology of EPIFP. Any requirement to calculate, disclose or apply a specific treatment to EPIFP will create additional costs for industry and consequently for consumers without enhancing policyholder protection. We have concerns that if EPIFP is disclosed, this would be misunderstood by financial markets and could lead to inappropriate conclusions. Besides, as there is no appropriate calculation methodology for EPIFP, but only proxies, it does not seem relevant to disclose these figures publicly or indeed as a standalone item under Solvency II reporting. If a solvency ratio has to be publicly disclosed than it must be ensured that the rate is adequately showing the tiering of own funds.	
OF - B1A & B1Q – Frequency	**Full quarterly reporting will present problems for the insurance industry as it represents a significant additional reporting requirement.** The GDV therefore requests that information on aggregate totals or approximations are accepted to facilitate quarterly reporting. Production of full own funds and capital on a quarterly basis would require significant Additional resources to produce alongside current GAAP/IFRS reporting deadlines. **For Groups, quarterly reporting would present a significant challenge to gather and compile this level of detail for all subsidiaries within an 11 week period.** Consideration should be given to the methods used for the calculation of group solvency capital requirements and whether they are reflected in the template. Instead, groups could provide this data when a significant change has taken place. Inclusion of EPIFP is too excessive for the quarterly OF template. Please refer to OF - B1A & B1Q – Disclosure.	

OF - B1A- cell C1A		
OF - B1A- cell B5		
OF - B1A- cell C5		
OF - B1A- cell D5		
OF - B1A- cell B6	***Further clarification required:*** • Further guidance on the difference between the revaluation reserve, other Solvency II items, reconciliation reserves and other reserves should be provided.	
OF - B1A- cell B10	This information will be required for Solvency II purposes, a valuation model will be developed to value sub-debt. Sourcing the data will not be problematic.	
OF - B1A- cell C10	Please refer to OF - B1A- cell B10.	
OF - B1A- cell D10	Please refer to OF - B1A- cell B10.	
OF - B1A- cell B11		
OF - B1A- cell C11		
OF - B1A- cell B14	The total of adjustments to participations A14 should be equal to A89. From a Groups perspective, the data value should be readily available from existing IFRS reporting processes once technical analysis has been carried out to determine which subsidiaries fall within the definitions of "financial and credit institutions".	
OF - B1A- cell C14		
OF - B1A- cell B17	The data value will be determined by applying the Solvency II tiering restrictions, therefore we can assume the data will be readily available. There appears to be duplication between row 17 and row 16.	
OF - B1A- cell C17	Applies to B1A group template.	

	Please refer to OF – B1A – cell B17.	
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		
OF - B1A- cell B30	We do not think it would make sense to identify EPIFP separately as the concept of EPIFP seems to be contradictory to the economic balance sheet approach under Solvency II. It appears to be unclear which concern the concept of EPIFP is trying to address and why the identification of this particular aspect of expected cash inflows is necessary to achieve the Solvency II objectives. Additionally, there are a number of concerns around both the definition and calculation methodology of EPIFP. Any requirement to calculate, disclose or apply a specific treatment to EPIFP will create additional costs for industry and consequently for consumers without enhancing policyholder protection. We have concerns that if EPIFP is disclosed, this would be misunderstood by financial markets and could lead to inappropriate conclusions. Besides, as there is no appropriate calculation methodology for EPIFP, but only proxies, it does not seem relevant to disclose these figures publicly or to supervisory authorities.	
OF - B1A- cell B31	Please refer to OF - B1A- cell B30.	
OF - B1A- cell C33	Further clarification on the layout of the template is required to prevent potential confusion if these details are meant to be publically disclosed. With regards to “eligibility SCR”, clarification would be helpful on the following view concerning “B33<=B32”: Even if the tier 1 available amount (B32) is higher than the SCR, here the minimum amount to comply with eligibility (that is 50% of the SCR)	

	could be posted. Then the remaining 50% can be filled in C33 (tier 2) and D33 (Tier 3) within their limits.	
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	Not clear why not “credit institutions” acc. to Article 323 bis SCG3, Para 1. (e) are considered? Description in LOG unclear/useless. It must be clarified **which value** is to be entered (proportional share of the undertakings’ own funds calculated according to the relevant sectoral rules?)and that only **subsidiaries** are to be considered. In our understanding participations are to be recognized via the “adjusted equity method” (acc. to Article 323 bis SCG3, Para 1. (d) &(f)).	
OF - B1A- cell A45A	Please refer to OF - B1A- cell A45.	
OF - B1A- cell A45B	Please refer to OF - B1A- cell A45. It is unclear what kind of entitites fall within the definition of "non regulated entities	

	carrying out financial activities". Please provide for a concrete definition of those entities,	
OF - B1A- cell B60		
OF - B1A- cell C60	The sign of the reduction is not defined although it can be concluded from the example that the negative impact to the company (reduction) is denoted by + sign, it would be helpful to state this explicitly.	
OF - B1A- cell B61	Please refer to OF - B1A- cell C60.	
OF - B1A- cell C61	Please refer to OF - B1A- cell C60.	
OF - B1A- cell B62		
OF - B1A- cell C62	Please refer to OF - B1A- cell C60.	
OF - B1A- cell B64		
OF - B1A- cell C64	Please refer to OF - B1A- cell C60 (sign of the reduction) and OF - B1A- cell B64 (tiering and eligibility).	
OF - B1A- cell B65	Please refer to cell OF - B1A- cell B64 (tiering and eligibility).	
OF - B1A- cell C65	Please refer to OF - B1A- cell C60 (sign of the reduction) and OF - B1A- cell B64 (tiering and eligibility).	
OF - B1A- cell B70		
OF - B1A- cell C70		
OF - B1A- cell B71		

OF - B1A- cell C71		
OF - B1A- cell B73		
OF - B1A- cell C73		
OF - B1A- cell D73		
OF - B1A- cell E73		
OF - B1A- cell F73		
OF - B1A- cell B74		
OF - B1A- cell C74	IFRS reporting processes include requirements on determining the existence of letters of credit and guarantees. Technical analysis will need to be carried out to confirm the treatment of these items under Solvency II rules on Own Funds.	
OF - B1A- cell D74	Please refer to OF - B1A- cell C74.	
OF - B1A- cell E74		
OF - B1A- cell F74		
OF - B1A- cell B75		
OF - B1A- cell C75		
OF - B1A- cell D75		
OF - B1A- cell E75		
OF - B1A- cell F75		
OF - B1A- cell A77.1	This could result in a long list, we would propose to show this in a separate template or to allow aggregation by nature of the ancillary own funds (e.g. by “member’s call”) The example in the LOG is not in the ISO8601 format. Clarification would be helpful that this format is the one which should be followed.	
OF - B1A- cell B77.1		
OF - B1A- cell C77.1		
OF - B1A- cell D77.1		

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OF - B1A- cell E77.1	Cell E78 (group) Heading makes no reason: Issuing entity (if belongs to the group G, otherwise NG). If the Subordinated MMA are reported as Own Fund, the issuing entity **must** be a group company.	
OF - B1A- cell F77.1		
OF - B1A- cell G77.1		
OF - B1A- cell H77.1		
OF - B1A- cell I77.1		
OF - B1A- cell J77.1		
OF - B1A- cell K77.1		
OF - B1A- cell L77.1		
OF - B1A- cell M77.1		
OF - B1A- cell N77.1		
OF - B1A- cell A77.n		
OF - B1A- cell B77.n		
OF - B1A- cell C77.n		
OF - B1A- cell D77.n		
OF - B1A- cell E77.n		
OF - B1A- cell F77.n		
OF - B1A- cell G77.n		
OF - B1A- cell H77.n		
OF - B1A- cell I77.n		
OF - B1A- cell J77.n		
OF - B1A- cell K77.n		
OF - B1A- cell L77.n		
OF - B1A- cell M77.n		
OF - B1A- cell N77.n		
OF - B1A- cell B79		

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OF - B1A- cell C79		
OF - B1A- cell D79		
OF - B1A- cell E79		
OF - B1A- cell F79		
OF - B1A- cell B80		
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		
OF - B1A- cell D85		
OF - B1A- cell A87.1		
OF - B1A- cell B87.1		
OF - B1A- cell C87.1		

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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		
OF - B1A- cell K87.1		
OF - B1A- cell L87.1		
OF - B1A- cell M87.1		
OF - B1A- cell N87.1		
OF - B1A- cell A87.n		
OF - B1A- cell B87.n		
OF - B1A- cell C87.n		
OF - B1A- cell D87.n		
OF - B1A- cell E87.n		
OF - B1A- cell F87.n		
OF - B1A- cell G87.n		
OF - B1A- cell H87.n		
OF - B1A- cell I87.n		
OF - B1A- cell J87.n		
OF - B1A- cell K87.n		
OF - B1A- cell L87.n		
OF - B1A- cell M87.n		
OF - B1A- cell N87.n		
OF - B1A- cell B88		

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OF - B1A- cell C88		
OF - B1A- cell B89		
OF - B1A- cell B90		
OF - B1A- cell C90		
OF - B1A- cell B92		
OF - B1A- cell C92		
OF - B1A- cell D92		
OF - B1A- cell E92		
OF - B1A- cell F92		
OF - B1A- cell B93		
OF - B1A- cell C93		
OF - B1A- cell D93		
OF - B1A- cell E93		
OF - B1A- cell F93		
OF - B1A- cell B94		
OF - B1A- cell C94		
OF - B1A- cell D94		
OF - B1A- cell E94		
OF - B1A- cell F94		
OF - B1A- cell B96		
OF - B1A- cell C96		
OF - B1A- cell D96		
OF - B1A- cell E96		
OF - B1A- cell B97		
OF - B1A- cell C97		
OF - B1A- cell D97		

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
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		
OF - B1A- cell B100.1		
OF - B1A- cell C100.1		
OF - B1A- cell D100.1		
OF - B1A- cell E100.1		
OF - B1A- cell F100.1		
OF - B1A- cell G100.1		
OF - B1A- cell H100.1		
OF - B1A- cell I100.1		
OF - B1A- cell J100.1		
OF - B1A- cell K100.1		
OF - B1A- cell L100.1		
OF - B1A- cell M100.1		
OF - B1A- cell N100.1		
OF - B1A- cell A100.n		
OF - B1A- cell B100.n		
OF - B1A- cell C100.n		
OF - B1A- cell D100.n		
OF - B1A- cell E100.n		
OF - B1A- cell F100.n		
OF - B1A- cell G100.n		

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OF - B1A- cell H100.n		
OF - B1A- cell I100.n		
OF - B1A- cell J100.n		
OF - B1A- cell K100.n		
OF - B1A- cell L100.n		
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		
OF - B1A- cell G106.1		
OF - B1A- cell H106.1		
OF - B1A- cell I106.1		
OF - B1A- cell J106.1		

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
OF - B1A- cell K106.1		
OF - B1A- cell L106.1		
OF - B1A- cell M106.1		
OF - B1A- cell N106.1		
OF - B1A- cell A106.n		
OF - B1A- cell B106.n		
OF - B1A- cell C106.n		
OF - B1A- cell D106.n		
OF - B1A- cell E106.n		
OF - B1A- cell F106.n		
OF - B1A- cell G106.n		
OF - B1A- cell H106.n		
OF - B1A- cell I106.n		
OF - B1A- cell J106.n		
OF - B1A- cell K106.n		
OF - B1A- cell L106.n		
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		
OF - B1A- cell D109		
OF - B1A- cell B110		
OF - B1A- cell C110		
OF - B1A- cell D110		

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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		
OF - B1A- cell A113.n		
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	LOG: A clear definition of ring-fenced fund is necessary; eg.there must be a clarification that conventional unit linked and reinsurance business do not fall within the scope of ring-fenced funds.	
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	Please refer to OF - B1A- cell A115.1. LOG not understandable/misleading: Clarification of “Shareholder value in RFF” required.	
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		
OF - B1A- cell J130.1		
OF - B1A- cell K130.1		
OF - B1A- cell L130.1		
OF - B1A- cell M130.1		
OF - B1A- cell A130.n	The scope must be in line with the draft level 2 text Art. 323, Para 1) and the framework directive Art. 222 -> only related insurance and reinsurance undertakings (Art. 212 1.b in the Directive) considered in scope for group supervision should be considered in the availability calculation. Therefore: • Delete in OF-B1A (group), cell B245 "IHC and ancillary entities" • Delete in LOG A130.n: "ancillary entities, SPVs and intermediate insurance holding companies" and "whether controlled or not controlled"	
OF - B1A- cell B130.n		
OF - B1A- cell C130.n	Cell C130.n is defined in the log file as a calculation therefore it should be shaded in the template with a light blue colour.	

OF - B1A- cell D130.n	Is must be clarified that the “Non available minority interests” is the minority interests in the eligible own funds **(after deducting other non available items)**of (re) insurance subsidiary exceeding the contribution of the solo SCR to the group SCR.	
OF - B1A- cell E130.n	We propose to delete this cell as ring-fenced funds are already **deducted** at solo level (Art. Article 58bis COF1bis Para 1.e) therefore it is unclear what should be entered in this cell. There a risk of double deduction.	
OF - B1A- cell F130.n	It is unclear what kind of items should be reported in this cell . Should it be the items listed in cells G130-M130 . Or is it meant that the items in G130-M130 are only for EEA-funds and F130 includes the total of these items for non EEA-companies? The LOG does not provide an indication of either possibility.	
OF - B1A- cell G130.n	The references to the framework directive and draft level 2 text in line 244 are misleading. Non available own funds ex art. 222 (2) to (5) of Directive 2009/138/EC and Art.323.4. We question why only paragraph 4 is referred to? Paragraph 4 relates to the cells D130-E130 but not to G130-M130.	
OF - B1A- cell H130.n		
OF - B1A- cell I130.n		
OF - B1A- cell J130.n		
OF - B1A- cell K130.n		
OF - B1A- cell L130.n		
OF - B1A- cell M130.n	This comment refers to OF - B1A (group)- cell N130.1 We do not find it clear the reason why the sum-position doesn’t include the cells D130-F130? The template must be clear as to the total amount to be deducted.	
OF - B1Q- cell C1A		
OF - B1Q- cell B5		
OF - B1Q- cell C5		
OF - B1Q- cell D5		
OF - B1Q- cell B6		

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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		
OF - B1Q- cell B25		
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	In particular for VA templates, undertakings will require sufficient time in order to establish the appropriate systems and calculation processes to be able to deliver these reporting templates. EIOPA's cooperation with industry to help with this process is very much appreciated. This template does not align well to OFB1 and is potentially redundant: We prefer to have a consistent manner of presenting the own funds items, at this moment the presentation of the own funds items doesn't align with the presentation in OF-B1. Further, we think this template redundant to the current OF B1A template which already shows the 'variations' in the period. We propose you delete this template. These templates should exclude items not included in BOF: The variations of BOF explained by variation Analysis Templates should not include the variation of BOF adjustments (items excluded from BOF) as included in V13 – V16, because these adjustments are not part of the variation analysis templates in C2B – C2D. According to the title "summary Analysis of other variations in BOF excl. adjustments" these adjustments are not included and should not be part of the template "Summary analysis of changes in BOF".	

	Incorrect referencing: The cell references of the variation detailed in OF-B1 are incorrect and should be adjusted accordingly (e.g. ordinary share capital, share premium). Cell V11: Furthermore in our understanding there are calculated the available own funds in cell V11 (not the eligible own funds). Please correct this misleading expression. Cell V8:In the context of calculating the basic own funds this line item should be defined as "the excess of assets over liabilities" (cell OF B1A B23) and deducted by Other basic own fund items (cell OF B1A B26). It is onerous and adds little value to have line of business splits: Splits should not be required by line of business, in particular regarding reinsurance this might not deliver reasonable actuals. **General comments** These templates are still based on underwriting year, the information will not be available in existing reporting systems that are based on the accident year. Clarification from EIOPA would be helpful that the option to use UWY/AY, as outlined in the impact assessment in relation to Techncial Provisions, would also be available for these templates.	
VA – C2A – Purpose	The template meets the purpose of providing a check that the change in BOF explained in the VA ties up to the OF-B1 template. The template includes a high-level summary of the VA. This is a sensible concept but the analysis is not very meaningful as it does not look at the underlying risks. It would also not be needed if the VA had not been split between 3 different templates. This template will be incredible difficult to report firstly, Revenues (interests) in ordinary P&L are not cash flow based and secondly, expenses related to investments are not cash flow based.	

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VA – C2A – Benefits	The aim to check against OF-B1 is of benefit. The aim of providing a high-level summary of the VA would be of benefit if it explained the movement in BOF in relation to the risks, but is of little benefit as currently proposed (as it would not be used by Management to understand the risks or manage the business). A high-level summary may not be needed if a single template explaining the movement in OF was produced.	
VA – C2A - Costs	High quality data for line of business split are very costly. Providing data on branch level or legal entity level should be sufficient.	
VA – C2A – Groups	According to the consultation paper on QRTs there is no open issue in the application for groups. Please change the wording in no, because in the consultation paper there is a clear statement, that the summary sheets should be identical.	
VA - C2A – Materiality		
VA - C2A – Disclosure		
VA – C2A – Frequency	Agree that the frequency should be annual.	
VA - C2B– General	This template starts with VA of OF and uses a bottom up approach to build the VA template by using detailed information from other templates, the issue is how to make this match the balance sheet. In reporting terms, this will be difficult. The separation of investments held also in the opening balance sheet and the new acquired investments during the period isn`t possible and does not make sense. • If there is a merger in a group then where would the information be reported? • When an undertaking sells new shares during year, we question what would be classed as old and new business – this isn't used by accounting. • It should be possible to use roll forward techniques as this will be necessary to bridge reporting data between two periods. • Cells A6-A8 will be very problematic, even undertakings who currently report according to fair value, do not have this information. Overall we believe these templates are too focused on a transaction-basis, but these cells are particulary so.	

VA – C2B – Purpose	All transactions per investment instrument needed to fulfil this reporting requirement. This data is not held in production system today – a separate system and data base is needed to fulfil these requirements which are very costly to build. The template does not align with the underlying risks nor does it explain variances from expected return: This template does not meet the purpose of explaining the movement in BOF due to economic impacts, as it ignores the impact of investment movements on liabilities and the investment return that was already anticipated at the start of the period within the calculation of liabilities. The information of the form is factual information on the investment income and changes in market values but does not help relate the change in BOF to the underlying risks.	
VA – C2B – Benefits		
VA – C2B - Costs	There will a major impact on costs, particulary if EIOPA officially propose a reporting requirement requiring a new system to be built based on transactional data. Please refer to VA – C2B – Purpose and General. Any deviation from IFRS will also be costly for undertakings to implement as it would move away from the underlying principles used for Solvency II.	
VA – C2B – Groups	According to the consultation paper on QRTs there is no open issue in the application for groups. Please change the wording in no, because in the consultation paper there is a clear statement, that the summary sheets should be identical.	
VA - C2B – Materiality		
VA - C2B – Disclosure		
VA – C2B – Frequency		
VA C2B - cell AA2	See comment VA C2B-cell A1 for comments on derivatives.	
VA C2B -cell A1	This comment applies to VA C2B - cells A1-A3. Interest received (cash flow position) will not fully explain the movement in OF	

	positions. I.e. undertaking has bonds that had accrued interest at opening Balance in the amount of 100 cash units. During Q1 the undertaking received 120 cash units interest in cash. On the Closing Balance accrued interest of 10 cash units. According to the scheme proposed, the undertaking has to report 120 cash units as a position explaining changes in BOF due to investments, however real change equals only 30 cash units (10 (CB) + 120 – 100). We therefore propose to remodel this cell. The wording and the content should be consistent with Assets-D3. Therefore the wording should be changed in "interest" according to Assets-D3 - cell O3: the description in the LOG is not clear. The sold investments have to be valued with the exit/sold price. Otherwise the development of the investments (shown in the cells O1 until O5) is not correct if you adjust the "change in investment values (= realised and unrealised gains/losses)". This a factual element of investment return, we do not think it is meaningful in explaining the change in BOF in relation to the risks modelled in the SCRs. Clarification required as to whether that interest accrued not included in this item (and therefore include in A6-A8). We propose to align with IFRS regarding the definition of investment revenue (accrued income). The current definition of investment revenue (cash flow) doesn't align with IFRS (accrued income) and should align with IFRS to avoid additional workload and different definitions of investment revenue. The current proposed presentation doesn't give any additional insight for the supervisor and creates unnecessary reconciling items between IFRS and SII.	
VA C2B -cell A2	Similar to the previous cell, this a factual element of investment return, we do not think it is meaningful in explaining the change in BOF in relation to the risks modelled in the SCRs. Please clarify that this is reported net of tax (for example in Poland dividend paid is less CIT) or gross.	
VA C2B -cell A3	See comments on A1	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
VA C2B -cell A4	See comments on A1	
VA C2B -cell A6	This comment applies to VA C2B - cells A6 – A8. Please also refer to our comments on Assets – D3. It will be difficult to split result on old and new business. Similar to previous cell, this a factual element of investment return, we do not think it is meaningful in explaining the change in BOF in relation to the risks modelled in the SCRs. As noted above, clarification required that interest accrued include in this item (and not in A1) We propose to report additions, disposals, realized and unrealized revaluations of the asset portfolio during the year according to IFRS and to avoid additional workload and different definitions of revaluation. The proposed presentation doesn't give any additional insight for the supervisor and creates unnecessary reconciling items between IFRS and SII (with the exception of valuation differences). The separation of investments held in the opening balance sheet and the new acquired investments during the period isn`t possible. It`s totally unclear which assets are sold if you have big asset inventories at the beginning and you buy during the year new assets. If you sell a part of these assets, are the sold assets the new or the former ones? Therefore you have to install an assumption perhaps first in - first out or an average price calculation for the assets. More appropriate would be to show realized and unrealized gains in the portfolio. Is there a possible cross check between VA C2B -cells A1-A3 to template D3?	
VA C2B -cell A7	This template must be checked for consistency against template D3. Is it right to put here bond redemptions, asset and fund capital reductions?	

	Unclear about what should be reported here.	
VA C2B -cell A8	The need to distinguish between changes in valuation on assets held at opening balance and assets acquired during the year eludes us. It is not required under IFRS and does not seem to add insight/value. It requires a considerable effort to include this in our transactional systems and financial reporting.	
VA C2B -cell O1	Factual information that is not meaningful in explaining the change in BOF in relation to the risks modelled in the SCRs.	
VA C2B -cell O2		
VA C2B -cell O3	Is it right to put here bond redemptions, asset and fund capital reductions? The description in the LOG is not clear. The sold investments have to be valued with the exit/sold price. Otherwise the development of the investments (shown in the cells O1 until O5) is not correct if you adjust the "change in investment values (= realised and unrealised gains/losses)".	
VA - C2C– General	The template should be analysed at a total level instead of at a line of business level: The analysis of changes in BOF due to technical provisions by each line of business is onerous and doesn't give any additional insight for the supervisor. Because of the level of detail, the cost of providing this information is high in relation to the benefit it provides. We think accuracy will come at an unnecessary cost, with no added value, for analysing re-insurance as this is not the way we analyse reinsurance business. We propose to analyse the changes in BOF due to technical provisions by the total of the lines of business. The analysis of changes in BOF due to technical provisions regarding the calculation is far too prescriptive (e.g. valuation of risks accepted during the period must be valued at period end, on end period assumptions etc.). We believes that more flexibility should be left to companies filing for an internal model when preparing the variation analysis, to allow companies to present the VA in line with the way they manage the business, which would also allow VAs to be built without constraints in mind.	

	Significant time and additional resources will be necessary to achieve successful implementation. We propose the analysis of changes in BOF due to technical provisions should be calculated according how the company is managed. The structure of this template does not follow the logic of the MCEV Analysis of Earnings. This relates especially to the fact that the "roll forward" (cells A1 to E1A) is made based on actual values as opposed to MCEV logic where model values are used. A parallel analysis of MCEV and Technical Provisions – using the same model runs – is therefore not possible. It is unclear whether part of risks accepted prior to period - Changes in estimates (only for scope of risks captured in BE) relates to LOB as well or only totals. Running of calculation to test impact of single assumptions would be time consuming – especially taking into consideration that this templates would be filled in at the end (one cannot make variation analysis without having the full picture before). There may be problems with keeping to deadlines (any re-run due to possible mistakes would be problematic). We have a number of comments on cells which do not have a reference in this template, for example VA–C2C–A0, or which apply to a range of cells. Comments are as follows: (a) For areas split by LoB, cell A0, where should the figures for each LoB be shown? To avoid inconsistency it needs to be specified. Possible examples include placing LoB either in separate tabs or in separate columns. (b) Cell CC7: this should be equal to item G2 (change in expected reinsurer default) rather than C3. (c) Cell CC1 : Summary table at the bottom: the table does not seem to currently allow for the natural run-off of BE TP from prior years, due to payments etc. Items A1-D1 and G1 should be included to reflect this explicitly. The overview table at the top does reflect this run-off through item AA4.	

	(d) For items E1 and H1 for clarity ought to refer to BE of future cashflows as oppose to BE of cashflows. Clarification is needed as to whether they are discounted or not and to what point do the discount refers to; for instance, is it to current year? Confirmation that it includes legally obliged and non-incepted as at reporting date. (e) VA – C2C LOG.doc states that recognition of these cash flows should be ‘consistent with how future cash flows are accounted for in the Best Estimate’ , but this may be difficult to ensure, given that cashflows may not be split in an accident year basis as some may be on an underwriting year basis. (f) VA – C2C LOG.doc : AA1 – In this section where it says : Note: Inception of risks accepted during the reporting period should be considered at the annual closing, not at the actual date of inception of the risk; movements between actual date of inception and period end (ex: supplementary premiums or claims paid) are not reported separately in this template.’ We would like confirmation that it is simply suggesting that one ought to allow for legally obliged only and not unincepted business. (g) We seek clarification on the treatment of development factors - Is a change of development factors a change in assumption or a change in experience? A4-E4 – We seek clarification as to whether this includes the impact of legally obliged contracts? The template C2C should be consistent to other templates. Therefore this template should be shown only on entity level. In the LOG file, the order of calculation is prescribed. There should be no regulation as to the order of the calculation steps. Such limitations could lead to unnecessary complexitiy (e.g. regarding processes), less efficiency, and a reduction in informative value.	
VA – C2C – Purpose	However, the level of detail regarding reinsurance recovcerables seems not feasible, especially taking into account the split between risks accepted during period an risk accepted prior to period. Expected reinsurance recoverable based on reinsurance contracts, especially for those on a non-proportional basis, cannot be split in a	

	reasonable way into risks accepted during the period and those accepted prior to the period. From the actuarial perspective, there is no added value using some allocation algorithm to allocate the expected Best Estimate from reinsurance contracts onto the requested level of detail. Therefore we suggest not to split the reinsurance recoverables into risks accepted during and prior to period; unwinding effects and effects of changes in the discount rate might be shown separately, all other effects should be shown as one figure only, similar to the risk margin. It is still unclear, whether commissions in relation to (ceded) reinsurance have to be recognized as deduction within the gross expenses or as part of the reinsurance recoverables.	
VA – C2C – Benefits	A VA would be of benefit if it explained the movement in BOF in relation to the risks, but is of little benefit as currently proposed (as it would not be used by Management to understand the risks or manage the business).	
VA – C2C - Costs	Please refer to VA – C2B – General & Costs and VA – C2C - General. In addition to major costs which would result from requiring new systems to support reporting of transactional data and data which deviates from IFRS definitions, we find that reporting per LOB will have a dramatic cost impact on the industry. This is particulary applicable for non-life undertakings who whose segmentation per LOB is greater than for their life counterparts. We propose to report variation analysis information only at solo undertaking level. As previously mentioned, these templates are still based on underwriting year, the information will not be available in existing reporting systems that are based on the accident year. To develop an alternative would incur an extremely high cost and for the purpose of reporting, we would ask that undertakings do not have to change the way they run their business. Also, the split between old and new business will require a more granular breakdown than that already proposed in the technical provisions templates.	

VA – C2C – Groups	According to the consultation paper on QRTs there is no open issue in the application for groups. Please change the wording in no, because in the consultation paper there is a clear statement, that the summary sheets should be identical.	
VA - C2C – Materiality	Please refer to VA – C2C – Costs for our comments on reporting per LOB. We appreciate EIOPA's consideration of a materiality level for reporting per LOB however this could then have an adverse affect on the reconciliation reserve, how differences would be explained and subsequent quarterly reporting of template BS – C1. This is an incredibly complex issue and to require more than entity level reporting is unduly burdensome. There should be an additional cell at the end of the sheet within the summary block to feed in the change of those immaterial LoB, similar to cells AA5 for the risk margin, otherwise a reconciliation to the balance sheet cannot be performed.	
VA - C2C – Disclosure		
VA – C2C – Frequency		
VA C2C -cell AA5		
VA C2C -cell A1	The definition for this cell is not in line with IFRS i.e. premium split in risk accepted during period/ risk prior to period. Clarification would be helpful that the premiums of the renewed contracts after the contract boundary at the end of the previous year are included. The example mentioned regarding premiums paid is not even true for contracts with monthly premium payments, as if a contract starts at 01/06/N, at the year end there are already payments made for 7 months. Obtaining this by LOB and separately for New Business would be a new accounting requirement as splits by LOB are no longer required for other QRTs.	

	- It would be more consistent with the way that business is managed for NB to be measured at Point of Sale and hence to exclude revenue items in this 'Risks accepted during period' section, or to use 'expected' revenue items to project to year end with variances analysed within other lines of the analysis. - It is not considered important to see the underlying split of revenue items separately in explaining the BOF where it is the total cashflows and BEL movements from writing new business that impact on the BoF. - Clarification required: are A1-D1 items on actual basis (experience) or from model? Suggest wording changed from 'Premium Paid' to "Premiums received on contracts underwritten during year N". A minor point but hopefully will improve clarity	
VA C2C -cell B1	See above	
VA C2C -cell C1	The separation of "salvages and subrogations recovered" is new in this template. In all other technical provision templates this effect is included in the "claims & benefits" position. To be consistent, we propose to delete this line item and include the effect in the line item "Claims & benefits". This comment also applies to VA – C2C – cell C4. Please refer to VA – C2C – cell B1 for comments on AY/UWY.	
VA C2C -cell D1	See above	
VA C2C -cell E1	Including BEL at the end period value without allowing for the investment returns between point of sale and year-end will create a misleading (and potentially volatile) view of the impact of writing new business. This will be particularly the case for WP business, where positive investment return will increase the asset share and hence the BEL, thus reducing the apparent impact on BOF of writing new business (with the offsetting impact on assets hidden in VA C2B). Conversely poor investment return will erroneously imply a larger increase in BOF from writing new business than is actually the case.	

	It would be more consistent with the way that the business is managed for this to be measured at POS (or the expected year end position rather than the actual end position). The new business impact measured here will be influenced by actual investment returns and changes to economic assumptions over the period, and therefore not tie up to published NBC This requires a gross BEL with reinsurance shown separately. Is this necessary given that it is only the net of reinsurance results which impact BOF?	
VA C2C -cell E1A	Same comment as for cell E1 above	
VA C2C -cell G1	Same comment as for cells A1 – D1 above. It is not clear whether this is intended to be net of reinsurance premiums (which it would need to be for the analysis to work) rather than just reinsurance recoverables. Difficult to split by Line of Business i.e. reinsurance contracts apply to branches or legal entities, or different portfolios, not to Lines of Business. Generating high quality data would lead to an unreasonable process and high IT cost.	
VA C2C -cell H1	It is not clear whether this is intended to be net of the BE of reinsurance premiums (which it would need to be for the analysis to work). Is it necessary to show the impact of reinsurance on the BE separately (rather than show a net figure)? Difficult to split by line of business i.e. reinsurance contracts apply to branches or legal entities, or different portfolios, not to line of business.	
VA C2C -cell E1A		
VA C2C -cell A2	***Further clarification required*** • What is meant by discount rates that applied during year N? It changes all the time. • What is calculation of the unwinding of discount rates? Is it run of one year N? • Isn't the approximation TP at the year end * yield of 1 y at the year end of N-1 sufficient? It is used regularly in the embedded value calculations.	

	More meaningful to consider this alongside expected investment return on the assets. Is it necessary to show results gross of reinsurance and reinsurance separately given it is only net results that impact BOF? From the actuarial perspective, it is reasonable to calculate the unwinding effect based on prior year end Best Estimate (based on former discounting pattern), as it is described here.	
VA C2C -cell B2		
VA C2C -cell D2	Not meaningful to consider this in isolation of impact of changes on discount rates on investment return. For example, an annuity liability may be well matched by assets of the same duration and so changes to interest rates may have limited impact on BOF, but this cell would show a large impact from a change in discount rates (with the offset hidden in VA C2B). Also, showing the impact of changes to discount rates in isolation of other assumptions that use the same interest rates (e.g. unit growth rates) is not meaningful. It is unclear why changes to discount rates would not be in the same section as economic assumption changes. Is it necessary to show reinsurance separately? Contains significant overlap with A3 (cell E53 - effect of econ assumptions). If the latter is to include all economic assumptions except the discount rate, then this should be clearly stated in the QRT's. From the actuarial perspective, it is reasonable to calculate the effect of changes of discount rates based on prior year end Best Estimates as used for calculation the unwinding effect (see cell A2), taking the unwinding effect into account.	

VA C2C -cell E2	Please refer to VA – C2C – D2.	
VA C2C -cell G2	It is not clear why this is shown as a separate item when many other items have been grouped together into cell E4. Change of expected default is included in the change in estimate part. As this is a change in assumption then should it be included in the change in assumption section?	
VA C2C -cell A3	Showing the impact of changes to assumptions isolation to the impact on asset values is not meaningful. This is meaningful only for assumptions that have no impact on asset values e.g. correlation assumptions. It is also not meaningful to show the impact of changes in unit growth / asset growth separately from changes in discount rates as both use the same risk-free rates. This provides no breakdown of which assumptions have been changed and the impact for each change. The difference between experience and assumptions in general insurance is indistinct, and not captured within the claims provisioning process. We do not currently have the ability to split these items, so at best the split will be estimated. (P&L attribution for internal reporting, for example, will not include a split between assumptions and experience, as this is not considered relevant for general insurance.) For non-life business, confirm /list the possible economic variables that ought to be included in this cell.	
VA C2C -cell B3	This gives no breakdown of the underlying assumption changes e.g. mortality, persistency, expenses. We would like to see more examples of what is expected here in a non-life context as it is difficult to isolate from the valuation work which will have been carried out on an accident year basis. What is required here will be impact of a change in assumptions for risks written prior to the current year i.e. all prior year accident years and some elements of the current accident year. We think that this item may include any impact from those policies incepted in the	

	current year, but legally obliged in previous year, is this a valid interpretation? Subsequently, we seek clarification on whether this ought to be included in the experience section as oppose to the assumption section. Please clarify if methodology changes should be included in this cell	
VA C2C -cell C3	Same comments as for cells A3 and B3. In addition, it does not make sense to split out economic and non-economic assumptions gross of reinsurance but combine the impact for reinsurance into one line. This gives less granular information for results that are net of reinsurance than gross (even though it is only the net results that impact BOF) and means that we cannot separately identify the impact of demographic assumption changes on BOF. Difficult to split by Line of Business i.e. reinsurance contracts apply to branches or legal entities, or different portfolios, not to Line of Business. Generating high quality data would lead to an unreasonable process and high IT cost.	
VA C2C -cell A4	Similar comments to cell A1. The split of cashflows into 'premiums, claims, benefits' etc is not really needed to explain movement in BOF. Under this presentation, it would be more consistent with the way the business is managed to include the premiums arising from new business. Then the calculated Actual v Expected (AvE) would include AvE on new business.	
VA C2C -cell B4	It is difficult to separate claims, expenses and technical provisions between risks accepted during the period and risks accepted prior to the period. This point relates to AY/UWY issue and the option provided for technical provisions. Proposals for VA should be consistent with this. We question why the whole claim and benefit is reported here? It impacts on the investments and their net impact on the total change seems to be = 0. The paid sums at risk have no impact on the technical provisions. Should only part of the benefits reported here which release the TP incl. IBNR. The net impact with investments is the sums at risk?	

	We requests additional technical documentation from EIOPA.	
VA C2C -cell C4	Please refer to VA – C2C – cell B4 where is issue of AY/UWY is raised. The separation of “salvages and subrogations recovered” is new in this template. In all other technical provision templates this effect is included in the “claims & benefits” position. To be consistent, please delete this cell and include the effect in the cell for “Claims & benefits”.	
VA C2C -cell D4	Expenses paid should be “booked expenses” instead – to be in accordance with local accounting rules.	
VA C2C -cell E4	This comment is meant for discussion: Overall this section (‘Risks captured prior to period – impact from experience and other’) will capture all elements not captured elsewhere. This means that this captures ‘AvE experience’ but has a number of shortcomings: - The impact is not broken down into individual sources of profit or loss such as mortality, persistency etc - PPA and other changes are included in the same line, which reduces the usefulness in explaining the underlying causes of profit and loss. - Unwind of the time value of financial options and guarantees (TVOG) will be ‘hidden’ in this section	

	- The impact of economic experience on BEL will be included in this line as well as the impact of demographic experience. This is because economic experience may impact BEL e.g. due to impact on future AMCs on unit-linked business. - There are no proposals for With Profits business equivalent to the proposals for adjusting the results for unit-linked business. Investment risk is largely borne by policyholders as for unit-linked business. The change in BEL due to changes in investment return credited to Asset Shares would therefore come through as experience variances, leading to an extremely volatile figure that is likely to swamp other items of AvE and not provide meaningful information (as it would be offset in the asset template). I.e. positive investment return will give apparent experience losses, and negative return will give apparent profits. - Distortions will occur as 'I-E' tax is modelled in BEL but it is not included as a revenue item within VA – C2C. Hence apparent experience variance profits will emerge in VA –C2C as no allowance is made for the actual policyholder tax payments that were expected within the start-year BEL. These apparent profits may be offset if allowing for 'I-E' tax in template VA – 2CD. Similarly experience variances will occur for unit-linked business unless the adjustment for unit-linked business is made net of policyholder tax and this tax is not included in VA – C2D. This issue relates to deferred tax as well as current tax e.g. the tax charged to unit funds or asset shares may relate to tax expected to be payable in the future. It would be more consistent with the way the business is modelled to also include change in new business liabilities from Point of Sale in this figure (so as to include AvE on new business).	
VA C2C -cell E4A		
VA C2C -cell G4	The title "reinsurance recoverables received" seems to ignore the reinsurance premiums received. Is this meant to be net of reinsurance premiums, which would be needed for the analysis to work?	

	Difficult to split by Line of Business i.e. reinsurance contracts apply to branches or legal entities, or different portfolios, not to Line of Business. Generating high quality data would lead to an unreasonable process and high IT cost.	
VA C2C -cell H4	See comments on G4	
VA C2C -cell BB1		
VA C2C -cell CC1	As already mentioned under “Purpose”: The level of detail regarding reinsurance recovcerables seems not feasible, especially taking into account the split between risks accepted during period an risk accepted prior to period. Expected reinsurance recoverable based on reinsurance contracts, especially for those on a non-proportional basis, cannot be split in a reasonable way into risks accepted during the period and those accepted prior to the period. From the actuarial perspective, there is no added value using some allocation algorithm to allocate the expected Best Estimate from reinsurance contracts onto the requested level of detail. Therefore we suggest not to split the reinsurance recoverables into risks accepted during and prior to period; unwinding effects and effects of changes in the discount rate might be shown separately, all other effects should be shown as one figure only, similar to the risk margin.	
VA - C2D– General	Please refer to VA – C2A, C2B and C2C – General.	
VA – C2D – Purpose	This template provides information on changes in BOF due to “other items” but is not particularly meaningful in understanding the underlying causes of the changes i.e. it does not map to underlying risks.	
VA – C2D – Benefits	A VA would be of benefit if it explained the movement in BOF in relation to the risks, but is of little benefit as currently proposed (as it would not be used by Management to understand the risks or manage the business).	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
VA – C2D - Costs	The costs would be reasonable if the VA was in a format useful to Management	
VA – C2D – Groups	According to the consultation paper on QRTs there is no open issue in the application for groups. Please change the wording in no, because in the consultation paper there is a clear statement, that the summary sheets should be identical.	
VA - C2D – Materiality		
VA - C2D – Disclosure		
VA – C2D – Frequency		
VA C2D -cell O2	This does not consider the underlying causes for variances. It would be more meaningful to calculate the total "Net Assets" as "assets less liabilities", and to analyse the movement due to "Expected Return" and sources of investment variances. It is not clear why this item needs to be shown separately. We propose to align with IFRS regarding the definition of interest charges (accrued income). The current definition of interests charges (cash flow) doesn't align with IFRS (accrued income) and should align with IFRS to avoid additional workload and different definitions of interest charges. The current proposed presentation doesn't give any additional insight for the supervisor and creates unnecessary reconciling items between IFRS and SII.	
VA C2D -cell O3	See comment on O2	
VA C2D -cell O4	See comment on O2	
VA C2D -cell O6	It is assumed that this is intended to include all tax as tax items are not included in VA – C2C. However, it is not meaningful to include all tax here as 'I-E' tax will be included within the BEL, and so with regard to 'I-E' tax it is only variances to expected that will have a net impact on BOF.	
VA C2D -cell O7	It is not meaningful to include changes in deferred tax where this relates to 'I-E' tax that has been included within liabilities. For example, tax may be charged to asset	

	shares or unit values creating spurious profits/losses in VA-C2C that are offset by spurious losses/profits here. Similarly, the impact of new business on deferred tax assets (e.g. future tax relief on acquisition costs) would be more meaningfully included within assessment of the impact of new business. In conclusion it would be more meaningful for the VA analysis to be performed net of tax with the impact of actual versus expected tax (current and deferred) included within the VA.	
VA C2D -cell O8	Log document defines this cell as Refers to incomes not captured in tabs VA C2B and VA C2C. Does it include also *extraordinary gains* line? Please clarify if this position shows the current positive cashflows regarding the line item O11. Additionally we understand this line item in a cashflow view. Please put this line item and the line item for expenses O9 together.	
VA C2D -cell O9	***Further clarification required*** • Log document defines this cell as "expenses not captured in tabs VA C2B and VA C2C". Does it include also *extraordinary losses* line? • Please clarify if this position shows the current positive cashflows regarding the line item O11. Additionally we understand this line item in a cashflow view. Please put this line item and the line item for expenses O9 together.	
VA C2D -cell O10	It is not clear if this is intended to reconcile to the difference between the opening and closing values on BS-C1. It should be net of any actual payments over the period.	
VA C2D -cell O11	It is not clear if this is meant to reconcile to the change in balance sheet items of anything not covered in VA C2C and other cells in VA C2D. If so then this would not reconcile the movement in BOF. For example, reinsurance receivables may reduce as actual recoveries are made, with no net impact on BOF. VA C2D -cell O11-O12 Log document defines this cell as Variation of BS value from opening to closing on assets items not captured elsewhere in VA C2B and VA C2C and other cells in VA C2D E.g. impairment of intermediaries' receivables, or one off changes. The split here is not clear – every change in balance sheet items (assets and liabilities) are also reflected in P&L either as income or expense – EIOPA should give more precise explanations what should be presented in other incomes/expenses and what in Changes in BOF related to	

	impact of variation of BS value of remaining Assets/Liabilities items	
VA C2D -cell O12	See comment on O11.	
SCR - B2A – General	We understand that undertakings using a full approved internal model are not required to fill out and publish this template. For undertakings which are required to provide an estimate of the standard formula according to Article 112(7) the sheet can be filled out but must not be published as any difference between the standard formula and the internal model would lead to wrong conclusions in the public domain. Such differences have to be explained anyway within the SFCR. It should be noted that the estimate of the standard formula will most probably contain approximations or simplifications as only an **estimate** of the SCR using the standard formula is required. We understand this requirement of Article 112(7) to imply that the requirements w.r.t. data quality and precision are less onerous compared to a binding determination of the SCR by means of the standard formula. Similar remarks apply to templates SCR – B3A to B3G. Undertakings will be required by Solvency II to have these systems in place. As a general remark, stringent reporting requirements which duplicate the internal functions, required by Solvency II Pillar II, should be avoided as much as possible. Formulas are missing in the template. It is not clear what cells have to be added/ subtracted to reach to the total in cell A20/ A21. ***Further clarification required:*** • Further guidance is required on how risk diversification could be accommodated within the existing design of the templates. This is a general comment on the colouring chart provided in the templates. The template suggests that cyan fields are calculated with a formula, and green fields are calculated as total sum. Is this a calculation functionality provided by EIOPA similarly to QIS5, or something else? There are inconsistencies within what is now marked as "calculated". For example, if you compare SRC-B3C where diversification effect and total capital requirement are shown as calculated, and SRC-B3D where similar fields	

	are not shown as calculated.	
SCR - B2A – Purpose		
SCR - B2A – Benefits		
SCR - B2A – Costs		

SCR - B2A – Groups	This template is considered manageable at group level.
	• The SCR in cell A21 does not match the Eligible own funds as reporting in cell A50/51 OF-B1A. There are different components in this template as compared to the Own Funds.
	  o Where/ how to account for diversification effects in the group
	  o SCR Non-controlled participation is added to SCR group while the Participation value of this entity is subtracted from the Own Funds.
	  o In OF-B1 the excess capital (Own funds -/- SCR) is subtracted while in SCR-B2A the entire SCR is subtracted.
	
	We query whether this template should not include/or link to a template with the SCR contribution of the entities to the group SCR? This now seems to be part of the OF-B1 template.	

SCR - B2A – Materiality	The principle of proportionality should be taken into account, in order not to overburden small and medium sized insurers with quarterly calculations. We therefore propose that the recalculation of the SCR should only apply to those risks, which are most relevant for the undertaking (e.g. those risks, which were accountable for 90% of last SCR).	
SCR - B2A - Disclosure	Further consideration should be given to the disclosure of group solvency capital requirements when undertakings are using a combination of two methods, consolidation or deduction and aggregation. For undertakings which are required to provide an estimate of the standard formula according to Article 112(7) this template should not be disclosed as any difference	

	between the standard formula and the internal model may lead to to wrong conclusions in the public domain, the SFCR requires a narrative explanation of such differences and we see this as a more appropriate form of disclosure. It should be noted that the estimate of the standard formula will most probably contain approximations or simplifications as only an estimate of the SCR using the standard formula is required. We understand this requirement of Article 112(7) to imply that the requirements with regards to data quality and precision are less onerous compared to a binding determination of the SCR by means of the standard formula. Similar remarks apply to templates SCR – B3A to B3G.	
SCR - B2A – Frequency	**We support EIOPA's proposal to require SCR templates on an annual basis only.** **Article 102 of Level 1 foresees annual calculation of the SCR, full systematic calculations on a more frequent basis will prove problematic to calculate and report**. Some of the risks in particular for which the SCR is calculated would be unlikely to change substantially during the period of one year, for example underwriting risk, credit risk and reserve risk.	
SCR - B2A - cell A1		
SCR - B2A - cell B1	The methodology has yet to be finalised for the derivation of the gross capital charge for life and health underwriting risks. In some cases, the internal model used for risk capital calculations does not determine gross capital charges. We therefore propose to report net figures in this template. This comment applies to SCR – B2A – cells B1 – B9.	
SCR - B2A - cell A2		
SCR - B2A - cell B2	For certain products in some jurisdictions losses arising from counterparty default may be shared between policyholders and shareholders and consequently the net value will also contain an adjustment for future discretionary benefits which seems to be acknowledged in the "Purpose" section of the corresponding LOG. For such products	

	the pre-defined formula should not be applied either by allowing different values or by the introduction of national requirements. In some jurisdictions , derivative contracts are part of, and cannot be separated from other investment assets. Consequently, derivative contracts are included in the allocation of profit and losses on customer accounts and own funds, respectively (profit sharing), irrespective of whether profit and losses are caused by changes in underlying cash flows/assets or the default of counterparties.	
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	In a situation where an undertaking is using a partial internal model to calculate their capital requirement, should the information reported in this include diversification between standard formula modules? Or should the total diversification stemming from partial internal models and standard formula modules be calculated and reported here? Where the aggregation rules leading to diversification effect between SF calculated parts and PIM parts has been agreed with the supervisor. As previously mentioned, we propose that this template is only applicable to partial internal model users for the part of the SCR that is calculated using the standard formula.	
SCR - B2A - cell B6	Please refer to SCR – B2A – cell A6.	
SCR - B2A - cell A7		

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SCR - B2A - cell B7=A7		
SCR - B2A - cell A8		
SCR - B2A - cell B8	Please refer to SCR – B2A – cell A6.	
SCR - B2A - cell A9	Please refer to SCR – B2A – cell A6.	
SCR - B2A - cell B9		
SCR - B2A - cell A11	The LOG and the template have different formulae. Both are inconsistent with the draft Level 2 text. 1. We question if it should read: max (min(B10-A10;FDB);0)? 2. Should this formula be A11= -min(FDB; B10-A10) and not A11= -min(FDB; B09-A09)?	
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		
SCR - B2A - cell A17	We query whether this cell should be formula-driven?	
SCR - B2A - cell A18		
SCR - B2A - cell A19	We query whether this cell should be formula-driven?	

SCR - B2A - cell A20	We query whether this cell corresponds to OF – B1 - cell-B1 (SCR)?	
SCR - B2A - cell A21	We query whether this cell corresponds to OF – B1 – cell A53 (MCR/minimum group SCR)?	
SCR - B2B – General	Please refer to cell SCR – B2A - General. We understand that undertakings using a full approved internal model are not required to fill out and publish this template.	
SCR - B2B – Purpose		
SCR - B2B – Benefits		
SCR - B2B – Costs		
SCR - B2B – Groups	We believe that this template will be manageable at group level.	
SCR - B2B – Materiality		
SCR - B2B - Disclosure	Please refer to cell B2A - Disclosure.	
SCR - B2B – Frequency	Please refer to cell B2A - Frequency.	
SCR - B2B- cell A1.1	***Further clarification required:*** • It was questioned how undertakings, who calculate their diversified SCR “directly” from their Probability Distribution Forecast (instead of by combining components for individual risks), should present their result? For example, should it be as a single line item, or should they break the SCR down into components? Further clarification and guidance would be helpful.	
SCR - B2B- cell A1A.1		
SCR - B2B- cell B1.1	***Further clarification required:*** • It was questioned how adjustments for deferred taxes are incorporated into this template? For example, should the net capital charge be “after	

	adjustments for future discretionary benefits and deferred taxes"?	
SCR - B2B- cell A1.n	We query how undertakings, who calculate their diversified SCR "directly" from their Probability Distribution Forecast (instead of by combining components for individual risks), should present their result? For example, should it be as a single line item, or should they break the SCR down into components? Further clarification and guidance would be helpful.	
SCR - B2B- cell A1A.n		
SCR - B2B- cell B1.n		
SCR - B2B- cell B3	The naming of this cell appears inconsistent with the "diversification" purpose and corresponding cell in SCR-B2A. Further guidance would be helpful on the content of this cell.	
SCR - B2B- cell B5		
SCR - B2B- cell B6		
SCR - B2B- cell B8		
SCR - B2C – General	For general comments, please refer to cells SCR – B2A/ B2B - General. To ensure the principle of proportionality is applied, the information requested from internal model users should not be greater than that requested for those using the standard formula. The column heading (cell D5) seems to be incorrect ("incl. loss absorbing capacity"): this cannot apply for B1, B2, because the loss absorbing capacity is separately mentioned under B5; if also B1, B2 was net of loss absorbing capacity, then the formula under B11 would be wrong.	
SCR - B2C – Purpose		
SCR - B2C – Benefits		
SCR - B2C – Costs		

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SCR - B2C – Groups	We believe that this template will be manageable at group level.	
SCR - B2C – Materiality		
SCR - B2C- Disclosure	Please refer to cell B2A - Disclosure. Disclosure should be based on direct discussions with the regulator.	
SCR - B2C – Frequency	Please refer to cell B2A - 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	Capital Requirements from ring fenced funds should not be required, separate reporting may limit the design of an internal model.	
SCR - B2C- cell B7A	See comment on cell B7	
SCR - B2C- cell B8A		
SCR - B2C- cell B8B		
SCR - B2C- cell B8C		
SCR - B2C- cell B9		
SCR - B2C- cell B10		
SCR - B2C- cell B11		

SCR - B2C- cell B13		
SCR - B2C- cell B14		
SCR - B2C- cell B15		
SCR - B3A – General	For general comments on SCR templates, please refer to cells SCR – B2A/B2B/B2C - General. The LOG instructs that this template applies to both users of the Standard Formula and users of Internal Models that have been requested to provide an estimate of the SCR using the standard formula under Article 112(7) of the Framework Directive. For the elements that require calculation by the standard formula, this template is helpful. It would not be feasible for undertakings using full Internal Models to complete this template. Furthermore, the LOG details that undertakings should report the proportion of assets and liabilities which are driving each risk. While the objective of providing comparability between undertakings is understood, it is not clear that such an allocation makes sense for liabilities. While this allocation is possible, it would require significant additional work, we propose to instead report total assets and liabilities in these cells as we believe this would provide sufficient information. It is unclear whether ring-fenced funds should be included in the template. For bilateral shocks, for example derivatives, interest rate etc, it should be possible to leave blank the two lines relating to interest rate risk (upward and downward shocks), if one of the two is obviously lower than the other. For instance, if you have a significant asset and liability duration mismatch, you do not need to carry out both calculations to know which shock will be the greater. The same applies for RFF, if it does not represent a huge part of the balance sheet, undertakings would only calculate the shock applicable to the non-RFF part of the undertaking. In such cases, it should be possible to mark the cell as "Non-relevant" or "Non applicable". For the calculation of the risk modules of the standard formula the value of assets and liabilities must be given before and after a shock is applied. The value to be entered in	

	these cells is the value of "all items underlying the shock, as used to compute the risk". We believe that this wording allows undertakings to give the value of precisely the items underlying the shock or a superset therof as long as all values in each line are based on the same set of items. In particular for the life business where a separation can be quite burdensome we would appreciate a confirmation that our interpretation of the text is feasible and the calculation can be based on a superset of the items underlying a certain shock (i.e. use all investments instead of only interest-rate-sensitive investments for the interest rate shock of the assets). The template is primarily designed to represent the SCR. To also report the assets and liabilities (both before and after the shock event) does not provide much additional insight. Therefore focussing teh SCR-B3 templates on SCR appears to provide a balanced cost benefit. In many cases the risk is driven by either assets or liabilities and thus assets and liabilities may not be attributable to a single risk driver. Only values of light blue cells should be delivered. We do not see the benefit of also delivering raw data that is already available via OF-SCRs	
SCR - B3A – Purpose		
SCR - B3A – Benefits	We do not see the benefit from the asset and liability cells.	
SCR - B3A – Costs	The template is primarily designed to represent the SCR. To also report the assets and liabilities (both before and after the shock event) does not provide much additional insight. In many cases the risk is driven by either assets or liabilities and thus assets and liabilities may not be attributable to a single risk driver. There is a high cost impact stemming from these cells.	
SCR - B3A – Groups	We believe that this template will be manageable at group level.	
SCR - B3A – Materiality		
SCR - B3A - Disclosure		
SCR - B3A – Frequency	Please refer to cell B2A - Frequency.	
SCR - B3A- cell CO	**The gross risk capital requirement in the interest rate shock module is the**	

	maximum of a decrease in interest rate gross capital requirements and an increase in interest rate gross capital requirements. This is not consistent with the methodology used in QIS5. In QIS5 the gross value corresponding to the net value was chosen. The currently used formula allows for different shock scenarios to be chosen for gross and net capital requirements. This leads to an incomparability of capital requirements between different companies and the risk that the calculated risk reducing capacity of future premiums does not match the difference of gross and net risk capital requirements. Furthermore it is possible that the difference between gross and net risk capital requirements is higher than available profits.	
SCR - B3A- cell D0	Please refer to SCR - B3A- cell CO.	
SCR - B3A- cell A1		
SCR - B3A- cell A1A		
SCR - B3A- cell B1		
SCR - B3A- cell B1A		
SCR - B3A- cell C1		
SCR - B3A- cell B1B	The comment in the LOG relating to this cell should refer to “absolute values after shock” rather than “initial absolute values before shock”.	
SCR - B3A- cell D1		
SCR - B3A- cell A2		
SCR - B3A- cell A2A		
SCR - B3A- cell B2	Please refer to SCR - B3A- cell A2 (to be deleted if comment to A2 is removed).	
SCR - B3A- cell B2A	Please refer to SCR - B3A- cell A2 (to be deleted if comment to A2 is removed).	
SCR - B3A- cell C2	Please refer to SCR - B3A- cell A2 (to be deleted if comment to A2 is removed).	

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SCR - B3A- cell B2B	Please refer to SCR - B3A- cell A2 (to be deleted if comment to A2 is removed).	
SCR - B3A- cell D2	Please refer to SCR - B3A- cell A2 (to be deleted if comment to A2 is removed).	
SCR - B3A- cell C3		
SCR - B3A- cell D3		
SCR - B3A- cell A4		
SCR - B3A- cell A4A	How to handle adaptations of the future profit participation? Which part of technical provisions is concerned?	
SCR - B3A- cell B4		
SCR - B3A- cell B4A	See comment A4A	
SCR - B3A- cell C4		
SCR - B3A- cell B4B	See comment A4A	
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	See comment A4A	
SCR - B3A- cell B8		
SCR - B3A- cell B8A	See comment A4A	

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SCR - B3A- cell B8B	See comment A4A	
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	See comment A4A	
SCR - B3A- cell B12		
SCR - B3A- cell B12A	See comment A4A	
SCR - B3A- cell C12		
SCR - B3A- cell B12B	See comment A4A	
SCR - B3A- cell D12		
SCR - B3A- cell C13		
SCR - B3A- cell D13		
SCR - B3A- cell A14		
SCR - B3A- cell A14A	See comment A4A	
SCR - B3A- cell B14		
SCR - B3A- cell B14A	See comment A4A	
SCR - B3A- cell C14		
SCR - B3A- cell B14B	See comment A4A	
SCR - B3A- cell D14		
SCR - B3A- cell C15		
SCR - B3A- cell D15		

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SCR - B3A- cell A16		
SCR - B3A- cell A16A	See comment A4A	
SCR - B3A- cell B16		
SCR - B3A- cell B16A	See comment A4A	
SCR - B3A- cell C16		
SCR - B3A- cell B16B	See comment A4A	
SCR - B3A- cell D16		
SCR - B3A- cell A17		
SCR - B3A- cell A17A	See comment A4A	
SCR - B3A- cell B17		
SCR - B3A- cell B17A	See comment A4A	
SCR - B3A- cell C17		
SCR - B3A- cell B17B	See comment A4A	
SCR - B3A- cell D17		
SCR - B3A- cell A18		
SCR - B3A- cell A18A	See comment A4A	
SCR - B3A- cell B18		
SCR - B3A- cell B18A	See comment A4A	
SCR - B3A- cell C18		
SCR - B3A- cell B18B	See comment A4A	
SCR - B3A- cell D18		
SCR - B3A- cell A19		
SCR - B3A- cell A19A	We do not understand this field. It should be deleted.	
SCR - B3A- cell C19		
SCR - B3A- cell D19		
SCR - B3A- cell A20		

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SCR - B3A- cell A20A	How to handle adaptations of the future profit participation? Which part of technical provisions is concerned? No cell for entering the value after shock	
SCR - B3A- cell C20		
SCR - B3A- cell D20		
SCR - B3A- cell A21	Currency Risk is looked at separately for different currencies. For each currency the worst scenario is chosen, this will depend on whether NAV_{curr} is positive or negative.	
SCR - B3A- cell A21A		
SCR - B3A- cell B21	Please refer to SCR – B3A - cell A21.	
SCR - B3A- cell B21A		
SCR - B3A- cell C21	Please refer to SCR – B3A - cell A21.	
SCR - B3A- cell B21B		
SCR - B3A- cell D21	Please refer to SCR – B3A - cell A21.	
SCR - B3A- cell C22		
SCR - B3A- cell D22		
SCR - B3A- cell C23		
SCR - B3A- cell D23		
SCR - B3B – General	For general comments, please refer to cells SCR – B3A/B2A/B2B - General. The principle of proportionality should apply, it should be possible to group counterparties together when many exist. The loss absorbing capacity of technical provisions should only be given once in B9. A split in type 1 and type 2 is not feasible.	
SCR - B3B – Purpose		
SCR - B3B – Benefits		
SCR - B3B – Costs	The requirements under this template would require significant effort with only a small resulting impact on the SCR. We believe that the calculation should be simplified	

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SCR - B3B – Groups	We believe that this template will be manageable at group level.	
SCR - B3B – Materiality		
SCR - B3B - Disclosure		
SCR - B3B – Frequency		
SCR - B3B- cell A0	The breakdown of Type 1 counterparty type capital charges are not currently automatically available, though can be calculated (pre-diversification) by setting all other counterparties to zero. This comment applies to SCR – B3B - cells A0-A4.	
SCR - B3B- cell B0	Delete cell	
SCR - B3B- cell A1		
SCR - B3B- cell A1A		
SCR - B3B- cell A2		
SCR - B3B- cell A3		
SCR - B3B- cell A4		
SCR - B3B- cell B6	Delete cell	
SCR - B3B- cell A7		
SCR - B3B- cell A8		
SCR - B3B- cell A9		
SCR - B3B- cell B9		
SCR - B3C – General	For general comments, please refer to SCR – B3A/B2A/B2B – General. The benefits of reporting assets is not clear as undertakings do not allocate assets by underwriting risk modules, as such an allocation would be arbitrary and artificial and increase the cost of implementation. Furthermore, a risk based allocation of assets seems to be inappropriate because the value of the assets does not change in relation	

	to the corresponding life risks. It appears more practical, when calculating the pre- and post-shock net asset value, to compare total assets with total liabilities for each risk module. It is not clear if annuity information for MTPL, TPL and workers compensation should be included in this template. The template is primarily designed to represent the SCR. To also report the assets and liabilities (both before and after the shock event) does not provide much additional insight. Therefore focussing teh SCR-B3 templates on SCR appears to provide a balanced cost benefit. In many cases the risk is driven by either assets or liabilities and thus assets and liabilities may not be attributable to a single risk driver.	
SCR - B3C – Purpose	The current template appears too detailed for its prescribed purpose.	
SCR - B3C – Benefits	Low benefit from additional asset and liability cells	
SCR - B3C – Costs	Please refer to SCR-B3A – Costs with regards to the assets and liabilities cells. We believe that the cost of producing the information required under this template outweighs the extra value provided to the supervisor (including controlling and governance costs).	
SCR - B3C – Groups	We believe that this template will be manageable at group level.	
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		

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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	If it is evident which scenario gives the highest stress, it should be possible to leave the other two scenarios uncompleted.	
SCR - B3C- cell D04	Please refer to SCR – B3C - cell C04.	
SCR - B3C- cell A4		
SCR - B3C- cell A4A		
SCR - B3C- cell B4		
SCR - B3C- cell B4A		
SCR - B3C- cell C4		

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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	In the LOG there is the printing error telling this cell is 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	Please refer to SCR – B3A/B2A/B2B – General, in particular for comments on bilateral shocks and that assets and liabilities may not be attributable to a single risk driver. The template appears to require assets to be split between the risk categories of technical provisions. In practice, assets are managed for the whole portfolio, otherwise certain diversification benefits wouldn't be achievable and the performance of policy holders' assets would decrease. Further clarification would be helpful on whether annuity information for accident claims should be included in this template.	
SCR - B3D – Purpose	EIOPA's purpose is to illustrate the main output of the capital requirement calculation	

	for this risk module, we believe that this template is too detailed for this purpose.	
SCR - B3D – Benefits	We believe that the benefit from reporting additional assets and liabilities cells are low. Please refer to SCR – B3A – Benefits.	
SCR - B3D – Costs	Please refer to SCR-B3A – Costs for comments on reporting assets and liabilities cells.	
SCR - B3D – Groups	We believe that this template will be manageable at group level.	
SCR - B3D – Materiality		
SCR - B3D - Disclosure		
SCR - B3D – Frequency		
SCR - B3D- cell A12	The column heading for premium and reserve risk for the standard deviation states "USP". We believe this should be "USP or prescribed". This comment applies to cells SCR – B3D – A12 – A15.	
SCR - B3D- cell A12A		
SCR - B3D- cell B12	Please refer to SCR – B3D - cell A12. This comment applies to SCR – B3D – cells B12 – B15.	
SCR - B3D- cell C12		
SCR - B3D- cell D12		
SCR - B3D- cell E12	The default value of 1 should be acceptable for health insurance.	
SCR - B3D- cell F12		
SCR - B3D- cell A13		
SCR - B3D- cell A13A		
SCR - B3D- cell B13		

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SCR - B3D- cell C13		
SCR - B3D- cell D13		
SCR - B3D- cell E13	Please refer to SCR – B3D - cell A12. This comment applies to SCR – B3D – cells E12 – E15.	
SCR - B3D- cell F13		
SCR - B3D- cell A14		
SCR - B3D- cell A14A		
SCR - B3D- cell B14		
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	The complexity of catastrophe risk in health insurance should be reduced as data is often not available. Furthermore, it should be possible to check whether a loss absorbing capacity of technical provisions is available. (see above)	
SCR - B3D- cell A24		
SCR - B3D- cell A25		
SCR - B3D- cell A26		
SCR - B3D- cell A27		
SCR - B3E – General	For general comments, please refer to SCR – B3A/B2A/B2B – General, in particular on assets and liabilities not being attributable to a single risk driver. We propose that Legal Expenses and Assistance be reported together with Miscellaneous-non-life insurance, if the volumes are immaterial. Some small undertakings indicated difficulties in obtaining the proposed information.	
SCR - B3E – Purpose		
SCR - B3E – Benefits	Please refer to SCR – B3A – Benefits for comments on reporting the assets and liabilities cells.	
SCR - B3E – Costs	Please refer to SCR – B3A – Costs for comments on reporting the assets and liabilities cells.	

	Some smaller non-life groups expressed concern that the information is not available.	
SCR - B3E – Groups	We believe that this template will be manageable at group level.	
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		
SCR - B3E- cell A3A		

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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		
SCR - B3E- cell F6		

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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		
SCR - B3E- cell D10		

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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		
SCR - B3E- cell A18		

SCR - B3F – General	This QRT asks for an excessive amount of detail. From our perspective, the level of granularity (going down to individual scenarios and regions in all cases) is not in line with the granularity required for the other SCR templates (in particular SCR-B3E regarding Non-Life UW Risk). We therefore suggest to reduce this template to the summary section at the top of the sheet, showing the gross SCR, the net SCR and the total risk mitigation for each scenario. In addition, many values in the QRT are not needed for the calculation at all or contradict the split required for individual calculation steps: <u>NatCat risk:</u> A1 to A20 (gross premiums to be earned) are not required for calculation (only A22 “Other regions” is needed) <u>Man Made Cat – Marine Tanker Collision:</u> *Gross Cat Risk Charge (A1, B1, C1):* It does not make sense to ask for the maximum per segment (marine hull, marine liab., marine oil pollution liab.), because in the SCR formula the maximum is *over all tankers t*, summing over all segments for every t *Estim. Risk Mitigation / Reinst. Premiums:* This is calculated based on the gross loss in the SCR formula, which combines all segments and all tankers; hence only the “Total” column makes sense, not the individual columns <u>Man Made Cat – Marine Platform Explosion:</u> *Estim. Risk Mitigation / Reinst. Premiums:* This is calculated based on the gross loss in the SCR formula, which combines all segments and all platforms; hence only the “Total” column makes sense, not the individual columns <u>Man Made Cat – Aviation:</u> *Gross Cat Risk Charge (A1, B1):* It does not make sense to ask for the maximum per segment (aviation hull, aviation	

	liab.), because in the SCR formula the maximum is *over all aircrafts a*, summing over all segments for every a *Estim. Risk Mitigation / Reinst. Premiums:* This is calculated based on the gross loss in the SCR formula, which combines all segments and all aircrafts; hence only the "Total" column makes sense, not the individual columns Man Made Cat – Liability: The values A4:E10 (split into "severity scenario" and "frequency scenario") are not needed in the calculation	
SCR - B3F – Purpose	EIOPA has indicated that this template is to provide a summary of the SCR calculation for non-life catastrophe risks. This template is equivalent to the whole calcaulation of module and we therefore do not believe that the level of detail proposed corresponds to the intended purpose.	
SCR - B3F – Benefits		
SCR - B3F – Costs		
SCR - B3F – Groups		
SCR - B3F – Materiality		
SCR - B3F - Disclosure		
SCR - B3F – Frequency		
SCR - B3F- cell Summary A1	The row labels refer to EEA regions 1 to 20. We question if there is supposed to be a link to the draft Level 2 text for example, if EEA region 1 explicitly refers to certain country(ies)? The draft Level 2 text specifically excludes some countries in the EEA region from certain natural catastrophes. Is this taken into account somehow in the reporting, since each natural catastrophe seems to be a rolling list from EEA region 1 to EEA	

	region 20?	
SCR - B3F- cell Summary C1		
SCR - B3F- cell Summary A9		
SCR - B3F- cell Summary C9		
SCR - B3F- cell Summary A17		
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	Please refer to SCR - B3F- cell Summary A1.	
SCR - B3F- cell Windstorm B2		
SCR - B3F- cell Windstorm C2		
SCR - B3F- cell Windstorm E2		
SCR - B3F- cell Windstorm F2		
SCR - B3F- cell Windstorm G2		
SCR - B3F- cell Windstorm H2		
SCR - B3F- cell Windstorm A3	SCR - B3F- cell Summary A1.	
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 Summary A1.	

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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		
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 Summary A1.	
SCR - B3F- cell Earthquake B1		
SCR - B3F- cell Earthquake		

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C1		
SCR - B3F- cell Earthquake E1		
SCR - B3F- cell Earthquake F1		
SCR - B3F- cell Earthquake G1		
SCR - B3F- cell Earthquake A2	SCR - B3F- cell Summary A1.	
SCR - B3F- cell Earthquake B2		
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 Summary A1.	
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		

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SCR - B3F- cell Earthquake A20	SCR - B3F- cell Summary A1.	
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		
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 Summary A1.	
SCR - B3F- cell Flood B1		
SCR - B3F- cell Flood C1		

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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 Summary A1.	
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		
SCR - B3F- cell Flood A3	SCR - B3F- cell Summary A1.	
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 Summary A1.	
SCR - B3F- cell Flood B20		
SCR - B3F- cell Flood C20		
SCR - B3F- cell Flood E20		

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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		
SCR - B3F- cell Flood F25		
SCR - B3F- cell Flood I25		
SCR - B3F- cell Hail A1	SCR - B3F- cell Summary 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 Summary A1.	
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		

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SCR - B3F- cell Hail A3	SCR - B3F- cell Summary A1.	
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 Summary A1.	
SCR - B3F- cell Hail B20		
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		

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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-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		

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SCR - B3F- cell Motor Vehicle Liability A5		
SCR - B3F- cell Marine Tanker Collision A1	The header stating – Maximum marine hull – should be rephrased by “Marine Hull or equivalent”, since the standard formula calculation in the draft Level 2 text is based on a given tanker having the maximum sum of the three (Marine Hull + Marine Liability + Marine Oil Pollution Liability), not the maximum of the components of the sum.	
SCR - B3F- cell Marine Tanker Collision B1	Please refer to SCR - B3F- cell Marine Tanker Collision A1.	
SCR - B3F- cell Marine Tanker Collision C1	Please refer to SCR - B3F- cell Marine Tanker Collision A1.	
SCR - B3F- cell Marine Tanker Collision A2		
SCR - B3F- cell Marine Tanker Collision B2		
SCR - B3F- cell Marine 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		

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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 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	In the case of unlimited cover, we question what should be reported in this cell?	
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 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	The draft Level 2 text does not propose any calculation rules for two liability scenarios, only the concept of number of liability claims has been introduced in addition to the risk factors and requirement of having gross earned premiums.	
SCR - B3F- cell Liability B4	Please refer to SCR - B3F- cell Liability A4.	
SCR - B3F- cell Liability C4	Please refer to SCR - B3F- cell Liability A4.	
SCR - B3F- cell Liability D4	Please refer to SCR - B3F- cell Liability A4.	

SCR - B3F- cell Liability E4	Please refer to SCR - B3F- cell Liability A4.	
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	Please refer to SCR - B3F- cell Liability A4.	
SCR - B3F- cell Liability B8	Please refer to SCR - B3F- cell Liability A4.	
SCR - B3F- cell Liability C8	Please refer to SCR - B3F- cell Liability A4.	
SCR - B3F- cell Liability D8	Please refer to SCR - B3F- cell Liability A4.	
SCR - B3F- cell Liability E8	Please refer to SCR - B3F- cell Liability A4.	

SCR - B3F- cell Liability A9		
SCR - B3F- cell Liability B9		
SCR - B3F- cell Liability C9		
SCR - B3F- cell Liability D9		
SCR - B3F- cell Liability E9		
SCR - B3F- cell Liability A10		
SCR - B3F- cell Liability B10		
SCR - B3F- cell Liability C10		
SCR - B3F- cell Liability D10		
SCR - B3F- cell Liability E10		
SCR - B3F- cell Liability A12	Please refer to SCR - B3F- cell Liability A4.	
SCR - B3F- cell Liability B12	Please refer to SCR - B3F- cell Liability A4.	
SCR - B3F- cell Liability C12	Please refer to SCR - B3F- cell Liability A4.	
SCR - B3F- cell Liability D12	Please refer to SCR - B3F- cell Liability A4.	
SCR - B3F- cell Liability E12	Please refer to SCR - B3F- cell Liability A4.	
SCR - B3F- cell Liability H12		
SCR - B3F- cell Liability A14		
SCR - B3F- cell Liability B14		

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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 & Suretyship Large Credit Default A5		
SCR - B3F- cell Credit & Suretyship Large Credit Default B5		
SCR - B3F- cell Credit & Suretyship Recession Risk A7		

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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 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		

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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 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		

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Accident J1		
SCR - B3F- cell Mass Accident K1		
SCR - B3F- cell Mass Accident L1		
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		

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SCR - B3F- cell Mass Accident A3		
SCR - B3F- cell Mass Accident B3		
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		
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	Submodule applicable to group accident insurance? Comment applies for the whole risk factor.	
SCR - B3F- cell Concentration Accident B1		
SCR - B3F- cell Concentration Accident C1		
SCR - B3F- cell Concentration Accident D1		
SCR - B3F- cell Concentration Accident E1		

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
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 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		

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Concentration Accident D3		
SCR - B3F- cell Concentration Accident E3		
SCR - B3F- cell Concentration Accident F3		
SCR - B3F- cell Concentration Accident G3		
SCR - B3F- cell 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		
SCR - B3F- cell Concentration Accident G22		
SCR - B3F- cell Concentration Accident J22		

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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		
SCR - B3F- cell Pandemic B3		
SCR - B3F- cell Pandemic C3		
SCR - B3F- cell Pandemic D3		
SCR - B3F- cell Pandemic		

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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	For general comments, please refer to SCR – B2A/B2B - General. There should be a consistency in terminology used within the templates, for example: "earned premium" used here (lines A5 to A10) and written premium in MCR – B4A (column C).	
SCR - B3G – Purpose		
SCR - B3G – Benefits		
SCR - B3G – Costs		
SCR - B3G – Groups	We believe that this template will be manageable at group level.	

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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	The example provided in the LOG is given to 4 decimal places in contrast to other examples which are given as rounded numbers. General guidance would be helpful with regards to the format and the implications that would have for systems solutions.	
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	Further guidance should be provided on how to complete this cell. It should be made clearer in the text of the template that only 30 % of the net Basic Solvency Capital requirement should be entered, not the full extent.	
SCR - B3G- cell A14		
SCR - B3G- cell A15		
SCR - B3G- cell A16		

MCR - B4A & B4B – General	**MCR - B4A** Article 129 of Level 1 foresees quarterly calculation and reporting of the MCR, we believe that this template reflects what will be required under Solvency II. It will be essential to develop processes to ensure that reporting has a means of verifying that the reports tie back to each other. Creating a mechanism for making sure reports tie back and link correctly will be important if the templates are going to meet regulatory and undertaking needs. Consistency of segmentation for reporting purposes with Level 2 and Level 1 should be sought. We believe the MCR templates would benefit from a simplier layout for example, it is currently unclear where annuities related to non-life contracts should be reported. 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. This would also aid management oversight and approval. **MCR - B4B** For general comments on MCR templates, please refer to feedback on template MCR – B4A above. If not specified, the same changes as identified for the MCR-B4A template apply to the MCR- B4B template	
MCR - B4A & B4B – Purpose		
MCR - B4A & B4B – Benefits		
MCR - B4A & B4B – Costs	We agree with EIOPA that the costs should be limited as undertakings are required to calculate and report MCR on quarterly basis. The GDV welcomes EIOPA's decision to accept in principle the use of simplified methods for quarterly calculation of technical provisions. This issue will be discussed	

	in more detail under the section for Technical Provisions.	
MCR - B4A & B4B – Groups		
MCR - B4A & B4B – Materiality		
MCR - B4A & B4B - Disclosure	The GDV believes that some of the information, for example on capital add-ons, may be sensitive for public disclosure, however non-disclosure of this information would not provide an accurate reflection of the MCR/SCR. We query how undertakings should report in the case their member state uses the option to not require disclosure of capital add-ons.	
MCR - B4A & B4B – Frequency	Please refer to MCR - B4A & B4B – Frequency.	
MCR - B4A- cell A1		
MCR - B4A- cell B2		
MCR - B4A- cell C2	Further guidance should be provided regarding meaning of written premiums. The definition provided in the LOG is that written premiums should be defined as all amounts due during the financial year in respect of insurance contracts regardless of the fact that such amounts may relate in whole or in part to a later financial year. What is not clear is whether this should take into consideration the undertaking's credit arrangements i.e. should this include premiums from contracts entered into in the financial year regardless of whether they are not due because of insurer allowing a credit period to the insured? Also, how should premiums paid in instalments be treated?	
MCR - B4A- cell B3		
MCR - B4A- cell C3		
MCR - B4A- cell B4		
MCR - B4A- cell C4		
MCR - B4A- cell B5		

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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		

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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		
MCR - B4A- cell A28		
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		
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		

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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		

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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		

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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		
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		
MCR - B4B- cell C35		
MCR - B4B- cell B36		
MCR - B4B- cell C36		
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	These templates are incredibly complex and will be difficult to complete, particularly in cases when data must be collected from external service providers. Service providers themselves may rely on other sources which creates multiple parties in the 'data chain'. At solo level, it will be required to develop data storage systems to consolidate information from numerous databases. In cases when data is required from external service providers, it can be assumed that the undertaking will be responsible for the cost. It may prove very difficult to obtain information from external service providers, for example fund managers, to perform the investment funds look through. With regards to this template specifically, we are unsure as to how the look-through will reconcile with this template. For example Assets-D1 shows a single line valuation of the investment fund (unit price x volume), this would include other fund balance sheet items (current assets / liabilities). In Assets – D4, a breakdown per asset class if required which would show the asset valuations on a gross basis i.e. exclude the other items. We query if the valuation in Assets - D1 should simply be apportioned across the asset classes in AS-D4? Providing anything beyond pure positional data will add extra burden to the companies without any visible benefit. For instance, information like duration, interest, dividends,	

etc. on instrument level should be dropped from the requirements.

This comment also applies to the field "general" of templates Assets-D1Q, Assets-D1S, Assets-D2O, Assets-D2T and Assets-D6.

A mapping exercise will be required in order to match data types to the codes in the CIC table. The definitions of data elements may vary across the EU so it will be necessary to ensure that matching to CIC codes is carried out in a consistent way. It could be the case that different countries apply the definitions in differing ways. For example, it is unclear to us what “structured notes” refers to.

Thus, a consistent Complementary Identification Code (CIC) is essential to ensure greater harmonisation and transparency, and reduce risk.

For general comments on the LOG examples which make reference to balance sheet items, please refer to BS – C1.

Further clarification required:

- Where to disclose bonds issued by Banks?

- The General Comments contain the following statement: „Each asset must be reported once in relation to each portfolio and / or each ring-fenced or other internal fund. So consequently a given security that is part of the investments of life and non-life business and / or several funds (e.g. several U-L) will result in 1 line for life, 1 life for non-life and as many lines as the funds where the security is present.” Does that mean that multiple attributions are possible? Or is it necessary that in a case, where an asset covers several portfolios, to split the total value between the different portfolios.

- **Special funds (SPF):** Do special funds "Related undertakings" ("Tochterunternehmen") according to Article 13 section 16 of Directive

	2009/138/EC have to be consolidated? Remark: We suppose not to consolidate SPF, because they do not represent related undertakings (according to Article 13 section 16 of Directive 2009/138/EC in connection with Directive 83/349/EWG). According to Level 2 Art. 323 bis SCG3 the latter only have to be consolidated. • **Investment funds** - QRT BS-C1 (EBS), D1 and D4 Do investment funds in which the undertakings holds more than 20% (thus including special funds), constitute a "participation", because they meet the definition of an undertaking? Or do they have to be recognized as investment funds representing internal funds (Sondervermögen) independent of the percentage interest held by the undertaking? If the latter holds the consequence is that all investment funds in QRT BS-C1 und Assets-D1 are to be reported under the item "investment funds" (and not under "participations"). Moreover, a look through needs to be carried out for all funds (including those in which the undertaking holds more than 20%) in QRT Assets-D4. <u>Remark:</u> Currently we tend to assume that investment funds (including special funds) as internal funds (Sondervermögen) do not meet the definition of an undertaking, i.e. they should be disclosed as "investment funds" and a look through should not be carried out in QRT Assets-D4. • How to deal with policy loans? • How to fill identification fields for aggregated categories (e.g. mortgages)? • Is it necessary to distinguish between restriced and unrestricted assets according to German insurance supervisory law (VAG)?	
Assets - D1- Purpose	It would be helpful if supervisors on a cross sectoral basis could develop a database to consolidate data for supervisory reporting from all entities. From an insurance perspective, much of the information requested on Assets could be easily retrieved from the ISIN code. If, for quarterly reporting, undertakings could report the ISIN	

	code only, it would significantly reduce the burden of supervisory reporting.	
Assets - D1- Benefits	We believe that reporting assets to this level of detail goes beyond what would be required to assess the solvency situation of an undertaking.	
Assets - D1- Costs	For a medium sized undertakings, the yearly cost to report information on Assets provided by an external source (for example Bloomberg) could be between 150 K€ - 250 K€. This cost would hugely increase if information on unit linked assets would also be reported. Also, the data collected from Bloomberg or rating agencies are for internal use only and the subsequent publication of such data would have a prohibitive cost.	
Assets - D1- Groups	The corresponding summary document states that “reporting at group level should only concern assets of the holding entity, non-EEA insurance undertakings and other non-supervised entities within the group”. In this context it is unclear if the term “holding entity” is the same as “insurance holding company” as defined by Article212(f) of the framework directive, or if another scope is intended in this respect. The final summary document should be clear on these points. At group level there will be an issue of double gearing particularly in cases where assets are required by portfolio, it may be the case that assets belong to more than one portfolio in which case, assets would be double counted. There is also an issue for groups on how to establish a data storage system to hold this capacity of information.	
Assets - D1- Materiality		
Assets - D1- Disclosure	We support EIOPA's decision not to disclose any of the Assets templates. The disclosure of investment funds in BS-C1 is sufficient.	
Assets - D1- Frequency		

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Assets – D1 – Quarterly Exemption	EIOPA has not indicated that a quarterly exmeption could be applied to this template.	
Assets - D1- cell A1	**The split of assets as proposed would require a significant remapping exercise.** The Life/Non-Life distinction may also not be available for some lines of business written by composite insurers (e.g. disability insurance). The GDV queries whether a materiality threshold could be introduced for composite undertakings for which the split is mandatory. An example, it could be 5%: if the premium volume of a life company within an insurance group is less than 5% compared to the non-life company, then the undertaking could be regarded as a 'non-composite'. ***Further clarification required:*** • Are unit linked funds considered to be ring fenced? • Where an asset is held in a ring fenced fund but the fund also covers, for example, Life Technical Provisions, should this be reported as "life" or "ring fenced"? • Some funds, such as annuity funds may have a portion of free assets that cannot be liked to a specific underlying asset, therefore how should how different portfolios within one fund should be reported? • What is meant by "General"?	
Assets - D1- cell A2	***Further clarification required:*** • Further guidance on "other internal funds" and "assets that are not freely disposable" would be helpful. It was questioned whether unit linked funds would fall under either of these categories? • Should the definitions for "fund number" also be aligned with cells A2 in templates D2 and D5?	

Assets - D1- cell A3	Since the risks related to these assets are not borne by the undertaking, we believe that this information may not be valuable for the supervisor. In the case that undertakings manage their portfolios as a whole, resulting in a particular securities holding being jointly owned by several portfolios/funds, this cell could be expressed as a fraction (percentage) of the holding for which the undertaking bears the investment risk.	
Assets - D1- cell A4	An issue has been raised with regards to the use of ISIN codes, in some counties assets held in the portfolio may not have an ISIN code. This could be as much as 20% of the portfolio with around 4% of assets in the portfolio having incomplete information linked to the ISIN code. Further guidance is necessary from EIOPA as to what codes undertakings should apply as an alternative. Reporting without a clear and complete assets database will be burdensome for undertakings. If many difference methodologies are applied, the results will be heterogenous and not in line with the principles of Solvency II.	
Assets - D1- cell A5		
Assets - D1- cell A6	Do encumbered real estates fall within the definition given?	
Assets - D1- cell A7	NSV/SSD cover a huge part of the capital assets. Isn't it necessary to take the corresponding titles (category 8)?	
Assets - D1- cell A8	There may be cost implications if it is not possible to get the information on the ultimate parent, from one source, for all securities. ***Further clarification required:*** • If a standard code is used, what form will the standard code take and who will be responsible for setting up and maintaining it? • Registered bonds (NSV/SSD) cover a huge part of the capital assets. Isn't it necessary to take the corresponding titles (category 8)?	

Assets - D1- cell A9	NACE codes are not readily available from current data sources for example, Bloomberg. An exercise will be required to map issuers to NACE codes. There is a risk of differences between the ways in which different entities complete this mapping. This could be avoided if supervisors centrally created a mapping of issuers to NACE codes rather than requesting this information via the QRTs. Other code systems are currently used across Europe, such as ICB and GICS, this makes the necessity for a mapping system even more essential. There is a question as to whether a licence fee should be paid in order to use NACE codes, in such cases, undertakings would be required to pay for the use of multiple coding systems. If it is the intention to collect information on non-tradable securities then the information should be collected specifically for that purpose and not part of a general requirement for all of industry. ***Further clarification required:*** • Would it be possible to use other codes such as Bloomberg? • It was questioned how non-financial sectors would be dealt with as they may not necessarily have an "issuer sector code". • Registered bonds (NSV/SSD) cover a huge part of the capital assets. Isn't it necessary to take the corresponding titles (category 8)? • Is it possible to use KNE at this point? •	
Assets - D1- cell A10	This information must be sourced from an external provider and will be difficult to report unless the fund/issuer has provided their ultimate parent company information. This is not always the case. Group structures are frequently subject to change and to update this information will be time consuming.	

	If ISIN codes have been used in cell A4 of this template, then the information will be easily identifiable. Please refer to D1- cell A4 for GDV comments on the use of ISIN codes.	
Assets - D1- cell A11	The correct interpretation of "legal seat" must be applied in order to fulfil the purpose of this requirement i.e. geographical risk assessment. ***Further clarification required:*** • Does issuer country refer to the entity identified under the "issuer name" or "issuer group" [the working assumption would be that it refers to the issuer name and not the group]? • Does seat of issuer mean 'country of incorporation', 'tax domicile' or another definition? • Comments explained in cell A9 are applicable here. Registered bonds (NSV/SSD) cover a huge part of the capital assets. Isn't it necessary to take the corresponding titles (category 8)?	
Assets - D1- cell A12	***Further clarification required:*** • For assets that are out on loan, repro'd or have been pledged as collateral, does the "country" correspond to the counterparty that is holding the asset? • Registered bonds (NSV/SSD) cover a huge part of the capital assets. Isn't it necessary to take the corresponding titles (category 8)?	
Assets - D1- cell A13		
Assets - D1- cell A15	Please refer to Assets – D1 – General. Any new asset classification system will involve tremendous administrative costs at first, such codes would have to be entered manually for the current book of business. Supervisory guidance is necessary to ensure all undertakings apply the codes in the same way, for example it could be the case that the same security is assigned a different CIC by different groups and undertakings. It could be the case that different undertakings use other CIC codes for the same investment instruments. It would be helpful if the CIC code is issued together with the ISIN codes or other codes used as a	

	result of reporting requirements. It would be useful to complete a mapping exercise as outlined in D1- cell A9. As it currently stands, the CIC does not seem to adequately distinguish between different types of risk categories, primarily with bonds. Financials and Corporates as well as Covered Bonds are all put into one asset group (Bonds- Corporate bonds), subordinated bonds are not addressed as a single category. Additional categories would be helpful, such as private equities. Furthermore, we suggest merging commodities funds with alternative funds. There is a need for a strong and stable reference frame, more precise definitions should be provided for each category, especially concerning Investment Funds. Clarification is also required as to what code would be used when the security is unlisted. We question the relevance of applying this to unit linked related securities from the perspective of risk exposure monitoring, considering that the investment risk in not supported by the undertaking. It has been reported by several undertakings that there are several financial assets that cannot be appropriately classified in the CIC table. Some of them suggest the possibility of letting undertaking to build its own asset mapping. **Further clarification reguired:** **CIC 15:** What is meant by the term "short term"? **CIC 44:** How to distinguish "Asset allocation funds" from other funds without any overlap? **CIC 5:** What is meant by the statement "Excluded from this category are fixed income securities that are issued by sovereign governments? **CIC 72:** According to the LOG file there is a contradiction whether those investments are categorized as "Deposits other than cash equivalents" or "Cash and equivalents". In our view, the latter holds. **CIC 79:** Are also investments included here or merely "Cash and equivalents"?	

	CIC 73 and 74: Both CICs refer to the time to maturity. What is explicitly meant by that? The time to maturity at initial recognition? Or is it necessary to classify investments with a respective short time to maturity to a different CIC (in our view this is not appropriate). **CIC 4:** Differentiation between types of funds, e.g. "Asset Allocation Fund" with shares of a specific branch: Is that an Equity fund or an Asset Allocation Fund? Generally speaking: It is unclear how to differentiate between different types of Investment Funds. **CIC 5/6:** Differentiation of structures / collateralised securities, in particular for the splitting of the risk classes, because many instruments contain several risk drivers. **CIC 73:** Remark: We tend to go for a strict interpretation and thus consider day-to-day money under CIC 73 (short term deposits). **CIC 73/74:** Remaining maturity: Reclassification if the remaining maturity changes from more than one year to less than one year? **CIC 15:** What is the difference between Treasury Bonds and Central Government Bonds? **CIC 16:** There are doubts that Covered Bonds by public issuers exist. Providing an example would be very helpful here. **CIC 21:** What is the difference between Common Bonds and Other Bonds? **CIC 25:** Do hybrid bonds represent subordinated corporate bonds with an associated equity component (junior subordinated)? **CIC 31:** What is the difference between Common Bonds and Other Bonds? **CIC 32:** What is the definition for "real estate related corporations"? **CIC 33:** Is there a difference between "equity rights" and so-called ADRs? **CIC 34:** Does "prefered equity" mean "prefered shares"? **CIC 46:** How to differentiate between "Alternative funds" (46) and the ones given in 1 to 5, 7, and 8? **CIC 47:** Do "commodity funds" only exist in the form of futures market funds (Terminmarktfonds)? **CIC 9:** According to CIC classification the direct property portfolio (Immobilien-Direktbestand) can be categorized as follows: "Office and commercial", "Residential", "For own use", "Under construction". In most cases it will be difficult to assign each real estate object to one of those categories. For example, there is a real estate object used for logistics or for commercial purposes. Moreover, real estate objects are often	

	used for investment and residential purposes at the same time. How to proceed in those cases? **CIC 95:** "Plant and equipment for own use" - What does that mean in terms of content? **CIC 8 X:** How to deal with mortgage based loans given to legal persons? Are legal persons considered as "individuals"? CIC 8X "Loans to senior management board": What is meant by that? **CIC 8:** Category 8 "doesn't include loans on policies" - What CIC is relevant for "loans on policies"? Or are these loans covered without a CIC in template Assets-D1? **CIC 49:** Each funds shall be assigned a CIC - is it correct to classifiy special funds (Spezialfonds) to category 49 (investment funds - other)? **CIC 8:** Dominant asset classes for German insurance undertakings are registered bonds (Namensschuldverschreibungen) and note loans (Schuldscheindarlehen). These instruments essentially correspond to the category "bonds" in terms of features and borrower structure; with the sole exception that they actually do not represent securities. Thus, the question arises whether these instruments should be categorized as "loans" (according to the IAS view) or a disclosure in the corresponding category "bonds" is considered more appropriate.	
Assets - D1- cell A16	We propose that this cell be deleted from the group template since after consolidation, the same amount may not be easily identifiable. ***Further clarification required:*** • The codes listed in the LOG are ambiguous, “N / YNGNS / YNGS / YGNS / YGS”. A choice of Y/N would be clearer? • Is it necessary to distinguish between accounting rules and supervisory law?	
Assets - D1- cell A17	There is an issue of how to deal with assets that are rated by more than one agency, we query whether the (re)insurer should use a form of ‘expert assessment’ or if another methodology should be applied. For example, in some cases a blended rating is used whereby the ratings from all the major agencies are examined and an aggregate of these ratings is established. In other cases the second best rating is used, this is the method used when assessing counterparty default risk.	

	Any guidance on the above issues should not consequently force undertakings to determine multiple ratings. Undertakings should report the external rating which in their view, is best representative and used internally for SCR/MCR calculations. Data based on rating assessments should only be requested on annual reporting dates. Any request in between would be too onerous and require an ongoing maintenance process of the data set. ***Further clarification required:*** • When external ratings are not available, should the undertaking determine an internal rating or leave this cell blank? This may be the case for tangible assets, mortgages or investment funds • In case more than one rating exist. How to proceed?	
Assets - D1- cell A18	Please refer to Assets D1- cell A17. Which rating agency to report in case of a second best-rating?	
Assets - D1- cell A19		
Assets - D1- cell A20	For some mutual funds this information may be difficult to provide in a standardised way. In the case of mixed mutual funds, it must be ensured that this information is interpreted in the correct way, thus as only applicable for the bond (and cash) portion of the fund. For Alternative Investment Funds, it is not always possible to perform a look through with regards to the duration, normally it is only the duration of the fund that is registered. It should be clearly stated that the information requested is the residual, and not	

	initial duration. ***Further clarification required:*** • How should undertakings deal with assets that have no fixed maturity date (common practice throughout Europe is to use the first call date)? • Clarification is required as to whether the modified duration is used as accounting or economic sensitivity measure , for example, what would be the sensitivity of a zero coupon bond in a "Hold to Maturity" category. For a callable bond an effective duration would be more appropriate. • How to proceed in case of an aggregated reporting of mortgage loans?	
Assets - D1- cell A22	***Further clarification required:*** • Does this refer to the number of assets, the number of investment funds or the nominal value of bonds?	
Assets - D1- cell A23	This comment applies to Assets – D1 - cells A23, A26 and A30. We assume that these cells must be completed using the quotation currency (A13), there will be multiple currencies in this column and as a result it would not reconcile to the Balance Sheet (BS-C1). Approximations should be allowed when using a mark-to-model approach. Why to report market values for securities, but not for real estate?	
Assets - D1- cell A24	In some cases the required data may be labelled differently, for example "market to market" and "market to model".	
Assets - D1- cell A25	The demand for reporting of acquisition costs of assets is not in line with the principles of market consistency, which is a cornerstone of Solvency II. Where a market consistent valuation has been used for years, the information is in general not kept in the data systems of insurance undertakings. Reassessing the acquisition cost of assets will be very costly, and we do not see the added value to supervisiors.	

	In most cases acquisition costs are not automatically available and not material, they would only be relevant for tangible assets for example, property, plant or equipment. They are often hidden or indirect costs for example, in the form of bid-offer spreads at the time of acquisition. We propose instead to rename this column and apply the following conditions: • For bonds, report the amortised cost (including amortisation) as defined by IAS 39; • For other titles, report the purchase price net of potential impairments. There is also an issue for unit linked assets, if there is not a unit cost detail on the investment reporting system then there is no book cost. It should be noted that this data will be based on acquisitions of the previous year. It is not possible to have a view of all products over time. **Further clarification needed:** Necessary to report local GAAP and IFRS figures? Moreover, the definiton remains unclear.	
Assets - D1- cell A26	The total SII amount is defined as including accrued interest for bonds and other interest bearing securities. This differs from the IFRS valuation where accrued interest would be included as part of prepayments/accrued income in other assets, rather than as part of the investment valuation. As Assets - D1 is then supposed to tie back to the SII balance sheet for investment values, this implies that the values in the BS-C1 cells A8 and A8A, should also include accrued interest. Clarification on this point would be beneficial. How to proceed with mortgages reported on an aggregate basis? What is to be understood under "SII value of the line"?	

Assets - D1- cell A28	A maturity date will only apply to bonds and other assets with a defined maturity, we therefore query what should be considered as the maturity date for callable bonds and perpetual callable bonds i.e. the call date or the final maturity date? If there is no fixed maturity date should this cell be left blank?	
Assets - D1- cell A30	Please refer to Assets – D1 – A26 for comments on the total Solvency II amount. How to proceed with mortgages reported on an aggregate basis?	
Assets - D1Q- General	Please refer to Assets – D1 – General. For comments on each of the individual cells in this templates, please refer to the corresponding cell in Assets – D1 and BS-C1.	
Assets - D1Q- Purpose	Please refer to Assets – D1 – Purpose. For comments on the use of ISIN codes, please refer to Assets – D1 – cell A4	
Assets - D1Q- Benefits	Please refer to Assets – D1 – Benefits.	
Assets - D1Q- Costs	Please refer to Assets – D1 – Costs.	
Assets - D1Q- Groups	The corresponding summary document states that "reporting at group level should only concern assets of the holding entity, non-EEA insurance undertakings and other non-supervised entities within the group. » In this context it is not clear if the term « holding entity » is the same as the term « insurance holding company » in Art. 212f of the directive or if another scope should be used for filling the QRT. Furthermore it is not clear if relationships between group companies not covered by this QRT and group companies covered by this QRT shall be included in the QRT or not or even if no consolidation steps should be made at all. The final summary document should be clear at these points.	
Assets - D1Q- Materiality	We support EIOPA's proposal to introduce a materiality threshold for a possible exemption of quarterly reporting. However we query how the threshold will be	

	calculated for example, coverage of undertakings representing (at EU level), at least 90% of the total value of investments? Does this mean that only undertakings which have more than 90% assets compared to the insurance group at EU level, should report fully Assets D1Q quarterly? The exemption for quarterly reporting of this template is not indicated as such in CP9b and we would ask that EIOPA clarify this point.	
Assets - D1Q- Disclosure		
Assets - D1Q- Frequency	Please refer to cell Assets – D1Q – Materiality. EIOPA indicated that this template should be compiled on a quarterly basis. We would suggest that transitional measures be applied for this template and the extent of quarterly reporting be relaxed during the first year following entry into force. Collecting the necessary data for completion of this template will be difficult within the timescales as required in the draft Level 2 measures, particularly upon first time reporting. For some securities (investment funds, participations), the information requested can only be provided or updated once a year. We support the direction that EIOPA has taken in terms of simplifying the templates for quarterly reporting however we note that the granularity of this template is the same as the annual template. The criteria for reporting the full list of portfolios and the summary is not clear. In particular we do not see link between the risk section of this template and Pillar 1 requirements, that would require reporting this information on a quarterly basis. That section, at least, should be removed.	
Assets - D1Q- cell A1 (list)		
Assets - D1Q- cell A2 (list)		

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
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 (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		
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	For general comments, please refer to cell Assets – D1 – General. EIOPA proposes to treat all structured products in the same way, despite the fact that the degrees of risk attached to the structured products vary according to the type of product. The level of information required for this template is not easily obtainable for the majority of undertakings. The following items in particular are not commonly collected and stored: • Underlying index/security/portfolio (A6) • Risk factors (A7)	

- Loss given default (A12)
- Attachment point (A13)
- Detachment point (A14)

In order to report these items, information would need to be collected and stored from custodians and investment managers with potentially significant additional costs incurred in the process.

More examples and guidance on definitions would be helpful on this template in order to more fully assess the proposals. For example, it is not clear what the structured product category is comprised of.

Further clarification required:

- Structured products (in connection with BS-C1)
  In the LOG file a destriction for cell A2 "Type of structured product" is given in the form of a closed list of products, namely CLN, CMS, CDOp, MBS, CMBS, CDO, CLO, CMO, Other.
  On the contrary, in template BS-C1 the products CDS, CMS and CDO are called "Structured Notes" and ABS, MBS, CMBS, CDO, CLO and CMO are called "Collateralised Securities".
  In our view, CLN are not identical with CDS. To that extent, the lists of products given in both QRTs do not perfectly match.
  Though it might be possible to find a solution in practice, a consistent form of the two lists is appreciated.

- What is meant by "Synthetic Standard Products"?

- Are CDS, CMS and CDO considered as structured notes? Or as merely products that contain CDS, CMS oder CDO?

- In this regard, are callables considered as structured products?

	• In this regard, are "Steepener" or similar structured products according to local GAAP to be considered as structured products? • For quarterly reporting, an exemption from reporting requirement is allowed if the sum of structured products is less than 5% of the sum of capital assets. • Do fund holdings have to be considered within that calculation? • Do securitized claims (e.g. CDO, ABS, etc.) have to be considered within that calculation?	
Assets - D1S- Purpose	Please refer to Assets – D1 – Purpose. For comments on the the use of CIC codes, please refer to cell Assets - D1 – General and cell A15.	
Assets - D1S- Benefits	Please refer to Assets – D1 - Benefits.	
Assets - D1S- Costs	Please refer to Assets – D1 – Costs.	
Assets - D1S- Groups	Please refer to cell Assets - D1Q – Groups.	
Assets - D1S- Materiality	The materiality threshold of 5% should be treated in a flexible manner in order to avoid a significant burden to undertakings.	
Assets - D1S- Disclosure	Please refer to cell Assets – D1 – Disclosure.	
Assets - D1S- Frequency	Please refer to cell Assets – D1 – Frequency. Please refer to Assets – D1S – General for comments regarding limitations on collection of data on structured products.	

Assets - D1S- cell A1	A closed list of structured products is welcomed, these should be accompanied by definitions to ensure the information can be entered accurately into the undertakings IT systems.	
Assets - D1S- cell A2		
Assets - D1S- cell A3	We are uncertain as to what is required from this cell. Collateral for CDS (held on a general OTC derivatives collateralisation platform and marked to market on daily basis) is something very different from the collateral bonds of a synthetic CDO. This information is likely to be part of the original prospectus but it is not clear how often this is disclosed. This could cause problems for undertakings that are expected to report this information on a quarterly basis. It is unclear what is meant by capital protection for ABS and similar structures.	
Assets - D1S- cell A4		
Assets - D1S- cell A5	This information should be available from the issuing prospectus but it may be problematic to provide a continuous update of this data, particularly in the case when some parts of structured debt can be redeemed at different times. In general, any application of a look-through approach may cause problems for the reporting undertaking. The data will likely be held across multiple sources and a specific database would be required to consolidate the necessary information. Manual reporting would be required if the process cannot be automated. How to proceed with different types of collaterals?	
Assets - D1S- cell A6	There are very significant difficulties in providing such information. In some cases the data cannot be reported, in the best case, free text could be provided. A 'free text box' implies a high degree of manual effort which would mean this template could not be easily automated.	

	In such cases, it was suggested to separate qualitative from quantitative data and greater insight/oversight may be obtained from understanding/explaining the risk management systems in place as part of governance rather than providing a detailed instrument by instrument analysis.	
Assets - D1S- cell A7	There is no closed list for this cell and as a result interpretation will be subjective.	
Assets - D1S- cell A8		
Assets - D1S- cell A9		
Assets - D1S- cell A10	We understand that this requirement relates to data for structured products with fixed rates. However there will be problems for undertakings if the rate is partially fixed and partially variable. The information may be difficult to report if the index is very complex.	
Assets - D1S- cell A12		
Assets - D1S- cell A13		
Assets - D1S- cell A14	A closed list of structured products is welcomed, these should be accompanied by definitions to ensure the information can be entered accurately into the undertakings IT systems.	
Assets - D1S- cell A15		
Assets – D2O- General	For general comments, please refer to cell Assets – D1 – General. The detail required for both historic and open derivative contracts is onerous and may prove very costly. The functions under the system of governance will be in a position to monitor very risky positions on investment asset holdings and therefore capturing closed trade data but this will be of little use for the day-to-day running of the undertaking. This data is purely for reporting purposes and We do not believe it fits with the rest of the templates. This requires reporting of transactional data while other templates focus on snapshots at a sigle point in time.	

	This template will require a huge amount of work consolidating information from different databases. A generous adaptation period would be welcomed. In general, we believe this template mixes regimes. For example, we do not see the basis for cell A17 in the Solvency II regime as it is a cost based measures. The most important information on derivatives data relates to the value and sensitivity of these instruments, information to be reported should therefore focus on these issues. ***Further clarification required:*** • We query whether unit-linked funds should be treated as ring-fenced? The LOG states, "Each derivative must be reported once in relation to each portfolio and / or each ring-fenced or other internal fund. So consequently a given derivative that is part of the investments of life and non-life business and /or several funds (e.g. several U-L) will result in one line for life, one for non-life and as many lines as the funds where the derivative is present".	
Assets – D2O- Purpose	Please refer to cell Assets – D1 – Purpose.	
Assets – D2O- Benefits	Please refer to cell Assets – D1 – Benefits.	
Assets – D2O- Costs	Please refer to cell Assets – D1 – Costs.	
Assets – D2O- Groups	Please refer to cell Assets – D1 – Groups.	
Assets – D2O- Materiality	We support EIOPA's proposal to introduce a materiality threshold for reporting of this template. We believe that this template should only be reported if the total notional amount	

	(A15) exceeds a certain percentage of total investments.	
Assets – D2O- Disclosure	Please refer to cell Assets – D1 – Disclosure.	
Assets – D2O- Frequency	Please refer to Assets – D20 – Materiality. It could be difficult to assess on a quarterly basis a threshold based on notional amounts, for example when the underlying data is more volatile that the total market value. We suggest that quarterly reporting only be required when an undertaking changes its hedging strategy/structure or if the total notional amount exceed a certain percentage of total assets. At the very least, cell A14 should not be subject to quarterly reporting, to determine "delta" would require stochastic calculations. As a general comment, if exemptions are set at a European level based on percentage coverage, undertakings on the fringes of the materiality boundaries would face uncertainty over their reporting obligations. During certain years they may have to report more and in other years, perhaps less. Exemption criteria which do not fluctuate should be developed to allow these smaller undertakings to more effectively plan for the necessary IT investments.	
Assets – D2O – Quarterly Exemption	Please refer to cell Assets – D2O – Frequency.	
Assets - D2O- cell A1	Please refer to Assets - D1 - cell A1.	
Assets - D2O- cell A2	Please refer to Assets - D1 - cell A2.	
Assets - D2O- cell A3	Please refer to Assets - D1 - cell A3.	

	We find it unclear to what level of look through is required for this template, for example, if derivatives included in investment funds should be reported If so, it would require an enhanced reporting at a very detailed level from the Fund manager for example, the maturity date of every single derivative included in the investment fund. This would result in more detailed reporting than outline in Assets –D4..	
Assets - D2O- cell A4		
Assets - D2O- cell A5		
Assets - D2O- cell A6	For OTC derivatives, a standard code list should include only major institutions in the OTC derivatives market. A code 'other' could be used for other derivatives counterparties, or undertakings could enter their own registration in a free-format. ***Further clarification required:*** • Who would be responsible for establishing and maintaining these codes? • Can internal standard codes be used here?	
Assets - D2O- cell A7	Can KNE numbers be used here?	
Assets - D2O- cell A8	Please refer to Assets – D20 – cell A6 for comments on OTC derivatives. Can the internal name be used here?	
Assets - D2O- cell A9	Requested information can be derived/ calculated with appropriate effort in some cases. In other cases, depending on the type of instrument, there could be many underlying contracts. We query if all underlying contracts be entered into this cell? It is unclear, what is meant here. Should only derivatives be considered to which a specific underlying within the portfolio can be attributed to (Single Stock Derivative vs. Makro Hedge)? How to proceed in case of currency options? Necessary to provide the	

	ISO-Code in the respective currency? At this point, a detailed definition complemented by specific examples (if possible) is necessary.	
Assets - D2O- cell A10	There is no explanation provided for derivatives with more than one currency for example, FX forwards, FX options, cross currency swaps. For example, how should the currency be reported in currency derivatives when there is a currency derivative between USD and JPY and the portfolio currency is EUR? The content remains unclear, explanatory examples should be provided.	
Assets - D2O- cell A11	The CIC table should also include fields for mortality risk in combination with derivatives (categories A-F). Please also refer to Assets - D1- General and cell A15.	
Assets - D2O- cell A13	Clarification on Micro and Macro hedge is useful and we welcome the suggestion for a closed list. To assess whether a derivative is used for qualitative or strategic purposes, would not be captured in the investment reporting system. This cell would therefore require management judgment/assessment. Instead of referring to assets it would be better to refer to “financial instruments or forecasted transaction”, in order to include all the hedging activities put in place by an undertaking. What is to be understood by "EPM"?	
Assets - D2O- cell A14	This data requirement is complex and will be costly to report, particularly on a quarterly basis. The valuation of complex derivatives will require stochastic modelling. It is anticipated that this reporting requirement will be very costly.	

	Further clarification required: • This cell is not relevant e.g. for interest rate swaps. Delta is a measure of rate of change in the option. There are different ways to perform the calculation depending of the type of option. • This is only applicable when used as a hedge. • It would be logical to follow only the single most important sensitivity parameter for derivatives.	
Assets - D2O- cell A15	The term "notional amount" is not familiar. The question arises as to what would be the notional amount if there were several trades during the reporting period. For example: 01/02: 10 Mio; 01/13: 25 Mio; 01/15: 7 Mio; 01/20: 0 The value under coverage not only depends on the derivatives that are held at any point in time, but also on the value of the assets held at any point in time. For example: 01/02: 10 Mio; 01/13: 25 Mio; 01/15: 7 Mio; 01/20: 0 What is meant here? The actual notional, or the contract volume (hedged volume)?	
Assets - D2O- cell A16	The data is available for futures, options and swaps. However the definition for "swaps" may need to be revised. An alternative approach could be as follows: Payer swap = short; receiver swap = long. Is it possible to say that Payer Swaps = Short and Receiver Swaps = Long? When to use the attribute "fixed for float"? For the receiver swap?	
Assets - D2O- cell A17	Requested information can be derived/ calculated easily.	

Assets - D2O- cell A19	The number of contracts has a different meaning for OTC and exchange traded derivatives, the latter having a defined contract size. In case of non-OTC derivatives it should be made clear how to count the number of contracts. More guidance is necessary in order to allow for appropriate derivation of this information. ***Further clarification required:*** • At what level should the number on the contract be reported? Per derivatives or accounted for the underlying contract? • What would be the number of contracts if there were several trades during the reporting year? How to proceed in case of swaps?	
Assets - D2O- cell A20	How to proceed in case of swaps?	
Assets - D2O- cell A21	The information in this column will vary depending on the nature of the derivative. Some derivatives for example, ladder options, can have more than one trigger. The reference in case of futures should be clarified.	
Assets - D2O- cell A22	We query how to deal with variable rates, should the value be taken at the reporting date? For swaps: offered (variable); interest rate (only for interest rate swaps), the data should be available. Swap outflow amount (A22): Year-to-Date or quarterly consideration?	
Assets - D2O- cell A23	For swaps: gained (fixed); interest rate (only for interest rate swaps), the data should be available.	

Comments Template on Draft proposal for Quantitative Reporting Templates		Deadline 20 January 2012 12:00 CET
	Swap inflow amount (A23): Year-to-Date or quarterly consideration?	
Assets - D2O- cell A24	Data should be available for the currency of the variable component of a swap (only for currency swaps).	
Assets - D2O- cell A25	Data should be available for the currency of the variable component of a swap (only for currency swaps).	
Assets - D2O- cell A26	Requested information can be derived/ calculated but practical problems exist. For example, how to deal with rolled options or futures. We query how to report this cell in the case there are several trades during the reporting period. Question: First the future is open, then partially open, then open again, then open again, and then close -> 5 lines should then be provided?	
Assets - D2O- cell A27		
Assets - D2O- cell A28	Further guidance is required to provide more detailed comments. The values of the derivatives will depend on the model used. If the undertaking does not use IFRS it is unclear how this would be dealt with using national GAAP. What does SII value mean exactly?	
Assets - D2O- cell A29	Definition according to IAS specific classification (Level 3)?	
Assets - D2O- cell A31	More guidance needed.	
Assets - D2O- cell A32	More guidance needed. Question: As we always cash collaterals, is it always possible to report nil here?	
Assets - D2O- cell A33		

	Comments Template on **Draft proposal for Quantitative Reporting Templates**	**Deadline** **20 January 2012** **12:00 CET**
Assets - D2O- cell A34	How to proceed in case of multiple ratings?	
Assets - D2O- cell A35	What kind of input to provide in case of multiple ratings?	
Assets - D2T- General	Please refer to cell Assets – D1 – General and Assets – D2O - General. For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1. We do not see that transaction data adds any value if the receiver does not have a portfolio system where this could be monitored i.e. the supervisor. Further clarification needed: - Do interest rate futures only contain futures contracts on bonds?	
Assets - D2T- Purpose	Please refer to cell Assets – D1 – Purpose and Assets – D2O - Purpose. **Supervisor will not be able to conduct an analysis between hedging transactions and the actual risk in any point of time with this information.** Since derivatives are not only used for hedging purposes but also to increase return, the purpose becomes somewhat inaccurate.	
Assets - D2T- Benefits	Please refer to cell Assets – D1 – Benefits and Assets – D2O - Benefits.	
Assets - D2T- Costs	Please refer to cell Assets – D1 – Costs and Assets – D2O - Costs.	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
	We believe that this template should be delated as it will be very costly to implement	
Assets - D2T- Groups	Please refer to cell Assets – D1 – Groups and Assets – D2O - Groups.	
Assets - D2T- Materiality	Please refer to cell Assets – D1 – Materiality and Assets – D2O - Materiality.	
Assets - D2T- Disclosure	Please refer to cell Assets – D1 – Disclosure.	
Assets - D2T- Frequency	Please refer to cell Assets – D1 – Frequency and Assets – D2O - Frequency.	
Assets – D2T– Quarterly Exemption	Please refer to cell Assets – D2O – Frequency and Quarterly Exemption.	
Assets - D2T- cell A1	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A2	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A3	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A4	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	

Assets - D2T- cell A5	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A6	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1. •	
Assets - D2T- cell A7	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A8	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A9	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A10	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A11	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A13	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A14	For comments relating to the specific cells in this template, please refer to Assets –	

	D2O and any corresponding reference back to Assets – D1. •	
Assets - D2T- cell A15	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A16	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A17	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A18	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1. Definition of both terms remain unclear. What kind of profits and losses should be recognized?	
Assets - D2T- cell A19	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A20	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A21	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	

Assets - D2T- cell A22	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A23	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A24	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A25	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A26	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A27	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A28	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A30		
Assets - D2T- cell A31	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
Assets - D2T- cell A32	For comments relating to the specific cells in this template, please refer to Assets – D2O and any corresponding reference back to Assets – D1.	
Assets - D2T- cell A34		
Assets - D2T- cell A35		
Assets – D3- General	Please refer to cell Assets – D1 – General. The template cannot reflect the fact that, especially for non-life undertakings, assets tend to be higher during the year (as the insurers receive premiums in January, earn interest on premiums and pay out claims again until December). This leads to relatively high interest payments that are compared to relatively low assets at the beginning and end of the year. To get meaningful figures investment, reports must be compared to a benchmark. As currently drafted, the template will only show that the profitability was good during the last year if markets were good (generally: lowering interest rates and spreads, rising equity prices) and bad if markets were bad. This will be difficult for undertakings to implement. ***Further clarification required:*** • How to calculate “gains and losses”. • This information is already reported in the annual report on a level more suitable for the industry. Double reporting should be avoided.	
Assets – D3- Purpose	Please refer to cell Assets – D1 – Purpose. The investment performance cannot be measured in absolute terms. The templates only provide the means to compare investment returns to the asset portfolio at the start and end of the year.	

	The content of this template will allow for some general judgements on liquidity risk. We do not believe that this template fulfils the purpose with regards to ALM. A meaningful ALM analysis cannot rely on the cash flows of the past but has to take into account projected cash flows of the future. This cannot be done with this template. All information in this template is about the last period and is already reflected in the balance sheet. We don't see how the information in this template can help supervisors. Investment systems calculate performance in original currencies. A conversion to reporting currencies where consideration is taken to currency hedges requires massive system changes.	
Assets – D3- Benefits	Please refer to cell Assets – D1 – Benefits.	
Assets – D3- Costs	Please refer to cell Assets – D1 – Costs. To complete this template, undertakings would have to introduce an additional accounting area, as this is the only way to compute realised and unrealised gains compared to the SII value at the start of the period.	
Assets – D3- Groups	Please refer to cell Assets – D1 – Groups.	
Assets – D3- Materiality	Please refer to cell Assets – D1 – Materiality.	
Assets – D3- Disclosure	Please refer to cell Assets – D1 – Disclosure. .	
Assets – D3- Frequency	Please refer to cell Assets – D1 – Frequency.	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
Assets - D3- cell A1	Please refer to Assets - D1- cell A1 regarding consistency towards the definition of “portfolio”.	
Assets - D3- cell A3	Please refer to Assets - D1- cell A3 regarding assets held in unit-linked funds.	
Assets - D3- cell A4	Please refer to Assets - D1- cell A15 regarding the CIC table.	
Assets - D3- cell A6	Investment performance for the year can only be properly evaluated by assessing all cash flows and accruals. It is our understanding that accruals are not included here. We also find that the definitions are not in line with IFRS. It would be helpful to clarify the purpose of reporting this information, we query if it is the intention to align Solvency II reporting with the profit and loss account? We note that the term “paid” has been replaced with the term “received”. It is not clear if that is more an editorial change or if it means that instead of a cash flow view (as it is suggested by the term “paid”), the template captures another view, for example a periodical view like in IFRS profit and loss accounting). The final LOG should be clearer in this point.	
Assets - D3- cell A7	Please refer to Assets – D3 – A6. To asses the profitability of an investment it would be better to use the accrued interests and rents instead of using the cash basis approach (interests and rents received). This comment applies to cells Assets – D3 – cells A7 – A8. ***Further clarification required:*** • How should zero coupon bonds be dealt with? • Should Information concerning "interests" (A7) be provided according to the accounting point of view or on a cash flow basis?	
Assets - D3- cell A8	The definition of "rent" is unclear. Does one has to provide gross or net rents?	

Assets - D3- cell A15	"Net gains and losses" are now defined as the difference between the selling value and Solvency II value, at the end of the prior reporting period. Or, in case of investments acquired during the period, the cost value for assets sold during the year. In our view such a definition makes no sense as in the total period overall, the net gains and losses do not show the performance of the underlying assets. Mark to market result would be more adequate to use from a supervisory perspective. There is inconsistency between "cash basis approach" used for dividends, interests and rents and "earned approach" used for realised gains (where only the part of realised gains relative to observed period should be considered). In our view, the definition in previous version of this template was more appropriate - beside the realised gains of the period, also unrealised gains/losses of the period were considered. Other elements of this template represent actual cash flows (not accruals); to merge realised and unrealised gains is going against the purpose of this template. We also note that the definitions are not in line with IFRS. The definition of "net gains and losses" is unclear, in particular with regard to unrealised profits or losses.	
Assets – D4- General	Please refer to Assets – D1 – General. **The requirement to report information on funds on a look through basis is extremely difficult and costly for companies. In certain cases, it may not be possible to implement as it is by no means certain that the fund management industry will agree to provide such information, especially in the case of non-EEA managers. This is a bigger problem than we initially anticipated, particualry if the fund is held/partially held outside the EEA.** In many cases, the funds held by undertakings are immaterial therefore there is little	

	need for undertakings to seek the level of data requested in this template. The potential level of detail required here may well cause undertakings to revise their investment strategy, so as to avoid investment in collective investment schemes altogether. **We recommend that proportionality be applied accordingly to the type of underlying investment: if a fund is invested in "vanilla" securities, which are all "Level 1", the risk is surely much less than that of another fund invested in "Level 3" assets and, hence, the former fund should be subject to less scrutiny.** Moreover, this template should not be applicable to assets backing unit linked products. This will represent a very significant additional burden. Indeed, this information for UL is not needed for Pilar 1 calculation as investment risks are beared by the policyholder. Thus, requiring this information only for reporting purposes appears excessive. Some level of approximation/estimation may have to be accepted where detailed information proves difficult/unduly costly to obtain. The use of benchmarks and information notices should be permitted. Undertakings have expressed a varied range of serious and material concerns related to this template: • Lack of appropriate instructions: it has been stressed that EIOPA's LOG file does not include sufficient background on the look-through process and, in general, information included in this template. More clarity is demanded. • There's a shared sense of necessity about a materiality threshold in this template. Work in order to clarify the underlying asset composition of a fund holding a very small portion of insurer investments are considered not worth the effort. • Some of the information has to be called from third parties (funds managers): serious concerns raised on the possibility of being able to comply with expected reporting calendars, which puts in doubt the utility of information for	

	supervisors (they will be revising a reality that probably do not represent the situation in the moment of their revision). More certainity is required with regards to definitions, for example “significant”, “very significant” etc. **Further clarification required:** The following idea must be communicated and discussed: A general and consistent approach should be chosen and an official form should be developed and agreed by the German Insurance Association (GdV) and the Federation of German Industries (BDI) (in analogy to the procedure chosen during the development of an insurance reporting system (Versicherungsmeldesystem) - Attachment funds. This means that the investment companies within the official form provide the corresponding data. • The intensity of the fund look through is unclear. What is the reference of the terms "main asset categories" and "main geographical zones and currency"?	
Assets – D4- Purpose	Please refer to cell Assets – D1 – Purpose. A split by main geographical zones is not current practice today If a look-through principle is to be used, it will be difficult or impossible to collect all information, since the information on geographical affiliation is not known in all cases.	
Assets – D4- Benefits	Please refer to cell Assets – D1 – Benefits.	
Assets – D4- Costs	Please refer to cell Assets – D1 – Costs. The look-through approach demanded will result in significant additional costs, mainly due to external providers’ charges for providing such information.	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
Assets – D4- Groups	Please refer to Assets – D1 – Groups.	
Assets – D4- Materiality	Please refer to Assets – D1 – Materiality. We propose that a materiality threshold be applied to look-through so that only the biggest investment funds should be reported, for example, funds which cover 80% of investments in investment funds. We propose a materiality threshold for the portfolio list, e.g. 1%, i.e. that all assets which account for less than 1% of total assets should not be reported asset-by-asset	
Assets – D4- Disclosure	Please refer to Assets – D1 – Disclosure.	
Assets – D4- Frequency	Many funds of funds and collective investment schemes provide information on their underlying investments annually and with a significant lag after the period end. This means it will be difficult to provide timely, accurate and reliable information in this template. Also, the data must be sourced from investment providers; if they report only on bi-annual/quarterly basis then the undertaking would have to incur additional costs. In the case that the undertaking holds immaterial sums in such funds, we believe that the materiality exemption should also apply annually.	
Assets – D4 – Quarterly Exemption	To receive information from Investment Funds will be a challenge, especially on a quarterly basis. There will be a lot of manual work involved with large risk of human error. Timing issue will also be challenging especially for quarterly reporting. An exemption should be introduced for investment funds backing unit-linked products.	

Assets - D4- cell A1	Please refer to Asses - D1- cell A4.	
Assets - D4- cell A2	Please refer to Assets - D1- cell A5. ***Further clarification required:*** • The definition "other internal funds" and "assets that are not freely disposable" should be clearer. We query whether the latter applies to assets in unit linked funds?	
Assets - D4- cell A3	Please refer to Assets – D1 – A2. The underlying asset category will be very difficult to retrieve for some private equity funds. A possible solution would be to extend the CIC table to allow for a category for private equity. ***Further clarification required:*** • Is there a threshold for the category to be included in the analysis? • Most investment funds (UCITS) have a primary asset class/type and a geographical region. If an investment fund has several classes/types of assets, should it be reported in separate rows? This would be very burdensome and we would support that a fund takes up only one line of the template.	
Assets - D4- cell A4	Please refer to Assets - D1- cell A15 regarding the CIC table. Underlying asset category will be impossible to retrieve for some private equity funds. Underlying asset category: The practical approach to liabilities is unclear.	
Assets - D4- cell A5	Please refer to Assets – D4 – Purpose for comments on split by geographical zone.	
Assets - D4- cell A6		
Assets - D4- cell A7	***Further clarification required:***	

	• Does the 'total invested amount in the asset category' relate to par value or fair value? The amount originally invested or the fair value? Or the actual fair value of the investment according to the reporting date? The value of some investment funds is estimated using the Revaluated Net Asset Value. Does the term "total amount" correspond to the "Net Asset Values" of the total funds?	
Assets - D4- cell A8	The LOG definitions for "Standard", "Mandate" and "Other" is still not fully clear. Further clarification will be necessary. It is entirely unclear how to deal with the position "level of look through". Please provide for a definition of the single categories (S,M,O). Furthermore, a provision of examples would be appreciated.	
Assets – D5- General	Please refer to cell Assets – D1 – General. Stock lending activities are fully indemnified, as a result, we believe the data being requested here is considered excessive. In particular, all stock is lent in return for stock of equal value, as well as commission. In some cases, gilt-edged stock is exchanged for other gilts. It is often the case that stock lending programmes are managed by custodians, with transactions occurring daily, the amount of data potentially required would therefore be very excessive in comparison to potential low risk activities. The LOG states, "There should be one line by security lending or repo operation", we question what this means and how it is to be applied in practice. In the case of stock lending, it would be possible to collapse some entries into one line, but not in the case of repos.	
Assets – D5- Purpose	Please refer to cell Assets – D1 – Purpose.	
Assets – D5- Benefits	Please refer to cell Assets – D1 – Benefits.	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
Assets – D5- Costs	Please refer to cell Assets – D1 – Costs. The reporting of all assets detained during the period is complex and costly to implement. The reporting should be limited to assets detained at the date of reporting.	
Assets – D5- Groups	Please refer to cell Assets – D1 – Groups.	
Assets – D5- Materiality	Please refer to cell Assets – D1 – Materiality.	
Assets – D5- Disclosure	Please refer to cell Assets – D1 – Disclosure.	
Assets – D5- Frequency	Please refer to cell Assets – D1 – Frequency. The repos and the securities lending operations do not represent a counterparty risk at the 1st level. The purpose of their monitoring is to assess a risk at the secondary level i.e. the probability of default of both the counterparty and the underlying asset. We do not believe it is relevant to ask for data on systematic basis but this could be requested ad hoc.	
Assets - D5- cell A1	Please refer to Assets - D1- cell A1. ***Further clarification required:*** • Some funds, such as annuity funds, may have a portion of free assets that cannot be likened to a specific underlying asset. We query how different portfolios within one fund should be treated.	
Assets - D5- cell A2	Please refer to comments on Assets – D1- cell A2. ***Further clarification required:*** • The definition “other internal funds” and “assets that are not freely disposable”	

	should be clearer. We query whether the latter applies to assets in unit linked funds?	
Assets - D5- cell A3	Please refer to Assets – D1- cell A3.	
Assets - D5- cell A4	Please refer to Assets – D1- cell A15 regarding the CIC table.	
Assets - D5- cell A5		
Assets - D5- cell A6		
Assets - D5- cell A7	Please refer to Assets – D2O- cell A6.	
Assets - D5- cell A8	We are still uncertain that all collateral types are defined in the CIC table. Collateral can consist of several types of assets at one time; furthermore, they can change over time. This cell will be difficult to complete for lending operations already closed.	
Assets - D5- cell A9	What query what would be the near leg amount for lending operations for example, when lending stocks. Would it be market value of stocks at the start date or the number of stocks? If this refers to the number of stocks then where would the volume of the lending transaction be captured?	
Assets - D5- cell A10	Please refer to Assets - D5- cell A9. The far leg amount for lending operations is unknown so a percentage cannot be calculated. Further clarification from EIOPA on the LOG definition would be helpful.	
Assets - D5- cell A11		
Assets - D5- cell A12		

Assets - D5- cell A13	***Further clarification required:*** • Most stock lending is on an open call basis, what if there is no agreed date? • What would EIOPA categorise as a closed agreement? The market value at maturity date is unknown.	
Assets - D5- cell A14	The title of this cell should be amended; the value generated by a lending operation is not the Solvency II value. ***Further clarification required:*** • The definition of "operation" and "contract" is unclear.	
Assets – D6- General	Please refer to cell Assets – D1 – General. The proposed requirements are too onerous for assets held as a collateral where all financial risks are borne by the lender (reinsurer for instance). The relevant information in this template is on the value of the collateral, and its nature (for instance to ensure that it is not the reinsurers own shares held as a collateral). We do not believe that the use of cash as collateral is not properly addressed in this template. **For these reasons, we propose to keep only the following cells:** • **A2 to A5** • **A12 (but only the first category of the CIC, i.e. the third position)** • **A19 and A20** • **A26 to A28** **Further clarification required:** - What is to be understood by the term "Collateral"? Please provide for a clear definition. - Does the term include rent deposits? - How to treat guarantees for real estate projects currently under construction?	

	- How to treat rent guarentees or letter os intent, in particular in view of contracts nearing expiration?	
Assets – D6- Purpose	Please refer to cell Assets – D1 – Purpose.	
Assets – D6- Benefits	Please refer to cell Assets – D1 – Benefits.	
Assets – D6- Costs	Please refer to cell Assets – D1 – Costs. If multiple sources are required in order to gather this information, it could result in additional costs surrounding indentifying the source, gathering the information and storing the information.	
Assets – D6- Groups	Please refer to cell Assets – D1 – Groups.	
Assets – D6- Materiality	Please refer to cell Assets – D1 – Materiality.	
Assets – D6- Disclosure	Please refer to cell Assets – D1 – Disclosure.	
Assets – D6- Frequency	Please refer to cell Assets – D1 – Frequency.	
Assets - D6- cell A2	We propose to keep this cell in favour of deleting others. Please refer to Assets - D1- cell A4.	
Assets - D6- cell A3	We propose to keep this cell in favour of deleting others. Please refer to Assets - D1- cell A5.	
Assets - D6- cell A4	We propose to keep this cell in favour of deleting others. Please refer to Assets - D1- cell A7.	

Assets - D6- cell A5	We propose to keep this cell in favour of deleting others. Please refer to D1- cell A8. How to treat collaterals for registered bonds (NSV/SSD)? According to the wording of the definition those collaterals should not be reported; however, this is hardly conceivable. A clarification should be provided, given that the Sheet BS-C1B creates the impression that those issues constitute a reporting reason (collateral held for loans made). As regards mortgages, a clarification should be provided.	
Assets - D6- cell A6	We propose to delete this cell. We query what issuer name should be used if the asset was derived from a non-financial sector?	
Assets - D6- cell A7	We propose to delete this cell. Please refer to Assets - D1- cell A10.	
Assets - D6- cell A8	We propose to delete this cell. Please refer to Assets - D1- cell A11.	
Assets - D6- cell A9	We propose to delete this cell. Please refer to Assets - D1- cell A12.	
Assets - D6- cell A10	We propose to delete this cell. Please refer to Assets – cell A13.	

Assets - D6- cell A12	We propose to keep this cell in favour of deleting others. Please refer to Assets D1- cell A15. In case of guarantees a CIC code cannot exist, because that does not correspond to the system of CIC codes.	
Assets - D6- cell A19	We propose to keep this cell in favour of deleting others. Please refer to Assets D1- cell A22.	
Assets - D6- cell A20	We propose to keep this cell in favour of deleting others. Please refer to Assets D1- cell A23. In case our assumption under A12 is incorrect, what kind of guarantees should be reported here?	
Assets - D6- cell A21	We propose to delete this cell. Please refer to Assets D1- cell A24. Valuation method SII (A21) - See Comment on A20	
Assets - D6- cell A22	We propose to delete this cell. Please refer to Assets D1- cell A26.	
Assets - D6- cell A24	We propose to delete this cell. Please refer to Assets D1- cell A28.	
Assets - D6- cell A25	We propose to delete this cell.	

	Please refer to Assets D1- cell A30.	
Assets - D6- cell A26	We propose to keep this cell in favour of deleting others. The definition of "type of assets" should be clarified. How to deal with collateral pools concluded with one single counterparty for various different transaction in the derivatives business?	
Assets - D6- cell A27	We propose to keep this cell in favour of deleting others. Please make clear for what kind of transactions outside the investment area collaterals must be provided (e.g. reinsurance).	
Assets - D6- cell A28	We propose to keep this cell in favour of deleting others.	
TP - F1 & F1Q- General	A breakdown of the BE by cash inflow and outflow is too detailed for part of the business modelled using simplifications, we propose for those businesses to report the gross BE only. This is of particular importance for SMEs. The reserving methods are covered through the governance and internal control procedures, they will also be incorporated in ORSA, and this level of control should provide sufficient confidence for supervisors. Cash inflows and outflows could be required in special cases of supervision. The proposals to report risk margin per LOB are overly onerous. We propose to report these items at an entity level only. This is justified by the fact that risk margin is calculated at entity level and not by LOB. We acknowledge that the current L2 Measures could be interpreted that technical provisions should be calculated by LOB. However, we should keep in mind that if the risk margin should be allocated by LOB it will be using proxies.To avoid reporting approximated and potentially misleading information, we strongly suggest merging all the cells regarding the risk margin.	

	Clarification is required on whether workers compensation is a life LOB. For further details on this point, please refer to TP – E1 – General. This template is complicated as it consists of many different values. Detailed guidance will be necessary on the reported values and their classifications. For MCEV users: In some templates the given structure does not match the approach certain insurers have chosen. As a consequence these insurers must apply simplification rules as percentage allocation or rule of three in order to fill all cells of these templates. In our opinion such simplification rules do not lead to satisfying results. Example: Template TP-F1 and the other assets and other liabilities items of the balance sheet template if life insurers' starting point is the MCEV. The reporting requirements go far beyond the information provided by MCEV models. Since MCEV models are commonly used by life insurers to manage their risks, the reporting requirements should be designed to be align with MCEV valuation and not prescribe a separate valuation approach. The current set of QRTs requires the latter, hence full compliance will be highly expensive without yielding any benefits to the undertaking. The design of the QRTs does not help the purpose of having risk management and risk reporting align and based on the same methodologies. The LOBs don't match the LOBs in the L2 exactly as there are a few LOBs in QRTs where TPs are required with / without guarantees. **Further clarification needed:** • Cell F14: The proposed Algorithm leads to a double counting of the risk margin for health insurance. F14 especially contains the sum of F10 and F11, both containing the risk margin in E10	
TP - F1 & F1Q - Purpose		
TP - F1 & F1Q - Benefits		

TP - F1 & F1Q - Costs	Many man hours are required for implementation of these templates; there are several reporting systems that would have to be extended and data systems/warehouses to store the information. In order to fully judge the cost of completing these templates guidance relating to the use of roll-forward technical provisions figures should be determined. This should be resolved as soon as possible.	
TP - F1 & F1Q - Groups	We welcome the decision of EIOPA to remove this requirement from group reporting.	
TP - F1 & F1Q - Materiality	We appreciate EIOPA's proposal to add a materiality threshold for reporting the gross best estimate for different countries (countries representing up to 90% of certain LOBs) however we find that the proposed templates are not consistent for life and non-life. The LOG states that for TP – E1 & E1Q, the materiality threshold of 90% applies to direct business and the respective LOB. Whereas the equivalent reporting requirement in TP – F1 & F1Q, the threshold applies only to the respective LOB. This inconsistency should be corrected.	
TP - F1 & F1Q - Disclosure	We support EIOPA's proposal that the simplified template F1Q is used for public disclosure.	
TP - F1 & F1Q - Frequency	The GDV appreciates that template F1Q is a simplified version of F1. This will help in the requirement to report the information quarterly. The use of approximations should still be accepted in quarterly reporting. We propose that a roll forward approach be used. We question why the risk margin should be required on a quarterly basis as it is required for SCR calculations but not the MCR. For this reason, we propose to remove the risk margin from template F1Q or perhaps use an approximation based on last annual risk margin, for instance, keeping the same risk margin/BE ratio.	
TP - F1- cells A1 – A14	This comment applies to TP – F1 cells A1 – A14.	

	It should be clarified in the definition whether this value should be gross or net of reinsurance. If it is gross of reinsurance then it is unclear how the reinsurance element is included for derivation of net provisions, we therefore assume it is net of reinsurance. Further clarification needed: • **Technical Provisions Calculated as a Whole:** We assume that net provisions (gross provisions minus reinsurance) should be reported. • **Profit Participation:** We assume that a profit participation of reinsurance should not be considered here, but instead only the discretionary participation features of primary insurance should be reported.	
TP - F1- cell A7A		
TP - F1- cell A7B		
TP - F1- cell A7C		
TP - F1- cells B1 – B14	This comment applies to TP – F1 – cells B1 – B1F. **We question the benefit of splitting between "cash out" and "cash in" flows. We recognise** that there is a need to perform this split in the modelling of the reserves; however it is unclear why these splits should be reported in the proposed template. BELs are evaluated using stochastic projections. It is unclear whether cash flows should be reported as deterministic cash flows based on one average scenario (certainty equivalent) or as the average of the stochastic projection. If it should be the stochastic average, then, the average claims, the average premiums and the average expenses do not need to sum up exactly to the best estimate liabilities, due to differences in averaging. A lot of effort would be required in the development and ongoing maintenance of such	

	reporting requirements. **It should be sufficient to report the gross best estimate total instead of per "cash in-flow" and "cash out-flow" for businesses modelled using simplifications.** The reserving methods are audited, and covered through the governance and internal control procedures, and in the ORSA, which should be sufficient. ***Further clarification required:*** • If the undertaking pays policyholder taxes, should this be included in claims? • The exact definition of "guaranteed benefits" for participating business is still unclear; it would be particularly difficult to separately evaluate the profit participation based on modelled returns over minimum guaranteed returns. • Clarification on "other cash flows" is necessary. • A clear definition of options and guarantees in health insurance contracts is needed. For example, are deferred benefits or the possibility to change the insurer options? • Further explanation of surrender value is needed. For example, it is unclear how to deal with the transferable ageing reserve? • More guidance regarding the definition of cash flows (e.g. discretionary benefits, costs, gross or net positions) are needed	
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	We believe that the definition used in the LOG to describe row BD, this row now overlaps with the cash flows in row BD. For example, with the additional resulting cash flows from the future premiums, expenses of the policies which would lapse without future premiums, difference of the expenses of active and paid-up policies and commissions.	

	We question the usefulness of split in lines BC-BF and question why the future cash flows in template TP – F2 are not sufficient.	
TP - F1- cells BD1 – BD13		
TP - F1- cells BF1 – BF13		
TP - F1- cells CB1 – CB14A	The required breakdown of the technical provisions is often too granular and full compliance will be highly expensive, without yielding any benefits to the undertaking. In practice, the required break down of the technical provisions prescribes a valuation approach, in particular in terms of data granularity and segmentation at which valuation is performed, which is often in conflict with standard industry practices. At the minimum a breakdown should be limited to line of business and gross best estimates, since everything else will be highly impractical. For instance a further breakdown of risk margins and potential losses from counterparty default is contrary to the idea that these are portfolio level items, where a breakdown to line of business does not yield additional information. The reinsurance recoverables should not be reported on such granular level as it is burdensome to provide all these data and the need for this granular level is not clear to us. A reporting of the reinsurance part within the prescribed calculation is burdensome, to our opinion it should be sufficient to provide reinsurance recoverables not more granular than on LoB-level. As MCEV models produce values net of reinsurance, it should be possible to provide net figures (in the granularity of TP-F1) and obtain the less granular gross values by adding the reinsurance part, instead of vice versa, where the gross is required to be reported very granular and the net is less granular. This comment also applies to cells CC1-CC14, CD1-CD14A and C1-C14A of TP-F1.	
TP - F1- cells CC1 – CC14	Please refer to TP - F1- cells CB1 – CB14A.	
TP - F1- cells CD1 – CD14A	Please refer to TP - F1- cells CB1 – CB14A.	

TP - F1- cells C1 – C14A	Please refer to TP - F1- cells CB1 – CB14A.	
TP - F1- cells CB9A – C9A		
TP - F1- cells E1 – E13	It has been agreed that the risk margin should be calculated once allowing for diversification; there is no reason to then split by LOB. Reporting the risk margin per LOB will be complicated and will require a significant effort; this adds complexity for the purpose of supervisory reporting only. We acknowledge that the current L2 Measures could be interpreted as specifying that technical provisions should be calculated by LOB. However, we should keep in mind that if the risk margin should be allocated by LOB it will be using proxies (e.g. during the QIS 5 exercise undertakings allocated their risk margin proportionally to the Best Estimate). To avoid reporting approximated and potentially misleading information we would suggest merging the cells on the risk margin. **The allocation of the risk margin would be meaningless for reporting purposes.**	
TP - F1- cells FB7A		
TP - F1- cells FB7B		
TP - F1- cells FB7C		
TP - F1- cells IA1 – IA 13	The previous template had an additional row for the surrender value, this has been removed however our previous comment still stands as it also applies to “technical provisions of products with a surrender option”. Reporting separately on products with surrender options would require significant effort in amending systems and processes to report the data requested. The template specifies “technical provisions of products with a surrender option”, this insinuates that the risk margin be split at product level in order to report on this requirement. A surrender value floor should not be applied to the valuation of technical provisions. We believe that a statement of the proportion of contracts with surrender options in relation to the technical provision would provide more meaningful information.	

	Further clarification required: • Does the definition of "surrender option" apply only to contracts where a non-zero surrender value is available? Significant effort will be required to amend systems and processes in order to support reporting of the data requested. The template specifies "technical provisions of products with a surrender option", this insinuates that the risk margin be split at product level in order to report on this requirement. **The allocation of the risk margin would be meaningless for reporting purposes.** **As a second best solution we would prefer to report only the "best estimate for products with a surrender option".**	
TP - F1- cells J1 – JL13	According to LOG of Template TP L-F1 (Cell Number J1 – J13), the amount of gross BE for different countries depends on "risk underwritten", i.e. localization of risk (cf. also LOG of Template Cover A1A, I7-I11). Even though there is a materiality threshold, this does not address the following issue: The business split according to countries, where the risk is located, is - for some business – not applicable, e.g. for Life Reinsurance: Due to the fact, that worldwide coverage is provided and that sometimes risks located in different countries are reinsured under one treaty, local loss events (e.g. Tsunami in Thailand or catastrophe of the funicular in Kaprun) affect risks located in different countries and treaties underwritten in different countries. Hence the proposed split is neither feasible nor useful.	
TP - F1- cells M1-M13	The format of these cells does not appear to allow for the description of more than one simplified method, while the percentages included in O1-O12 would include the impacts of additional areas where simplified methods are used. There is the potential for misinterpretation of the results. ***Further clarification required:*** • The definition of allowable "simplified methods" are still under development in the context of the draft Level 2 text – note that there should be no pre-defined	

	set of simplified methods. An undertaking should be able to use any method, as long as it has been approved by the supervisor.	
TP - F1- cells N1-N13		
TP - F1- cells O1-O13		
TP - F1- cells P1-P13	The LOG definition for this row now refers to “total amount of surrenders”, it previously referred to TPs calculated by LOB. Clarification needed what reporting period is anticipated and if both surrenders and transfers should be included in the amount. We query if the total amount of surrenders refer to actual surrenders or surrenders from the modeling of BE?	
TP - F1- cells Q1-Q13	Additional information cannot be summarised, unless specified as amounts.	
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		
TP - F1Q- cell C11		
TP - F1Q- cell C12		
TP - F1Q- cell C13		
TP - F1Q- cell C14A		
TP - F1Q- cell E1-E13	We would propose to merge all cells related to the risk margin. To split these, for reporting purposes only, will be unduly burdensome.	
TP – F2- General	It should be clarified whether the cash flows are gross or net of reinsurance and also	

	on the methodology anticipated for example, deterministic scenario, mean of the stochastic scenario etc. We would like to reiterate our comment that detailed data on "in and out" cash flows cannot be reported for contracts modelled without using cash-flows projections. It must be stressed that this template obliges undertakings to run complex calculations therefore a generous adaptation period would be welcomed. This template raises some concerns for non-life undertakings who would have to report information on Health SLT and annuities in this template. It is normal in non-life undertakings to estimate estimate total reserve levels. The approach used in this template would overhaul that general principle and would require drastic changes to methods currently used. We believe that this template, along with the cash-inflows and out-flows in TP – F1, amounts to quite burdensome reporting. It should be possible to reduce the level of detail in TP – F1 or only report this template if the supervisor determines that a closer level of supervision is required, for example if an undertaking breaches certain limits. **Further clarification required:** • The technical provisions are determined stochastistically, i.e. they contain the value of options and guarantees. But the cashflows in F2 only make sense deterministically.	
TP – F2- Purpose		
TP – F2- Benefits		
TP – F2- Costs	We query whether undertakings would be forced to annualise projections if they were currently done on a monthly basis. IT systems would have to be redesigned if is the case. Changing to cash flow based approach will be costly and require a considerable	

	amounts of resources.	
TP – F2- Groups	We welcome the decision of EIOPA to remove this requirement from group reporting.	
TP – F2- Materiality	The principle of materiality should be applied to this template. It is disproportionate to ask for all cash flows and this should be restricted to material cash flows only. If certain segments are to be reported in detail, there should be a threshold decided between the undertaking and the supervisor.	
TP – F2- Disclosure	We support EIOPA's decision not to disclose information on cash flows. This is commercially sensitive information.	
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		
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	We assume that recoverables from intra-group retrocession are included in this column.	
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	The template requires data to be synchronised between "technical provisions" (actuarial) and "claims paid and premiums received" (accounting). The required data is currently not held nor matched at the product denomination level of granularity and it will be highly onerous to provide this information. The definition of "product denomination" will result in a huge number of rows in this table. Systematic reporting should only be required for annualised guaranteed rate and the "Identification and classification" section (green) for supervisory purposes. For ad-hoc reporting only some columns should be required as set out below. Other areas should be reported on a qualitative basis (table, surrender rates, financial replication). The summary document gives the impression that HRG's are regrouping products yet the excel template appears to indicate that it is more detailed than products. We would urge EIOPA not to follow a level of granularity that is not aligned to the way that undertakings manage their risks. **Calculations of BE at HRG level would be onerous and expensive (in term of timing and setting-up systems).**	

If we correctly understand, a single product will have different lines when it has different characteristics according to following fields (guarantees with different risks, different commercialisation dates, etc). It should be noted that the same product could be part of several HRGs. For example, products with different guaranteed rates during the life of a single contract, we assume that we can regroup contracts and calculate an average guaranteed rate.

Furthermore, we assume that it is possible to mention 2 tables used to calculate the BE, one for men and one for women, avoiding to split the product in 2 only because of gender.

This template contains too much information to be collected and reported annually.

We believe this is an excessive level of detail about technical provisions. For assessing how model points are built, this information should not be requested systematically but either on an ad hoc basis or in coordination with an on-site inspection. For analysing the products sold. A simpler template could be developed consisting only of cells A1 – A8, A24 – A30 and potentially A15.

For ad-hoc reporting, where supervisors wish to check the model points/HRG of a particular undertaking, a reporting template could be based on the following:

- green section (cells A1 – A8);
- red section: A34A.
- The other information should be analysed on a more qualitative basis, and we should let the undertaking decide the format in which to answer to the questions of the supervisors, as part of the natural dialogue between the two. For instance, we query how the surrender rate could be reported when we using stochastic projections as this would depend on the scenario.
- Dialogue on how surrenders are modelled would be more useful for supervisors and this would involve a qualitative exchange between the supervisor and the undertaking.

	Further clarification required • It is not clear how many lines on the report are expected per product. Is it correct that selling the product in more than one country may lead to more lines? And applying combinations of premium types (for pension) would not lead to more lines? • How to deal with product extentions (additional covers or garantees) • Cell A21By definition the technical provisions contain the value of O&G before tax. There are two possibilities to calculate the technical provisions: We can either consider them as the mean value over 1000 stochastic projections or we can calculate a deterministic value and add the value of O&G. Both can be done using our stochastic system. For the QRT a separation of the technical provisions into different product lines (products with death risk, with longevity risk, with disability risk etc.) is required. This separation can be done for the deterministic cashflows. It cannot be done for the value of O&G. For us the value of O&G does only make sense on the whole portfolio. We could break the value down mechanically. But I doubt that this increases the information content. • What is the required granularity for TP-F3? • What is the difference between homogeneous Risk Group und Product Denomination.	
TP – F3- Purpose	Feedback from EIOPA indicated that the purpose of this template is to determine if model points/HRGs are well defined. This information is part of internal control systems and model validation. Supervisors will validate models and monitor internal controls of the undertaking therefore we do not believe that this template would add additional insights to fulfil the intended purpose.	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
TP – F3- Benefits	We believe that the benefit to supervisors of requiring detailed systematic information on model points/HRGs, in comparison to the potential burden to industry, is excessive. **A qualitative analysis of the products to be included in particular HRGs would be an alternative way of performing this assessment.**	
TP – F3- Costs	Overall, the granularity in this template is significant and therefore will be very time consuming and expensive to create. Information on stock and movements (cells A9 to A15) in particular will be very costly to report and the information may not be available for example, the number of insured persons for group contracts. **Best estimate information (A21) should not be required at HRG level. Undertakings would complete these calculations at entity level or fund level.**	
TP – F3- Groups		
TP – F3- Materiality	A materiality clause should be introduced so that the template focuses on meaningful information.	
TP – F3- Disclosure		
TP – F3- Frequency		
TP - F3- cell A1	More guidance is required on “product denomination” and how granular the proposal will be in practice. The more granular the denomination is the more demanding it will be to complete the template. In few cases, information was said to be available on a product basis but in the vast majority of cases, a split by product will be very difficult to achieve. **Difficulties may arise when using “commercial name” as this can often be subject to change.**	

	The reporting of different guarantees with different risks and different commercialisation dates in single lines would, in some cases, result in more than 200 separate lines for single undertakings. The LOG comment specifies that annuities stemming from non-life contracts are excluded however the definition for cell A1 states that for non-life annuities, it should be specified which product it belongs to. This seems to be inconsistent. The LOB is not mentioned in the list of different characters. There are hybrid products where the policyholder can choose the yield to be guaranteed or unit linked. ***Further clarification required:*** • In some cases, policies include both with-profits and unit-linked technical provisions. How should these policies be handled? • We interpret that a product can be repeated on more than one row because there are variations of HRG and or types of premiums (A7) within one product denomination. Is this correct?	
TP - F3- cell A2A		
TP - F3- cell A2B	There is a partial definition of HRG in the draft Level 2 text (Article 28(2) and 29) but they apply only to life insurance and cases where grouping is made. Also, those definitions are in contradiction with the definition provided in the LOG for this cell. The definition of HRG must be fully detailed in at least the Level 2 text. It must be checked that all the requirements connected to HRG's are workable. A clearer title could be “Number of HRG's in Product”. We understand the current title to mean that HRG's are listed and numbered, and the number of that list is reported in this cell. As the breakdown to HRGs is required, some guidance as to how granular the HRGs need to be would be highly appreciated. We suggest to allow for flexibility in the definition of HRGs, setting the minimum granularity requirement as the LoB-	

	breakdown. This comment also applies to cells A2C and A21 of TP-F3.	
TP - F3- cell A2C	If the partial definition in the Level 2 text is used, the answer in this closed list would always be "No".	
TP - F3- cell A3		
TP - F3- cell A4	This cell may be relevant if the product is in run off. The judgement on risk is different if you know that the product will grow or decrease in the future.	
TP - F3- cell A5	To assist the comparability between undertakings, a closed list of products should be developed. The "type of product" list should not be more extensive than the product categories set out in TP-F1. The closed list could include a value "other", in the case that undertakings report a large number of "other products", the supervisor could then consider extending the closed list.	
TP - F3- cell A6	Initial mapping work will be significant in order to assign policies to the new product classification IDs. **In the LOG, the harmonised code still contains a position (2nd letter) to identify the risk driver of a product, whereas in TP-F1 the segmentation into risk driver has been removed.**	
TP - F3- cell A7	***Further clarification required:*** • Clarification would be helpful on whether any combination from the list of R/S/NS/NF/O can be paid into one single policy, for example a pension policy? • "Regular but flexible premium" is very important class of premium paid but not included in this list.	

TP - F3- cell A8	Please refer to TP - F1 – cells J1 – JL13.	
TP - F3- cell A9	Successful reporting of this information is dependent on all databases being kept completely up to date. **We do not understand why the reference for contracts is IFRS 4. In Solvency II framework there's no distinction between insurance and investment contracts.** For the cells A9, A10 and A15, the LOG states that only contracts classified as insurance contracts in IFRS 4 are included in this cell. We question what should be done with contracts classified as investment contracts, for example unit linked and if they are to be included in the template? This information does not appear to be relevant for Reinsurance undertakings. If so, deadlines established for this template should be adapted to reinsurance business specificities. The compilation process of data from ceding undertakings requires more time compared to insurance undertakings (3 months more by common practices)).Therefore, reinsurers should have a longer deadline for reporting purposes e.g. currently, local regulation in certain EU members set an extended period that should be recognized in SII. No special provisions for reinsurers are taking on board these specificities. It´s important to highlight that 111 reinsurers participated in QIS5, of which around 100 were SMEs ***Further clarification required:*** • How should undertakings treat cluster contracts?	

TP - F3- cell A10	Please refer to TP - F3- cell A9 for comments on insurance contracts under IFRS. The implication currently is that a new policy insuring a life already covered under an existing policy would count as zero in this column. This would be logistically difficult for many companies. ***Further clarification required:*** • How should policies with periods of less than a year be included?	
TP - F3- cell A15	Please refer to TP - F3- cell A9 for comments on insurance contracts under IFRS. ***Further clarification required:*** • Clarification would be helpful on whether single premiums are reported as the actual amount paid or as a percentage of premiums e.g. 10%? • The purpose of this cell is to assess movements in contract amounts and compare (reconcile?) with the evolution in technical provisions. Is this possible if no information is held on about transfers of contracts together with assets/provisions from other undertakings?	
TP - F3- cell A21	It will be very difficult to report BE calculations at HRG level. For instance, value of options and guarantees are calculated at a macro level (usually entity level) and an artificial allocation of this value to HRG would not make sense. If the idea is to understand the volume of the product, then other information, such as surrender value or capital at risk, should be used. BE information should be presented at entity level or at the most granular, fund level. Point 4 of the LOG for this cell leads to unspecified results of HRG's and Products: "If a line represents several HRGs which are common to other products (i.e. cell A2B > 1 and cell A2C = Y), then all lines concerned should be merged." If F3 has higher granularity than the data in F1, we will not be able to report it in such	

	a high granularity	
TP - F3- cell A24	More guidance is required in order to assess the exact implications of this proposal. It may be difficult to calculate this at product denomination level. Capital at risk is reinsurance dependent (eg. Article 106(2)(a)) and reinsurance may be undertaking specific, not product or contract specific, so that this information may be difficult to issue. Better information would be sum at risk.	
TP - F3- cell A26	Calculation of total surrender value for all in-force business would be very time-consuming. BE liabilities seem to already capture the value of these options and clarification would be helpful on why they are required to be reported separately.	
TP - F3- cell A30	This appears to be very specific to individual product types and/or territories and therefore not appropriate for all products/territories. ***Further clarification required:*** • Is this cell only applicable to annuity business or non-profit with guarantee? • This cell should not be applicable for unit linked or with profits business.	
TP - F3- cell A34A	There will often be many tables applied to sub-categories of an overall product denomination (e.g. one for each homogenous risk group. Also, this assumes that all policies within a product denomination are valued in the same way. The LOG refers to cell A20 however this cell no longer exists in this template. ***Further clarification required:*** • Provide BE assumption – but should this only be provided where mortality rates have an impact on pricing and benefit i.e. not relevant for Unit Linked Savings?	
TP - F3- cell A41	***Further clarification required:***	

	• Should there be an affirmative response only when the TP has been calculated by the replication method?	
TP – F3A- General	This proposed reporting template introduces higher reporting standards for undertakings selling variable annuities. In our view, there are already clear principles governing specific considerations on the basis of the risk and materiality of the undertaking's activities. We express concern as to whether there is indeed a necessity to have specific recommendations for certain product types, given that Solvency II is a principles-based, risk-based system applied uniformly across product types. In our view, the individual characteristics of Variable Annuities (e.g. the use of hedging programmes, the situations in which stochastic modelling is required, etc) are unfounded and should not be part of systematic reporting requirements. For "accepted reinsurance of VA business" a split of business into different products is impractical. In particular a treaty-by treaty description would neither be feasible nor would such granular information provide any additional benefit for supervisors. As a general attitude we would consider the split of the hedging into different "Greeks" as adequate for supervisors to assess the hedging approach. One might observe, however: It is not yet defined which figures should be reported in this sheet. Moreover, one has to ensure, that the figures to be reported are well defined and measurable by the insurer without excessive additional effort. Applies to F3B Moreover a split of VA business into different products may not provide supervisors with additional information. For the sake of this quantitative risk- and result assessment a universal assessment may provide more relevant figures since in many cases there are correlation effects between different products to be taken into account. In particular for reinsurance the split into products should not be interpreted as a treaty-by treaty assessment – in view of numerous different contracts with overlapping risk profiles.	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
TP – F3A- Purpose	Please refer to cell TP - F3A- General.	
TP – F3A- Benefits	Please refer to cell TP - F3A- General.	
TP – F3A- Costs	Please refer to cell TP - F3A- General.	
TP – F3A- Groups		
TP – F3A- Materiality	Please refer to cell TP - F3A- General.	
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		
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		

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
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	Please refer to cell TP - F3A- General. **We don't understand why, being a Life LOB, information for Annuities stemming from non-life are required for a template, appropriate for a non-life LOB.** **As for all technical provisions templates, we propose to remove any obligation to report by AY or UWY. This should be determined by the undertaking.** Annuities stemming for non-life business are modelled and managed jointly and in the same manner, disregarding if they come from Motor TPL, general TPL or others. We suggest removing the requirement for a split by LOB. We do not agree with the proposed required that the best estimate be reported per LOB. This should be reported at entity level. Also, reporting of historical data will be problematic, especially in the immediate years following entry into force. We propose to reduce the number of years in this template to 5 years as a standard requirement, with no requirement to report historical data during an initial transitional period.	

	Claims Movements should be limited to direct business only. Reinsurers do not receive this level of claims information from their cedants. This would then be consistent with E6 (Loss Distribution Profile). According to LOG the released annuity claims provisions (and annuity IBNR) do not fit to any column A0-A5. As with many templates in the technical provisions category, the LOB/currency mix could result in a large number of combinations for this template. It is possible that some annuities of this nature could exist in a reinsurer's portfolio. Anyway, the reinsurer does not currently face annuity payments, due to which, in the case it is a "pure" reinsurer (underwriting only reinsurance business) it will not have this template's information at its disposal. Due to that, the pure reinsurer should be permitted not to fill this template. **We strongly recommend to delete/review this template.**	
TP – F4- Purpose	Please refer to cell TP – F4- General.	
TP – F4- Benefits	Please refer to cell TP – F4- General.	
TP – F4- Costs	Please refer to cell TP – F4- General.	
TP – F4- Groups		
TP – F4- Materiality	We appreciate EIOPA's proposal to apply a materiality threshold to deal with a split by material currencies. We would also propose to remove the split . Please refer to cell TP – F4- General, for an expanded justification.	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
TP – F4- Disclosure		
TP – F4- Frequency		
TP - F4- cell A0		
TP - F4- cell A1	Annuities are normally not paid on a health product and if they are paid, they cannot be separated easily from the other payments. ***Further clarification required:*** • Do the annuity payments also include benefits such as waiver of premium? • The method of calculation should be specified. • Is this amount meant to be an average or total amount? • Should the description of this cell refer to 'annuities and other payments paid during the reporting year'? • Where should undertakings report annuity claims provisions ***released*** during year N?	
TP - F4- cell A2	• Is it the case that Single Life, Joint First Death and last Survivor Annuities are required to be shown separately? • How should survivorship annuities be included?	
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	Please refer to TP – F1 & F1Q – General. The completion of the template requires big effort and it is not feasible in reasonable	

	quality within the suggested time frame. This is true especially for the annual template. The definition of LoBs is not fully compatible with the segmentation that is used by many insurers. Hence, the LoB breakdown should allow for more flexibility to have risk management, risk reporting and financial reporting being fully align. Quarterly template: The calculation of the risk margin is not mandatory to be performed, but the risk margin could be derived from prior calculations. To split the approximated risk margin onto segments, does not provide sufficient information, as there are two approximations are used, the risk margin itself and also the split onto segments. Therefore the split on segments should be skipped. It seems to be sufficient to split the risk onto life non-life business, if applicable. Annual template: The business split according EEA member states as well as non EEA member states regarding technical provisions seems not appropriate due to the following reasons: (1) their calculation is usually performed on a higher aggregated level than on a single country basis, i.e. homogeneous risk groups cover more than one country (e.g. Germany and Austria might be seen as homogeneous risk groups), (2) as already stated in the comment on “Cover – A1 – cell A19”, the split on country is not feasible for some segments. Especially for Marine/ Transport, aircraft and goods in transit, a country cannot be specified and only worldwide exposure could be shown. Or for Health insurance, the insured person might also be insured on travelling – also no country could be assigned. Regarding accepted non-life business from reinsureres, the split on countries where the risk is located, is much more difficult than for direct business. (3) the classification of risks as required here is in most cases concerning non-Life business more detailed than the minimum segmentation requirement for the	

	calculation of technical provisions. The classes regarding sickness and accident as set out in the Annex 1 of the Framework Directive do not match with the required minimum segmentation for calculating the technical provisions. Therefore, the technical provisions have to be distributed on a different level of detail than used for calculating them by using an allocation algorithm, with the disadvantage, that the allocation algorithm could only be seen as an approximation and does not reflect the "real situation". It may be the case that segmentation into the HRG takes place before splitting into LOB; in such cases there will be a problem in that the best estimate derived from one homogenous risk group may populate more than one LOB. The splitting of gross best estimate by country will be problematic, particularly for LOBs that are considered global (e.g. marine/aviation/transport business) and multi-territory policies. We note that this requirement has been removed from QIS5 and we would request that this is reflected in this template The split between gross and net total best estimate has been resolved in TP – F1 and we question why this is not the same in TP – E1. As allocated loss adjustment expenses are calculated on a file by file basis, these are not available separated from outstanding loss reserves. The need to split out intra-group reinsurance (either accepted or ceded) may cause some difficulties for undertakings where it is netted at present. Further clarification should be given on whether the entries for "recoverables from reinsurance and SPV" require a segmentation or allocation of those items. For proportional reinsurance these two would coincide. But in case of non-proportional reinsurance recoverables, they would be segmented into the four segments for non-proportional reinsurance only (in the table columns marked with (13) – (16). Whereas in allocation, the choice of segment would be based on the segmentation of the underlying direct (or accepted) reinsurance obligation.	

	If the amount of non-proportional reinsurance is not material, it should be allowed to include the respective figures into the LoBs 1-12 (direct business and proportional reinsurance). Providing the non-material non-proportional reinsurance figures separately would be burdensome for insureres where internally there is no distinction between proportional and non-proportional reinsurance due to the very small size of the non-proportional business. We still oppose the split of reinsurance recoveries into: - Recoveries from SPVs - Recoveries from Finite Reinsurance - Other reinsurance Recoveries While this is required to be split out in various texts, we still do not see the value in this. **Further clarification required:** • It is required to explicitly report "cash in-flows from salvage and subrogation". In the IM Article 21bis there is a restriction on "payments for salvage and subrogation to the extent that they do not qualify as separate assets or liabilities in accordance with international accounting standards". Moreover, in IM Art. 30 TP17 (Non-life insurance contracts) those cashflows have been deleted. • Receivables and liabilities from reinsurance contracts (Depotforderungen bzw. -verbindlichkeiten) Is it possible to dispense discounting of those items provided they are not material? How to provide evidence of inmateriality? • General remark TP: Please provide clarification in relation to the technical provision of the small	

	portion of the portfolio not modelled: is it necessary to rescale this amount on the modelled technical provision?	
TP – E1 & E1Q - Purpose	Please refer to TP - F1 & F1Q – Purpose.	
TP – E1 & E1Q - Benefits	Please refer to cell TP - F1 & F1Q – Benefits.	
TP – E1 & E1Q - Costs	Please refer to cell TP – F1 & F1Q – Costs.	
TP – E1 & E1Q - Groups	We welcome the decision to remove this template from group reporting.	
TP – E1 & E1Q - Materiality	Please refer to cell TP – F1 & F1Q – Materiality.	
TP – E1 & E1Q - Disclosure	Please refer to TP – F1 & F1Q – Disclosure.	
TP – E1 & E1Q - Frequency	Please refer to cell TP – F1 & F1Q – Frequency. We question why the risk margin should be reported on a quarterly basis as it is required for SCR calculations but not the MCR. For this reason, we propose to remove the risk margin from template F1Q or we suggest using an approximation based on last annual risk margin. For example, keeping the same risk margin/BE ratio over the year.	
TP - E1- cells A1-P1	Clarification is required on whether this is calculated gross or net of reinsurance. If it is gross, then it is unclear how the reinsurance element is reported for derivation of net provisions. More clarification is required regarding Solvency II LOBs on “medical expenses insurance” and “income protection insurance”. Solvency II LOB classification is understood to be risk based. Does it mean as a result that medical expenses of, for example, MTPL are to be included in “medical expenses” in Solvency II LOB classification?	

	Further guidance should be provided on how Workers' Compensation should be reported in this template. In particular, whether EIOPA view this as a life or non-life LOB?	
TP -E1- cellss A2-L2	This comment applies to cells A2 – Q22. ***Further clarification required:*** • It was unclear how recoverables from reinsurance, SPV and finite reinsurance should be calculated for the best estimate premium provisions. • Supervisory guidance on how to calculate expected losses due to counterparty default would be welcome	
TP -E1- cellss A3-L3		
TP -E1- cellss M4-P4		
TP -E1- cellss A5-P5	We question the value of including information "before the adjustment for expected losses due to counterparty default". This information is included in the reinsurance templates therefore we would request that undertakings report the figure after adjustments are made.	
TP -E1- cellss A6-L6		
TP -E1- cellss M7-P7		
TP -E1- cellss A9-P9	The required breakdown of the technical provisions is often too granular and full compliance will be highly expensive, without yielding any benefits to the undertaking. In practice, the required break down of the technical provisions prescribes a valuation approach, in particular in terms of data granularity and segmentation at which valuation is performed, which is often in conflict with standard industry practices. At the minimum a breakdown should be limited to line of business and gross best estimates, since everything else will be highly impractical. For instance a further	

	breakdown of risk margins and potential losses from counterparty default is contrary to the idea that these are portfolio level items, where a breakdown to line of business does not yield additional information. This comment also applies to cells A10-P10, A11-P11, A12-P12 of TP-E1.	
TP -E1- cells A10-P10	See comment TP – E1 – cellss A9-P9	
TP -E1- cells A11-P11	See comment TP – E1 – cellss A9-P9	
TP -E1- cells A12-P12	See comment TP – E1 – cellss A9-P9	
TP -E1- cells A14-L14	Please refer to TP -E1- cells A5-P5.	
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	Risk margins for each LOB must reflect diversification benefits in order for the sum in Q22 to be correct. It is unclear from the template how this adjustment should be proportioned across each LOB. The risk margin should be calculated at entity level only; to split per LOB is an added complexity for the purpose of supervisory reporting only. Reporting the risk margin per LOB will be complicated and will require a significant effort; this adds complexity for the purpose of supervisory reporting only. To avoid reporting approximated and potentially misleading information we would suggest merging the cells on the risk margin.	
TP -E1- cells A29-P29		

TP -E1- cells A30-P30	As the breakdown to HRGs is required for life and non-life technical provisions, some guidance as to how granular the HRGs need to be would be highly appreciated. This comment also applies to cells A31-P31, A32-P32, A33-P33 of TP-E1	
TP -E1- cells A31-P31	See comment TP – E1 – cells A30-P30	
TP -E1- cells A32-P32	See comment TP – E1 – cells A30-P30	
TP -E1- cells A33-P33	See comment TP – E1 – cells A30-P30	
TP -E1- cells A34-P34	BELs are evaluated using stochastic projections. It is unclear whether cash flows should be reported as deterministic cash flows based on one average scenario (certainty equivalent) or as the average of the stochastic projection. If it should be the stochastic average, then, the average claims, the average premiums and the average expenses do not need to sum up exactly to the BELs due to differences in averaging. A lot of effort would be required in the development and ongoing maintenance of such reporting requirements. **It should be sufficient to report the gross best estimate total instead of per 'cash in-flow' and 'cash out-flow' for businesses modelled using simplifications or without cash-flow projection.** The reserving methods are audited, and covered through the governance and internal control procedures, and in the ORSA, which should be sufficient. We support that EIOPA has included "recoverables from salvages and subrogations" in "other cash-in flows". Data on "recoverables from salvage and subrogation" may not be readily available for all LOB and business units, as figures net of salvage and subrogation are entered on to claims systems. To obtain data in this case would therefore require potentially extensive and expensive changes in processes and systems. This is consistent with the approach in template TP – E2. We believe that the data may often be too scarce for statistical methods to be reliable.	

	Further clarification required: • We assume that this equals cash flows **discounted** to present value, for best estimate cash flows, and can be derived from or consistent with TP-E2 tab? • Also, the sum of items A33 to A37 should equal (A2 + A3)? • Supervisory guidance would be helpful in determining what exactly is required and how the templates and cells link together for data collection purposes.	
TP -E1- cells A35-P35	Costly changes would be required in the recovery process, pricing and related systems if it is required to separate the recourse and any recovery cash flows from the cash flows. Many undertaking perform pricing based on the "net" cash flows (not splitting cash flows to out- and in-flows itself or splitting aforementioned two cash-flows to sub-groups as well).	
TP -E1- cells A36-P36	Please refer to TP – E1 – cells A35 – P35.	
TP -E1- cellss A37-P37	Please refer to TP – E1 – cells A35 – P35.	
TP -E1- cellss A38-P38	It is not clearly defined, what is understood as simplification regarding the calculation of technical provisions. Therefore, the information that should be provided within this template is not clear and maybe not comparable.	
TP -E1- cellss A39-P39		
TP -E1- cellss A40-P40		
TP -E1- cellss A41-L53	Analysing the gross best estimate based on localisation of risk will be incredibly difficult to split out, in the same way that data on technical provisions are not available by counterparty. In some instances, reserves are currently not calculated at geographical location of risk level therefore the specific geographical location of risk is not available for several lines of insurance and reinsurance business written, notably marine and transit. It was thought that risk mitigation and risk clash monitoring, included in the qualitative reporting requirements, would be of more value to the Supervisor.	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
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	Please refer to cell TP – F2 – General for comments on cash flow projections. Undertakings do not have sufficient run-off data for the application of actuarial methods to estimate the future cash flows and as such, the proposed approach will be difficult to implement. In addition, it may be very complex to identify the cash flows of future premiums. This template could be restricted to cases when the supervisor believes that closer supervision is necessary, for example if an undertaking breaches some limits. Please note that for gross business and recoverable from reinsurance there might be some distortions because of different LoBs for primary insurance gross business/assumed proportional reinsurance and non-proportional ceded business. As the recoverable from reinsurance contracts have to be segmented into homogeneous risk groups (Art.81 of the Directive), this would imply, that proportional ceded business is separated from non-proportional ceded business. Therefore a primary company will show the reinsurer's share – proportional business - within the same segment as the gross business, whereas the reinsurer's share – non-porportinal business – will be shown within the respective non-proportinal segment. In case where the insurer accepts some non-proportional business, this has to be interpreted carefully. In addition, for reinsurers the retroceded part of their business could be even more irritating regarding segmentation; assumed business could be non-proportional, whereas ceded part could be retroceded as proportional business.	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
TP – E2- Purpose	Please refer to cell TP – F2 – Purpose.	
TP – E2- Benefits	Please refer to cell TP – F2 – Benefits.	
TP – E2- Costs	Please refer to cell TP – F2 – Costs. Changing to a cash flow based approach will incur considerable costs and resources for many undertakings where actuarial methods have worked sufficiently well to date.	
TP – E2- Groups		
TP – E2- Materiality	Please refer to TP – F2 – Materiality.	
TP – E2- Disclosure	Please refer to TP – F2 – Disclosure.	
TP – E2- Frequency		
TP - E2- cells A1-A31		
TP - E2- cells B1-B31	A clear definition is required for future expenses and other cash outflows, for example the parts of overhead expenses that should be included. It is our opinion that future expenses should include those components that cannot be directly attributed to a particular claim.	
TP - E2- cells C1-C31	***Further clarification required*** • A clear definition is required for future premiums i.e. how far ahead would it be required to project future premium receipts?	
TP - E2- cells D1-D31		
TP - E2- cells E1-E31		
TP - E2- cells F1-F31		

TP – E3- General	We understand the importance of development triangles as essential regarding evaluation of provisioning. Hwever, the GDV considers this template to be the most complicated with the highest potential for negative impact on the industry. While EIOPA has clarified that supervisors will have a national discretion in dertiming whether AY or UWY should be applied, we would like to enforce that it will be very costly for undertakings to change their business structures and this should not be for supervisory reporting only. It is unclear whether this discretion applies to all cases where EIOPA have considered a specific approach towards AY/UWY, we hope that it would be the case otherwise different approaches will be applied to different templates and the results will not be comparable. We still do not believe that there is any value in a regulator imposing a set cohort for triangle production (AY or UWY) as is suggested. The value of these triangles to the regulator, as listed in the summary, is to offer information on the appropriateness of technical provisions. Unless the regulator collects the triangles in the same format as was used to calculate the technical provisions then the triangles will be useless. It is therefore imperative that the triangles collected are in the same cohort as that used for reserving or else the primary purpose of their collection is lost. In the EIOPA document "Impact assessment on the reporting package for Solvency II", it is asked for the form E3 and E4 "RBNS triangles in TP-E3" Both of these templates contain information on RBNS (Outstanding) claims data, which is to be collected twice. This is unnecessary. It would be better for regulators to collect this data once and transform it as necessary to create the second template. Requiring individual insurers to make this transformation will massively multiply efforts. **In any case, 15 years is FAR too long for non-life provisions**. The requirement to look at historical data backdated 15 years is highly excessive for many LoB, such as other motor insurance (3-4 years) , assistance (2-3 years); property insurance (5-8 years). The required length should be held flexible at an LoB level with an maxium length of 10 years. As the purpose should not be for auditing, the template could be for a standard 10	

	years, and left empty for those years there is not data available, for short tailed lines. The claim adjustment expenses we do not currently report with the claims payments, and we do not have this information per accident year (or uw year for that matter), i.e. a process and system change would be needed. We could not get the historical data in any way. We have the "net" triangles of the claim payments, not the split into the 3 first triangles. What would be the specific supervisory purpose of the split? We use endogenous inflations mainly, which may specific per HRGs. Then you would also need the triangles per HRGs, which we certainly do not recommend. A simple yes/no answer could be sufficient at the top of the page. The methods used, and tail factor, is also per HRG, or even several methods within one HRG, so it must be thought about the optimal way to gather this information, if at all. We believe it is perhaps too detailed, and more suitable only for audit purposes. <u>We would like to emphasise the following points:</u> • The triangle of Best Estimate would be impossible to complete for the years before Solvency II implementation. We strongly suggest a transition phase, and report only years after 2012. If undertakings, on a best effort basis, would like to fill in even the years before S2 implementation, they should be allowed to do this. However, requesting that for all undertakings would be a significant cost compared to the benefit foreseen. • Reinsurance recoveries are usually not done using triangles. It is very complicated to allocate the recoveries of one year by development year. The reinsurance part (and so the net one), should be only one line, reinsurance recoveries by year. • The calculation of gross and net results should be simplified. A gross/net proxy could be used as appropriate. The transfer from gross to net cash flow triangles is not necessary from a risk management perspective. <u>Claims provisioning is not an automated process</u> • It is highly recommended that when calculating reserves, the actuary uses different techniques and, together with expert judgement, identifies the risk drivers for all parts of the portfolio in order to choose methods or combinations for each part of the HRG.	

	• An automated process, such as the use of claims triangles, is not always appropriate. A variety of considerations must be taken into account, particularly when dealing with cross LOB, sub-portfolio analysis, AY/UWY calculations and different deterministic /stochastic methods. • For long-tail business, triangles are too short. For short-tail business, triangles are too long. The length of the triangle should be decided by the undertaking, consistently with their technical provision assessment and their exchanges with the supervisor. In some cases, triangles would be meaningless for example, surety ship. • The mechanical application of a triangulation method to data may in itself lead to distorted results. When triangulation methods are used, there are a number of issues that may invalidate the underlying assumption that the future claims development is likely to be in line with the past claims development. We would like to reiterate the point on valuing the judgement of the actuary. It should be noted that triangles would differ from one undertaking to another as they might have different actuarial methods to build them. This template therefore is not relevant for statistical information. Undertakings should be allowed to fill the triangles consistently with their methodology for calculating technical provision, and a constructive dialogue is needed between the supervisor and the undertaking to analyse those triangles. Currency • The level of detail regarding currencies seems unnecessary detailed. To project sound ultimates, it is sufficient to use currency adjested development triangles, i.e. all postings within one foreign currency are translated with the same exchange rate to the reporting currency. • For discounting purposes, the currency in which the liability has to be paid out, has to be recognized. The currency information to determine the payment pattern is irrelevant, as in homogeneous segments, the expected future payments per AY/ UY for future calendar years (as percentage of the outstanding provisions) is independent from the original currency of the outstanding provision. Additionally, the higher the volume within a (homogenious) segment, the more stable the projection result is. • If currency adjusted development triangles per segment are reported to the	

supervisor, the whole business could be covered in respect of the sufficiency of the reserves, whereas the restriction to selected currencies results in missing bits of the whole portfolio. Some (re)insurance undertakings already publish currency adjusted development triangles, which are used e.g. by rating agencies to assess the sufficiency of the provisions.

- Therefore we suggest to only provide (currency adjusted) development triangles for the respective segments.

<u>Reporting of historical data should not be required</u>

- Reporting of this information would require a historical backwards calculation.
- At the moment many insurers are not able to provide best estimates for the last 10 years in the required granularity of claims triangles (LOB, currency). For example, the majority of insurers have no historical data on salvages and subrogations triangles. Data are not available. It would be very burdensome and almost impossible to collect historic data for the existing portfolio. Contracts have to be scanned on an individual basis. Therefore, we request not to require historic claims data.
- We would support a transition phase, with reporting only from 2015 onwards. If undertakings, on a best effort basis, would like to fill in even the years before S2 implementation, they should be allowed to do this. However, requesting that for all undertakings would be a significant cost compared to the benefit foreseen.
- Undertakings who took part in the QIS exercises may be in a position to provide some data however those who did not will experience problems generating this information for first time reporting.

<u>We recommend just collecting data on a gross basis.</u>

- In our view it is not possible to derive statements from net triangles without having further actuarial information, which is only available in the business units. In case of growing LOBs it is usual to change the reinsurance program. While interpreting the net triangles without a detailed understanding of the BUs background we see the risk of misinterpretation of the situation.

- If this requirement remains we suggest that the calculation of gross and net

	results should be simplified. In our opinion a gross/net-proxy could be appropriate. It is unclear if and how annuities should be included in this template. We suggest dropping the salvage and subrogation triangle for paid claims. For RBNS claims, these are reserved taking salvage etc into account when relevant, but no split of « gross reserve » and « salvage reserve » exists and would have to be done using keys. We do not see any advantages in doing so.	
TP – E3- Purpose	Gross best estimate triangles include salvage and subrogation therefore it should not be required to produce separate templates on each.	
TP – E3- Benefits	It is the intention for supervisors to use these triangles in a mechanical way however this is not the way in which undertakings use them at present. They are used in specific cases to, for example, analyse large claims or clean/adapt to derive RBNI reserves etc. We do not agree that supervisors need reinsurance recoveries in this format to assess if TP are well calculated. Gross to net ratios could be used without using such granular information. As development triangles per currency are not necessary for actuarial projections, and a split into different currencies does not provide added value, no benefit is provided on reporting development triangles per currency, as long as the undertaking can make sure, that discounting is based on the relevant currencies.	
TP – E3- Costs	The information requested for reinsurance or historical Best Estimates is not requested for non-life TP calculation. Historical data on BE could be used for USP, but not if using the standard formula parameters. This template, specifically because of information asked on reinsurance and historical BE, is very costly and only for reporting purpose. Cost in terms of resource may be considerable in creating a 15 year set of triangles for	

	first reporting. Existing regulatory reporting is not fully consistent with the classes used in Solvency II and will require the recreation of each year's triangle using the new risk class analysis. In the cases of earlier years this data may already have been archived, thus creating significant rework in arriving at a 15 year triangle.	
TP – E3- Groups		
TP – E3- Materiality	LOB and currency combinations remain to be a major problem for industry. It was also suggested that a percentage of the total balance sheet could be used as an indicative materiality threshold. For general comments on LOB/currency combinations, please refer to template TP – E3 – cell 04.	
TP – E3- Disclosure		
TP – E3- Frequency		
TP - E3- cells A00	By requesting information per LOB and currency (A04) could result in a large number of combinations, therefore this template would be reported multiple times. By requesting information per LOB and **material** currency (A04) could result in a large number of combinations, therefore this template would be reported multiple times.	
TP - E3- cells A01	It was indicated that not every method used will have a specific name. A number of different actuarial methods may be used or considered when calculating claim provisions for a given LOB. Is it to be assumed that more than one method can be listed? In such cases the list could run to several paragraphs as, for example, different methods could be used for different accident years. Tail factors may not be unique for all years.	
TP - E3- cells A02	Please refer to E3- cell A01.	
TP - E3- cells A03: N		
TP - E3- cells A04	By requesting information per LOB (A00) and currency could result in a large number	

	of combinations, therefore this template would be reported multiple times. For example, in the case of international received reinsurance i.e. multinational /worldwide programmes could incorporate up to 100 different currencies. Separate triangulation in different currencies is not currently reported and we believe this would be unduly burdensome. Particularly for received reinsurance, we question the benefit to supervisors of splitting triangles by currency. We suggest reporting for different currencies up until 90% of the technical provision are reached, then report for all other currencies under "other currencies" As a general comment on currency, we believe that economic currency and not settlement currency should be used here. This would be more appropriate for risk management purposes.	
TP - E3- cells A1-A15-J0	Increase in number of accident / underwriting years and development years too onerous and not sensible. Applies for all cells.	
TP - E3- cells A17-A31-J16	**Salvage and subrogation should be included in claims paid** • Data on "recoverables from salvage and subrogation" may not be readily available for all LOB and business units, as figures net of salvage and subrogation are entered on to claims systems. To obtain data in this case would therefore require potentially extensive and expensive changes in processes and systems. • For NL analysis, it is generally of very little additional benefit to separately report/analyse salvage and subrogation. Instead claims paid are analysed net of salvage and subrogation. • Separate reporting of this item could be very costly indeed since IT-systems generally are not designed to keep, separate, track of these. • We propose to delete salvage and subrogation and include it under claims paid. • Some undertakings manage provisions net of salvage and subrogations etc. Hence the detailed triangle are not compatible with how the risks are managed	
TP - E3- cells A33-A47-J32	Reinsurance recoveries are not always related to single claims. For example they might depend only on the development of a LOB.	

	Reinsurance recoveries are usually not done using triangles. It is very complicated to allocate the recoveries of one year by development year. The reinsurance part (and so the net one), should be only one line, reinsurance recoveries by year. For instance, undertakings doing their reporting under IFRS usually have only one line (corresponding here to one column) for their reinsurance triangles. Moreover, reinsurance triangles are notused to calculate best estimate. Due to the fact that development of reinsurance recoverables cannot be obtained in all occasions directly from data, highly burdensome calculations and estimations have to be made. We would suggest including recoverables development only in an overall basis. The benefit from reporting reinsurance triangles is not obvious to us in case that the reinsurance is non-proportional as the reinsurance program is tailored to the current need for each reporting period and therefore changes over time.	
TP - E3- cells P1-P15-J0	For each of the claims provision triangles, the “year end” formula seems to be picking up the latest development year only. If each cell is collecting absolute data then the “year end” formula should be a total of all years (all cells in the triangle). It is our understanding that “best estimate claims provisions” triangle refers to figures including IBNR (including IBNER) and outstanding claims i.e. unpaid claims. This would require the undertaking to backfill this triangle using prior years reserve projections. The prior accident year’s projection data are unlikely to be on a consistent basis (in terms of methodology) as that required under Solvency II. We would suggest not completing this triangles including IBNR. We would expect this information to be quite volatile, depending on the LOB and occurrence of large losses / catastrophes. We therefore question if it is reasonable to separate out large losses and additional claims. We ask to report undiscounted BE figures. This will ensure a better comparability between years (diagonals of the triangles) and a better comparability with the others triangles, without discounting.	

	The definition of undiscounted best estimate claim provision is not fully clear. Is this equal to the RBNS claims + IBNR? If not, why not use the discounted BE. Why is there no triangle for salvage and subrogation in the undiscounted BE. Is this seen as part of the gross undiscounted BE The reference to undiscounted best estimates, but with a total on a discounted basis is very confusing. Will firms have to use discounted or undiscounted numbers or both? Whilst this may not be onerous in terms of running a process to produce this information, it is likely that many firms will at least have to make enhancements to their internal models to be able to show both calculations. Increase in number of accident / underwriting years and development years too onerous and not sensible	
TP - E3- cells P33-P47-J32	Due to the fact that development of reinsurance recoverable cannot be obtained in all occasions directly from data, highly burdensome calculations and estimations have to be made. We would suggest including recoverables development only in an overall basis. Increase in number of accident / underwriting years and development years too onerous and not sensible	
TP - E3- cells AE1-AE15-J0	We interpret claims outstanding “claims outstanding” as the individual claims outstanding numbers, recorded on the claims system, rather than the best estimate figure. We believe it is unclear whether this should be reduced by a standard actuarial exercise which effectively applies an increase or reduction to these estimates at a global rather than individual claim level. Increase in number of accident / underwriting years and development years too onerous and not sensible	

TP - E3- cells AE17-AE31-J0	Data regarding recoverables from salvage and subrogation may not be readily available for all LOB and business units due to figures net of salvage and subrogation being entered on to claims systems. To obtain this data would therefore require potentially extensive and expensive changes in processes and systems. It was also questioned why salvage and subrogations would be split from gross payments. Increase in number of accident / underwriting years and development years too onerous and not sensible	
TP - E3- cells AE33-AE47-J0	Reinsurance recoveries are not always related to single claims. For example they might depend only on the development of a LOB. Reinsurance recoveries are usually not done using triangles. It is very complicated to allocate the recoveries of one year by development year. The reinsurance part (and so the net one), should be only one line, reinsurance recoveries by year. For instance, undertakings doing their reporting under IFRS usually have only one line (corresponding here to one column) for their reinsurance triangles. Due to the fact that development of reinsurance recoverable cannot be obtained in all occasions directly from data, highly burdensome calculations and estimations have to be made. We would suggest including recoverables development only in an overall basis. Increase in number of accident / underwriting years and development years too onerous and not sensible	
TP - E3- cells IH1-IE15B		
TP – E4- General	This template is based on the assumption that one can distinguish open from closed claims, thus the usability of this report is highly dependent on the reserving process and systems in place; if a case reserve, with a standard reserve is used, then the number of claims and closed/open status are relevant. But if such a process is not used and/or not supported by the systems, the number of claims data will not be of good quality/available. In addition to this, there are LOBs, e.g. workers compensation or other personal lines	

	(e.g. MTPL or general liability), where it is impossible to close a claim. It should not be required to split open, closed and reopened claims. The template implies a connection between each individual claim in the base system and the corresponding amount booked in the general ledger, for example cells P1-P11. This connection does not exist today, and it is not possible to recreate the. For reinsurance, the split of claims between those opened, settled and closed doesn't give any risk sensitive information but causes great IT-efforts. This is valid for gross data and especially for net-data. Quite often it won't be possible to standardise the related processes especially in the case of Nat Cat. The corresponding IT-efforts might be tremendous. To complete this template is not feasible for assumed reinsurance business, there are a number of constraints which means the information is not available for reinsurance undertakings: • Number of claims. • Number of claims which are still open and the corresponding RBNS/IBNR. • The number of claims ended without any payment. • The IBNR of a reinsurance undertaking usually does not refer to a specific claim. Guidance is required on open claims, the number of events, and definition of a claim. We query whether IBNR are calculated on a gross or net basis and also whether a clearer definition of RBNS will be made available. It is unclear to us whether the templates are applicable to the reinsurance business and whether they are applicable to undertakings dealing with both SLT and NSLT. Further clarification would be helpful on EIOPA's motivation to require specific information on claims settled without payment. This information might be required to check that undertakings do not "adjust" their results however we believe that reporting re-opened claims should be sufficient. The information on claims settled without payment would be an onerous development for undertakings. For general comments on LOB/currency combinations, please refer to cell TP – E3 – cells 00 and 04.	

	Undertakings should be free to choose whether they report by AY or UWY. For most direct insurers this will be AY but there may be instances where UWY is more appropriate. **This essentially is a business decision and reporting requirements should not impact on an undertaking's ability to choose the best way of monitoring their business**. Considerable effort would be required for each claim to be tracked to each policy risk period and then create an algorithm to re-allocate to the alternative period. Some Members were uncertain whether they would have the capacity to create such systems. In some jurisdictions, the analysis for numbers of claims are carried out across accident years of numbers of claims closed and numbers of claims outstanding for each reporting category. To determine separately the numbers of new notifications, numbers of "old" and "new" claims closed in the year and numbers of re-opened and closed claims in the year will be extremely onerous. For some undertakings, it will be difficult to obtain the net data, as well as the data pertaining to reopened claims in the year (gross). In some cases, undertakings are not able to show this information (RBNS claims with detail of claims opened at the beginning of the year, claims incurred during the year, claims reopened during the year) as it is not officially required in the Balance Sheet. In particular, it may be difficult to report the number of claims. We question the need to report by currency. If a split by currency is required, the currency used should be the settlement currency of the claims rather than the settlement currency of the premiums, this is due to the fact this template relates to claims provisions. Reporting of claims numbers would be possible but it would have its own drawbacks. There is no industry standard on claim numbers for example, one accident might be regarded as one claim, two claims (fire with damage to building and personal property) or many claims (several injured persons in an accident). This ambiguity would make reporting less meaningful.	

	Information of movement of non-life claims portfolios does not substitute a P&L attribution and is for common actuarial techniques not relevant. We see no need to calibrate indirectly the underwriting risks with this information. Template E3 provides more relevant (and enough) information in this regard. The template implies a connection between each individual claim in the base system and the corresponding amount booked in general ledger. (e.g. column 17) This connection does not exist today, and the history is not possible to recreate. To complete this template is not feasible for assumed reinsurance business due to the following constraints: • The number of claims is not available for a reinsurance undertaking. • The number of claims which are still open and the corresponding RBNS/IBNR are are not available for a reinsurance undertaking. • The number of claims ended without any payments is not available for a reinsurance undertaking • The IBNR of a reinsurance undertaking usually does not refer to a specific claim. Therefore, this template should be limited to primary insurance undertakings and direct business only, and should not be reported by reinsurance undertakings. **We understand and support the need for EIOPA to collect this kind of information, but the template should be simplified.** **Too much details and for too long periods are requested. This requires a lot of effort to set-up systems, with huge costs for undertakings.** The entire templateis based upon the assumption that one can distinguish open from closed claims, thus the usability of this report is highly dependent on the reserving process and systems in place; if a case reserve with a standard reserve is used, then the number of claims and closed/open status are relevant. But if such a process is not used and/or not supported by the systems, the number of claims data has poor quality even if it was available.	

	Further clarification required: • Information about **reserves** for not yet settled claims is required. These reserves are usually set according to local GAAP and are therefore not comparable to (discounted) best estimate reserves, given in most other sheets. Furthermore, most of this detailed information is already covered by the paid and incurred triangles in E3.	
TP – E4- Purpose	We express concern at the level of detail in this template and believe that EIOPA's purpose could be fulfilled through a simpler template. **As these templates require information to be split by line of business and currency, fulfilling the proposed reporting requirements will be extremely onerous; there could be cases of 100+ LOB and currency combinations. We question the additional need to perform an analysis by currency.** As the requested information is not available for accepted reinsurance business, the supervisory purpose, in respect of P&L stemming from movements of the claims outstanding, might nevertheless be fulfilled. Actual vs. expected analysis have to be performed as part of the actuarial analysis (Art. 48 (1f) of the Directive: compare best estimates against experience).	
TP – E4- Benefits		
TP – E4- Costs	The template is based on the follow-up of individual claims. Such reporting would require that the claims provision is known for each claim. Completing the template would require either the use of case-by-case reserving or an allocation of the claims provisions to the different columns of the template. Several commonly used estimation techniques are based on aggregated data on homogeneous risk groups. There is no allocation of the resulting claims provision to the individual claims events. If such an allocation is made, the result of it would be questionable. Case-by-case is, on other hand, an approximation that can be used under certain conditions only. Therefore it may be impossible for several undertakings /LOBs to complete this template. The ex-post allocation of claims provisions at the beginning of the year to	

	different columns based on the status of the claim at the end of the year (settled/not settled) is arbitrary, we believe the costs of reporting would heavily outweigh the possible benefits. EIOPA do not believe that this form should have a large cost for undertakings as the "requested data are usually used for the calculation of TP". This may or may not be true but the transformation of the data into the required format would be hugely expensive. Some companies do not systematically look at their data in this format for the calculation of TP. Particular difficulties include: - Defining a "Number of Claims" in the purpose of partially settled claims or claims that cover more than one line of business. - The calculation of how claims become settled. - To calculate the data for form E4 would require going back to individual claims records. This would be vastly expensive. The IT migration systems, in order to complete this template, will be problematic to implement and potentially very costly. We anticipate a problem with the reopened claims data due to the fact that many IT-solutions don't keep track of reopening of claims (only first opening and latest closing date are available). It is only in very rare situations that undertakings would look at reopened claims for the purposes of calculating technical provisions. Thus, the expected costs are likely to be much more significant than EIOPA believes.	
TP – E4- Groups		
TP – E4- Materiality	Ceding undertakings usually don't communicate this information to the reinsurer. Because of this, the so called pure reinsurers (underwriting only reinsurance activity) should be required to complete this template. The materiality threshold in the summary file seems inappropriate. It refers to the overall size of the line of business, not the materiality of the LoB within it..	

	We propose reporting for different currencies up until 90% of the technical provision are reached, then report for all other currencies under "other currencies".	
TP – E4- Disclosure		
TP – E4- Frequency		
TP - E4- cells A1-A10	The actuarial systems of some undertakings do not have the number of claims in their main tables. This will cause problems in collecting this data.	
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	We question the proposal to report specific information on claims settled without payment. We understand that the intention is to ensure undertakings do not "adjust" their results. We emphasise that for this purpose the request of report re-opened claims is enough. The information on claims settled without payment would be an onerous development for undertakings. We suggest merging the information requested disregarding the fact that the claim was settled without payment. The decision tree in the LOG does not show any added value for requesting this information.	
TP - E4- cells I1-I10		
TP - E4- cells J1-J10		
TP - E4- cells K1-K10	We assume that this cell also incorporates cell K11 and our response should be treated as such. The data "gross payments where the claim remains open at the end of the year", cannot be entered into these cells. Consequently, part-payments on current year	

	claims are not reported anywhere in this template. Inclusion of this amount would allow this template to reconcile with the gross claims paid triangle in template TP – E3. Clarification is required on whether this comment refers to both triangles “gross claims paid for development year” (cells A1/A10/J0) and “gross claims outstanding for development year” (cells U1/U10/AF0)?	
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	For general comments, please refer to cell TP – E4 – General. The data requested in this template is not readily available, for example some systems use average claims and do not have any well defined small reserve amount per claim. Finding the payment amount per claim (for smaller claims) upon implementation of Solvency II is expected to be difficult, as this information is generally only recorded for the larger losses. Also, in other systems, only claims above a certain threshold are stored individually from some reporting claim systemsIf the claim size categories start below the threshold, there can be problems finding the exact numbers in the first categories. Some systems do not record case estimates, hence undertakings could only use the payments to assess the claim size. Whereas in other systems, in general all open claims have a case reserve associated, and it is possible to find the reported incurred	

	claim cost (paid+case) for them. This means that the definition of "claim cost per loss" can be different for various systems and countries. Since all the figures should be reported in reporting currency, the appropriate currency rates must be applied. Finding the exact time of transaction for all paid amounts will be difficult as the data may span across systems/countries therefore the amounts in reporting currency will be subject to some uncertainty. It would be useful to collect information on the claims distribution. According to the LOG "incurred" means the "sum of gross paid and gross outstanding amounts for each claim". However, here arises the same problem as with TP-E4. We query how this information would be captured by an undertaking involved in a merger upon initial completion of the merger. ***Further clarification required:*** • It is not clear if the template deals with only risk insurance or also other classes of insurance? • Some definitions must be made for this template to make sense, e.g., should zero-claims be counted? What currency principles to use? Should case estimates be added to the claim cost, and if so, from which countries/systems?The information required in this template does not correspond to the underwriting procedures of health insurance (health non-SLT). How should health insurers deal with this requirement?	
TP – E6- Purpose	In our opinion it is not relevant or reasonable that undertakings on full internal models should go through the huge reporting burden that it is to report the templates E4 and E6. The internal model used by the undertaking which will be approved by the supervisor will take into account the reserve risk. In the description of the purpose of QRT E6 it is mentioned that "one can evaluate if the use of the standard formula to calculate the SCR for the reserve risk is appropriate" therefore it does not seem reasonable that undertakings using a full internal model should be forced to report this information.	

TP – E6- Benefits	The benefits from reporting this template are supervisory only. Data in this particular split/specification is not presently used in the processes, or actuarial models,of calculating and assessing technical provisions.	
TP – E6- Costs	Please refer to cell TP - E3 – Costs.	
TP – E6- Groups		
TP – E6- Materiality	Please refer to cell TP – E3 – Materiality. Ceding undertakings usually don't communicate this information to the reinsurer. Because of this, the so called pure reinsurers (underwriting only reinsurance activity) should not be required to complete this template.	
TP – E6- Disclosure		
TP – E6- Frequency		
TP – E6- cells A1-A20	***Further clarification required:*** • Clarification would be helpful on whether EIOPA expect a split per LOB by AY/UWY or of one approach will be applied to all LOBs in this template. Please refer to TP – E3 – General for comments on the reporting year.	
TP – E6- cells B1-B20	Please refer to TP - E6 - cell A1.	
TP – E6- cells C1-C20	Clarification is required on whether the loss amounts disclosed relate to just the reporting period or the cumulative total for that year.	
TP – E6- cells D1-D20		
TP – E6- cells E1-E20		
TP – E6- cells F1-F20	Please refer to TP – E3 – General for comments on the reporting year.	

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	Number of claims for reporting year minus 14 too onerous and not sensible	
TP – E6- cells AF1-AF20	Total claims incurred for reporting year minus 14 too onerous and not sensible	
TP – E7A- General	This template only has added value if seen for risks not covered via reinsurance programmes (facultative or regular). Assessment on homogeneity should be carried out by the actuarial function. This can always be requested by the regulator under the SRP. Regarding Reinsurance data (templates E7, J1, J2 regarding reinsurance used as risk mitigation): The reporting burden in total is extensive and we question if all this data around the reinsurance programmes of the undertaking is necessary. We query whether if peak risks occur, if this provides valuable information about the homogeneity of the portfolio. • The peak risk will differ per LOB and is for some lines more relevant than for others. For most LOB's there will masses of contracts with the same peak risk. • In some reinsurance programs there are a large number of stop/loss contracts. As a result, for car insurance programs there is the same net risk per policy. Guidance on how to report this would be reported. • Any other individual risks not covered via regular reinsurance programs are covered facultative. **Further clarification required:**	

	• What kind of risks are considered in TP E7? Are these (i) exclusively risks that are reinsured optionally, (ii) all reinsured risks or (iii) all risks? In case these are e.g. XLs inmotor vehicle liability insurance and general liabilty insurance, what to enter? From a theoretical perspective, each policyholder might have a claim exceeding the priority. In case always an identical priority exists, 10 times the same priority should be entered in the list? How to enter "Quote"?	
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	This cell appears not feasible for third party liability reinsurance (motor and general). In any case more guidance are required on how to fill in the insured sum. What has to be reported under unlimited sum insured?	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
TP – E7A- cell J1	What is a PML for motor vehicle liability insurance and general liabilty insurance?	
TP – E7A- cell K1		
TP – E7A- cell L1		
TP – E7A- cell M1		
TP – E7B- General	**The term "mass risk" could be inconsistent compared to the LOB that are compulsory for this template. Usually "mass risk" refers to LOB characterised by a huge number of contracts with low severity.**	
TP – E7B- Purpose		
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	The net share could be the same for a number of the top ranked facultative covers which raises the question, how to treat the policies if, for example, there are more than 10 and also, how would they be ranked/chosen. Overall we believe that this	

	template would lead to burdensome calculations and data re-elaborations. A more simplified approach would be beneficial. **A significant amount of work would be required to identify the ten policies with biggest net share of risk capital across each LOB and, as some LOBs may be relatively small, it may not be proportionate to require 'top 10' by LOB.** Reporting of the 10 biggest risks across all LOBS was suggested as an alternative or to specify a materiality threshold at business level. **We query the supervisory purpose of requesting only LOBs with facultative risks, if the purpose is to evaluate the vulnerability of a single risk event, we propose to report the 10 (or 20) largest single risks, gross of reinsurance, and investigate whether or not the risk is partially covered with facultative reinsurance**. Probable Maximum Loss could be used as an assessment indicator, only facultatives for specific LOB will always be on the list (where PML is required and/or with the highest self-retentions). **It is said (General Comment) that this template "is prospective for the selected facultative covers that start in the coming year (active on 1/1 or after) and are known when filling the template. Re-J1 will be resubmitted at the end of the year (31/12)".** **At present, similar information is reported to some supervisors in March of any given year (based on 31/12 year end), in respect of the top 10 facultative placements in force during the year before for each line of business.** **In this way the picture is always complete and there is no need to refresh it at a later stage. Given the fact that the facultative book is relatively stable over the time and also considering the purposes of the report, we recommend that this template should be submitted by 31 March (or any other date after) of any given year showing information about the facultative placements in force during the year before. The picture would be complete, accurate and up-to-date - without need to have it re-taken at the end of the year.**	

	There is a common business practice to use "Fronting" to handle an international non-life risk, when you need a "Good Local Policy" and there are national pools or similar that prevents you from issue a local policy through FPS (Freedom to provide Service). The Insurance Company requests a partner in the country where you need a cover to issue a local policy. The local policy is then ceded back to the Requesting insurance company, being part of the total cover for a client. Formally this is reinsurance, but it is considered more as an administrative procedure rather than a way of risk mitigation. However, when you fill in the RE-J1, these fronting businesses are likely to be the most important facultative risks in many cases and the code for Reinsurer will have to cover all the insurers as well in this case. It would therefore be desirable if fronting business would be separated from the reporting of facultative reinsurance as risk mitigation. The term Facultative generally means reinsurance for one single risk as opposed to treaty which is reinsurance of portfolio. Facultative reinsurance is also commonly used as a mechanism in industrial insurance in various risk sharing solutions. These situations are because the client wishes to share the risk, and not because the "risk doesn't fit into the regular policy acceptance of the insurance company ". Clarification needed if also captive and coinsurance risks are intended. This template appears more applicable to 'industrial insurance' where there is a high level of facultative risks. For the risk management of other insurers, we believe it is more important to concentrate on risks which are not covered by a reinsurance firm. Systems and reporting tools would need to be developed to enable lean and high quality reporting of this template. The information requested in this template is often not held directly by undertakings. It is not clear in the revised templates how to report reinsurance shared between reinsurers. Further guidance is required on whether separate lines should now be included for each reinsurer making up a single reinsurance item. ***<u>Further clarification required:</u>***	

	• Risk capital (Life) is defined as insured capital less provision for insurance liabilities; it is not clear whether the insurance liabilities are based on Best Estimates or Best Estimates + Risk Margin or some other definition. Clarification would be helpful. • It is not clear how to treat reinsurance contracts not covering the full entity. • We interpret the guidelines in the way that groups also have to report only the 10 biggest facultative covers (and not the 10 biggest per subsidiary). Clarification would be helpful. • A definition of 'facultative business' would be useful to better determine what is expected. • It needs to be made clear whether claims and reinsurance figures for all templates are on either i) a booked basis within the systems or ii) a best estimate or iii) best estimate plus risk margin. • Definition of FAC: Are Reverse Flow and Co-reinsurance programs with Limit/SI/EML for **single client** exceeding Treaty limit or totally outside treaty, to be regarded as facultative reinsurance and be included in this section?	
Re - J1- Purpose	We question to what extent the template will address its stated purpose i.e. providing insight into the risk profile of the undertaking on basis that risk is managed and mitigated in a more holistic way, looking at extracts of data in isolation may not adequately reflect this. **The adequacy of overall capital needs could be better addressed through an undertaking's ORSA and other Pillar II processes**.	
Re - J1- Benefits		
Re - J1- Costs	While the required data is generally available (directly/indirectly), additional costs will be incurred in aligning internal systems with the required EIOPA codes.	
Re - J1- Groups		
Re - J1- Materiality	Most facultative purchases are concentrated within a few lines of business, this means there will be a number of LOBS which will only have one or two risks. Unless a materiality threshold is applied, the template would require reporting of very small	

	risks in respect of those lines of business for which few facultative covers are obtained. Reporting of such items would not serve to improve the quality of supervision and risk management. If the calculation is carried out without reinsurance under pillar one due to materiality reasons (cost and resource question), can there be an exemption from the reporting requirement of reinsurance? Within the review report of the annual reporting the BaFin already receives an annual summary of reinsurance contracts	
Re - J1- Disclosure		
Re - J1- Frequency		
Re - J1- cell A00	We assume the LOB category to be reported on reinsurance is the LOB of the underlying insurance risk. As the reinsurance reporting is from the viewpoint of the ceding undertaking, this would be the LOB of the insurance contract for which the risk is ceded. For example: A reinsurance agreement between a Life insurer (the cedent) and a Reinsurer on an insurance coverage of type Life: Index linked and unit-linked. For the Ceding company this is reinsurance on the LOB Index linked and unit linked. The Reinsurer would look at the same contract from the point of view of the reinsurer and classify the contract as Accepted reinsurance, however as this report is based on the viewpoint of the ceding company the reported LOB will be Index-linked and unit-linked. This comment also applies to l TP-E7A – cell D1, Re – J1 – cell A01 and Re – J2 – cell H1.	
Re - J1- cell A1		
Re - J1- cell B1		
Re - J1- cell C1	We believe that the LOG definition is unclear.	

	Further clarification required: • What is the purpose of the unique code in C1 compared with the unique code in cell B1? • The text in the LOG suggests all items that have been in force at any point in the reporting period not just those in force for the full period, as described in the general comment for this template, should be included. Clarification would be helpful on this point.	
Re - J1- cell D1	It is unclear whether these codes will be determined by the undertaking or EIOPA; clarification would be helpful on this matter.	
Re - J1- cell E1		
Re - J1- cell F1		
Re - J1- cell G1		
Re - J1- cell H1	We are concerned over the level of detail required in this template, in particular for facultative policies covering property portfolios. Would this be required at individual building level? If so, this would create some significant issues with regards to data privacy and commercially sensitive information.	
Re - J1- cell I1	We query what should be included under "line of activity"? Further guidance should be given as to whether this is a sub-category of "line of business" The text in the LOG refers to "treaty" which is not relevant for facultative reinsurance, this should be corrected. **Our understanding of the expression "entity specific" is that the undertaking would be free to use whatever description is used in its database to better qualify the risk. More guidelines on this issue would be appreciated.** What is to be understood by "line of activity"? How to differentiate between LOB and HRG according to Solvency II?	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
Re - J1- cell J1		
Re - J1- cell K1		
Re - J1- cell L1		
Re - J1- cell M1	We do not believe that reporting the whole sum insured would be helpful for describing risk. For example, multiple businesses in multiple cities. ***Further clarification required:*** • We query whether the sum insured refers to each risk, for example location, or by an event? • Does sum insured include deductibles?	
Re - J1- cell N1	In some cases, Facultative reinsurance covers more than one Solvency II LOB. In such cases, splitting SI or PML would not be straightforward. This template refers to PML, where “normal functioning of prevention measures” are assumed. In cases, undertakings underwrite their business using an evaluation method (EML = estimated maximum loss), where such measures are not assumed, thereby being more prudent. Having to report using PML would therefore not reflect the way the business is run, meaning significant changes to data just for the purpose of supervisory reporting. The principle of reporting information should be consistent with the way the business is run. Also, we do not find that the LOG is compatible with the way in which undertakings calculate EML. The essential difference is that undertakings do <u>not</u> take in to account all factors likely to lessen the extent of the loss. For example, when calculating a fire EML for property – inEML estimates, no allowance is made of active fire protection systems, such as sprinkler protection. Taking in to account all factors likely to lessen the extent of the loss would be more consistent with Normal Loss Expectancy (NLE) assessment. Although the terms EML and NLE may vary between undertakings, the disregard of active protection systems is a fundamental aspect of the EML assessment.	

	We would ask that EIOPA clarify that the definitions used are consistent with accepted terminology. The LOG refers to the situation where a PML is not applicable to a LOB. We would ask that EIOPA provide details of the LOB to which PML (or EML) would not be applicable. ***Further clarification required:*** • We query if data on the PML relates to the original cover or to the reinsurance.	
Re - J1- cell P1		
Re - J1- cell Q1	Including additional fields such as this will increase costs. We query how the list of codes will be maintained and what contingency will be in place should a code not exist for a particular reinsurer.	
Re - J1- cell W1	Including additional fields such as this will increase costs. We query how the list of codes will be maintained and what contingency will be in place should a code not exist for a particular broker.	
Re - J1- cell Y1		
Re - J1- cell Z1		
Re - J1- cell AB1	For “Facultative ceded Reinsurance Premium” and “Facultative Reinsurance Commission”, we question the supervisory purpose for requesting this information as we do not believe it is relevant for evaluating the effectiveness of the reinsurance program. We propose to remove “reinsurance” from the definition in LOG document to make it clearer.	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
Re - J1- cell AC1		
Re - J1- cell A01	Clarification would be helpful as to whether the LOB is to be defined as the primary insurance LOBs. If this is not the case, supervisory guidance will be necessary.	
Re - J1- cell A11		
Re - J1- cell B11		
Re - J1- cell C11	We believe that the LOG definition is unclear. ***Further clarification required:*** • What is the purpose of the unique code in C1 compared with the unique code in cell B1? • The text in the LOG suggests all items that have been in force at any point in the reporting period not just those in force for the full period, as described in the general comment for this template, should be included. Clarification would be helpful on this point.	
Re - J1- cell D11		
Re - J1- cell E11		
Re - J1- cell F11		
Re - J1- cell G11		
Re - J1- cell H11	What is to be understood by "line of activity"? How to differentiate between LOB and HRG according to Solvency II?	
Re - J1- cell I11		
Re - J1- cell J11		
Re - J1- cell K11		
Re - J1- cell L11	As parts of the portfolio are assessed approximately by using specific assumptions, differentiation per LOB may be difficult.	
Re - J1- cell M11	Risk capital is defined as insured capital less provision for insurance liabilities; it is not clear whether the insurance liabilities are based on Best Estimates or Best Estimates +	

	Risk Margin or some other definition. Clarification would be helpful.	
Re - J1- cell O11		
Re - J1- cell U11		
Re - J1- cell W11		
Re - J1- cell X11		
Re - J1- cell Z11		
Re - J1- cell AA11	For "Facultative ceded Reinsurance Premium" and "Facultative Reinsurance Commission", we question the supervisory purpose for requesting this information as we do not believe it is relevant for evaluating the effectiveness of the reinsurance program. We propose to delete the word "reinsurance" from the LOG definition.	
Re – J2- General	Reinsurance solutions for the "next reporting year" are generally not finalised until very late and thus information about the next year neither exists or is registered until very late in the year or early in the next year. For example, 2015 treaties cannot be reported fully in 2014. We question if EIOPA intend that reinsurance agreed, but not in force, be reported in this template. Or since accurate data is not always available if estimations would be accepted. This template requires information which cannot be processed in an automated way, information must be manually added. As this is an extensive template, it should contain information that is readily available in systems. This template would lead to burdensome calculations and data re-elaborations. A simplified template would be highly welcomed. We query whether risks/policies that are reinsured to captives or fronted to other insurance companies are considered as program or facultative placements. The template implies that some of the terms of the treaty (such as limit, maximum cover, etc) will apply across all reinsurers; where this is not the case further	

	advice/guidance is required on how the template should be completed. A clear distinction is required between those covers which have already been signed and those which are only expected to be signed. Reporting of all reinsurance transactions is extensive, especially for larger companies (up 1.500 pages). This Excel sheet asks for the exact terms of the reinsurance programs. An evaluation of the reinsurance strategy solely on the basis of these figures is questionable. A meaningful analysis of the reinsurance program requires profound knowledge of the insured risks and the risk appetite of management. ***Further clarification required:*** • Should the “Treaty” or “Program” be reported? The title indicates that programs should be reported whereas in the individual cells, only the treaty is mentioned. We would prefer to report programs. • The template implies that some of the terms of the treaty (such as limit, maximum cover, etc) will apply across all reinsurers, where this is not the case, further advice/guidance would be required on how to complete the template. • It remains unclear whether information per year, risk or exposure is required. Moreover, more guidance and clear definitions are necessary in order to adequately fill the template. • We query whether all ceded reinsurance is required in this template irrespective of the size of the portfolio/risk ceded? • How to treat premium adjustment clauses? In general the Log-Files has to be adjusted. Clear guideline is necessary to understand the meaning of each position.	
Re – J2- Purpose	Clarification would be helpful as to whether this template is applicable to Life business.	
Re – J2- Benefits		

Re – J2- Costs	Significant additional costs will be incurred as a result of this template and the additional data required. For example: progressive sections; progressive number and quantity of surplus/layers in program; EIOPA codes and names of Reinsured, Reinsurer and Broker; Type of treaty; Catastrophic guarantees specifications. As previously mentioned, it will be required to manually input information into this template. This will have a cost impact.	
Re – J2- Groups		
Re – J2- Materiality		
Re – J2- Disclosure		
Re – J2- Frequency	It is envisaged by EIOPA that "in case of any changes introduced to the reinsurance structure, i.e. modifications to treaties in force including renewals, cancelled treaties or new treaties placed during the previous quarter, the template needs to be resubmitted quarterly as at the inception date of the quarter". Some undertakings currently supply more or less the same treaty book data to supervisors howevertemplates are supplied in March of any given year and re-submitted in October, in case of changes occurred during the first H/Y, and in March of the following year, in case of changes occurred during the second H/Y. This frequency seems very reasonable both from the viewpoint of the supervisor and that of the undertaking. It is our considered view that increasing the frequency would only make the reporting task more cumbersome without achieving any real benefit. We therefore recommend the adoption of the following reporting pattern: Template_1 Template_2 Template_3 Year 2013 31 March 2013 31 October 2013 31 March 2014 Year 2014 31 March 2014 31 October 2014 31 March 2015 Year 2015 31 march 2015 31 October 2015 31 March 2016 Template_1 is the picture of the treaty book at 01.01	

	Template_2 is the picture of the treaty book at 30.06 Template_3 is the picture of the treaty book at 31.12	
Re - J2- cell A1		
Re - J2- cell B1		
Re - J2- cell C1	EIOPA should provide an indication as to when the codes will be ready, undertakings will have to make the necessary amendments to their systems.	
Re - J2- cell D1	It is unclear whether a list of these will be provided by EIOPA or determined by the undertaking?	
Re - J2- cell E1		
Re - J2- cell F1		
Re - J2- cell G1	If an insurance company operates non-traditional or finite reinsurance, this information should be entered on a separate sheet (or for example, in the sheet Re SPV). For all other insurance, this column can be omitted	
Re - J2- cell H1	Many of an undertaking's reinsurance contracts will cover multiple LOBs therefore an additional split per LOB will be very onerous. How should treaties that include several LoB's be reported. E.g. Event covers usually cover both FOP, MAT, MOC etc. **Line of business:** Are SII LoBs meant here? (We have doubts since the LOG file talks about "Fire and other damage".)	
Re - J2- cell I1	The definition of this item is not clear. It has been assumed this is a subcategory of a LOB. However the example in the LOG "Property" implies otherwise. What does "Line of Activity" mean? How to differentiate between LoB and HRG according to Solvency II?	
Re - J2- cell J1	"Working XL" and "Catastrophe XL" are not specific terms. Stop Loss as a term is also used differently and is not specific. Definitions are needed to cover these types of	

	treaties. Type of reinsurance treaty value list as defined here is different from the types defined on IGT3-J6. There should be one value list. The value list does not seem to be covering all possible types (missing: Financial reinsurance) and we would expect some specific types for Life reinsurance. What to enter if the reinsurance contract is treated as a surplus treaty contract (Summenexcedentenvertrag) below a certain limit set for regulatory purposes, and is treated optionally above that limit. A more closer specification would be helpful.	
Re - J2- cell K1	We question the need to report this item due to the large costs involved.	
Re - J2- cell L1		
Re - J2- cell M1		
Re - J2- cell N1		
Re - J2- cell O1	There does not appear to be a LOG entry for this cell. Please refer to Re - J1 cell N1.	
Re - J2- cell P1	We do not understand why this information is being requested?	
Re - J2- cell Q1	The LOG states that the premiums paid for 100% of the treaty should be stated – it is not clear how this would work where a treaty has only been partially placed. What is meant here? Gross in terms of the total portfolio or gross in terms of the proportion that is reinsured? Corresponding estimation are only partly possible.	
Re - J2- cell R1	N1.2 (%) – further guidance and definition is requested?	
Re - J2- cell S1		
Re - J2- cell T1	Further guidance is required as to whether sub-limits are intended for this item?	
Re - J2- cell U1		
Re - J2- cell V1		

	We believe that further guidelines should be developed for this template to include examples for different reinsurance programs in order to prevent misunderstandings. For example, how (per line of business) a reinsurance program would be reported, which contains quota share reinsurance, excess liability reinsurance and Life XL-reinsurance. Please find below an example for a Life Reinsurance Program: Treaty Retention/Priority Limit Maximum Cover per risk/event Maximum/treaty Share of Reinsurer Life Q/S 70% 25.000 25.000 30% Life Surplus 0 250.000 250.000 100% Life Cat XL/event 250.000 2.000.000 3.000.000 100% ***Further clarification required:*** • For certain types of reinsurance, the limits are applied to each policy while for other types of reinsurance; limits may be applied to a portfolio of policies. Should the presentation of amounts be made consistent? • P1: Limit: there could be different limits for treaties or LOB, it is not clear which one should be reported. • R1: Maximum cover per treaty: the definition in the LOG specifies how to calculate this with the number of ”free” reinstatements. What happens when some reinstatements are not free but at pre-defined rates?	
Re - J2- cell W1		
Re - J2- cell X1	Should the obligatory amount (Obligatorium) for the first excedent be reported here?	
Re - J2- cell Y1		
Re - J2- cell Z1		
Re - J2- cell AA1	We do not understand why this information is being requested. What is the distinction between reinsurance commission and overriding commission?	
Re - J2- cell AB1	Please refer to RE – J2 – cell AA1.	

Re - J2- cell AC1	Please refer to RE – J2 – cell AA1.	
Re - J2- cell AD1	Please refer to RE – J2 – cell AA1. How to interpret "XL rate 1 and 2" ? It is unclear, what is required here. Are only specific reinsurance rates covered here? A closer specification by means of an example would be helpful.	
Re - J2- cell AE1	Please refer to RE – J2 – cell AA1. How to interpret "XL rate 1 and 2" ? It is unclear, what is required here. Are only specific reinsurance rates covered here? A closer specification by means of an example would be helpful.	
Re - J2- cell AF1	Please refer to RE – J2 – cell AA1.	
Re - J2- cell AG1		
Re - J2- cell AM1		
Re - J2- cell AO1		
Re - J2- cell AP1	Please refer to Re - J2 – General – only estimates will be available for contracts relating to the next reporting year.	
Re - J2- cell AQ1	The ”estimated reinsurance premium” will be difficult to value in particular for XL and stop loss treaties. ***Further clarification required:*** • Should the estimated premium include the estimated impact of new business in	

	the year after the valuation? • Should there be some comparison with reinsurance premiums paid / payable in the current financial year?	
Re – J3- General	Any calculation on reinsurance recoverables for single reinsurers can only be carried through by using approximations. Detailed calculations would represent a disproportionate burden especially for undertakings that are small and medium, in terms of nature, sizeand complexity. Reconciliations to Solvency II balance sheet must be embedded in the process and as such the definitions in the template should be the same as in the Counterparty Default Risk module to avoid confusion. We believe that the split of reinsurance share of SII technical provisions by counterparty would be problematic for quota share contracts, special systems would be required to handle reporting of this information. ***Further clarification required:*** • Clarification on whether to report active reinsurance would be welcome. • Should 'fronting insurance' be reported in this template i.e. captives? • The balancing of net receivables between insurer and reinsurer is done according to treaty conditions and usually within the months after the end of each quarter of the year. It was questioned if net receivables, for example, net receivables for 4th quarter balanced as at 28.2.2010 should also be reported in this template? We query how to address the situation of undertakings with different ratings within the same group? • Some undertakings point out that this template would lead to burdensome calculations and data re-elaborations. They call for a simplification.	
Re – J3- Purpose		
Re – J3- Benefits		
Re – J3- Costs	Additional costs will be incurred through the need to include additional data items. For example: EIOPA codes and names of Reinsured; Reinsurer and Broker; Type of reinsurer.	

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
Re – J3- Groups	The issue of reporting ratings at group level could be problematic. We propose that an aggregate approach be adopted, the following is an example of how this could be broken down: Reporting grade: Percentage of the reinsurance companies AAA 15% AA 55% BBB 30%	
Re – J3- Materiality	A materiality clause should be introduced to report only the 10 largest reinsurers, this would prevent the need for every item to be reported, regardless of its relative size. We believe this is an example of how proportionality could be applied to reporting templates.	
Re – J3- Disclosure		
Re – J3- Frequency		
Re - J3- cell A1		
Re - J3- cell B1		
Re - J3- cell C1	There needs to be a clearly defined set of references for reinsurers, such as NAIC or LORS codes, to avoid misunderstandings.	
Re - J3- cell D1	We believe the list should also include a category to capture 'Fronting' type arrangements. ***Further clarification required:*** • Clarification and guidance will be necessary to ensure consistency of definitions on an undertaking by undertaking basis. For example, one undertaking might internally categorise themselves as an insurer, but from another undertaking perspective it may be categorised as an external reinsurer. Better definitions needed. Some companies use the same legal entity for both direct insurance (=insurer) and assumed treaty reinsurance (=reinsurer).	

	According to Doc one of the possible attributions is SPV. How is that possible although having a seperate QRT for SPV?	
Re - J3- cell E1		
Re - J3- cell F1	Development of systems will be necessary to ensure consistency in the approach between ratings/agencies reported across both Assets templates and Reinsurance templates. ***Further clarification required:*** • We believe it is unclear which rating should be used. For example, the same as for Counterparty default or is it optional? We express preference to use the same rating as used for counterparty. • If more than one rating is available for a reinsurer, which one would take precedence?	
Re - J3- cell G1	Please refer to RE – J3 – cell F1. •	
Re - J3- cell H1	Purpose of reporting by broker is not clear. Even in the case of placement, the risk will be with the reinsurer and not with the broker. Does the report require the specification of both the name of the Broker and the Reinsurer or can the name of the reinsurer be left out if the Broker is specified.	
Re - J3- cell I1	Please refer to RE - J3 – cell H1.	
Re - J3- cell J1	Please refer to RE - J3 – cell H1.	
Re - J3- cell L1	Further guidance is required on completing this field and whether this should be on a best estimate basis, the reinsurance recoveries relating to claims provisions, cash flow without discounting, present value of cash flows, i.e. including discounting effects. Best estimates adjustments are calculated actuarially at the population level. Is there an expected treatment to apply/subdivide this adjustment to individual reinsurers as	

	we feel this will be spurious accuracy given the uncertainty surrounding the gross claims best estimates values? With regard to the reinsurance recoverables of technical provisions we note that the draft Implementing Measures (Level 2) allows in the context of Article 47 TPS1 and 48 TPS2 a simplified calculation which is in contrast to the presentation by counterpart in cells K1, L1 and M1 of Template Re – J3. This comment also applies to cells K1 and M1 of Re-J3.	
Re - J3- cell M1	Please refer to RE – J3 – cell L1.	
Re - J3- cell O1	Assumption that this number is equivalent to reinsurance debtors may lead to the risk of double-counting as reinsurance debtors are included within the undertakings calculations for reinsurance premiums and claims reserving. In the situation where amounts are due via a broker, not directly from a reinsurer, we ask that EIOPA clarify how such amounts are to be presented in this template.	
Re - J3- cell P1	Reporting this information will require some effort to develop the appropriate systems and processes. ***Further clarification required:*** • More detailed definitions are required for “Asset pledge” and ”financial guarantees” in order to better understand the differences between the two • How are Letters of Credit allowed for? The assets are not necessarily pledged but are contingent.	
Re - J3- cell Q1	We question whether parental guarantees given in support of reinsurer subsidiaries should be included in this field?	
Re - J3- cell R1	Reporting this information will require some effort to develop the appropriate systems and processes.	

	Further clarification required: • More detailed definitions are required for "Asset pledge" and "financial guarantees" in order to better understand the differences between the two • How are Letters of Credit allowed for? The assets are not necessarily pledged but are contingent.	
SPV - General	Data relating to SPVs is unlikely to change over the lifetime of an SPV therefore the information to be submitted to Supervisors upon authorisation of an SPV should be sufficient in terms of reporting. Some undertakings point out that this template would lead to burdensome calculations and data re-elaborations. They call for a simplification. Significantly new information required.	
SPV - Purpose		
SPV - Benefits		
SPV - Costs		
SPV - Groups	We believe that this template will be manageable at group level as it would essentially consist of a sum of solo templates.	
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		
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	EIOPA clarifies that this template is based on figures of solo undertakings net of IGT. We believe it would be logicial for all information at solo level to be reported gross of IGT (to properly illustrate where the transaction exists) but when it comes to group data, the information be reported net of IGT, as is the case in the normal consolidation process. Since this template requires information on underlying solo undertakings, we propose the information be reported gross of IGT. The effects of	

	consolidation, elimination of IGT and further identification of IGT are dealt with in seperate templates under this category. Clarification on how to incorporate UCITS and other items on the 'non-exhaustive' list would be helpful. Information on UCITS will be difficult to obtain, such vehicles generally hold assets backing policyholder liabilities which have no impact on Group Capital/Shareholder Position, and we therefore question the purpose of reporting this information. Clarification on how to incorporate 'Real Estate' and general guidance for 'Funds' i.e. how consolidation should be applied, would be helpful. In general, the volume of data requested will be difficult to achieve. **There is a mix of SII and IFRS items in this report for example, ranking criteria against criteria of influence.** Our understanding is that a list of ownerships is required (all legal entities belonging to the group). Based on this, template should provide information on inclusion in (IFRS) accounting consolidated balance sheet and in SII balance sheet. In order to reduce complexity and potential costs, we would prefer that the scope of SII balance sheet should be almost entirely consistent with IFRS balance sheet. It is not clear whether some cells do not require input from the group. It should be clearly marked which cells needs to filled by the (group) supervisor. ***Further clarification required:*** • Reference number: will this be the same as the identification code referred to in paragraph 6 of the cover note; also, will it be provided by the Supervisor? • Turnover: clarification would be helpful. Should solo numbers be provided or The decision on the scope of the group must be communicated well in advance of entry into force so that IT tools and data processes can be implemented in advance.	
G01-Benefits		

G01-Costs	Further costs are likely to be incurred at future dates as a result of any changes within the group scope.	
G01-Application	We request further clarification regarding the level of non-controlling participations that should be included in this template.	
G01-Materiality	Reporting every entity within the group does not appear consistent with the principle of proportionality. We propose to report enough information to clarify ownership at group level, all material subsidiaries and significant investments in joint controlled entities and associates. If this exercise is performed once at group level, it should not be required to apply group reporting requiring a bottom up view of the group. There should be a materiality threshold that allows for exclusion of entities of negligible interest. This is consistent with Article 214 of the Framework Directive. A quantitative threshold could be for all undertakings contributing less than 5% to the group SCR.	
G01-Disclosure	We understand a related disclosure requirement derives from the draft Level 2 text. We appreciate that supervisors must have a comprehensive understanding of the group which they authorise and that this information is also important for transparency purposes. However we propose that any further disclosures on group structures can be based on a simplified view of this template, given that this template will already be disclosed. It should be clarified when disclosing this template, that this is the starting point for determining the scope of the group and not all underlying undertakings may fall under the scope of Solvency II group supervision or group capital requirements, and the information should be viewed as such.	
G01-Frequency		
G01- cell A1		
G01- cell B1	It is unclear whether this will be a new number to be assigned to the group by EIOPA or if a national code would be used? The question arises as to how non-regulated entities would be treated and how EIOPA can ensure a harmonised code structure is	

	used by third country supervisors. There is an issue of how to deal with entities that are not SII regulated and that don't have a code which can be derived by EIOPA/ from national registration systems. The same is for Non-EEA entities. Further clarification required. "reference number" and „identification code" (G03/G04) should be identical. Please decide which consistent wording to be used in all group-specific templates.	
G01- cell C1		
G01- cell D1		
G01- cell E1		
G01- cell F1	Should be deleted, only one cell should be used to indicate on legal form. Further guidance would be helpful on how this cell differs from from cell E1.	
G01- cell G1		
G01- cell H1	We question the relevance of using balance sheet and written premiums for the purpose of ranking undertakings in terms of significance. In order to report this cell the solvency II BS must be consolidated for the group, otherwise BS sum net of IGT cannot be identified. Clarification would be helpful on whether the term "Total Balance Sheet" refers to "excess of assets over liabilities" in BS – C1 – cell – L27. Since this template will help supervisors to assess the scope of Solvency II group supervision and capital requirement calculations, we believe the starting point should indeed be Solvency II. It may however be the case that some groups use the scope of consolidated accounts as the starting point for assessing the group and make adjustments so the information is consistent with Solvency II. This method should also be possible and in such cases, the group would use IFRS (for example) as the starting point, adjust to Solvency II and discuss with the supervisor that this is the case. Please refer to G01 – General. We do not understand why the total of solo balance	

	sheets are reported net of IGTs. . The information should be taken directly from the solo balance sheet whereby information would be presented gross of IGT. Netting and the results of consolidation will be presented in other group templates. This is also consistent with the approach used under IFRS. We question the relevance of using SII balance sheet net of IGTs. This information would not be meaningful at all and extremely onerous to create. We would propose to allow IFRS figures before any consolidation. This would be more appropriate to give an overview of the group activities. Further clarification required: For non insurance undertakings, total amount of balance sheet net of IGTs used for prudential purposes. What is exactly meant with this?	
G01- cell I1	It is unclear what should be reported for entities that are purely cost entities, and hence have no turnover? Pleas provide clarification whether SII data shall be reported or statutory data(local GAAP/IFRS). We recommend to apply this cell for insurance undertakings only and to report premiums as shown in the consolidated IFRS statements. To gather this information for non-insurance undertakings would be burdensome, without any benefit for supervisory purposes.	
G01- cell J1	It is unclear how the group should report the underwriting and investment performance of their underlying undertakings. We question the purpose and added value for supervisors of reporting this information. The supervisory purpose of requesting „performance figures" is still unclear. It is not appropriate to publically disclose information on underwriting/ investment/ total performance on a single entity level. We are strictly against disclosure of such „performance figures", therefore we believe that J1-L1 need to be deleted. If this (private) reporting requirement remains, further clarification will be requested	

	on what is meant by "performance". We strongly recommend to allow/ report IFRS performance figures instead of any other artificially created performance values.	
G01- cell K1	Please refer to G01 – cell J1. There is an error in the LOG whereby this cell is also described as "underwriting performance". The supervisory purpose of requesting „performance figures" is still unclear. It is not appropriate to publically disclose information on underwriting/ investment/ total performance on a single entity level. We are strictly against disclosure of such „performance figures", therefore we believe that J1-L1 need to be deleted. If this (private) reporting requirement remains, further clarification will be requested on what is meant by "performance". We strongly recommend to allow/ report IFRS performance figures instead of any other artificially created performance values.	
G01- cell L1	Please provide clarification what the total performance is. Is this the sum of cell J1-K1? Clarification whether SII data is required is needed. See also comment cell K1	
G01- cell M1		
G01- cell N1		
G01- cell O1		
G01- cell P1		
G01- cell Q1	Although it is stated that the group supervisor is responsible for assessing the level of influence exercised by the parent undertaking as either "dominant" or "significant", it would be helpful to have some guidelines, such as the thresholds outlined in QIS 5, to avoid any confusion.	

	Is this column filled by the supervisor directly? No input required from the group?	
G01- cell R1	Is this column filled by the supervisor directly? No input required from the group?	
G01- cell S1	Is this column filled by the supervisor directly? No input required from the group? We believe the inclusion of the entity in the SII consolidated accounts is set by scope of group supervision which is decided on with this QRT. Therefore we do not see how the parent of the group shall answer this item. Only entities in scope of supervision will be included in the SII consolidated BS. The log states this cell should indicate if the entity is consolidated in the group consolidated accounts. We query if this relates only to entities which are under dominant influence and therefore fully consolidated (e.g. subsidiaries) or would it also include entities which are under significant influence and therefore equity accounted (e.g. associates)? It would be helpful to have an example of entities that would not be included in the group consolidated accounts and guidance on how the premium and balance sheet items should be reported for these entities.	
G01- cell T1	Is this column filled by the supervisor directly? No input required from the group? The scope of the group will be known after consultation with the supervisor. Cell S1 and T1 should align and therefore the requested data is duplicated. Please refer to G01 – cell – S1. We understand that the scope of group capital requirements and group supervision may differ. More clarification and guidance from EIOPA would be of help.	
G01- cell U1	Is this column filled by the supervisor directly? No input required from the group?	
G01- cell V1		
G03 & G04-Purpose	Please refer to G01 – General. In general, it is too detailed to require all information on an single entity level. In particular the reporting requirements for all non-EEA entities (local capital	

	requirement, so-called intervention ladder, etc.) is too granular. It will be a difficult task to get the equivalent of SCR and MCR for legal entities based in non-EEA countries. **G03** There are a lot of inconsistencies between the template and the LOG file. It would be helpful to clarify the scope of reported entities. The template gives the impression that only entities included via D&A need to be reported, whereas the LOG file states "to have in overview of solvency assessments at solo level for all the (re)insurance entities." Furthermore, the LOG file still describes cell Q1&R1 ('decision on equivalence'), whereas in the template these cells were deleted. An exact definition of the data for reporting is often missing: • For non-EEA insurance companies, guidance would be helpful on how to calculate first the "local level of capital requirement (equivalent of SCR)" and secondly, the "local final intervention point (equivalent of MCR)". • We assume that only data/values as at the reporting date are required in the first year of reporting. If possible, an example of a completed template would be helpful for the parent to anticipate what is required. It has been assumed that the "Standard Formula" and "Internal Model used" sections are mutually exclusive i.e. group to complete both. Clarification would be helpful on this point. Similarly, if equivalence has been granted, then there should be no requirement to complete the SII rules sections. Again, clarification would be helpful. The requirement to complete local solvency information where equivalence has not been recognised may prove very onerous. It could be the case that local regulatory equivalents of SCR, MCR and Own Funds do not exist, or may not be available in line with the reporting deadline for Solvency II templates. In making the decision to grant equivalence, the supervisor will have already assessed and understood the differences	

	between Solvency II and the non-EEA basis. Therefore we do not believe that the supervisory benefit, in comparison to the costs to the group, are proportionate. We would propose that data is reported at an appropriate level of summarisation to be readily and easily understood in the context of a group as a whole. **G04** Our understanding is that this template is required for entities that are listed in G01, but not covered by G03 reporting. If so, this would be a very extensive list. Since Solvency II is focused on (re)insurance undertakings, it should be allowed to report on a more aggregated level. Asset Management entities could be reported as a whole. Banks which are subject to Basel II could be an exception. Alternatively, a threshold could be introduced to allow that smaller immaterial non-(re)insurance undertakings be reported as a whole. ***Further clarification required:*** • The UK indicated a specific issue with the treatment of Syndicates and Management Agencies of Lloyd's. Management Agencies are separate legal entities and are incorporated into the capital requirement calculations of the Group to which they belong. It is assumed they would be reported as such in this template however clarification would be welcome. Management agencies, however, also form part of the Lloyd's market so the question arises if reporting should be done by their group parent, by Lloyd's, or by both. SCR information should not be provided for every solo entity including entities outside EEA. Instead the SCR reporting should only be done for major business units. G04 scope/definition is not fully clear/ It defines in scope: regulated entities. Insurance holding companies are not regulated when not also a solo company. Are these non-regulated holding companies part of G04.	
G03 & G04-Benefits	Please refer to cell G01 – General.	

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G03 & G04-Costs	Please refer to cell G01 – General.	
G03 & G04-Application	Please refer to cell G01 – General. The information reported with these templates are of a sensitive nature so that we welcome that the information do not have to be publically disclosed.	
G03 & G04-Materiality	For general comments, please also refer to cell G01 – General. The “Summary document” indicates that no materiality threshold is applied. A materiality threshold would appear appropriate, i.e. 5% of Group SCR	
G03 & G04-Frequency		
G03- cell A1	Applies ti cell A2: Further clarification is needed what the identification code from national registration systems is meant to be. EIOPA should make clear the scope of this template. According to our understanding of the column heading “EEA entities and non EEA entities included via D&A using SII rules” We understand that columns B1 to M1 are applicable to entities only that are included via D&A, while the columns N1 to P1 are provided for non EEA entities that are not included via D&A. Conversely, this template is not provided for entities that are included via the consolidation method. Are we right?	
G03- cell B1	The LOG refers to makes reference to the following solo templates: SCR – B2A; or SCR – B2B. Should the LOG also make reference to SCR - B2C?	
G03- cell C1		
G03- cell D1	It is unclear whether the data requested in this cell relates to eligible own funds to meet the SCR or the MCR – further clarification would be helpful.	
G03- cell E1		
G03- cell F1		
G03- cell G1		
G03- cell H1		
G03- cell I1		

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G03- cell J1		
G03- cell K1		
G03- cell L1		
G03- cell M1		
G03- cell N1	It is not completely clear if data shall be reported even when no D&A method is used.	
G03- cell O1	Please refer to G03 – cell N1.	
G03- cell P1	Please refer to G03 – cell N1.	
G04- cell A1	The LOG states that this template would incorporate holding companies and other financial sectors. We query if non-financial sectors are also to be incorporated here and if not, where?	
G04- cell A2	Further clarification is needed what the identification code from national registration systems is meant to be. There is an issue of how to deal with entities that are not SII regulated and that don't have a code which can be derived by EIOPA/ from national registration systems. The same is for Non-EEA entities. Further clarification required.	
G04- cell B1		
G04- cell C1	Should this section include the notional SCR's of third country firms/intermediaries and, if so, how should these be calculated?	
G04- cell D1		
G04- cell E1		
G14-Purpose	Please refer to G01 – General. We do not support the splitting of risk margin per LOB and believe that diversification benefits should be taken into account at group level.	

	The definitions in the LOG should be further developed and consistency should be ensured with other templates, for example BS-C1. ***Further clarification required:*** • Guidance would be helpful on whether contribution to Group in Column R is gross or net of reinsurance. Should the values in the "Solo Gross BE and TP calculated as a whole" in columns E, I & M reconcile to the "contribution to the Group Balance Sheet (Without IGT)" value in column R? • Clarification is required on "reinsurance ceded externally to the group". • Clarification would be helpful on how diversification should be treated at Group level within the context of this template.	
G14-Benefits		
G14-Costs		
G14-Application		
G14-Materiality		
G14-Disclosure		
G14-Frequency		
G14- cell A1	reference number" and „identification code" (G03/G04) should be identical. Please decide which consistent wording to be used in all group-specific templates.	
G14- cell B1	The treatment of NFS should be clear, other templates relate to reporting of information per "legal entity" whereas this cell refers to "undertaking".	
G14- cell C1	We understand that gross TP means TP including IGT and before cession. Are we right?	
G14- cell D1	We understand that net TP means TP eccluding IGT and before cession. Are we right?	
G14- cell E1	Does the percentage share refers to TP before cession. Are we right?	
G14- cell F1	See C1 above	

G14- cell G1	See D1 above	
G14- cell H1	See E1 above	
G14- cell I1	See C1 above	
G14- cell J1	See D1 above	
G14- cell K1	See E1 above	
G14- cell L1	See C1 above	
G14- cell M1	See D1 above	
G14- cell N1	See E1 above	
G14- cell O1	See C1 above	
G14- cell P1	See D1 above	
G14- cell Q1	See E1 above	
G14- cell R1		
G20-Purpose	Please refer to G01 – General. ***Further clarification required:*** • We query how to complete this template when using a partial/full internal model. If an internal model is used, it may not necessarily follow the same split as in this template.	
G20-Benefits		
G20-Costs		
G20-Application		

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G20-Materiality	Please refer to cell G01 – Materiality.	
G20-Disclosure	The information reported with these templates are of a sensitive nature so that we welcome that the information do not have to be publically disclosed.	
G20-Frequency		
G20- cell A1	Further clarification what the reference number is should be provided.	
G20- cell B1		
G20- cell C1		
G20- cell D1		
G20- cell E1		
G20- cell F1		
G20- cell I1	Clarification would be helpful why the scope of this cell (including internal model) differs from from the scope of cells C1-H1 (standard formula only)	
G20- cell J1	This comment applies to cells J1-K1.	
G20- cell K1		
IGT1 to IGT4-Purpose	The reporting of IGT at entity level is unduly onerous requiring a large amount of data to be captured, we would support that some form of aggregate reporting be allowed. As with the other Group templates, we believe that the format of the IGT templates **are not user friendly**. We welcome that a **"SII revaluation**" is not mandatory for IGT reporting purposes. IFRS may be used if the differences to SII are not material. We believe that a reporting on IGT which has **ended during the reporting period** provides no "value added". **We recommend "very significant IGT" to be reported on an ad-hoc basis rather than on standardized templates.**	

	Valuation of IGTs It is not clear how these templates will be validated. A particular template, such as equity, captures one side of the transaction and only includes items above the prescribed materiality level, so the total transactions at the Group level will not net to zero. We query whether all IGTs should be reported, which had occur during the reporting period, especially as Solvency II is ultimately a measure at a point in time and therefore it is confusing to include items which no longer impact on the solvency position. Explanatory documents similar to those accompanying templates on Assets and Balance Sheet would be helpful to clarify some of the definitions and abbreviations used. We would advocate a pragmatic approach to the valuation of IGTs (e.g. appropriate use of reporting GAAP), given that IGTs should, in any case, eliminate on Group consolidation. The pragmatic approach – using IFRS data for the valuation of IGT – should be possible without any severe materiality restrictions as the IGT data according to IFRS are already available without any problem. The significance of the identification of any intragroup creation of capital within the group does not alter when different valuation approaches are applied. The preparation of the SII valued IGT might be time-consuming without additional benefit for supervisory purposes as the meaningfulness is comparable. **Lack of totals/sub-total / summarisation** As with the other Group templates, we believe that the format of the IGT templates are not user friendly. An efficient internal review and sign-off process would be facilitated by a more summarised level of data in line with current reporting / management structure of the Group. This would also have the advantage of assisting comparability between periods and different companies for external users of the returns.	

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	Loan with the same entity at a sub-group level: As above, identifying loan at legal entity would be onerous task and potentially some of the loan within two entities in the same sub-group may not be reported at the Group level because they eliminate at the level below the group consolidation. **Further questions to be answered**: Are all of these templates really necessary for the **assessment of risk**, e. g. Cost sharing agreements (IGT4)?	
IGT1 to IGT4-Benefits		
IGT1 to IGT4-Costs	What does it mean, “the level of details required in these group IGT templates are expected to be less than those reported at the solo level (where applicable) as only IGT that are equal to or exceed the corresponding thresholds are required to be reported here.” IGT reporting should only be provided at the group level and not at the solo entity level. Comment should be deleted as it could be misleading. The potential costs will depend on the thresholds that will be set for the group	
IGT1 to IGT4-Application		
IGT1 to IGT4-Materiality	It is difficult to comment on materiality thresholds without first knowing the end result, we understand the result will depend on consultations between the parent undertaking and the group supervisor. We support EIOPA’s proposal to work towards harmonised thresholds however a specific quantitative limit may be suitable in some countries and not in others. It is important that the criteria for establishing thresholds is established in supervisory guidelines but the threshold itself should not. In this sense, we have numerous questions about how thresholds would apply i.e. how would a reinsurance agreement be valued to compare to the threshold? Which amount is compared to the threshold amount to determine if the transaction is to be reported: Reinsurance result, Maximum cover, Claims paid, Premiums paid, .. ?	

	Supervisors should also consider the thresholds applied under other legislative requirements to which the group parent must comply with, for example, the Financial Conglomerates Directive. Again this is subjective to size, not every (re)insurance parent undertaking will be categorised as a financial conglomerate. We would support an agreement on materiality thresholds well in advance of entry into force in order to plan for the necessary reporting requirements. Thresholds should be appropriate to the circumstances of the particular reporting group. We would welcome the opportunity to discuss with EIOPA, potential criteria for setting these thresholds. Measurements linked to Solvency II could be X in relation to percentage of assets held, SCR or own funds, for example.	
IGT1 to IGT4-Disclosure		
IGT1 to IGT4-Frequency	We understand that EIOPA will elaborate further on "very significant IGT" and the achievement of "as soon as practicable" through supervisory guidelines. Once the guidelines and reporting package are finalised, a link should be made between the two.	
IGT1- cell B6	We question the 'value added' of reporting IGT on equity type information for the purpose of Solvency II, we believe it is unclear how it would assist in the monitoring of risk. Investments in subsidiaries would eliminate on consolidation (investment in subsidiary cancelling with share capital plus pre-acquisition reserves) for purposes of Group reporting. We assume that collective investment scheme subsidiaries are not included in the scope. We also believe it is unlikely that ISIN codes would be made available on intra-group equity investments, in general, ISIN codes do not exist for internal funding. To report this data for a group of significant size would be extremely time consuming, especially having to list separately all movements since the previous reporting period and include details by different currency. The final listing would run to many tens of pages, especially if data is built up and reported piecemeal over time, as implied by the 'Issue date' column.	

	Further clarification required: • Clarification would be helpful on whether this includes Intra-Group Trading balances. • Clarification would be helpful on whether all transactions ended since the last reporting date must also be reported. If completing a template for period 1 Jan to 31 March, and reporting on 30 April, should this include settled transactions between 1 April and 30 April? Should the group utilise this template to report intra-group loans issued, as well as those received? If intra-group loans have been both issued/received and repaid in full during the reporting period would there be a requirement to report these? If so, how does EIOPA envisage these to be reported? • Should the template include repos or swaps, or only loans and capital? • A definition is required for 'any transaction having the same impact', for example, does this also include 'accounts receivables on reinsurance business' or 'funds held by others under reinsurance business assumed'? • As per above, the purpose of this data is not apparent and we note, depending on further clarification, that it will potentially be difficult to obtain and report.	
IGT1- cell C6	There is an issue of how to deal with entities that are not SII regulated and that don't have a code which can be derived by EIOPA/ from national registration systems. The same is for Non-EEA entities. Further clarification required.	
IGT1- cell D6		
IGT1- cell E6	There is an issue of how to deal with entities that are not SII regulated and that don't have a code which can be derived by EIOPA/ from national registration systems. The same is for Non-EEA entities. Further clarification required.	
IGT1- cell F6	The GDV questions how the use of ID codes will be applied to entities within the group structure that would be subject to this template? ISIN codes may not exist for internal funding therefore it should be possible to use undertaking specific codes in such cases an external code does not exist. It is not clear whether this data field refes to the investor/buyer/transferee or –as we assume - the Issuer/seller/transferor. The LOG should be clear at this point.	

	We recommend to delete "Undertaking/company specific codes as developed by the group itself should not be used unless the codes are also publicly used."	
IGT1- cell G6	The GDV questions how the use of ID codes will be applied to entities within the group structure that would be subject to this template? ISIN codes may not exist for internal funding therefore it should be possible to use undertaking specific codes in such cases an external code does not exist. It is not clear whether this data field refes to the investor/buyer/transferee or –as we assume - the Issuer/seller/transferor. The LOG should be clear at this point.	
IGT1- cell H6	If the threshold constitutes a monetary value then reporting should be based on the groups' reporting currency. This is consistent with the methods used when reporting consolidated accounts.	
IGT1- cell I6	***Further clarification required:*** • There should be further definition of the types of transactions to be covered here in order to clarify the scope of this form? Also, does this refer only to transactions during the reporting period? For example, what about where there is an investment in a subsidiary but no transactions during the year but there is a balance at the beginning and end of the year? • Or if the only movement is due to impairment or Fair Value movements? For an equity investment would the only transactions to be reported be dividends, investments in equity or reductions in equity during the reporting period? • We believe that the closed list needs to be extended or need to provide further information on what is exactly meant by these categories. For example "Bonds/Debt": does this type only include any internal transfer of an asset position or does this also include any internal loan/ bond agreements between two group entities. We recommend to differentiate between pure transfer/sale transactions and transactions which have an impact on the equity/debt position of an related undertaking. This would make the template much more user-friendly for both insurance groups and group supervisors. • It seems that only fixed dated loans (or of similar nature) needs to be reported. Current accounts such like cash pool agreements seems to be "out of scope". What about "Accounts receivables on reinsurance business" or "Funds held by	

	others under reinsurance business assumed”?	
IGT1- cell J6	Consistency with other templates should be ensured. For example, SCR B2A makes reference to the use of ISO format for the reporting of dates.	
IGT1- cell K6		
IGT1- cell L6	We recommend to use group currency values (EURO) as the threshold will be -most probably- determined on a group currency basis.	
IGT1- cell M6		
IGT1- cell N6		
IGT1- cell O6	We recommend to report one single amount only which should be the maximum amount of transaction or maybe the closing balances. Anything else would not cause any material benefit and would increase complexity.	
IGT1- cell P6	We recommend to report one single amount only which should be the maximum amount of transaction or maybe the closing balances. Anything else would not cause any material benefit and would increase complexity. The definition „top-ups“ unclear.	
IGT1- cell Q6	We recommend to report one single amount only which should be the maximum amount of transaction or maybe the closing balances. Anything else would not cause any material benefit and would increase complexity.	
IGT1- cell R6		
IGT1- cell S6	Further clarification required: we do not understand for what reason and under which conditions accompanying reference documents are required. Additional documents should be only delivered upon regulators’ explicit request. Cell should be deleted.	
IGT2- cell B6	**Summarised reporting** We would expect a far more summarised level of reporting than that currently set out which, as noted above, appears potentially extremely onerous. ***Further clarification required:*** • There appears to be no disclosure of closing balances, does this imply that the	

	template is only concerned with transactions that have occurred during the reporting period?	
IGT2- cell C6	There is an issue of how to deal with entities that are not SII regulated and that don't have a code which can be derived by EIOPA/ from national registration systems. The same is for Non-EEA entities. Further clarification required.	
IGT2- cell D6	We believe there is an overlap between this template and IGT1, the description states that the aim is to list all significant IGT on equity and other capital items; this is also requested in IGT1. We query whether the template should capture IGTs, other than those on equity, which are captured in IGT1? With a derivative transaction such as an interest rate swap, who should be represented as the investor/buyer and who should be represented as the issuer/seller as they are both just counterparties to a derivative contract? Typical terminology for the two parties here would be 'payer' (paying fixed rate) and 'receiver' (paying floating rate). Also, all cells in the log accompanying the template are designated as e.g. B6 instead of B5.	
IGT2- cell E6	Here is an issue of how to deal with entities that are not SII regulated and that don't have a code which can be derived by EIOPA/ from national registration systems. The same is for Non-EEA entities. Further clarification required	
IGT2- cell F6	It is not clear whether this data field refes to the investor/buyer/transferee or –as we assume - the Issuer/seller/transferor. The LOG should be clear at this point. It is unlikely that ISIN codes does exist. We recommend to use undertaking-specific codes rather than external codes. We recommend to delete "Undertaking/company specific codes as developed by the group itself should not be used unless the codes are also publicly used."	
IGT2- cell G6	Please refer to IGT2 – cell F6.	
IGT2- cell H6		
IGT2- cell I6		
IGT2- cell J6		

IGT2- cell K6	***Further clarification required:*** If there is no maturity date, should this cell be left blank?	
IGT2- cell L6	probably- determined on a group currency basis.	
IGT2- cell M6		
IGT2- cell N6		
IGT2- cell O6		
IGT2- cell P6		
IGT2- cell Q6		
IGT2- cell R6		
IGT2- cell S6		
IGT2- cell T6		
IGT2- cell U6		
IGT2- cell V6		
IGT2- cell W6	Further clarification required: we do not understand for what reason and under which conditions accompanying reference documents are required. Additional documents should be only delivered upon regulator's explicit request. Cell should be deleted.	
IGT3- cell B6	Reinsurance contracts are in general underwritten annually, a shorter timeframe is highly exceptional therefore quarterly reporting would neither produce relevant additional information nor could the required data be generated without intense and time-consuming additional effort (especially because every existing reinsurance relation, including its accounting and valuation parameters are affected and have to be depicted in a very detailed manner). The requested data is available but would require considerable cost to provide it in the proposed template. Also, the reinsurance strategy is strictly confidential and should not be publically disclosed by the Supervisor. ***Further clarification required:*** • The extent of reporting for the current accident year and movement on prior underwriting year results regarding internal quota share reinsurance	

	arrangements should be clarified. • Clarification would be helpful on whether this template solely relates to internal re-insurance with ceded premiums in the current year. Clarification is required on lines of activities: specify the LOBs; date of signature: signing date/ treaty in force? • References are made only to "treaty" - are we to assume that facultative cover is not included? As a general comment, the letters and numbering in the LOG do not always correspond to the template. For the purpose of our response, GDV comments will refer to the letters and numbering used in the template.	
IGT3- cell C6	According to log file an entity identification code will be assigned by EIOPA. Prefer this to conform to existing standards (not another new company code). There is an issue of how to deal with entities that are not SII regulated and that don't have a code which can be derived by EIOPA/ from national registration systems. The same is for Non-EEA entities. Further clarification required.	
IGT3- cell D6		
IGT3- cell D6		
IGT3- cell E6	There is an issue of how to deal with entities that are not SII regulated and that don't have a code which can be derived by EIOPA/ from national registration systems. The same is for Non-EEA entities. Further clarification required.	
IGT3- cell F6	According to general IGT document file, transaction amounts are to be reported in the currency of the transaction. Assume this does not apply to the threshold value (i.e. threshold to be reported in the Reporting currency of the group).	
IGT3- cell G6		
IGT3- cell H6		
IGT3- cell I6	General remark on this report suggests that all transaction amounts are to be reported in the currency of the transaction. 1) This results in a list with incomparable amounts, as the amounts will be specified in	

	different currencies. That does not help in identifying major risks. 2) Assume for reinsurance agreements this is the Currency of the treaty. Not clear if all amounts reported here are 'transaction amounts' and thus to be reported in the currency of the treaty.	
IGT3- cell J6	Re-J2 cell H1 states that an extended coding system will be provided. If that occurs, this should also be applied to this template for consistency. This is referred to as M6 in the log – change to K5. Type of reinsurance treaty value list provided in log file is different from the type of reinsurance treaty value list on Re-J2. Values gives specific codes for Reinsurance treaty, but for Facultative reinsurance would expect additional values (Proportional / Non proportional). Type of reinsurance treaty: closed list not consistent with list in QRT Re-J2 (cell J1)	
IGT3- cell K6	We recommend to use group currency values (EURO) as the threshold will be -most probably- determined on a group currency basis.	
IGT3- cell L6		
IGT3- cell M6		
IGT3- cell N6	This appears to be a new measure not used in the solo templates. Clarification would be helpful regarding how this template should be completed. Please also refer to cell I6 with regards to reporting currency. We recommend to have a pragmatic approach to the valuation of the reinsurance result, e.g. appropriate use of reporting GAAP. A reinsurance result exclusively based on a cashflow view would not be meaningful.	
IGT3- cell O6	Further clarification required: we do not understand for what reason and under which conditions accompanying reference documents are required. Additional documents should be only delivered upon regulator's explicit request. Cell should be deleted.	
IGT4- cell B5	As a general comment, we do not believe that reporting of "internal cost sharing", or generic IGT information, would assist in assessing risk management. We would suggest reporting of intra-group transactions in line with existing IFRS requirements. We question the Supervisory purpose of requesting this information; we believe that	

	to list all transactions internally on a cost sharing basis would be overly onerous in comparison to the value gained. Requesting this information on an ad hoc basis could be more appropriate. Some undertakings highlighted that service and cost agreements are used to promote efficiency and that information relating to internal cost sharing does not always exist per entity therefore the level of detail requested in this template would be difficult to achieve. In general, more qualitative feedback will be possible once materiality thresholds are better understood. ***Further clarification required:*** • It is unclear if transfer of shares should be included in the column “Transaction Type”. • Should unrealised profits be reflected in this sheet? • Further clarification on definition and the transactions expected to be reported in this template would be helpful. • It is unclear how to report the revenue and expenses regarding the intra group transactions. • The question was raised if this template would cover internal cost sharing between life entities or broader, for example, service level agreements. • Further clarification on definition and the transactions expected to be reported in this template would be helpful. • What asset is meant by “entity that is purchasing/ investing in the asset…”?	
IGT4- cell C5	Clarification that this template is intended to capture IGTs other than equity is helpful. There remains the question however as to what off-balance sheet items should be reported. Guarantees are clear, but repros and derivatives are included in the LOG definition, which do not appear on the balance sheet. The granularity of available data will depend on the instrument itself, guidance would be helpful from EIOPA that full reporting of all columns will depend on whether the data request applies/is available on each particular instrument.	

	With the replacement of IAS37 "contingent liabilities" will disappear. Liabilities will no longer represent possible outflows but a probability-weighted average of possible outflows. ***Further clarification required:*** • In general, further guidance on definitions would be helpful.	
IGT4- cell D5	What asset is meant by "entity that is selling/ transferring the asset…"?	
IGT4- cell E5	There is an issue of how to deal with entities that are not SII regulated and that don't have a code which can be derived by EIOPA/ from national registration systems. The same is for Non-EEA entities. Further clarification required.	
IGT4- cell F5		
IGT4- cell G5	What benefit does the supervisor gain from information on Internal Cost Sharing?	
IGT4- cell H5	The information is of limited value and may be onerous to collect in such detail. Therefore, we recommend to delete this type of IGT.	
IGT4- cell I5		
IGT4- cell J5	Regarding type "Others", additional documents should be only delivered upon regulator's explicit request.	
IGT4- cell K5		
IGT4- cell L5		
IGT4- cell M5	Should be M6: Clarification of LOG needed. What value should be reported?	
IGT4- cell N5	To have a split into contingent liab included and not included into S2 balance sheet is not meaningful. N5 and O6 should be merged.	
IGT4- cell O5		
IGT4- cell P5	Further clarification required: we do not understand for what reason and under which conditions accompanying reference documents are required. Additional documents should be only delivered upon regulator's explicit request. Cell should be deleted	
RC-Purpose	It's difficult to give a relevant view through only quantitative reporting, since the notion of risk concentration is difficult to define precisely. A pragmatic way could be to <u>combine quantitative reporting</u> such as for example the	

	10 biggest aggregate exposures to individual counterparties (counterparties in terms of companies / groups of companies; aggregating equity, bond, derivative, reinsurance and other measurable exposures) with qualitative reporting, asking for the most prominent risk concentrations in terms of product, geography or otherwise to be described briefly qualitatively. If such brief qualitative information triggers the need for deeper information, the supervisor would ask for it when the need arises. We are not convinced that the data gathered is the most efficient means for addressing the supervisor's concerns around risk concentration i.e. the detailed information at a point of time can give only a 'snapshot', whereas there are better tools (e.g. Pillar II/ORSA) to assess the Group's ability to manage and control risk concentration. We are also concerned at the apparent overlap/duplication with the already highly detailed Assets schedules (D-templates). It would seem from the template that liability exposures are requested in addition to asset exposures. It would be useful to know how this information will be monitored for risk concentration purposes as generally more focus is placed on asset and potential asset exposures to highlight potential losses to the group if something happens to that counterparty. "Most important" exposures have not been defined, especially where different types of exposure to the same counterparty exist. For instance, if a loan has been taken from a bank, but shares are also held in that same bank, there may be qualitative considerations as well as simple quantitative factors. ***Further clarification required for assets:*** • Should exposures to sovereign counterparties be disclosed within the RC templates? Particularly as sovereign exposure risk within the EEA has increased in relevance recently. • With respect to country exposure are you looking for just exposure to government bonds or country exposure for all investments held? • Where counterparties have received national government assistance & bailouts should those entities be categorised as a sovereign exposure where those national governments have become the single largest or majority shareholders	

	or where they are able to exercise dominant influence? • Which credit rating agency is required? It is not uncommon for different agencies to assign different ratings. What ratings are required for unrated instruments? In general, equities and real estate are not allocated credit ratings by recognised agencies. • How is it envisaged that exposure via derivatives will be recorded? • Clarity on the definitions of ID codes would be helpful. SEDOL/Bloomberg ID? Some Members indicated that updating of this information would have to be done manually. • Treatment of derivatives, guarantees, collateral: it is not clear how derivatives, guarantees, collateral etc. would be encompassed by this template. ***Further clarification required for liabilities:*** • Is it necessary to split out for different currencies, or just list currencies of exposure? • How is it envisaged that exposure via derivatives will be recorded? • How is it envisaged that Stock Lending and Collateral be treated? • How is 'exposure' measured? ***Further clarification required on global issues:*** • In order for data to be consistent across entities, a definition will be required. • The current amount utilised most extensively as an internal measure of exposure is single hit/ 1st loss exposure. Treatment of reinstatements and impact on maximum exposure is an area where specific guidance will be required. • The extent of the detailed drill down for major issuers is unclear; do we need to list all exposures totalling back to the total? • It is unclear whether all existing reinsurance agreements are to be listed or only the current accumulation year. If all existing reinsurance agreements would have to be listed, difficulties with the availability of data would occur. Within facultative reinsurances contracts, there are several hundred risks separately insured. **In general:** How does EIOPA envisage that the reporting threshold set will practically	

	help in the population of this template with respect to the consolidation process, as the solo entities will have to report a complete list of counterparties in order for the Group to aggregate and assess which of those are above the threshold. This seems overly onerous. A lot of the data is repeated in the asset forms as well as derivatives etc – could the counterparty information somehow be brought in so that the list of balances is only reported once? In terms of alternative formats for this template, we prefer that EIOPA clearly set out what information on counterparties is considered critical for the purposes of supervision and work with industry for a more practical solution.	
RC-Benefits		
RC-Costs		
RC-Application		
RC-Materiality	The volume of information to report will be significant, depending on what is agreed with supervisors, we think that this template could be simplified by the EIOPA clearly defining a threshold (i.e. a disclosure only for the positions > X% of the total SII Value of the consolidated entity).	
RC-Disclosure	In some countries this information is given to rating agencies however the intention to disclose this to the wider public is of great concern. Disclosure of a Group's major counterparties could lead to market instability. Further, by the time the template would be disclosed, the information may no longer be relevant. The GDV does not support public disclosure of this template.	
RC-Frequency		
RC- cell A2	The definition should be clarified – does this means the exposure counterparty rather than the group counterparty which has the exposure (latter looks to be required in	

	A10)? If a standard code is to be supplied, this should be done as soon as possible in order to allow for systems implementation. Also, what form will this take and how will it be maintained? Will this be the entity concerned as well as the group it belongs to or only the group?	
RC- cell A3	Will a closed list be provided? It would seem from below that liability exposures are to be included in this table - please clarify how this information will be used to monitor the risk exposure of the group as generally risk exposure focuses on assets and potential assets.	
RC- cell A4	Further clarity required, e.g. where an equity, would this be where the equity is listed, or where the headquarters of the entity issuer is located? It will be particularly difficult to determine the country of exposure where we have global counterparties that have numerous policies with subsidiaries across the globe.	
RC- cell A5		
RC- cell A6	Are all ID code sources of equal merit or will there be a list in order of preference? Also, we will need the closed list as soon as possible to ensure the data we have available sources the allowed ID code type.	
RC- cell A7		
RC- cell A8	Are all rating agency sources of equal merit, or will there be a list in order of preference? Such a list should be provided as soon as possible to ensure systems development has captured available sources.	
RC- cell A9		
RC- cell A10	An aggregated balance would be more meaningful. A list of entities is onerous to pull together. Definition is not clear: Does it concern only the entity with the most impact or all entities? Does EIOPA expect a new entry for every Group entity that holds a balance with the counterparty in question? One would expect that an aggregated balance is more meaningful and if so, documenting a list of entities is onerous to pull together.	
RC- cell A11		

	Comments Template on Draft proposal for Quantitative Reporting Templates	Deadline 20 January 2012 12:00 CET
RC- cell A12	Consistency with other templates should be ensured. For example, SCR B2A makes reference to the use of ISO format for the reporting of dates.	
RC- cell A13	The group reporting currency should be used for this cell. What is the SII value of the exposure? Clarification needed? Is this applicable for reinsurance? Solvency II exposure should be reported in group currency (EURO) so that a aggregation would make sense. Orginal currency code could be added. We note that a Solvency II value should be provided "if available" can this be left blank if not available? Please provide examples where this is expected to not be available	
RC- cell A14	The group reporting currency should be used for this cell. Could USD be a group currency in EU? "Currency of the group": should this be the currency to which we are principally exposed or is a separate line needed for each currency exposure to that counterparty?	
RC- cell A15	What is the maximum exposure (does it refer to internal risk appetite?) Maximum exposure: Should the sign convention be made explicit for this cell, as it could be misleading to present all assets and liabilities as a positive balance – particularly if it is a publicly disclosed document? Is this only applicable for reinsurance? Information on reinsurance exposure is too granular and very difficult to achieve	
RC- cell A16		
RC- cell A17		
RC- cell A18	For off-balance sheet items, it should be clarified whether this is a potential asset or liability.	