

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public (please delete the not applicable)
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> <li>- Do not change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool</li> <li>- Please do not insert or delete any row. If you have no comment on a paragraph or a cell, keep the row empty.</li> <li>- Leave the last column empty.</li> <li>- Please fill in your comment in the relevant row.</li> <li>- Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <ul style="list-style-type: none"> <li>o Certain rows represent a group of cells with similar information (ex : TP-E1- cells A43-L43)</li> <li>o If your comment refers to multiple cells or paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other cells or paragraphs this also applies.</li> <li>o If your comment refers to subparagraphs or specific cells within a group, please indicate this in the comment itself.</li> </ul> </li> </ul> <p>Please send the completed template, in Word Format, to <a href="mailto:CP-13-010@eiopa.europa.eu">CP-13-010@eiopa.europa.eu</a>. Our IT tool does not allow processing of any other formats. The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the Technical Annexes II and III.</p>		
<b>Reference</b>	<b>Comment</b>	<b>Resolution</b>

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
<b>General Comments</b>	<p>1) In some cases the references in the EIOPA Comments Template do not correspond to the Consultation Paper. For example, section VIII in the Comments Templates encompasses 1.82-1.86 whereas in the Consultation Paper it encompasses 1.79-1.82. We therefore would like to point out that our comments will refer to the numbering in the Consultation Paper. For example, a comment for 1.83 refers to 1.83 in the Consultation Paper, which is part of Section IX, even though it belongs to Section VIII in the Comments Templates.</p> <p>2) During the last consultation phase EIOPA mentioned it was considering a Q&amp;A process to assist in reporting (refer to comment 11 in Comments_Template_General_Final). Does EIOPA still plan to set up a Q&amp;A process? This would be of great help as there are still a lot of open issues on quantitative and narrative reporting in many undertakings.</p> <p>3) We understand and sympathize with the ambition of EIOPA to provide Guidelines on some key topics such as submission of information to national competent authorities from the perspective of avoiding divergence of national standards before the introduction of Solvency II. We also understand the complexity of such a task, given that neither Level 1 nor Level 2 texts have reached a final state, leading to e.g. an ill-defined Technical Provisions and consequently ill-defined Own Funds and SCR to be reported on. Another major issue exists for those companies with (partial) internal models, for the IMAP has likely not been completed for most of them, leading inevitably to (partial) double implementing and reporting efforts. And yet EIOPA aims to deal with these complications by providing Guidelines.</p> <p>For companies and competent national authorities alike these Guidelines could lead not only to preparedness of the industry, but also to implementations of systems and processes that likely have to be corrected at a later stage when current uncertainties are resolved. We perceive that it depends heavily on the precise position of any given insurance company or national competent authority, what would be the optimal choices when it comes to (partial) implementation of what will once become Solvency II. We fear that (strict and far-reaching implementation of such Guidelines) that will not</p>	
<b>Introduction General Comments</b>		
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Name of Company:	Deloitte & Touche	
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<b>Section I. General Comments</b>		
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<b>Section II. General Comments</b>		
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1,35	<p>We would welcome if national competent authorities notified relevant undertakings (especially small and medium undertakings that do fall within the reporting thresholds) at an earlier point of time than 11 months before the first submission date, for example, with the publication of guidelines by national competent authorities. This would ensure higher data quality as the implementation of reporting processes means huge efforts for many undertakings, especially w.r.t. quarterly and group reporting.</p>	
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1,45	Guideline 10 – Groups’ quarterly quantitative reporting thresholds: Where it says "they are required to submit to the group supervisor the set of annual quantitative information identified in Guideline 19", should it be a "... set of quarterly quantitative information..." instead?	
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<b>Section III. General Comments</b>		
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1.60	<p>TO BE NOTED: SECTION IV STARTS WITH GUIDELINE 20 (REF.1.60) TO GUIDELINE 26 (REF. 1.67)_PLEASE PAY ATTENTION IN ORDER TO AVOID MISUNDERSTANDING OF COMMENTS</p> <p>1) Ref. 1.60, a): We question on what will the NCAs be basing the assessment of the adequacy of the SoG to the business strategy of the undertaking, since no information regarding the latter is requested here?</p> <p>2) Ref. 1.60 c): We question if a specific focus on the key SII functions (risk management, actuarial function, internal audit and compliance) is expected within the broader description of the "System of governance". In this regard we suggest including some specific information at least related to the risk management and actuarial functions, considering their importance within the entire framework of the directive. It could also be useful both internally (for undertakings) and externally (regulator) to get a view on how the two functions are structured. Please consider that in Guideline 23 specific information on the compliance function is explicitly requested.</p> <p>3) We also suggest requesting explicitly any material changes in the system of governance that have taken place over the reporting period, in order to enhance the reporting of any material change incurred.</p>	
1,61	<p>1) Ref. 1.61, a): We ask for clarification whether Solvency II key functions (risk management, actuarial function, internal audit and compliance) are meant here?</p> <p>2) Ref. 1.61, b): We welcome the requirements in point b, since the existence of policies, processes and procedures for ensuring fit and proper requirements are essential.</p>	

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1,62	<p>1) Could you please provide an explanation as to why it is requested, within the Guideline 25 (Ref. 1.66 d), to provide the qualitative and quantitative information about material specific risks at group level and it is not requested to provide the information on material risks at solo entity level?</p> <p>2) Ref. 1.62 a) and c): the two bullets seem to be partly repetitive in terms of information requested. We suggest merging bullet c) into bullet a) in order to enhance clarity: "A general description of the undertaking's risk management system including information on how the undertaking is able to effectively identify, measure, monitor, manage and report, on a continuous basis, the risks on individual and aggregated level, to which the undertaking is or could be exposed; an information on risk management strategies, processes and reporting procedures for each category of risk, with an explanation how these are documented, monitored and enforced."</p> <p>3) Ref. 1.62 e): Could you please provide more guidance on how to perform the assessment of adequacy? Please check the following examples</p> <ul style="list-style-type: none"> <li>- Information related to the adoption of an internal credit assessment model;</li> <li>- Information on how external credit assessments are used for the calculation of the SCR (second best approach).</li> </ul>	

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<b>Section IV. General Comments</b>	<p>1) Please confirm our understanding regarding the narrative contents required within the interim measures. Some sections already foreseen for both the SFCR and RSR have been selected as requirements to be submitted and they are related to</p> <ul style="list-style-type: none"> <li>- System of Governance</li> <li>- Capital management</li> <li>- Valuation for solvency purposes</li> </ul> <p>We are wondering if there are specific reasons for selecting only these areas instead of including general information related to the risks within the "Risk Profile" section since some narrative contents related to this section are required within the interim measures (For example, Ref. 22 d), Ref 22 e), Ref. 1.66 d)). We welcome minimization of deviations in structure of reports between the interim measures and final Solvency II guidelines with regard to same or similar content requirements.</p> <p>2) Since there aren't any specific references to the L3 guidelines (Final Report CP 11 and previous) in this new CP, we would like to receive some guidance on how undertakings should comply with the requirements. In fact, the majority of the information requested is consistent with the one described within the L3 guidelines, with the difference that the latter prescribed and expanded the nature of the information needed into more granular depth. That said, could you please confirm that undertakings, when developing the information requested herein, should take L3 guidelines into account? We believe that taking into consideration L3 at this stage could lead to additional unnecessary burden, so we suggest stating the relationship between L3 text and Interim Measures within the text in order to avoid misunderstanding or doubts.</p>	
1,63	Ref. 1.63 c): Please see comment on 1.60 (1). Additionally, we question why information on the compliance function is requested here with reference to the internal control system. We suggest removing this requirement from here and adding information on the key SII functions (i.e. risk management, actuarial, internal audit and compliance functions within the description of the overall System of Governance) in 1.60.	
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1,66	<p>1) Ref. 1.66 d: Could you please provide more explanations as to why qualitative and quantitative information/data regarding material specific risk at group level is requested in relation to the system of governance? Would it be more appropriate to ask how the undertaking deals with other material risks arising at group level through a perspective that is more "system of governance" oriented instead of a "pure risk management" one, i.e. similar to Ref. 1.60 c) to ask for providing information on the undertaking's risk management strategies, objectives, processes and reporting procedures for these material specific group risks, with an explanation how these are documented, monitored and enforced?</p> <p>2) Ref. 1.66 d: Could you please provide more explanation on what is meant by "quantitative information" since the nature of the risks which have been recognized as group specific seem to be difficult to quantify? We kindly request if EIOPA could provide more guidance and examples on the risks at the level of the group that could be quantitatively treated.</p>	
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1,68	<p>TO BE NOTED: SECTION V STARTS WITH GUIDELINE 27 (REF.1.68) TO GUIDELINE 27 (REF. 1.69)_PLEASE PAY ATTENTION IN ORDER TO AVOID MISUNDERSTANDING OF COMMENTS</p> <p>Ref. 1.68 b): Potential repetition based on the information included within the quantitative template OF. We question which kind of information is expected here? Is more or different quantitative information being requested here in comparison with the data included within the templates? We kindly ask for more guidance on how to deal with quantitative/qualitative information in order to enhance comparability and convergence among undertakings.</p>	
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1.70	<p>TO BE NOTED: SECTION VI STARTS WITH GUIDELINE 28 (REF.1.70) TO GUIDELINE 32 (REF. 1.77)_PLEASE PAY ATTENTION IN ORDER TO AVOID MISUNDERSTANDING OF COMMENTS</p> <p>1) Ref.1.70 a): We question if undertakings could use classes other than those used in the Solvency II balance sheet template (for example using classes which are mostly based on the function of the asset rather than only on its nature) during the interim phase, since it was foreseen within the L3 text (previous CP 11, Guideline 7). Despite the fact that including information on the function of the asset could be extremely useful for the NCA, we are wondering if a closer consistency with financial statements reporting (Local and IFRS) in certain countries could be reached.</p> <p>2) Ref. 1.70 b): We kindly ask for more guidance and examples on what kind of quantitative information is needed with regard to valuation basis, assumptions etc.</p>	
<b>Section V. General Comments</b>	We question if there was any specific reason why information, at least on internal processes and policies, on OF have not been foreseen, especially taking into account the fact that all the necessary quantitative data are already included within the QRT OF and they do not need to be repeated.	
1,71	<p>Ref. 1.71): We agree on the decision to not request the other requirements related to some of the corrective measures discussed within the LTGA assessment, that are</p> <p>"(i) any material changes in the relevant assumptions made in the calculation of technical provisions compared to the previous reporting period,</p> <p>(ii) where applicable, the counter-cyclical premiums applied in the calculation of technical provisions,</p> <p>(iii) where applicable, the matching premiums applied in the calculation of technical provisions."</p> <p>That said, we question if EIOPA envisages that any potential requirements of the ones stated above could be added before the first reporting during the interim phase is due.</p>	
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<b>Section VI. General Comments</b>		
1,73	Please see comments on 1.70	
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1,75	We question if there is a specific reason in requesting "strategic and undertaking-specific" information in relation to assets and liabilities (i.e. future management actions and policyholders behaviour), since almost the entirety of the information which is more "strategic and undertaking-specific" has not been selected as due during the preparatory phase. We feel that at this stage, since the majority of Solvency II requirements are not finalised yet, it would be more appropriate to address this kind of information in the undertaking's internal report on FLA (ORSA).	
1,76	Ref. 1.76 c-d): These two points should be better explained in terms of what is expected (e.g. quantitative/qualitative explanations, documentation of the assumptions) Could EIOPA provide undertakings with examples? Please consider describing into more depth what is expected in terms of content and consider the fact that few NCAs already ask for this kind of information (which may vary across Europe) within their jurisdiction.	
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<b>Section VII. General Comments</b>		
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<b>Section VIII. General Comments</b>		
1,82	It appears that according to this paragraph the solo and group narrative reporting needs to be submitted 20 weeks after the undertaking's financial year end. This is inconsistent with the reporting of quantitative information for groups where paragraph 1.81 grants an extra 6 weeks additional time for group reporting. Therefore, we suggest that the 6 weeks additional time for group reporting also applies to narrative reporting.	
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<b>Section IX. General Comments</b>		
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<b>Compliance and Reporting Rules General Comments</b>		
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<b>Technical Annex I General Comments</b>	Part of the information in "General comments" at the top of the log files (July 2012) is missing in Annexes I and II of the Consultation Paper. As this information is necessary for understanding how to fill	
BI-1		
BS-C1-2		
BS-C1-3		
BS-C1D-4		
AS-D1-5	<p>Compared to "General Comments" in the log file (July 2012) for AS-D1 QRT Annexes I and II of the Consultation Paper lack information on how to deal with loans and mortgages. We would welcome clarification from EIOPA whether the instructions in the log file (July 2012) for AS-D1 QRT with respect to loans and mortgages to individuals (one row for loans to senior management board and one row for everything else) also apply during the preparation phase.</p> <p>Furthermore, we would welcome clarification from EIOPA with regard to loans to non-individuals as this is not further specified in the log file and information in the EIOPA Final Comments of July 2012 ("Comments_template_QRT_Assets_final") is contradictory:</p> <ul style="list-style-type: none"> <li>- Comment 54 says that legal persons are individuals as well. This implies that in total there only have to be two lines for loans and mortgages since a legal person includes companies and corporations.</li> <li>- On the other hand, comment 921 states that loans to collective entities (corporates) have to be shown on a different basis from those to individuals.</li> </ul> <p>Therefore, we would welcome if EIOPA clarified terms such as individuals, legal persons, corporates and collective entities more precisely. Alternatively, EIOPA could provide another meaningful specification that clarifies whether a separate row is needed for every loan to non-individuals. It should be taken into account that terms such as legal persons differ from member state to member state and thus may lead to a different interpretation of this requirement, which would lead to distortions among insurers in different countries.</p>	
AS-D1-6		
AS-D20-7		
AS-D20-8		

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TP-F1-9	<p>Could you please confirm that our understanding of reporting requirements for the technical provisions templates is correct:</p> <p>2014 -&gt; Annual reporting of:  - TP-F1Q, TP-E1Q  - TP-F1, TP-E1 (only information w.r.t. best estimates by country)</p> <p>2015 -&gt; Annual reporting of:  - TP-F1, TP-E1 (only information w.r.t. best estimates by country)  - no annual reporting of TP-F1Q and TP-E1Q</p> <p>2015 -&gt; Quartlery reporting (3rd and 4th quarter) of  - TP-F1Q and TP-E1Q</p> <p>For insurers that only have business in their home country, reporting of TP-F1 and TP-E1 would not add value as this information is already included in TP-F1Q and TP-E1Q. Therefore, we suggest that insurers with business only in their home country be exempted from reporting TP-F1 and TP-E1 during the preraration phase.</p>	
TP-E1-10	<p>1) see comment in "TP-F1-9"</p> <p>2) Split of technical provisions among countries based on the localization of risk which is required for the following LoBs (Log File July 2012) might be diffucult. We would appreciate more exact guideline on localization of risk.</p> <ul style="list-style-type: none"> <li>- Medical expense</li> <li>- Income protection</li> <li>- Workers' compensation</li> <li>- Fire and other damage to property</li> <li>- Credit and suretyship</li> </ul> <p>The example is medical expense insurance. The extreme case might look like the following - Czech policyholder concluded policy in Austria with coverage in whole Europe, falls ill in Hungary, and is hospitalised in Slovakia. What would be the country under which the technical provision should be presented?</p>	
TP-F1Q-11	Please see comments in "TP-F1-9"	
TP-E1Q-12	Please see comments in "TP-F1-9"	
OF-B1Q-13		
SCR-B2A-14		
SCR-B2A-15		
SCR-B2B-16		
SCR-B2B-17		

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Name of Company:	Deloitte & Touche	
SCR-B2C-18		
SCR-B2C-19		
SCR-B3A-20		
SCR-B3A-21		
SCR-B3B-22		
SCR-B3B-23		
SCR-B3C-24		
SCR-B3C-25		
SCR-B3D-26		
SCR-B3D-27		
SCR-B3E-28		
SCR-B3E-29		
SCR-B3F-30		
SCR-B3F-31		
SCR-B3G-32		
SCR-B3G-33		
MCR-B4A-34		
MCR-B4B-35		
G01-36		
G03-37		
G03-38		
G03-39		
G04-40		
G14-41		
<b>Technical Annex II General Comments</b>		
<b>Technical Annex III General Comments</b>		
<b>BI - General Comments</b>		
BI- cell A1		
BI- cell A2		
BI- cell A3		
BI- cell A4		
BI- cell A5		
BI- cell A6	For the future "full" implementation of the Solvency II reporting (we are aware that for the interim phase the usage of USP is not envisaged), we suggest giving the opportunity to state whether the undertaking shall be applying for USP, other than for full/partial internal model or standard formula.	

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BI- cell A7	<p>Additionally to the information with regard to whether the undertaking is composite or non-composite the QRT may give the opportunity to state whether the solo-undertaking is an insurance/reinsurance and if it underwrites life, non life and /or health business (in context of LoBs).</p>	
BI- cell A8		
BI- cell A9		
BI- cell A10		
<b>BS-C1 - General Comment</b>	<p>1) In line with our previous comments, we would consider it useful to include a reconciliation between the statutory and Solvency II balance sheet, for material differences, as a standard in the annual reporting. However, we feel that to include this in quarterly reporting would place a disproportional burden on those territories which do not require quarterly GAAP or IFRS reporting. This reconciliation can be shown separately whereby the different items are detailed and explained. This may be particularly important for items which are valued at nil for Solvency II, but have a GAAP value, or vice-versa. We recognise that the material differences will be explained in the narrative reporting (RSR &amp; SFCR).</p> <p>2) It is currently unclear whether the investment lines (A4 - A14A) in the Solvency II balance sheet should include the full "dirty" market value of investments (ie including adjustments such as accrued interest) or whether they should show just the "clean" market value with no accrued interest or index linking. Both the clean and dirty price could be reconciled to the assets report D1; however, the IFRS value in the GAAP statutory accounts column here would show the clean value, since IFRS splits the accrued interest out separately. This is a further example of why a reconciliation between the GAAP and said balance sheets is important.</p> <p>3) The instructions often switch between referencing IFRS and referencing local GAAP. This could have a dysfunctional effect if undertakings report in local GAAP but must calculate IFRS values for their balance sheet for particular items. An example of this is in cell A2 which states that the value of deferred tax assets "should have a value if accounts are under IFRS", but also that they "may not have an accounting value under statutory accounts". If these assets are given an IFRS value here, it is inconsistent with the rest of the statutory accounts column for a GAAP reporting undertaking.</p> <p>4) Finally, we do not see why cells in the SII and Statutory Accounts columns have the same reference, whereas in the past they have been separated as distinct unique references (eg A1 and AS1, not A1 and A1).</p>	
BS-C1- cell AS1		
BS-C1- cell AS24		

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Name of Company:	Deloitte & Touche	
BS-C1- cell A2	<p>Specific instructions should be included here on whether the definition of an intangible asset, being "sold separately and the insurance and reinsurance undertaking can demonstrate that there is a market value for the same or similar assets", is in line with IFRS (IAS 38) requirements for recognition and valuation of an intangible asset. We recognise that the technical guidance refers to the revaluation method in IAS 38 as appropriate for valuing intangibles, however, this does not address the definition of an intangible and ability to recognise.</p> <p>For example, should the SII valuation require rights to future economic benefits and the control of an intangible asset?</p> <p>The presence of a market value for such an intangible asset could be that a potential acquirer has made a bid to purchase at a price, or could refer to a deeper, more liquid market, which is unlikely to exist, in our opinion.</p>	
BS-C1- cell A26		
BS-C1- cell A25B		
BS-C1- cell A3		
BS-C1- cell A4		
BS-C1- cell A5		
BS-C1- cell A6		
BS-C1- cell A7B		
BS-C1- cell A7		
BS-C1- cell A7A		
BS-C1- cell A8E		
BS-C1- cell A8		
BS-C1- cell A8A		
BS-C1- cell A8C		
BS-C1- cell A8D		
BS-C1- cell A9	<p>1) We welcome the removal of the requirement to use the "look-through" approach here to split the investments in funds down further into classes of assets.</p> <p>2) We would welcome it if this split of investments was also removed from the public disclosure template for the final implementation of Solvency II. The current version based on the July 2012 QRTs still contains the split of investments for public disclosure purposes.</p>	
BS-C1- cell A10A		
BS-C1- cell A10B		
BS-C1- cell A11		
BS-C1- cell A12		
BS-C1- cell A14		
BS-C1- cell A14B		
BS-C1- cell A14C		

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Name of Company:	Deloitte & Touche	
BS-C1- cell A14A		
BS-C1- cell A16		
BS-C1- cell A17A		
BS-C1- cell A17		
BS-C1- cell A18		
BS-C1- cell A19B		
BS-C1- cell A18A		
BS-C1- cell A19		
BS-C1- cell A19A		
BS-C1- cell A13		
BS-C1- cell A21		
BS-C1- cell A20		
BS-C1- cell A23		
BS-C1- cell A28A		
BS-C1- cell A28B		
BS-C1- cell A27		
BS-C1- cell A29		
BS-C1- cell A30		
BS-C1- cell LS0		
BS-C1- cell L1		
BS-C1- cell L1A	<p>For technical provisions and for those undertakings which report using IFRS valuation basis, the split between "whole", "best estimate" and "risk margin" could be included in the statutory accounts column also, with instructions to complete at a total level (as is currently the only option) until such a time as future GAAP may allow the split. This will future-proof the templates with a view to the BEL + margin approach of IFRS 4 phase II being phased in shortly after the assumed commencement date of Solvency II.</p> <p>This would leave the option for undertakings to complete these individual cells or to complete the total cell, depending on whether their current GAAP allows this - we recognise that this is likely to apply only to IFRS reporters, after the introduction of IFRS 4 phase II.</p> <p>We also suggest considering the opportunity to foresee two additional columns (IFRS and Local GAAP columns) other than the SII one in order to take into account potential differences/analogies/allowances between SII, IFRS and Local GAAP schemes with the option for insurers to complete only one column (IFRS or Local GAAP).</p> <p>This comment applies to all technical provisions cells here - L1A through to L12.</p>	



<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
BS-C1- cell L2	Please see comments for cell L1A	
BS-C1- cell L3	Please see comments for cell L1A	
BS-C1- cell L4	Please see comments for cell L1A	
BS-C1- cell L4A	Please see comments for cell L1A	
BS-C1- cell L5	Please see comments for cell L1A	
BS-C1- cell L6	Please see comments for cell L1A	
BS-C1- cell LS6F	Please see comments for cell L1A	
BS-C1- cell L6B	Please see comments for cell L1A	
BS-C1- cell L6C	Please see comments for cell L1A	
BS-C1- cell L6D	Please see comments for cell L1A	
BS-C1- cell L6E	Please see comments for cell L1A	
BS-C1- cell L7	Please see comments for cell L1A	
BS-C1- cell L7A	Please see comments for cell L1A	
BS-C1- cell L8	Please see comments for cell L1A	
BS-C1- cell L9	Please see comments for cell L1A	
BS-C1- cell L10	Please see comments for cell L1A	
BS-C1- cell L10A	Please see comments for cell L1A	
BS-C1- cell L11	Please see comments for cell L1A	
BS-C1- cell L12	Please see comments for cell L1A	
BS-C1- cell LS14		
BS-C1- cell L23		
BS-C1- cell L18		
BS-C1- cell L22		
BS-C1- cell L13		
BS-C1- cell L17		
BS-C1- cell L16		
BS-C1- cell L19		
BS-C1- cell L20		
BS-C1- cell L15A		
BS-C1- cell L15B		
BS-C1- cell L15C		
BS-C1- cell L15E		
BS-C1- cell L15D		
BS-C1- cell L26		
BS-C1- cell L25		
BS-C1- cell L25A		
BS-C1- cell L27		
<b>BS-C1D – General Comments</b>		
BS-C1D- cell A1		

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Name of Company:	Deloitte & Touche	
BS-C1D- cell B1		
BS-C1D- cell A3		
BS-C1D- cell A4	The formula in the instructions for this (A3 + A27 in BS-C1) item ignores loans and mortgages in A14 in BS-C1. In our opinion, these should be included in the formula. Therefore in our opinion the correct formula is A3 + A27 + A14 in BS-C1. We would welcome it if EIOPA could check the formula and amend if necessary.	
BS-C1D- cell A5		
BS-C1D- cell A5A		
BS-C1D- cell A6		
BS-C1D- cell A7		
BS-C1D- cell A7A		
BS-C1D- cell A8		
BS-C1D- cell A9		
BS-C1D- cell A10		
BS-C1D- cell A11		
BS-C1D- cell A12		
BS-C1D- cell A13		
BS-C1D- cell A14		
BS-C1D- cell A15		
<b>AS-D1- General Comment</b>		
AS-D1- cell A1		
AS-D1- cell A2		
AS-D1- cell A3		
AS-D1- cell A4		
AS-D1- cell A5		
AS-D1- cell A6		
AS-D1- cell A7		
AS-D1- cell A8		
AS-D1- cell A9	In case the instructions from the general comment in the log file (see comment for Technical Annex I General Comments) are also valid during the preparatory phase, we would welcome clarification from EIOPA whether cells A9 (Issuer sector), A10 (Issuer group), and A11 (Issuer Country) need to be filled out for CIC 8 and 95. In our understanding, this is not the case since these items do not need to be reported on a line-by-line basis (according to the general comment in the log file) and a meaningful entry could thus not be provided. Therefore we would welcome if EIOPA, in line with description of other cells (for example cell A22 Quantity), could explicitly name those CICs for which cells A9, A10 and A11 are not applicable.	
AS-D1- cell A10	Please see comments in "As-D1-cell A9"	
AS-D1- cell A11	Please see comments in "As-D1-cell A9"	

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Name of Company:	Deloitte & Touche	
AS-D1- cell A12		
AS-D1- cell A13		
AS-D1- cell A15	<p>1) We would welcome feedback from EIOPA whether callable bonds (bonds that are solely equipped with the issuer option to redeem prior to its maturity date but are plain vanilla with respect to everything else) are to be classified as CIC 1 or 2 and not as CIC 5 (structured notes). In case of reply that undertakings have to decide this themselves based on the main risk features of callable bonds we would welcome more clarification from EIOPA on which criteria this classification should be based.</p> <p>2) We would welcome clarification from EIOPA to which CIC financial assets belong for which a price has been agreed on before the actual transaction date (pre-emptions). We believe that such financial assets belong to CIC 1 or 2 and not to CIC 5 (structured notes) as long as a separate fair value measurement of the embedded derivative (pre-emption) is not required for the Solvency II balance sheet.</p>	
AS-D1- cell A16		
AS-D1- cell A17		
AS-D1- cell A18		
AS-D1- cell A20		
AS-D1- cell A22		
AS-D1- cell A23		
AS-D1- cell A24		
AS-D1- cell A25		
AS-D1- cell A26		
AS-D1- cell A28		
AS-D1- cell A30		
AS-D1- cell A50		
<b>AS-D20- General Comments</b>		
AS-D20- cell A1		
AS-D20- cell A2		
AS-D20- cell A3		
AS-D20- cell A4		
AS-D20- cell A5		
AS-D20- cell A6		
AS-D20- cell A7		
AS-D20- cell A8		
AS-D20- cell A9		
AS-D20- cell A10		
AS-D20- cell A11		

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Name of Company:	Deloitte & Touche	
AS-D20- cell A13		
AS-D20- cell A14		
AS-D20- cell A15		
AS-D20- cell A16		
AS-D20- cell A17		
AS-D20- cell A19		
AS-D20- cell A20		
AS-D20- cell A21		
AS-D20- cell A22		
AS-D20- cell A23		
AS-D20- cell A24		
AS-D20- cell A25		
AS-D20- cell A26		
AS-D20- cell A27		
AS-D20- cell A28		
AS-D20- cell A29		
AS-D20- cell A31		
AS-D20- cell A32		
AS-D20- cell A33		
AS-D20- cell A34		
AS-D20- cell A35		
AS-D20- cell A50		
<b>TP-F1- General Comments</b>	<p>1) We would welcome more precise guideline on classification of complicated Life products, especially of those where unbundling is difficult or not possible, to LoBs. E.g. for products with possibility to invest in both unit-linked (UL) and guaranteed funds and with possible subsequent change to the proportion of those investments. In which category of the following LoBs - Insurance with profit participation, UL with/without O&amp;G, Other life insurance with /without O&amp;G - the products should be classified?</p> <p>2) Some clarification will ultimately be required, either from EIOPA or at a national level as several understandings can be observed regarding classification of products with certain guarantees (e.g. classification of the Best-Estimate related to GMDBs offered on unit-linked products).</p>	
TP-F1- cell J1,J2,J4,J6,J7,J9,J10,J12,J13,J14		
TP-F1- cell JA1,JA2,JA4,JA6,JA7,JA9,JA10,JA12,J A13,JA14		

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Name of Company:	Deloitte & Touche	
TP-F1- cell JE1,JE2,JE4,JE6,JE7,JE9,JE10,JE12,JE13,JE14		
TP-F1- cell JF1,JF2,JF4,JF6,JF7,JF9,JF10,JF12,JF13,JF14		
<b>TP-E1- General Comments</b>		
TP-E1- cells A43-L43		
TP-E1- cells A44-L44		
TP-E1- cells A45-L45		
TP-E1- cells A46-L46		
TP-E1- cells Q43-Q46		
<b>TP-F1Q- General Comments</b>		
TP-F1Q- cells A1		
TP-F1Q- cells A3	We suggest renaming this cell A2 instead of A3 to be consistent with cells E2 and F2.	
TP-F1Q- cells A5		
TP-F1Q- cells A6		
TP-F1Q- cells A7		
TP-F1Q- cells A7A		
TP-F1Q- cells A7B		
TP-F1Q- cells A7C		
TP-F1Q- cells A9		
TP-F1Q- cells A10		
TP-F1Q- cells A12		
TP-F1Q- cells A13		
TP-F1Q- cells A14		
TP-F1Q- cells B1		
TP-F1Q- cells B2		
TP-F1Q- cells B3		
TP-F1Q- cells B4		
TP-F1Q- cells B5		
TP-F1Q- cells B6		
TP-F1Q- cells B7		
TP-F1Q- cells B9		
TP-F1Q- cells B10		
TP-F1Q- cells B11		
TP-F1Q- cells B12		
TP-F1Q- cells B13		
TP-F1Q- cells B14		

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Name of Company:	Deloitte & Touche	
TP-F1Q- cells C1		
TP-F1Q- cells C2		
TP-F1Q- cells C3		
TP-F1Q- cells C4		
TP-F1Q- cells C5		
TP-F1Q- cells C6		
TP-F1Q- cells C7		
TP-F1Q- cells C9		
TP-F1Q- cells C10		
TP-F1Q- cells C11		
TP-F1Q- cells C12		
TP-F1Q- cells C13		
TP-F1Q- cells C14		
TP-F1Q- cells E1		
TP-F1Q- cells E2		
TP-F1Q- cells E4		
TP-F1Q- cells E6		
TP-F1Q- cells E7		
TP-F1Q- cells E9		
TP-F1Q- cells E10		
TP-F1Q- cells E12		
TP-F1Q- cells E13		
TP-F1Q- cells E14		
TP-F1Q- cells F1		
TP-F1Q- cells F2		
TP-F1Q- cells F4		
TP-F1Q- cells F6		
TP-F1Q- cells F7		
TP-F1Q- cells F9		
TP-F1Q- cells F10		
TP-F1Q- cells F12		
TP-F1Q- cells F13		
TP-F1Q- cells F14		

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Name of Company:	Deloitte & Touche	
<b>TP-E1Q- General Comments</b>	<p>Split of the reinsurance recoverables into the prescribed lines of business might be difficult. The insurers are able to conclude one reinsurance contract with cover for more than one LoB (e.g. one stop loss contract covering more LoBs). We would appreciate more exact guideline, how this kind of contracts should be split among the particular lines of business (LoBs).</p> <p>In Pillar 1 the calculation requirements for technical provisions are principle-based, not going into details. So basically the company can calculate the BE liabilities by any method that fits the principles (for example, reinsurance shall be applied, but it is up to the company to come up with a method of estimation of the reinsurance effect). Only in the end the company must be able to report the net liabilities in this split by LoB - and that's where further guidance from EIOPA or NCAs may be needed. Example: the insurer is covered by a stop-loss treaty reinsurance covering for example 3 LoBs:</p> <ul style="list-style-type: none"> <li>- Other motor (Casco),</li> <li>- Fire and property,</li> <li>- Accepted non-proportional property reinsurance.</li> </ul> <p>The stop-loss conditions say: if total losses from these LoBs (in total) exceed given limit, the excess will be covered by reinsurer.</p> <p>How shall the effect of this reinsurance be allocated to individual LoBs? Based on premium? Based on losses in each of the LoB? Based on other criteria?</p> <p>Split of the effect of some reinsurance treaties covering e.g. the above 3 LoBs and having a complex commission/profit sharing/reinstatement rules might also be difficult.</p>	
TP-E1Q- cells A1-P1		
TP-E1Q- cells Q1		
TP-E1Q- cells A5-P5		
TP-E1Q- cells A12-P12		
TP-E1Q- cells A13-P13		
TP-E1Q- cells Q5-Q13		
TP-E1Q- cells A14-P14		
TP-E1Q- cells A21-P21		
TP-E1Q- cells A22-P22		
TP-E1Q- cells Q14-Q22		
TP-E1Q- cells A23-P23		
TP-E1Q- cells A24-P24		
TP-E1Q- cells A25-P25		
TP-E1Q- cells Q23		
TP-E1Q- cells Q24		
TP-E1Q- cells Q25		

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Name of Company:	Deloitte & Touche	
TP-E1Q- cells A26-P26		
TP-E1Q- cells A27-P27		
TP-E1Q- cells A28-P28		
TP-E1Q- cells Q26		
TP-E1Q- cells Q27		
TP-E1Q- cells Q28		
<b>OF-B1Q – General Comments</b>	<p>Although compared with the log files in July 2012 some items have been clarified and unclear items have been left out of scope, we observe that the setup and definitions do not reflect a group consolidation perspective as will be required for insurance groups and many items will benefit greatly from added clarification in light of such group consolidation perspective. Therefore we welcome more guidance and explanations on OF items in light of the group consolidation perspective.</p>	
OF-B1Q- cell A1		
OF-B1Q- cell B1		
OF-B1Q- cell C1		
OF-B1Q- cell A1A		
OF-B1Q- cell C1A		
OF-B1Q- cell A2		
OF-B1Q- cell B2		
OF-B1Q- cell C2		
OF-B1Q- cell A3		
OF-B1Q- cell B3		
OF-B1Q- cell C3		
OF-B1Q- cell A4		
OF-B1Q- cell B4		
OF-B1Q- cell C4		
OF-B1Q- cell D4		
OF-B1Q- cell A5		
OF-B1Q- cell B5		
OF-B1Q- cell C5		
OF-B1Q- cell D5		
OF-B1Q- cell A6		
OF-B1Q- cell B6		
OF-B1Q- cell A7		
OF-B1Q- cell B7		
OF-B1Q- cell A8		
OF-B1Q- cell B8		
OF-B1Q- cell C8		
OF-B1Q- cell D8		



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Name of Company:	Deloitte & Touche	
OF-B1Q- cell A9		
OF-B1Q- cell B9		
OF-B1Q- cell C9		
OF-B1Q- cell D9		
OF-B1Q- cell A10		
OF-B1Q- cell B10		
OF-B1Q- cell C10		
OF-B1Q- cell D10		
OF-B1Q- cell A11		
OF-B1Q- cell B11		
OF-B1Q- cell C11		
OF-B1Q- cell D11		
OF-B1Q- cell A12		
OF-B1Q- cell B12		
OF-B1Q- cell A12A		
OF-B1Q- cell B12A		
OF-B1Q- cell A13		
OF-B1Q- cell B13		
OF-B1Q- cell C13		
OF-B1Q- cell D13		
OF-B1Q- cell A14		
OF-B1Q- cell B14		
OF-B1Q- cell C14		
OF-B1Q- cell D14		
OF-B1Q- cell A15		
OF-B1Q- cell D15		
OF-B1Q- cell A15A		
OF-B1Q- cell D15A		
OF-B1Q- cell A16		
OF-B1Q- cell B16		
OF-B1Q- cell B16A		
OF-B1Q- cell C16		
OF-B1Q- cell D16		
OF-B1Q- cell A17	All Minority Interest is included in Tier 1 unrestricted and so it is unclear why there is the option in the template to tier them. We suggest EIOPA either clarify why the option to tier is there or remove the ability to enter data in tiers other than Tier 1 unrestricted.	
OF-B1Q- cell B17	Please see comments in "OF-B1Q-cell A17"	
OF-B1Q- cell B17A	Please see comments in "OF-B1Q-cell A17"	
OF-B1Q- cell C17	Please see comments in "OF-B1Q-cell A17"	

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Name of Company:	Deloitte & Touche	
OF-B1Q- cell D17	Please see comments in "OF-B1Q-cell A17"	
OF-B1Q- cell A18		
OF-B1Q- cell B18		
OF-B1Q- cell B18A		
OF-B1Q- cell C18		
OF-B1Q- cell D18		
OF-B1Q- cell A19		
OF-B1Q- cell B19		
OF-B1Q- cell B19A		
OF-B1Q- cell C19		
OF-B1Q- cell D19		
OF-B1Q- cell B502		
OF-B1Q- cell A503	As all participations will be included in the investments line in the Balance Sheet their value will be included in the reconciliation reserve in the OF template. This is all tier 1 unrestricted and so the deduction should be made to the corresponding tier. It is therefore unclear why the option to tier is available. We suggest EIOPA either clarify why the option to tier is there or remove the ability to enter data in tiers other than Tier 1 unrestricted.	
OF-B1Q- cell B503	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell C503	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell D503	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell A603	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell B603	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell C603	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell D603	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell A604	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell B604	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell C604	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell D604	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell E604	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell A605	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell B605	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell C605	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell D605	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell E605	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell A606	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell B606	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell C606	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell D606	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell E606	Please see comments in "OF-B1Q-cell A503"	

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OF-B1Q- cell A607	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell B607	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell C607	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell D607	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell E607	Please see comments in "OF-B1Q-cell A503"	
OF-B1Q- cell A20		
OF-B1Q- cell B20		
OF-B1Q- cell B20A		
OF-B1Q- cell C20		
OF-B1Q- cell D20	The formula given in the instructions is $D20 = D4 + D8 + D9 + D13 + D15 + D16 - F502$ . However, cell F502 does not exist. We would welcome if EIOPA reviewed the formula and corrected it if necessary.	
OF-B1Q- cell A21		
OF-B1Q- cell B21		
OF-B1Q- cell B21A		
OF-B1Q- cell C21		
OF-B1Q- cell D21		
OF-B1Q- cell A42		
OF-B1Q- cell C42		
OF-B1Q- cell D42		
OF-B1Q- cell A43		
OF-B1Q- cell C43		
OF-B1Q- cell D43		
OF-B1Q- cell A44		
OF-B1Q- cell C44		
OF-B1Q- cell D44		
OF-B1Q- cell A46		
OF-B1Q- cell B46		
OF-B1Q- cell C46		
OF-B1Q- cell D46		
OF-B1Q- cell E46		
OF-B1Q- cell A47		
OF-B1Q- cell B47		
OF-B1Q- cell C47		
OF-B1Q- cell D47		
OF-B1Q- cell A50		
OF-B1Q- cell B50	The formula given is $B50 = B46$ . This does not take into account that own funds cannot be negative. In our opinion the correct formula should therefore be $B50 = \max(B46, 0)$ . We would welcome if EIOPA reviewed the formula and corrected it if necessary.	

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Name of Company:	Deloitte & Touche	
OF-B1Q- cell C50	The formula given is $C50 = \max(0, \min(B50 * 0.25, C46))$ . In our opinion the correct formula should be $C50 = \max(0, \min(B50 * 0.2, C46))$ . We would welcome if EIOPA reviewed the formula and corrected it if necessary.	
OF-B1Q- cell D50	The formula given is $D50 = \max(0, \min(0.5 * A52, ((C46 - C50) + (D46))))$ . In our opinion the correct formula should be $\max(0, \min(B50 + C50, 0.5 * A52, (C46 - C50 + D46)))$ to take account of all tier limits. We would welcome if EIOPA reviewed the formula and corrected it if necessary.	
OF-B1Q- cell E50	The formula given is $E50 = \max(0, \min(((0.5 * A52) - D50), 0.15 * A52, (E46)))$ . In our opinion the correct formula should be $E50 = \max(0, \min(0.15 / 0.85 * (B50 + C50 + D50); B50 + C50 - D50; 0.15 * A52; \text{Sum}(0.5 * A52, -D50), \text{Sum}(D46, -D50, E46)))$ to take account of all tier limits. We would welcome if EIOPA reviewed the formula and corrected it if necessary.	
OF-B1Q- cell A51		
OF-B1Q- cell B51		
OF-B1Q- cell C51		
OF-B1Q- cell D51	The formula given is $D51 = \text{Max}(0, \min(0.2 * A53, ((C46 - C51) + (D46))))$ . In our opinion the correct formula should be $D51 = \max(0, \min(0.25 * (B51 + C51), 0.2 * A53, C47 - C51 + D47))$ . We would welcome if EIOPA reviewed the formula and corrected it if necessary.	
OF-B1Q- cell A52	<p>1) We would welcome clarification from EIOPA whether the total SCR including Add-on (Item A20 in SCR-B2A ) or excluding Add-on (Item A18 in SCR-B2A "Amount of the total diversified SCR before any capital add-on") is to be reported here.</p> <p>2) There appears to be a typing error in the instructions to this data cell. Reference is made to template SCR B3C for the SCR of the full internal model, but we believe it should be made to SCR B2C. We would welcome if EIOPA reviewed and corrected this, if necessary.</p>	
OF-B1Q- cell A53		
OF-B1Q- cell A45		
OF-B1Q- cell A45A	For a sponsor backed IOPR in the UK the SII balance sheet already includes any pension deficit or surplus via consolidation. Thus, no separate value for pension scheme own funds exists. We suggest that EIOPA confirm that for this scenario pension scheme own funds would not be disclosed here.	
OF-B1Q- cell A45B		
OF-B1Q- cell A45C		
OF-B1Q- cell A45D		
OF-B1Q- cell B45D		
OF-B1Q- cell C45D		
OF-B1Q- cell D45D		
OF-B1Q- cell E45D		
OF-B1Q- cell A45E		
OF-B1Q- cell B45E		

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Name of Company:	Deloitte & Touche	
OF-B1Q- cell C45E		
OF-B1Q- cell D45E		
OF-B1Q- cell E45E		
OF-B1Q- cell A48		
OF-B1Q- cell B48		
OF-B1Q- cell C48		
OF-B1Q- cell D48		
OF-B1Q- cell E48		
OF-B1Q- cell A49		
OF-B1Q- cell B49		
OF-B1Q- cell C49		
OF-B1Q- cell D49		
OF-B1Q- cell A50A		
OF-B1Q- cell B50A		
OF-B1Q- cell C50A		
OF-B1Q- cell D50A		
OF-B1Q- cell E50A		
OF-B1Q- cell A51A		
OF-B1Q- cell B51A		
OF-B1Q- cell C51A		
OF-B1Q- cell D51A		
OF-B1Q- cell A52A	The formula refers to SCR template B2A, which is for firms applying standard formulas. For firms applying a full internal model this would need to be amended to refer to SCR template SCR_B2C.	
OF-B1Q- cell A53A	The formula refers to SCR template B2A, which is for firms applying standard formulas. For firms applying a full internal model this would need to be amended to refer to SCR template SCR_B2C.	
OF-B1Q- cell A53B		
OF-B1Q- cell B23		
OF-B1Q- cell B24		
OF-B1Q- cell B25		
OF-B1Q- cell B26		
OF-B1Q- cell B27		
OF-B1Q- cell B28		
OF-B1Q- cell B29		
OF-B1Q- cell B29A		
OF-B1Q- cell A30		
OF-B1Q- cell A31		
OF-B1Q- cell A32		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
<b>SCR - B2A - General Comment</b>	What is the purpose of the distinction between "N/A" and "N" for cell A30 (which is not applicable for the purpose of this CP)?	
SCR - B2A - cell A1		
SCR - B2A - cell B1		
SCR - B2A - cell A01		
SCR - B2A - cell A2		
SCR - B2A - cell B2		
SCR - B2A - cell A02		
SCR - B2A - cell A3		
SCR - B2A - cell B3		
SCR - B2A - cell A03		
SCR - B2A - cell A4		
SCR - B2A - cell B4		
SCR - B2A - cell A04		
SCR - B2A - cell A5		
SCR - B2A - cell B5		
SCR - B2A - cell A05		
SCR - B2A - cell A6		
SCR - B2A - cell B6		
SCR - B2A - cell A7		
SCR - B2A - cell B7		
SCR - B2A - cell A07		
SCR - B2A - cell A10		
SCR - B2A - cell B10		
SCR - B2A - cell A11		
SCR - B2A - cell A12		
SCR - B2A - cell A13		
SCR - B2A - cell A013		
SCR - B2A - cell A14A		
SCR - B2A - cell A14C		
SCR - B2A - cell A8		
SCR - B2A - cell A9		
SCR - B2A - cell A17		
SCR - B2A - cell A15		
SCR - B2A - cell A15A		
SCR - B2A - cell A15B		
SCR - B2A - cell A15C		
SCR - B2A - cell A16		
SCR - B2A - cell A18		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
SCR - B2A - cell A20		
SCR - B2A - cell A21		
SCR - B2A - cell A14B		
SCR - B2A - cell A14		
SCR - B2A - cell A11A		
SCR - B2A - cell A11B		
<b>SCR - B2B – General Comment</b>	What is the purpose of the distinction between "N/A" and "N" for cell A30 (which is not applicable for the purpose of this CP)?	
SCR - B2B- cell A1		
SCR - B2B- cell A1A		
SCR - B2B- cell A1B		
SCR - B2B- cell A1C		
SCR - B2B- cell B1		
SCR - B2B- cell C1		
SCR - B2B- cell B2		
SCR - B2B- cell C2		
SCR - B2B- cell B3		
SCR - B2B- cell C3		
SCR - B2B- cell B4		
SCR - B2B- cell C4		
SCR - B2B- cell B5		
SCR - B2B- cell B6		
SCR - B2B- cell B7		
SCR - B2B- cell C5		
SCR - B2B- cell C6		
SCR - B2B- cell B8		
SCR - B2B- cell B8AA		
SCR - B2B- cell B8A		
SCR - B2B- cell A11A		
SCR - B2B- cell A11B		
<b>SCR - B2C – General Comment</b>	What is the purpose of the distinction between "N/A" and "N" for cell A30 (which is not applicable for the purpose of this CP)?	
SCR - B2C- cell A1		
SCR - B2C- cell A1A		
SCR - B2C- cell A1B		
SCR - B2C- cell A1C		
SCR - B2C- cell B1		
SCR - B2C- cell C1		
SCR - B2C- cell B2		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
SCR - B2C- cell C2		
SCR - B2C- cell B3		
SCR - B2C- cell C3		
SCR - B2C- cell B4		
SCR - B2C- cell C4		
SCR - B2C- cell B5		
SCR - B2C- cell B6		
SCR - B2C- cell B7		
SCR - B2C- cell B7A		
SCR - B2C- cell B7B		
SCR - B2C- cell B7C		
SCR - B2C- cell B8		
SCR - B2C- cell B9		
SCR - B2C- cell B10		
SCR - B2C- cell B12		
SCR - B2C- cell B13		
SCR - B2C- cell C5		
SCR - B2C- cell C6		
SCR - B2C- cell B14		
SCR - B2C- cell B14AA		
SCR - B2C- cell B14A		
SCR - B2C- cell A11A		
SCR - B2C- cell A11B		
<b>SCR - B3A – General Comment</b>	What is the purpose of the distinction between "N/A" and "N" for cell A30 (which is not applicable for the purpose of this CP)?	
SCR - B3A – cell A00		
SCR - B3A – cell AA01		
SCR - B3A – cell AA02		
SCR - B3A – cell AA03		
SCR - B3A – cel A30		
SCR - B3A- cell C0		
SCR - B3A- cell D0		



<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>	<b>Deadline 19. Jun 13 12:00 CET</b>
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Name of Company:	Deloitte & Touche	
SCR - B3A- cell A1	<p>Need for clarification in the presence of several General Accounts (not RFF) of "assets sensitive to interest rate down shock" as we observe more than one understanding from insurers: (1) the General Accounts that are sensitive to that shock or (2) there is a need to identify within the General Account the assets that are sensitive to this shock.</p> <p>(1) can be complex to put in place within an automated reporting process as it implies to flag the General Accounts according to their sensitivities, which might change over years</p> <p>(2) might be meaningless given the complex interactions between assets and liabilities as well as between types of assets</p> <p>Comment applies to A1 - A21 and A1A - A21A</p>	
SCR - B3A- cell A2		
SCR - B3A- cell A1A		
SCR - B3A- cell A2A		
SCR - B3A- cell B1		
SCR - B3A- cell B2		
SCR - B3A- cell B1A		
SCR - B3A- cell B2A		
SCR - B3A- cell C1		
SCR - B3A- cell C2		
SCR - B3A- cell B1B		
SCR - B3A- cell B2B		
SCR - B3A- cell D1		
SCR - B3A- cell D2		
SCR - B3A- cell C3		
SCR - B3A- cell D3		
SCR - B3A- cell A4		
SCR - B3A- cell A4A		
SCR - B3A- cell B4		
SCR - B3A- cell B4A		
SCR - B3A- cell C4		
SCR - B3A- cell B4B		
SCR - B3A- cell D4		
SCR - B3A- cell A5		
SCR - B3A- cell B5		
SCR - B3A- cell A6		
SCR - B3A- cell B6		
SCR - B3A- cell A7		
SCR - B3A- cell B7		
SCR - B3A- cell A8		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
SCR - B3A- cell A8A		
SCR - B3A- cell B8		
SCR - B3A- cell B8A		
SCR - B3A- cell C8		
SCR - B3A- cell B8B		
SCR - B3A- cell D8		
SCR - B3A- cell A9		
SCR - B3A- cell B9		
SCR - B3A- cell A10		
SCR - B3A- cell B10		
SCR - B3A- cell A11		
SCR - B3A- cell B11		
SCR - B3A- cell A12		
SCR - B3A- cell A12A		
SCR - B3A- cell B12		
SCR - B3A- cell B12A		
SCR - B3A- cell C12		
SCR - B3A- cell B12B		
SCR - B3A- cell D12		
SCR - B3A- cell C13		
SCR - B3A- cell D13		
SCR - B3A- cell A14		
SCR - B3A- cell A14A		
SCR - B3A- cell B14		
SCR - B3A- cell B14A		
SCR - B3A- cell C14		
SCR - B3A- cell B14B		
SCR - B3A- cell D14		
SCR - B3A- cell C15		
SCR - B3A- cell D15		
SCR - B3A- cell A16		
SCR - B3A- cell A16A		
SCR - B3A- cell B16		
SCR - B3A- cell B16A		
SCR - B3A- cell C16		
SCR - B3A- cell B16B		
SCR - B3A- cell D16		
SCR - B3A- cell A17		
SCR - B3A- cell A17A		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
SCR - B3A- cell B17		
SCR - B3A- cell B17A		
SCR - B3A- cell C17		
SCR - B3A- cell B17B		
SCR - B3A- cell D17		
SCR - B3A- cell A18		
SCR - B3A- cell A18A		
SCR - B3A- cell B18		
SCR - B3A- cell B18A		
SCR - B3A- cell C18		
SCR - B3A- cell B18B		
SCR - B3A- cell D18		
SCR - B3A- cell A19		
SCR - B3A- cell A19A		
SCR - B3A- cell C19		
SCR - B3A- cell D19		
SCR - B3A- cell A20		
SCR - B3A- cell A20A		
SCR - B3A- cell C20		
SCR - B3A- cell D20		
SCR - B3A- cell C22		
SCR - B3A- cell D22		
SCR - B3A- cell C23		
SCR - B3A- cell D23		
<b>SCR - B3B – General Comment</b>		
SCR - B3B – cell A00		
SCR - B3B – cell A001		
SCR - B3B – cell A30		
SCR - B3B – cell A10		
SCR - B3B- cell A1		
SCR - B3B- cell B1		
SCR - B3B- cell C0		
SCR - B3B- cell C1		
SCR - B3B- cell A2		
SCR - B3B- cell A3		
SCR - B3B- cell C3		
SCR - B3B- cell D4		
SCR - B3B- cell C4		
<b>SCR - B3C – General Comment</b>		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
SCR - B3C – cell A01		
SCR - B3C – cell A02		
SCR - B3C – cell A03		
SCR - B3C – cell A04		
SCR - B3C – cell A05		
SCR - B3C - cell A06		
SCR - B3C – cell A001		
SCR - B3C – cell A30		
SCR - B3C- cell A1	<p>Need for clarification in the presence of several guarantees backed by a General Account of "assets and liabilities subject to mortality risks" as we observe more than one understanding from insurers: (1) the General Account is taken as a whole even if backing guarantees sensitive to mortality and longevity or (2) there a need to separete the liabilities sensitive to mortality from the liabilities sensitive to longevity.</p> <p>(2) might be complex to perform as the calculation is likely to be made a the level of the portfolio and would require to allocate the assets to liabilities</p> <p>Comment applies to A1 - A9 and A1A - A9A</p>	
SCR - B3C- cell A1A		
SCR - B3C- cell B1		
SCR - B3C- cell B1A		
SCR - B3C- cell C1		
SCR - B3C- cell B1B		
SCR - B3C- cell D1		
SCR - B3C- cell A2		
SCR - B3C- cell A2A		
SCR - B3C- cell B2		
SCR - B3C- cell B2A		
SCR - B3C- cell C2		
SCR - B3C- cell B2B		
SCR - B3C- cell D2		
SCR - B3C- cell A3		
SCR - B3C- cell A3A		
SCR - B3C- cell B3		
SCR - B3C- cell B3A		
SCR - B3C- cell C3		
SCR - B3C- cell B3B		
SCR - B3C- cell D3		
SCR - B3C- cell C04		
SCR - B3C- cell D04		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
SCR - B3C- cell A4		
SCR - B3C- cell A4A		
SCR - B3C- cell B4		
SCR - B3C- cell B4A		
SCR - B3C- cell C4		
SCR - B3C- cell B4B		
SCR - B3C- cell D4		
SCR - B3C- cell A5		
SCR - B3C- cell A5A		
SCR - B3C- cell B5		
SCR - B3C- cell B5A		
SCR - B3C- cell C5		
SCR - B3C- cell B5B		
SCR - B3C- cell D5		
SCR - B3C- cell A6		
SCR - B3C- cell A6A		
SCR - B3C- cell B6		
SCR - B3C- cell B6A		
SCR - B3C- cell C6		
SCR - B3C- cell B6B		
SCR - B3C- cell D6		
SCR - B3C- cell A7		
SCR - B3C- cell A7A		
SCR - B3C- cell B7		
SCR - B3C- cell B7A		
SCR - B3C- cell C7		
SCR - B3C- cell B7B		
SCR - B3C- cell D7		
SCR - B3C- cell A8		
SCR - B3C- cell A8A		
SCR - B3C- cell B8		
SCR - B3C- cell B8A		
SCR - B3C- cell C8		
SCR - B3C- cell B8B		
SCR - B3C- cell D8		
SCR - B3C- cell A9		
SCR - B3C- cell A9A		
SCR - B3C- cell B9		
SCR - B3C- cell B9A		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
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		
<b>SCR - B3D – General Comment</b>		
SCR - B3D – cell A01		
SCR - B3D – cell A02		
SCR - B3D – cell A03		
SCR - B3D – cell A04		
SCR - B3D – cell A05		
SCR - B3C – cell A001		
SCR - B3C – cell A30		
SCR - B3D- cell A1		
SCR - B3D- cell A1A		
SCR - B3D- cell B1		
SCR - B3D- cell B1A		
SCR - B3D- cell C1		
SCR - B3D- cell B1B		
SCR - B3D- cell D1		
SCR - B3D- cell A2		
SCR - B3D- cell A2A		
SCR - B3D- cell B2		
SCR - B3D- cell B2A		
SCR - B3D- cell C2		
SCR - B3D- cell B2B		
SCR - B3D- cell D2		
SCR - B3D- cell A3		
SCR - B3D- cell A3A		
SCR - B3D- cell B3		
SCR - B3D- cell B3A		
SCR - B3D- cell C3		
SCR - B3D- cell B3B		
SCR - B3D- cell D3		
SCR - B3D- cell C04		
SCR - B3D- cell D04		
SCR - B3D- cell A4		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
SCR - B3D- cell A4A		
SCR - B3D- cell B4		
SCR - B3D- cell B4A		
SCR - B3D- cell C4		
SCR - B3D- cell B4B		
SCR - B3D- cell D4		
SCR - B3D- cell A5		
SCR - B3D- cell A5A		
SCR - B3D- cell B5		
SCR - B3D- cell B5A		
SCR - B3D- cell C5		
SCR - B3D- cell B5B		
SCR - B3D- cell D5		
SCR - B3D- cell A6		
SCR - B3D- cell A6A		
SCR - B3D- cell B6		
SCR - B3D- cell B6A		
SCR - B3D- cell C6		
SCR - B3D- cell B6B		
SCR - B3D- cell D6		
SCR - B3D- cell A7		
SCR - B3D- cell A7A		
SCR - B3D- cell B7		
SCR - B3D- cell B7A		
SCR - B3D- cell C7		
SCR - B3D- cell B7B		
SCR - B3D- cell D7		
SCR - B3D- cell A8		
SCR - B3D- cell A8A		
SCR - B3D- cell B8		
SCR - B3D- cell B8A		
SCR - B3D- cell C8		
SCR - B3D- cell B8B		
SCR - B3D- cell D8		
SCR - B3D- cell C9		
SCR - B3D- cell D9		
SCR - B3D- cell C10		
SCR - B3D- cell D10		
SCR - B3D- cell C12		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
SCR - B3D- cell D12		
SCR - B3D- cell E12		
SCR - B3D- cell F12		
SCR - B3D- cell C13		
SCR - B3D- cell D13		
SCR - B3D- cell E13		
SCR - B3D- cell F13		
SCR - B3D- cell C14		
SCR - B3D- cell D14		
SCR - B3D- cell E14		
SCR - B3D- cell F14		
SCR - B3D- cell C15		
SCR - B3D- cell D15		
SCR - B3D- cell E15		
SCR - B3D- cell F15		
SCR - B3D- cell A16		
SCR - B3D- cell F16		
SCR - B3D- cell A17		
SCR - B3D- cell A18		
SCR - B3D- cell A18A		
SCR - B3D- cell B18		
SCR - B3D- cell B18B		
SCR - B3D- cell D18		
SCR - B3D- cell D19		
SCR - B3D- cell D20		
SCR - B3D- cell B21		
SCR - B3D- cell A21		
SCR - B3D- cell B22		
SCR - B3D- cell A22		
SCR - B3D- cell B23		
SCR - B3D- cell A23		
SCR - B3D- cell B24		
SCR - B3D- cell A24		
SCR - B3D- cell B25		
SCR - B3D- cell A25		
SCR - B3D- cell B26		
SCR - B3D- cell A26		
SCR - B3D- cell B27		
SCR - B3D- cell A27		



<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
<b>SCR - B3E - General Comment</b>		
SCR - B3E- cell A001		
SCR - B3E- cell A30		
SCR - B3E- cell C1		
SCR - B3E- cell D1		
SCR - B3E- cell E1		
SCR - B3E- cell F1		
SCR - B3E- cell C2		
SCR - B3E- cell D2		
SCR - B3E- cell E2		
SCR - B3E- cell F2		
SCR - B3E- cell C3		
SCR - B3E- cell D3		
SCR - B3E- cell E3		
SCR - B3E- cell F3		
SCR - B3E- cell C4		
SCR - B3E- cell D4		
SCR - B3E- cell E4		
SCR - B3E- cell F4		
SCR - B3E- cell C5		
SCR - B3E- cell D5		
SCR - B3E- cell E5		
SCR - B3E- cell F5		
SCR - B3E- cell C6		
SCR - B3E- cell D6		
SCR - B3E- cell E6		
SCR - B3E- cell F6		
SCR - B3E- cell C7		
SCR - B3E- cell D7		
SCR - B3E- cell E7		
SCR - B3E- cell F7		
SCR - B3E- cell C8		
SCR - B3E- cell D8		
SCR - B3E- cell E8		
SCR - B3E- cell F8		
SCR - B3E- cell C9		
SCR - B3E- cell D9		
SCR - B3E- cell E9		
SCR - B3E- cell F9		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
SCR - B3E- cell C10		
SCR - B3E- cell D10		
SCR - B3E- cell E10		
SCR - B3E- cell F10		
SCR - B3E- cell C11		
SCR - B3E- cell D11		
SCR - B3E- cell E11		
SCR - B3E- cell F11		
SCR - B3E- cell C12		
SCR - B3E- cell D12		
SCR - B3E- cell E12		
SCR - B3E- cell F12		
SCR - B3E- cell A13		
SCR - B3E- cell F13		
SCR - B3E- cell A14		
SCR - B3E- cell A15		
SCR - B3E- cell A15A		
SCR - B3E- cell B15		
SCR - B3E- cell B15A		
SCR - B3E- cell C15		
SCR - B3E- cell A16		
SCR - B3E- cell A17		
SCR - B3E- cell A18		
<b>SCR - B3F – General Comment</b>		
SCR - B3F- cell A1		
SCR - B3F- cell A2-A6		
SCR - B3F- cell A7		
SCR - B3F- cell B1		
SCR - B3F- cell B2-B6		
SCR - B3F- cell B7		
SCR - B3F- cell C1		
SCR - B3F- cell C2-C6		
SCR - B3F- cell C7		
SCR - B3F- cell A8		
SCR - B3F- cell B8		
SCR - B3F- cell C8		
SCR - B3F- cell A9		
SCR - B3F- cell A10-A15		
SCR - B3F- cell A16		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
SCR - B3F- cell B9		
SCR - B3F- cell B10-B15		
SCR - B3F- cell B16		
SCR - B3F- cell C9		
SCR - B3F- cell C10-C15		
SCR - B3F- cell C16		
SCR - B3F- cell A17		
SCR - B3F- cell A18		
SCR - B3F- cell B17		
SCR - B3F- cell B18		
SCR - B3F- cell C17		
SCR - B3F- cell C18		
SCR - B3F- cell A19		
SCR - B3F- cell A20		
SCR - B3F- cell A21		
SCR - B3F- cell B19		
SCR - B3F- cell B20		
SCR - B3F- cell B21		
SCR - B3F- cell C19		
SCR - B3F- cell C20		
SCR - B3F- cell C21		
SCR - B3F- cell A22		
SCR - B3F- cell A23-A25		
SCR - B3F- cell A26		
SCR - B3F- cell B22		
SCR - B3F- cell B23-B25		
SCR - B3F- cell B26		
SCR - B3F- cell C22		
SCR - B3F- cell C23-C25		
SCR - B3F- cell C26		
SCR - B3F- cell AA1-AA20		
SCR - B3F- cell AA21		
SCR - B3F- cell AA22-AA35		
SCR - B3F- cell AA36		
SCR - B3F- cell AA37		
SCR - B3F- cell AB1-AB20		
SCR - B3F- cell AB21		
SCR - B3F- cell AB22-AB35		
SCR - B3F- cell AB36		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
SCR - B3F- cell AB37		
SCR - B3F- cell AC1-AC20		
SCR - B3F- cell AC21		
SCR - B3F- cell AD1-AD20		
SCR - B3F- cell AD21		
SCR - B3F- cell AE1-AE20		
SCR - B3F- cell AF1-AF20		
SCR - B3F- cell AF21		
SCR - B3F- cell AF36		
SCR - B3F- cell AF37		
SCR - B3F- cell AF38		
SCR - B3F- cell AF39		
SCR - B3F- cell AG1-AG20		
SCR - B3F- cell AG21		
SCR - B3F- cell AG36		
SCR - B3F- cell AG37		
SCR - B3F- cell AH1-AH20		
SCR - B3F- cell AH21		
SCR - B3F- cell AH36		
SCR - B3F- cell AH37		
SCR - B3F- cell AI1-AI20		
SCR - B3F- cell AI21		
SCR - B3F- cell AI36		
SCR - B3F- cell AI37		
SCR - B3F- cell AI38		
SCR - B3F- cell AI39		
SCR - B3F- cell BA1-BA20		
SCR - B3F- cell BA21		
SCR - B3F- cell BA22-BA35		
SCR - B3F- cell BA36		
SCR - B3F- cell BA37		
SCR - B3F- cell BB1-BB20		
SCR - B3F- cell BB21		
SCR - B3F- cell BB22-BB35		
SCR - B3F- cell BB36		
SCR - B3F- cell BB37		
SCR - B3F- cell BC1-BC20		
SCR - B3F- cell BC21		
SCR - B3F- cell BD1-BD20		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
SCR - B3F- cell BD21		
SCR - B3F- cell BE1-BE20		
SCR - B3F- cell BE21		
SCR - B3F- cell BE36		
SCR - B3F- cell BE37		
SCR - B3F- cell BE38		
SCR - B3F- cell BE39		
SCR - B3F- cell BF1-BF20		
SCR - B3F- cell BF21		
SCR - B3F- cell BF36		
SCR - B3F- cell BF37		
SCR - B3F- cell BG1-BG20		
SCR - B3F- cell BG21		
SCR - B3F- cell BG36		
SCR - B3F- cell BG37		
SCR - B3F- cell BH1-BH20		
SCR - B3F- cell BH21		
SCR - B3F- cell BH36		
SCR - B3F- cell BH37		
SCR - B3F- cell BH38		
SCR - B3F- cell BH39		
SCR - B3F- cell CA1-CA14		
SCR - B3F- cell CA15		
SCR - B3F- cell CA16-CA29		
SCR - B3F- cell CA30		
SCR - B3F- cell CA31		
SCR - B3F- cell CB1-CB14		
SCR - B3F- cell CB15		
SCR - B3F- cell CB16-CB29		
SCR - B3F- cell CB30		
SCR - B3F- cell CB31		
SCR - B3F- cell CC1-CC14		
SCR - B3F- cell CC15		
SCR - B3F- cell CD1-CD14		
SCR - B3F- cell CD15		
SCR - B3F- cell CE1-CE14		
SCR - B3F- cell CF1-CF14		
SCR - B3F- cell CF15		
SCR - B3F- cell CF30		

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Name of Company:	Deloitte & Touche	
SCR - B3F- cell CF31		
SCR - B3F- cell CF32		
SCR - B3F- cell CF33		
SCR - B3F- cell CG1-CG14		
SCR - B3F- cell CG15		
SCR - B3F- cell CG30		
SCR - B3F- cell CG31		
SCR - B3F- cell CH1-CH14		
SCR - B3F- cell CH15		
SCR - B3F- cell CH30		
SCR - B3F- cell CH31		
SCR - B3F- cell CI1-CI14		
SCR - B3F- cell CI15		
SCR - B3F- cell CI30		
SCR - B3F- cell CI31		
SCR - B3F- cell CI32		
SCR - B3F- cell CI33		
SCR - B3F- cell DA1-DA9		
SCR - B3F- cell DA10		
SCR - B3F- cell DA11-DA24		
SCR - B3F- cell DA25		
SCR - B3F- cell DA26		
SCR - B3F- cell DB1-DB9		
SCR - B3F- cell DB10		
SCR - B3F- cell DB11-DB24		
SCR - B3F- cell DB25		
SCR - B3F- cell DB26		
SCR - B3F- cell DC1-DC9		
SCR - B3F- cell DC10		
SCR - B3F- cell DD1-DD9		
SCR - B3F- cell DD10		
SCR - B3F- cell DE1-DE9		
SCR - B3F- cell DF1-DF9		
SCR - B3F- cell DF10		
SCR - B3F- cell DF25		
SCR - B3F- cell DF26		
SCR - B3F- cell DF27		
SCR - B3F- cell DF28		
SCR - B3F- cell DG1-DG9		

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Name of Company:	Deloitte & Touche	
SCR - B3F- cell DG10		
SCR - B3F- cell DG25		
SCR - B3F- cell DG26		
SCR - B3F- cell DH1-DH9		
SCR - B3F- cell DH10		
SCR - B3F- cell DH25		
SCR - B3F- cell DH26		
SCR - B3F- cell DI1-DI9		
SCR - B3F- cell DI10		
SCR - B3F- cell DI25		
SCR - B3F- cell DI26		
SCR - B3F- cell DI27		
SCR - B3F- cell DI28		
SCR - B3F- cell EA1		
SCR - B3F- cell EB1		
SCR - B3F- cell EC1		
SCR - B3F- cell ED1		
SCR - B3F- cell EE1		
SCR - B3F- cell EE2		
SCR - B3F- cell EE3		
SCR - B3F- cell EF1		
SCR - B3F- cell EG1		
SCR - B3F- cell EH1		
SCR - B3F- cell EH2		
SCR - B3F- cell EH3		
SCR - B3F- cell FA1		
SCR - B3F- cell FB1		
SCR - B3F- cell FC1		
SCR - B3F- cell FD1		
SCR - B3F- cell FE1		
SCR - B3F- cell GA1		
SCR - B3F- cell GA2		
SCR - B3F- cell GA3		
SCR - B3F- cell GA4		
SCR - B3F- cell GA5		
SCR - B3F- cell GA6		
SCR - B3F- cell HA1		
SCR - B3F- cell HB1		
SCR - B3F- cell HC1		

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Name of Company:	Deloitte & Touche	
SCR - B3F- cell HD1		
SCR - B3F- cell HE1		
SCR - B3F- cell HF1		
SCR - B3F- cell HG1		
SCR - B3F- cell HH1		
SCR - B3F- cell HA2-HE2		
SCR - B3F- cell HF2		
SCR - B3F- cell HG2		
SCR - B3F- cell HH2		
SCR - B3F- cell HI2		
SCR - B3F- cell HJ2		
SCR - B3F- cell HA3		
SCR - B3F- cell HB3		
SCR - B3F- cell HC3		
SCR - B3F- cell HA4		
SCR - B3F- cell HB4		
SCR - B3F- cell HC4		
SCR - B3F- cell HA5		
SCR - B3F- cell HB5		
SCR - B3F- cell HC5		
SCR - B3F- cell IA1-IB1		
SCR - B3F- cell IC1		
SCR - B3F- cell ID1		
SCR - B3F- cell IE1		
SCR - B3F- cell IF1		
SCR - B3F- cell JA1		
SCR - B3F- cell JA2		
SCR - B3F- cell JA3		
SCR - B3F- cell JA4		
SCR - B3F- cell KA1-KE1		
SCR - B3F- cell KA2-KE2		
SCR - B3F- cell KA3-KE3		
SCR - B3F- cell KA4-KE4		
SCR - B3F- cell KA5-KE5		
SCR - B3F- cell KA6-KE6		
SCR - B3F- cell KA7-KE7		
SCR - B3F- cell KF1		
SCR - B3F- cell KF4		
SCR - B3F- cell KF5		



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Name of Company:	Deloitte & Touche	
SCR - B3F- cell KF6		
SCR - B3F- cell KF7		
SCR - B3F- cell KA8		
SCR - B3F- cell KB8		
SCR - B3F- cell KC8		
SCR - B3F- cell KA9		
SCR - B3F- cell KB9		
SCR - B3F- cell KC9		
SCR - B3F- cell KA10		
SCR - B3F- cell KB10		
SCR - B3F- cell KC10		
SCR - B3F- cell LA1-LB1		
SCR - B3F- cell LC1		
SCR - B3F- cell LA2-LB2		
SCR - B3F- cell LC2		
SCR - B3F- cell LA3-LB3		
SCR - B3F- cell LC3		
SCR - B3F- cell LA4-LB4		
SCR - B3F- cell LC4		
SCR - B3F- cell LA5-LB5		
SCR - B3F- cell LC5		
SCR - B3F- cell LA6-LB6		
SCR - B3F- cell LC6		
SCR - B3F- cell LA7		
SCR - B3F- cell LA8		
SCR - B3F- cell LA9		
SCR - B3F- cell LA10		
SCR - B3F- cell LA11		
SCR - B3F- cell LA12		
SCR - B3F- cell LB12		
SCR - B3F- cell LC12		
SCR - B3F- cell LA13		
SCR - B3F- cell LB13		
SCR - B3F- cell LC13		
SCR - B3F- cell LA14		
SCR - B3F- cell LB14		
SCR - B3F- cell LC14		
SCR - B3F- cell MA1-ME1		
SCR - B3F- cell MA2-ME2		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
SCR - B3F- cell MF2		
SCR - B3F- cell MG2		
SCR - B3F- cell MH2		
SCR - B3F- cell MF3		
SCR - B3F- cell MG3		
SCR - B3F- cell MH3		
SCR - B3F- cell MF4		
SCR - B3F- cell MG4		
SCR - B3F- cell MH4		
SCR - B3F- cell NA1,NC1,NE1,NG1,NI1		
SCR - B3F- cell NB1,ND1,NF1,NH1,NJ1	We would welcome more clarification with regard to the definition of benefits payable since it is not clear from Annex II guidance if benefits amount is the gross value of benefits or discounted value of	
SCR - B3F- cell NK1		
SCR - B3F- cell NK32		
SCR - B3F- cell NK33		
SCR - B3F- cell NK34		
SCR - B3F- cell NL1		
SCR - B3F- cell NL32		
SCR - B3F- cell NM1		
SCR - B3F- cell NM32		
SCR - B3F- cell NN1		
SCR - B3F- cell NN32		
SCR - B3F- cell NN33		
SCR - B3F- cell NN34		
SCR - B3F- cell OA1	We would welcome more clarification with regard to what constitutes "largest number of persons".	
SCR - B3F- cell OB1,OC1,OD1,OE1,OF1		
SCR - B3F- cell OG1		
SCR - B3F- cell OG21		
SCR - B3F- cell OG22		
SCR - B3F- cell OG23		
SCR - B3F- cell OH1		
SCR - B3F- cell OH21		
SCR - B3F- cell OI1		
SCR - B3F- cell OI21		
SCR - B3F- cell OJ1		
SCR - B3F- cell OJ21		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
SCR - B3F- cell OJ22		
SCR - B3F- cell OJ23		
SCR - B3F- cell PA21		
SCR - B3F- cell PB21	Please see comments on "SCR - B3F - Cell PC1"	
SCR - B3F- cell PC1	Reinsurance undertakings will need to develop systems to get policyholder level information, particularly when reinsurance undertaking accepts books by accepting bouquets of insurance. This could lead to disproportionately high costs for reinsurance undertakings for providing this information to regulators.	
SCR - B3F- cell PD1,PF1,PH1	Futher clarification is required whether the best estimate cost should be gross cost or discounted value of expected costs?	
SCR - B3F- cell PE1, PG1, PI1	Please see comments on "SCR - B3F - Cell PC1"	
SCR - B3F- cell PJ1		
SCR - B3F- cell PJ21		
SCR - B3F- cell PK21	Futher clarification is required if this includes any specific treaty reinsurance contracts or all should be specific facultative contracts.	
SCR - B3F- cell PL21		
SCR - B3F- cell PM21		
<b>SCR - B3G - General Comments</b>		
SCR - B3G- cell A30		
SCR - B3G- cell A1		
SCR - B3G- cell A2		
SCR - B3G- cell A3		
SCR - B3G- cell A4		
SCR - B3G- cell A5		
SCR - B3G- cell A6		
SCR - B3G- cell A7		
SCR - B3G- cell A8		
SCR - B3G- cell A9		
SCR - B3G- cell A10		
SCR - B3G- cell A11		
SCR - B3G- cell A12		
SCR - B3G- cell A13		
SCR - B3G- cell A14		
SCR - B3G- cell A15		
SCR - B3G- cell A16		
<b>MCR - B4A - General Comments</b>		
MCR - B4A- cell A1		
MCR - B4A- cell B2		
MCR - B4A- cell C2		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
MCR - B4A- cell B3		
MCR - B4A- cell C3		
MCR - B4A- cell B4		
MCR - B4A- cell C4		
MCR - B4A- cell B5		
MCR - B4A- cell C5		
MCR - B4A- cell B6		
MCR - B4A- cell C6		
MCR - B4A- cell B7		
MCR - B4A- cell C7		
MCR - B4A- cell B8		
MCR - B4A- cell C8		
MCR - B4A- cell B9		
MCR - B4A- cell C9		
MCR - B4A- cell B10		
MCR - B4A- cell C10		
MCR - B4A- cell B11		
MCR - B4A- cell C11		
MCR - B4A- cell B12		
MCR - B4A- cell C12		
MCR - B4A- cell B13		
MCR - B4A- cell C13		
MCR - B4A- cell B14		
MCR - B4A- cell C14		
MCR - B4A- cell B15		
MCR - B4A- cell C15		
MCR - B4A- cell B16		
MCR - B4A- cell C16		
MCR - B4A- cell B17		
MCR - B4A- cell C17		
MCR - B4A- cell A18		
MCR - B4A- cell B19		
MCR - B4A- cell B20		
MCR - B4A- cell B21		
MCR - B4A- cell B22		
MCR - B4A- cell C23		
MCR - B4A- cell A24		
MCR - B4A- cell A25		
MCR - B4A- cell A26		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
MCR - B4A- cell A27		
MCR - B4A- cell A28		
MCR - B4A- cell A29		
MCR - B4A- cell A30		
<b>MCR - B4B – General Comments</b>		
MCR - B4B- cell B1		
MCR - B4B- cell C1		
MCR - B4B- cell D2		
MCR - B4B- cell E2		
MCR - B4B- cell F2		
MCR - B4B- cell G2		
MCR - B4B- cell D3		
MCR - B4B- cell E3		
MCR - B4B- cell F3		
MCR - B4B- cell G3		
MCR - B4B- cell D4		
MCR - B4B- cell E4		
MCR - B4B- cell F4		
MCR - B4B- cell G4		
MCR - B4B- cell D5		
MCR - B4B- cell E5		
MCR - B4B- cell F5		
MCR - B4B- cell G5		
MCR - B4B- cell D6		
MCR - B4B- cell E6		
MCR - B4B- cell F6		
MCR - B4B- cell G6		
MCR - B4B- cell D7		
MCR - B4B- cell E7		
MCR - B4B- cell F7		
MCR - B4B- cell G7		
MCR - B4B- cell D8		
MCR - B4B- cell E8		
MCR - B4B- cell F8		
MCR - B4B- cell G8		
MCR - B4B- cell D9		
MCR - B4B- cell E9		
MCR - B4B- cell F9		
MCR - B4B- cell G9		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
MCR - B4B- cell D10		
MCR - B4B- cell E10		
MCR - B4B- cell F10		
MCR - B4B- cell G10		
MCR - B4B- cell D11		
MCR - B4B- cell E11		
MCR - B4B- cell F11		
MCR - B4B- cell G11		
MCR - B4B- cell D12		
MCR - B4B- cell E12		
MCR - B4B- cell F12		
MCR - B4B- cell G12		
MCR - B4B- cell D13		
MCR - B4B- cell E13		
MCR - B4B- cell F13		
MCR - B4B- cell G13		
MCR - B4B- cell D14		
MCR - B4B- cell E14		
MCR - B4B- cell F14		
MCR - B4B- cell G14		
MCR - B4B- cell D15		
MCR - B4B- cell E15		
MCR - B4B- cell F15		
MCR - B4B- cell G15		
MCR - B4B- cell D16		
MCR - B4B- cell E16		
MCR - B4B- cell F16		
MCR - B4B- cell G16		
MCR - B4B- cell D17		
MCR - B4B- cell E17		
MCR - B4B- cell F17		
MCR - B4B- cell G17		
MCR - B4B- cell B18		
MCR - B4B- cell C18		
MCR - B4B- cell D19		
MCR - B4B- cell F19		
MCR - B4B- cell D20		
MCR - B4B- cell F20		
MCR - B4B- cell D21		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Deloitte & Touche	
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		
<b>G01-General Comments</b>		
G01- cell A1		
G01- cell B1		
G01- cell C1		
G01- cell D1	<p>1) A closed list similar to that provided in the Log file of the July 2012 QRT set should be provided here.</p> <p>2) The aforementioned July 2012 closed list does not include Mixed Financial Holding Companies (MFHCs). We believe they should be included.</p> <p>3) Cell B1 of template G04 refers to a notional requirement for MFHCs, which reinforces the idea that they should be included in the closed list.</p>	
G01- cell E1		
G01- cell F1	<p>1) The order of cells F1 and G1 has been inverted in Technical Annex II, G01-L (ie, ... E1, G1, F1, ...).</p> <p>2) A closed list similar to that provided in the Log file of the July 2012 QRT set should be provided here.</p>	
G01- cell G1	Please see first comment for cell F1.	
G01- cell H1a	Information to be reported in cells H1a to H1c was contained in a single cell, H1, in the G01 template included in the July 2012 QRT set. Given that this split depends on the type of undertaking ((re)insurance /non-regulated /other regulated), which in turn is reported in cell D1, the split is not necessary and causes an additional burden to companies preparing their reporting systems.	
G01- cell H1b	Please see comment for cell H1a.	
G01- cell H1c	Please see comment for cell H1a.	

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
G01- cell I1a	<p>1) Information to be reported in cells I1a and I1b was contained in a single cell, I1, in the G01 template included in the July 2012 QRT set. Given that this split depends on the type of undertaking (insurance /other), which in turn is reported in cell D1, the split is not necessary and causes an additional burden to companies preparing their reporting systems.</p> <p>2) For cell I1a, "(re)insurers" would be preferred to "insurers" as both base their activity on writing premiums.</p>	
G01- cell I1b	<p>1) Please see the first comment for cell I1a.</p> <p>2)The instructions state that for other types of undertakings turn over defined as the gross revenue under IFRS or local GAAP is to be used here and for insurance holding companies where appropriate turnover defined as the gross revenue under IFRS or local GAAP. Can the group itself choose which definition of turn over or gross revenues to apply? The definition of turnover is not unambiguous depending on the sector of the undertaking (for example, building and loan associations) and will lead to different interpretations among market participants. We would thus welcome it if EIOPA or national authorities provided recommendations or examples of the IFRS or local GAAP figures to be used here for different types of undertakings.</p>	
G01- cell J1	<p>We would welcome further guidance concerning country specific characteristics of these performance figures. For instance, under local GAAP in Germany the underwriting performance for life insurers includes the investment performance whereas for nonlife insurers it is disclosed separately as "non-underwriting performance". EIOPA or national authorities should therefore clarify whether life insurers should</p> <ul style="list-style-type: none"> <li>- report underwriting performance as stated in the financial statement, which includes investment performance, and state the investment performance separately in cell K1. As a result, the total performance would not be the sum of the the underwriting and investment performance.</li> <li>- or adjust the underwriting performance by subtracting the investment performance. Then, the reported figure would deviate from the financial statement under local German GAAP.</li> </ul> <p>EIOPA or national authorities should provide guidance clarifying which figures should be employed here.</p>	
G01- cell K1		
G01- cell L1		
G01- cell M1		



<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
G01- cell N1	<p>The definition of the cell in the log has changed with respect to the July 2012 version in an attempt to correct a typo, but the new wording is not clear.</p> <p>- July 2012 log: "Percentage as defined by the consolidated account directive for the integration of consolidated undertakings into the consolidation which may differ from M1For full integration, minority interests should also be reported in the cell."</p> <p>- New log: "Percentage as defined by the consolidated account directive for the integration of consolidated undertakings into the consolidation which may differ from item M1 for full integration, minority interests should also be reported in this item."</p> <p>- Proposed: "Percentage as defined by the consolidated account directive for the integration of consolidated undertakings into the consolidation which may differ from item M1. For full integration, minority interests should also be reported in this item."</p>	
G01- cell O1		
G01- cell P1		
G01- cell Q1		
G01- cell R1	In our opinion the last sentence of the definition given in G01-L: "As stated in article 221 of Directive 2009/138/EC, the proportional share should be determined by the group supervisor." is not totally correct, as the proportional share can be determined without intervention of the group supervisor, except in those cases mentioned in article 221(2) of the Directive. We would welcome if EIOPA reviewed the sentence and corrected it if necessary.	
G01- cell S1		
G01- cell T1		
G01- cell U1	A closed list similar to that provided in the Log file of the July 2012 QRT set should be provided here.	
<b>G03 – General Comments</b>	We believe clarification is needed that the group currency should be used for this template in general, as stated in EIOPA's response to comment N <sup>o</sup> 111 included in the Summary of Comments on CP 009/2011.	
G03- cell A1		
G03- cell A2	We believe that the provided definition of ID code could be misleading, as it is very generic and may create confusion around what entities to report in this template. We would welcome if EIOPA reviewed the definition and formulated it more precisely.	

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
G03- cell B1	<p>1) Paragraph 1.51 (Guideline 14 – Solo quantitative annual information – Ring Fenced Funds) of the present CP states: "1.51. The information referred to in paragraphs n) to t) of Guideline 12 should comprise, separately, the solvency capital requirement regarding the Ring Fenced Fund with the biggest Solvency Capital Requirement and the Solvency Capital Requirement regarding the remaining part of the business of the undertaking." Paragraphs n) to t) refer, respectively, to the solo SCR-B3A to SCR-B3G templates. In the event an entity has a RFF, it has to report two QRTs per each of these paragraphs. Therefore, the definition of cell B1 in G03-L: "Solo SCR Market Risk for each entity as reported in solo SCR-B3A" should clarify what is understood by "as reported in solo SCR-B3A" when the entity has RFFs and more than one solo SCR-B3A QRT is reported.</p> <p>2) Under the current wording "Solo SCR Market Risk for each entity as reported in Solo SCR - B3A", we query if this same cell should be used in the event the entity has an internal model.</p>	
G03- cell B2	Please see comments for cell B1.	
G03- cell B3	Please see comments for cell B1.	
G03- cell B4	Please see comments for cell B1.	
G03- cell B5	Please see comments for cell B1.	
G03- cell B6	Please see comments for cell B1.	
G03- cell B7		
G03- cell C1		
G03- cell D1		
G03- cell F1		
G03- cell G1		
G03- cell H1		
G03- cell N1	We ask EIOPA to clarify what should be entered here, if no such local requirement exists for certain countries.	
G03- cell O1	We ask EIOPA to clarify what should be entered here, if no such local requirement exists for certain countries.	
G03- cell P1		
<b>G04 – General Comments</b>	<p>In our opinion clarification is needed on the type of entities included in the scope of this QRT. The definition given in paragraph 40 of this CP does not mention holding companies other than IHCS. However, cell B1 mentions:</p> <ul style="list-style-type: none"> <li>- Mixed Activity Holding Companies: no capital requirement (but if these companies were not required for this QRT, this would be redundant);</li> <li>- Mixed Financial Holding Companies: a notional capital requirement (are MFHCs required for this QRT or not?)</li> </ul>	
G04- cell A1		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Deloitte & Touche	
G04- cell A2	We believe that the provided definition of ID code could be misleading, as it is very generic and may create confusion around what entities to report in this template. We would welcome if EIOPA reviewed the definition and formulated it more precisely.	
G04- cell A3		
G04- cell B1	Please see General Comment for this QRT.	
G04- cell C1		
G04- cell D1		
G04- cell E1	In our opinion clarification is needed that the cell is intended to mean "eligible to meet the SCR (equivalent)", as stated in EIOPA's response to comment N° 207 included in the Summary of Comments on CP 009/2011.	
<b>G14- General Comments</b>	<p>1) A new definition seems to have been decided for this QRT. The July 2012 Summary document stated that the template should provide an overview of the TP across (re)insurance undertakings within the group. In the present CP paragraph 41 does not convey this same information, therefore we query whether this is still intended.</p> <p>Also, the July 2012 Summary specified that only method 1 or combination of methods were relevant for this QRT. Now method 2 is also included, and a column (S1) has been added to identify which method is applied.</p> <p>2) For cell R1, the name was changed in the new G14-L log file ("Total amount of TP (excluding IGT)") with respect to the July 2012 Log (Total of net contribution to Group TP ). However, this amendment is reflected neither in the template itself nor in paragraph 41 f) of this CP.</p> <p>We ask EIOPA for clarification whether these amendments are final ones and are to comply with in the final Solvency II regime or they are only valid during the preparation phase.</p>	
G14- cell A1	We believe that the provided definition of ID code could be misleading, as it is very generic and may create confusion around what entities to report in this template. We would welcome if EIOPA reviewed the definition and formulated it more precisely.	
G14- cell B1		
G14- cell S1	The first value of the closed list "Method 1 or combination of methods 1 and 2" makes sense at the level of the group. However it is required at the level of each individual entity included in the template, and it is not clear what is meant by "combination of methods" in this context. We ask EIOPA for clarification.	
G14- cell C1,F1,I1,L1,O1	Following the July 2012 log, we understand that these cells contain data gross of IGTs, gross of reinsurance. We ask EIOPA for clarification. If this is confirmed, we propose renaming these cells to "Amount of gross TP (gross of IGT)" for clarity.	
G14- cell D1,G1,J1,M1,P1	Following the July 2012 log, we understand that these cells contain data net of IGTs, gross of reinsurance ceded outside the group. We ask EIOPA for clarification. If this is confirmed, we propose renaming these cells to "Amount of gross TP (net of IGT)" for clarity.	

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
G14- cell E1,H1,K1,N1,Q1		
G14- cell R1	The name of the cell was changed in the new G14-L log file ("Total amount of TP (excluding IGT)") with respect to the July 2012 Log (Total of net contribution to Group TP ). However, this amendment is reflected neither in the template itself nor in paragraph 41 f) of this CP. We ask EIOPA for clarification and if necessary amendment.	
<b>Technical Annex IV General Comments</b>		
<b>Technical Annex V General Comments</b>		
<b>Technical Annex VI General Comments</b>		
<b>Technical Annex VII General Comments</b>		
CAS1		
CAS2		
CAS3		
CAS4	The formula stated in the assertion is $BS\_C1.A3 + BS\_C1.A27 + BS\_C1.A14 + BS\_C1.A14A = \text{sum}(BS\_C1D.A4[CUR])$ . In our opinion the correct formula should be $BS\_C1.A3 + BS\_C1.A27 + BS\_C1.A14 = \text{sum}(BS\_C1D.A4[CUR])$ , where $BS\_C1.A14 = BS\_C1.A14A + BS\_C1.A14B + BS\_C1.A14C$ . We would welcome if EIOPA reviewed the formula and corrected it if necessary.	
CAS5		
CAS6		
CAS7		
CAS8		
CAS9		
CAS10		
CAS11		
CAS12		
CAS13		
CAS14		
CAS15		
CAS16		
CAS17		
CAS18		
CAS19		
CAS20		
CAS21		
CAS22		
CAS23		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
CAS24		
CAS25		
CAS26		
CAS27		
CAS28		
CAS29		
CAS30		
CAS31		
CAS32		
CAS33	<p>We believe there are two data checks missing. We propose including the following two assertions:            BS_C1.L10A =TP_F1Q_A3            BS_C1.L12 = TP_F1Q_E2            We would welcome if EIOPA reviewed the checks and amended it if necessary.</p>	
CAS34	<p>1) We aks EIOPA to confirm whether TP_F1Q.A1[LOB:LB32] is the same as TP_F1Q.A10 + TP_F1Q.A12 + TP_F1Q.A13.</p> <p>2) Furthermore we ask EIOPA for feedback why this notation is used and not the reference to the cells in the usual way as this notation is more confusing. We therefore suggest addressing the cells with their common codes such as TP_F1Q.A10 and not TP_F1Q.A1[LOB:LB32]. Furthermore, we ask EIOPA for explanation why this notation is used for the life templates only and not for the non-life templates? There is also another risk of confusion as LOB:LB26 does not refer to line of business 26 (Non-proportional casualty reinsurance), in the annexes of the LTGA, but is defined as "Lines of business for life obligations" on page 245 of the Consultation Paper, which can easily be overseen.</p>	
CAS35	Please see comment for CAS34	
CAS36	Please see comment for CAS34	
CAS37	Please see comment for CAS34	
CAS38	Please see comment for CAS34	
CAS39		
CAS40		
CAS41		
CAS42		
CAS43		
CAS44		
CAS45		
CAS46		
CAS47		
CAS48		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Deloitte & Touche	
CAS49		
CAS50		
CAS51		
CAS52		
CAS53		
CAS54		
CAS55		
CAS56		
CAS57		
CAS58		
CAS59	<p>We believe the current formula does not capture well the case in which the TPs in MCR_B4A and TP_E1Q sheets will be both positive but of different values. We would rather change the formula in the following way:  <math>MCR\_B4A.B2 = \max(0; TP\_E1Q.A24)</math>.  We would welcome if EIOPA reviewed the formula and amended it if necessary.</p>	
CAS60	Pease see comment for CAS 59.	
CAS61	Pease see comment for CAS 59.	
CAS62	Pease see comment for CAS 59.	
CAS63	Pease see comment for CAS 59.	
CAS64	Pease see comment for CAS 59.	
CAS65	Pease see comment for CAS 59.	
CAS66	Pease see comment for CAS 59.	
CAS67	Pease see comment for CAS 59.	
CAS68	Pease see comment for CAS 59.	
CAS69	Pease see comment for CAS 59.	
CAS70	Pease see comment for CAS 59.	
CAS71	Pease see comment for CAS 59.	
CAS72	Pease see comment for CAS 59.	
CAS73	Pease see comment for CAS 59.	
CAS74	Pease see comment for CAS 59.	
CAS75	Pease see comment for CAS 59.	
CAS76	Pease see comment for CAS 59.	
CAS77	Pease see comment for CAS 59.	

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
CAS78	<p>We believe this formula should include cell B28 (other non available own funds) as a deduction. It would also make more sense to include deductions not included in the reconciliation reserve by replacing A503 with A607.</p> <p>The proposed formula would read: <math>OF\_B1Q.A20 = BS\_C1.L27 - OF\_B1Q.B24 - OF\_B1Q.B25 - OF\_B1Q.B27 - OF\_B1Q.B28 - OF\_B1Q.B502 - OF\_B1Q.A607 + BS\_C1.L26</math></p> <p>We would welcome if EIOPA reviewed the formula and amended it if necessary.</p>	
CQS1		
CQS2		
CQS3		
CQS4		
CQS5		
CQS6		
CQS7		
CQS8		
CQS9		
CQS10		
CQS11		
CQS12		
CQS13		
CQS14		
CQS15		
CQS16		
CQS17		
CQS18		
CQS19	<p>We believe there are two data checks missing. We propose including the following two assertions:</p> <p><math>BS\_C1.L10A = TP\_F1Q\_A3</math></p> <p><math>BS\_C1.L12 = TP\_F1Q\_E2</math></p> <p>We would welcome if EIOPA reviewed the checks and amended it if necessary.</p>	

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
CQS20	<p>We ask EIOPA to confirm whether TP_F1Q.A1[LOB:LB32] is the same as TP_F1Q.A10 + TP_F1Q.A12 + TP_F1Q.A13?</p> <p>We ask EIOPA to clarify why this notation is used and not the reference to the cells in the usual way as this notation is more confusing? We therefore suggest addressing the cells with their common codes such as TP_F1Q.A10 and not TP_F1Q.A1[LOB:LB32]. Furthermore, could ask EIOPA to clarify why this notation is used for the life templates only and not for the non-life templates? There is also another risk of confusion as LOB:LB26 does not refer to line of business 26 (Non-proportional casualty reinsurance), in the annexes of the LTGA, but is defined as "Lines of business for life obligations" on page 245 of the Consultation Paper, which can easily be overseen.</p>	
CQS21	Please see comment for CQS19	
CQS22	Please see comment for CQS19	
CQS23	Please see comment for CQS19	
CQS24	Please see comment for CQS19	
CQS25		
CQS26		
CQS27		
CQS28		
CQS29		
CQS30		
CQS31		
CQS32		
CQS33		
CQS34		
CQS35		
CQS36		
CQS37		
CQS38		
CQS39		
CQS40		
CQS41		
CQS42		
CQS43		
CQS44		



<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
CQS45	<p>We believe the current formula does not capture well the case in which the TPs in MCR_B4A and TP_E1Q sheets will be both positive but of different values. We would rather change the formula in the following way:  <math>MCR\_B4A.B2 = \max(0; TP\_E1Q.A24)</math>.            We would welcome if EIOPA reviewed the formula and amended it if necessary.</p>	
CQS46	Please see comment for CQS 45.	
CQS47	Please see comment for CQS 45.	
CQS48	Please see comment for CQS 45.	
CQS49	Please see comment for CQS 45.	
CQS50	Please see comment for CQS 45.	
CQS51	Please see comment for CQS 45.	
CQS52	Please see comment for CQS 45.	
CQS53	Please see comment for CQS 45.	
CQS54	Please see comment for CQS 45.	
CQS55	Please see comment for CQS 45.	
CQS56	Please see comment for CQS 45.	
CQS57	Please see comment for CQS 45.	
CQS58	Please see comment for CQS 45.	
CQS59	Please see comment for CQS 45.	
CQS60	Please see comment for CQS 45.	
CQS61		
CQS62		
CQS63		
CGS1		
CGS2		
CGS3		
CGS4		
CGS5		
CGS6		
CGS7		
CGS8		
CGS9	<p>The formula in the instructions for this item (<math>BS\_C1.A3 + BS\_C1.A27 = \text{sum}(BS\_C1D.A4[CUR])</math>) ignores loans and mortgages in BS_C1.A14 in BS-C1. In our opinion, these should be included in the formula. Therefore in our opinion the correct formula is <math>BS\_C1.A3 + BS\_C1.A14 + BS\_C1.A27 = \text{sum}(BS\_C1D.A4[CUR])</math>. We would welcome it if EIOPA could check the formula and amend if necessary.</p>	
CGS10		
CGS11		
CGS12		

<b>Comments Template on            Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline            19. Jun 13            12:00 CET</b>
Name of Company:	Deloitte & Touche	
CGS13	<p>The formula in the instructions for this item (BS_C1.A2+ BS_C1.A26 + BS_C1.A25B+ BS_C1.A16+ BS_C1.A14A+ BS_C1.A20+ BS_C1.A23+ BS_C1.A29+ BS_C1.A28A+ BS_C1.A28B = sum(BS_C1D.A7[CUR])) includes reinsurance recoverables (BS_C1.A16), loans on policies (BS_C1.A14A), and reinsurance receivables (BS_C1.A20). However, these items are already included in other items and should therefore not be counted twice. Therefore in our opinion the correct formula is <math>A2+A26+A25B+A23+A29+A28A+A28B = \text{sum}(BS\_C1D.A7[CUR])</math>. We would welcome it if EIOPA could check the formula and amend if necessary.</p>	
CGS14		
CGS15		
CGS16		
CGS17		
CGS18		
CGS19		
CGS20		
CGS21	<p>We believe this formula should include cell B28 (other non available own funds) as a deduction. It should also include cell A607 (total deductions) in place of A503 (deductions for participations in financial and credit institutions (solo)). This is a group specific check and so the solo deduction is not seen as relevant.</p> <p>The proposed formula would read: <math>OF\_B1Q.A20 = BS\_C1.L27-OF\_B1Q.B24-OF\_B1Q.B25-OF\_B1Q.B27-OF\_B1Q.B28-OF\_B1Q.B502-OF\_B1Q.A607+BS\_C1.L26</math>.</p> <p>We would welcome if EIOPA reviewed the formula and amended it if necessary.</p>	
QCGS1		
Instructions		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
<b>Name of Company:</b>	Deloitte & Touche	
<b>Impact Assessment – General Comments</b>	<p>1) Many of the SII elements which are still undefined (OMDII, L2, L3) will have an impact on the reporting. Prior to this CP, companies were already facing challenges in preparing their systems to comply with SII reporting requirements. Furthermore from responses to the July 2012 final report and the XBRL CP announced, companies were expecting an updated QRT set to be released sometime during 2013, which created additional uncertainty around the possibly diverging QRT sets and added burden in preparations insurers may have underway.</p> <p>EIOPA has, through this CP, introduced updates of the QRTs and log files, which was not announced, or expected by, the market. Notable changes include:</p> <ul style="list-style-type: none"> <li>- Summary documents were not provided and some examples, closed lists and cells, such as the "General Comments", were removed from the log files.</li> <li>- A few guidelines were included instead of these (eg, CP, Annex I, paras 37 to 41 for group templates), but they do not necessarily convey the same information. This could, on its own, make the information provided with this CP less informative or even misleading.</li> <li>- Color coding / cell type was removed from the templates &amp; logs;</li> <li>- Most notably, the newly released templates were changed, and some of them (eg G14) even changed significantly;</li> <li>- In addition, in some cases QRTs previously intended for quarterly reporting are now proposed for annual reporting.</li> </ul> <p>Therefore two draft (QRT + log) sets - July 2012 and March 2013 - are available as the "latest set" that do not reconcile, which makes it hard for insurers to see what they should base development of their systems reporting on. Should it be considered that they have to maintain two different sets of QRTs at least for the preparatory phase?</p> <p>At least one final set is expected this year (see 2.15 of Final Report on CP 11/009 and 11/011). It is currently unclear whether guidelines for 2015 will remain in the "final set" or if the July 2012 will prevail.</p> <p>Therefore, in order to ensure that the costs of providing the information during the preparation phase</p>	

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
2,1	<p>We believe that, in line with our comment in the "Impact Assessment - General Comments " cell above, in the interest of transparency a remark should be made to the fact that the (QRT+log) set released with the current CP differs from the July 2012 set. Therefore we suggest EIOPA amend the following last sentence in the paragraphe "The information to be submitted is based on a limited subset of the reporting package EIOPA proposed in the EIOPA Final Report on Public Consultations No. 11/009 and 11/011 [...] published in July 2012".</p> <p>As a minimum, in order to reduce the burden on (re)insurers, we believe that EIOPA should make it clear where differences exist between the July 2012 (QRT+log) set and the one released with this CP. At this stage, with (re)insurers having reporting system preparations underway, a document including the track of changes made would be welcomed by the industry.</p>	
2,2	<p>It seems this article suggests that apart from Omnibus II, also the Level 2 and Level 3 have to be final before the application of these guidelines. Is it realistic that Level 2 and Level 3 will be agreed before the end of 2013 sufficiently in advance to enable insurers timely implementation? Will there be any guidance in case the Level 2 and Level 3 will not yet be approved?</p>	
2,3		
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2,8		
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2,15		
2,16		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
Question 1	<p>We understand EIOPA's reasons for wanting to check progress before full implementation of Solvency II, subject to our comments below.</p> <p>We agree with the proposed option 2 because divergence from uncertainty or opacity is unfavourable and more costly than understanding what general direction is intended. However, this is on the basis that the interim reporting is a "stepping stone" to the full Solvency II requirements and not a separate set of reporting, requiring additional work from undertakings already dealing with much change. We feel that if this interim reporting were an additional burden, not a stepping stone to full Solvency II reporting, this would not serve the purpose which EIOPA aim for but, rather, would distract undertakings from their core preparatory activities and have a detrimental effect on their work towards compliance.</p>	
Question 1 – Option 1		
Question 1 – Option 2		

<b>Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities</b>		<b>Deadline 19. Jun 13 12:00 CET</b>
Name of Company:	Deloitte & Touche	
Question 2	<p>We do not support any of the four options in full, however, option 4 comes closest to our preferred course of action.</p> <p>We suggest no quarterly reporting and that the annual reporting should be the templates included in appendix 1, as long as these templates are confirmed as a stepping stone to final QRTs and not a separate exercise requiring different solutions alongside the planned Solvency II activities which undertakings are carrying out (as we mention above).</p> <p>We would suggest that, for EIOPA's purposes of assessing the progress made by the industry, 2014 year-end data should be reported in 2015, with considerably extended timescales (to give insurers flexibility over when during 2015 they complete it) – this would have the advantage of a) flexibility and b) providing annual comparatives.</p> <p>While it is true that undertakings are already familiar with the calculation of the SCR due to participation in QIS and, therefore, should be able to complete the SCR-B2 templates, the SCR-B3 templates contain very granular information such as the 10 largest counterparty exposures, the split into assets and liabilities or information for the catastrophe risk module etc. This granularity level potentially will not be fully implemented within the undertakings prior the first submission dates of the preparatory phase since no final guidelines with regard to SCR calculation are currently available. We would welcome it if EIOPA examined again whether the submission of this granular information in the preparatory phase makes sense, while no final guidelines are issued. As it takes time to set up proper processes and technical infrastructure for reliable reporting these data within the undertakings we recommend the submission of the SCR-B2 templates only in the preparatory phase. This provides authorities with sufficient information on undertakings' ability to calculate the SCR while ensuring at the same time that undertakings can dedicate more time and resources on implementation of requirements with regard to the data in SCR-B3 templates.</p>	
Question 2 – Option 1		
Question 2 – Option 2		
Question 2 – Option 3		
Question 2 – Option 4	<p>We wonder why the inclusion of quarterly reporting of MCR is considered here. This is not expected under any other option and we therefore ask EIOPA to review this.</p> <p>What should we make of the word "possibly"? We would welcome clarification from EIOPA, at least, on what this would depend.</p>	

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Question 3	<p>We would prefer the option 3.</p> <p>From our perspective, quarterly reporting means a huge effort for insurance companies and national competent authorities alike, especially for those undertakings which would fall within the threshold for quarterly reporting in the preparatory phase but which currently do not have to produce quarterly reports. An exemption from quarterly reporting for these undertakings would help them to set up processes properly while avoiding unnecessary expenses for requirements that may change again with the arrival of final guidelines. See also our comments on question 2, above.</p>	
Question 3 – Option 1		
Question 3 – Option 2		
Question 3 – Option 3		
Question 4	<p>We favor option 5, which would allow NCAs to use more flexible arrangements. European local insurance markets differ significantly, therefore in our opinion the option 5 appears the most favourable to allow NCAs to fix the thresholds so that the requirement to ensure that "the provisions described in the Opinion are applied to in a manner which is proportionate to the nature, scale and complexity inherent in the business of the insurance and reinsurance undertaking" is fulfilled for each local market in the preparatory phase.</p> <p>However, as already stated above, we believe NCAs should agree to implement these preparatory measures provided that NCAs accounting for a given threshold of the European market insurance market agree (to avoid too few markets applying the rules and being at a disadvantage). If this is not the case, there will be disproportionate impact on some member states, where NCAs require submission, whereas others may not.</p>	
Question 4 – Option 1		
Question 4 – Option 2		
Question 4 – Option 3		
Question 4 – Option 4		
Question 4 – Option 5		
Question 5	<p>We favor option 1. This is dependent on the outcome of question 7, where we state that we would prefer that this reporting is performed based on assumptions that models are approved as they stand. This is also consistent with our thinking that these interim measures should be a stepping stone towards full Solvency II implementation, rather than a separate set of reporting which will not be required under full implementation.</p>	
Question 5 – Option 1		
Question 5 – Option 2		

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Question 6	We favor option 2 (although this seems quite similar to option 3). Note that, consistent with our answer to question 7, we are assuming these models and countries are approved and that local rules may be used. This has the advantage of being straightforward for undertakings. It may also be difficult for undertakings to impose draft Solvency II rules on third countries, particularly when they may not be required to once Solvency II is fully implemented.	
Question 6 – Option 1		
Question 6 – Option 2		
Question 6 – Option 3		
Question 6 – Option 4		
Question 7	We favor option 1. We believe that part of the value of interim reporting will be in assessing how models work and the granularity and quality of the output, therefore reporting should be based on all current models being approved in their current state. Moreover, as stated under 1.10 the preparation phase presents an opportunity for national authorities to enter into a dialogue with insurance undertakings and gain experience for Solvency II. It would thus make sense to allow the inclusion of items requiring approval and give undertakings the opportunity to profit from this dialogue with national authorities. In case authorities would be reticent on the use of these items, this would give undertakings more time to develop new methods or consider new items.	
Question 7 – Option 1		
Question 7 – Option 2		
Question 7 – Option 3		
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Appendix 1		
Appendix 2		
Appendix 3		