

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

Name of Company:	Crédit Agricole Assurances	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ <u>Do not change the numbering</u> in the column “reference”; if you change numbering, your comment cannot be processed by our IT tool ⇒ Leave the last column <u>empty</u>. ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph or a cell, keep the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <ul style="list-style-type: none"> ○ In spreadsheets & LOGs, certain cell number may seem like they are missing (ex : going directly from cell B1 to cell B3); this is normal, as they may refer to a previously existing cell that has been deleted during informal consultations, and cell numberings have not been changed for interal consistency purposes ○ If your comment refers to multiple cells or paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other cells or paragraphs this also applies. ○ If your comment refers to subparagraphs or specific cells within a group, please indicate this in the comment itself. <p>Please send the completed template, <u>in Word Format</u>, to cp-011@eiopa.europa.eu. Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the <u>accompanying spreadsheets and LOGs</u>.</p>		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

Reference	Comment	
General Comment	<p>We would like to thank EIOPA for giving us the opportunity to comment on this issue paper.</p> <p>This response is for Group needs and Solo needs : it is a joint response of CAA Group and Entities (which are impacted by providing information to Group in order to produce Group reporting). We would like to specify that the questions sent hereby are additional to the ones sent to EIOPA on the 20th of January.</p> <p>We would like to highlight the following topics that we consider important :</p> <p>> Regarding the quarterly MCR/SCR/BE calculation requirement, we would like :</p> <ul style="list-style-type: none"> - to alert EIOPA on the constraints and costs that this will represent especially due to the heavy operationnal process involved and furthermore, if applicable at group level for MCR and BE. - to confirm that a “capital add-on” can not be required after a SCR quaterly calculation. <p>Could you precise the objectives related to the FS reporting ? Statistics, joint actions with regulator,... ?</p> <p>> Regarding the timing to send the Financial Stability Reporting at Group level This consultation indicates that Groups will have to report the FS reporting “<i>with the same deadlines applying to solo undertakings for other supervisory reporting requirements</i>”, that is, without the 6-week-delay allowed for Groups for the standard QRT. We would like to confirm that this extra time should apply as well for the submission of a FS reporting at Group level, to allow time for consolidation of solo data.</p> <p>> We also have the following questions on which we would like your confirmation :</p> <ol style="list-style-type: none"> 1. Should “December consultation” requirements replace “November consultation” requirements in terms of scope, content and frequency : <ul style="list-style-type: none"> o Scope → Templates MCR (B4A and B4B) and TP (E1Q and F1Q) can be 	

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

	<p>expected at Group level in the December consultation, whereas they are expected only at solo level in the November consultation.</p> <ul style="list-style-type: none"> ○ Content → Regarding assets' templates, November consultation indicates that <i>"reporting at group level should only concern assets of the holding entity, non-EEA insurance undertakings and other non-supervised entities within the group"</i>, whereas December consultation indicate s that templates D1, D2O, D3, D4 and D5 require a <i>"full list"</i> of solo data to be reported at conso level. This question is important regarding the operational impact for Groups of being able to aggregate solo assets at detailed level. <p>Our comprehension is there would be 2 different reportings : one reporting concerning assets of the holding (defined by the CP of November 2011) and one reporting concerning the <i>"full list"</i> of assets of the group (defined by the CP of December 2011 on Financila Stability Reporting). Is that comprehension correct ?</p> <ul style="list-style-type: none"> ○ Frequency → At group level, templates Re-J3, Asset D3 and D5 are required on a quarterly basis in December consultation, versus only annually in November consultation. <p>2. The QRT for FS purposes will be not public.</p> <p>3. Could you precise if a unique sending and format for all the prudential reportings (QRT and Financial Stability Reporting) is expected ? Otherwise, what would be the expected sending format of the Financial Stability Reporting (other than XBRL) ?</p> 	
3.1		
3.2		
3.3		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

3.4		
3.5		
3.6		
3.7	<p>Our outstanding is that the quarterly and annual publication deadlines of the Financial Stability Reporting are the same for a Group or a Solo entity (cf. paragraph 3.7 "with the same deadlines applying to solo undertaking).</p> <p>Thus, in the case of a Group, the FS reporting will have to be respectively communicated in 14 or 5 weeks (for annual / quarterly closings), while the standard QRT will be required in 20 or 11 weeks (with a 6-week-additional period). This would require a double process to be implemented.</p> <p>As consolidation requires extra time (for both standard QRT and FS reporting, at Group level), we would like to confirm that the deadlines allowed for the Group standard QRT should also apply for the deadlines of the FS reporting at Group level</p>	
3.8		
4.1		
4.2		
4.3		
4.4		
4.5		
6.1		
6.2		
6.3		
6.4		
6.5		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

6.6		
6.7		
6.8		
6.9		
6.10		
6.11		
6.12		
6.13		
6.14		
6.15		
6.16		
6.17		
6.18		
6.19		
6.20		
6.21		
6.22		
6.23		
6.24		
6.25		
6.26		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

6.27		
6.28		
6.29		
6.30		
7.1		
7.1 Q1		
7.1 Q2		
7.1 Q3		
7.1 Q4		
7.1 Q5		
Technical Annex		
FS 1 - A1	Could you confirm us that the required information is only an amount ?	
FS 1 – A2	Could you confirm us that the required information is only an amount ?	
FS 1 – A3	Could you confirm us that the required information is only an amount ?	
FS 1 – A4	Could you confirm us that the required information is only an amount ?	
FS 1 – A5	Could you confirm us that the required information is only an amount ?	
FS 1 – A6	Could you confirm us that the required information is only an amount ?	

Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes		Deadline 20 February 2012
FS 1 – A7	Could you confirm us that the required information is only an amount ?	
FS 1 – A8	Could you confirm us that the required information is only an amount ?	
FS 1 – A9		
	<p>1/ We would like to confirm that only the sheets « Overview FS Needs » and « FS-1 » are required within the Excel file communicated in the December consultation.</p> <p>2.1/ Within the FS reporting consultation, templates TP-F3 and Re-J2 are marked annually (cf. in the xls sheet "Overview FS Needs", column "FSC needs (for defined sample)") and quarterly (cf. in the pdf document "Consultation_paper_on_the_Proposal_for_Quantitative_Reporting_Template_for_Financial_Stability_Purposes", column "QFS", "R").</p> <p>> Could you confirm which frequency should apply for TP-F3 and Re-J2 : quarterly or annually ?</p> <p>2.2/ In the xls sheet « Overview FS Needs », templates Assets-D3, Assets-D5 and Re-J3 are marked « not available » in column « current proposal (groups) » (column which we understand as the timing requirement for Group QRT indicated in the November consultation as annually), while also marked annually at group level (cf. "Consultation_paper_on_the_Proposal_for_Quantitative_Reporting_Template_for_Financial_Stability_Purposes").</p> <p>> Could you confirm which frequency should apply, at group level, for templates D3, D5 and Re-J3 for the different reportings (FS and QRT) ?</p>	
Overview FS Needs - all tab		
Cover - A1Q- cell A1		
Cover - A1Q- cell A2		
Cover - A1Q- cell A3		
Cover - A1Q- cell A4		
Cover - A1Q- cell A5		
Cover - A1Q- cell A6		
Cover - A1Q- cell A7		
Cover - A1Q- cell A8		
Cover - A1Q- cell A9		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

Cover - A1Q- cell A10		
Cover - A1Q- cell A11		
Cover - A1Q- cell A12		
Cover - A1Q- cell B13		
Cover - A1Q- cell B14		
Cover - A1Q- cell B15		
Cover - A1Q- cell B16		
Cover - A1Q- cell D1		
Cover - A1Q- cell D2		
Cover - A1Q- cell D3		
Cover - A1Q- cell D4		
Cover - A1Q- cell D5		
Cover - A1Q- cell D6		
Cover - A1Q- cell D7		
Cover - A1Q- cell D8		
Cover - A1Q- cell D9		
Cover - A1Q- cell D10		
Cover - A1Q- cell D11		
Cover - A1Q- cell D12		
Cover - A1Q- cell D13		
Cover - A1Q- cell D14		
Cover - A1Q- cell D15		
Cover - A1Q- cell D16		
Cover - A1Q- cell H1		
Cover - A1Q- cell H2		
Cover - A1Q- cell H3		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

Cover - A1Q- cell H4		
Cover - A1Q- cell H5		
Cover - A1Q- cell H6		
Cover - A1Q- cell H7		
Cover - A1Q- cell H8		
Cover - A1Q- cell H9		
Cover - A1Q- cell H10		
Cover - A1Q- cell H11		
Cover - A1Q- cell H12		
Cover - A1Q- cell H13		
Cover - A1Q- cell H14		
Cover - A1Q- cell H15		
Cover - A1Q- cell H16		
Cover - A1Q- cell H1Z		
Cover - A1Q- cell H2Z		
Cover - A1Q- cell H3Z		
Cover - A1Q- cell H4Z		
Cover - A1Q- cell H5Z		
Cover - A1Q- cell H6Z		
Cover - A1Q- cell H7Z		
Cover - A1Q- cell H8Z		
Cover - A1Q- cell H9Z		
Cover - A1Q- cell H10Z		
Cover - A1Q- cell H11Z		
Cover - A1Q- cell H12Z		
Cover - A1Q- cell H13Z		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

Cover - A1Q- cell H14Z		
Cover - A1Q- cell H15Z		
Cover - A1Q- cell H16Z		
Cover - A1Q- cell H1F		
Cover - A1Q- cell H1G		
Cover - A1Q- cell I1		
Cover - A1Q- cell I2		
Cover - A1Q- cell I3		
Cover - A1Q- cell 13A		
Cover - A1Q- cell 13B		
Cover - A1Q- cell I4		
Cover - A1Q- cell I5		
Cover - A1Q- cell I6		
Cover - A1Q- cell K1		
Cover - A1Q- cell K2		
Cover - A1Q- cell K3		
Cover - A1Q- cell K3A		
Cover - A1Q- cell K3B		
Cover - A1Q- cell K4		
Cover - A1Q- cell K5		
Cover - A1Q- cell K6		
Cover - A1Q- cell N1		
Cover - A1Q- cell N2		
Cover - A1Q- cell N3		
Cover - A1Q- cell N3A		
Cover - A1Q- cell N3B		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

Cover - A1Q- cell N4		
Cover - A1Q- cell N5		
Cover - A1Q- cell N6		
Cover - A1Q- cell N1Z		
Cover - A1Q- cell N2Z		
Cover - A1Q- cell N3Z		
Cover - A1Q- cell N3AZ		
Cover - A1Q- cell N3BZ		
Cover - A1Q- cell N4Z		
Cover - A1Q- cell N5Z		
Cover - A1Q- cell N6Z		
Cover - A1Q- cell R		
Cover - A1Q- cell S1		
OF - B1Q- cell A13		
OF - B1Q- cell A50		
OF - B1Q- cell B50		
OF - B1Q- cell C50		
OF - B1Q- cell D50		
OF - B1Q- cell E50		
OF - B1Q- cell A51		
OF - B1Q- cell B51		
OF - B1Q- cell C51		
OF - B1Q- cell D51		
MCR - B4A- cell A31		
MCR - B4B- cell A31		
Assets - D1Q- cell A1 (list)		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

Assets - D1Q- cell A2 (list)		
Assets - D1Q- cell A3 (list)		
Assets - D1Q- cell A4 (list)		
Assets - D1Q- cell A5 (list)		
Assets - D1Q- cell A6 (list)		
Assets - D1Q- cell A7 (list)		
Assets - D1Q- cell A8 (list)		
Assets - D1Q- cell A9 (list)		
Assets - D1Q- cell A10 (list)		
Assets - D1Q- cell A11 (list)		
Assets - D1Q- cell A12 (list)		
Assets - D1Q- cell A13 (list)		
Assets - D1Q- cell A15 (list)		
Assets - D1Q- cell A16 (list)		
Assets - D1Q- cell A17 (list)		
Assets - D1Q- cell A18 (list)		
Assets - D1Q- cell A20 (list)		
Assets - D1Q- cell A22 (list)		
Assets - D1Q- cell A23 (list)		
Assets - D1Q- cell A24 (list)		
Assets - D1Q- cell A25 (list)		
Assets - D1Q- cell A26 (list)		
Assets - D1Q- cell A28 (list)		
Assets - D1Q- cell A30 (list)		
Assets - D20- cell A1		
Assets - D20- cell A2		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

Assets - D20- cell A3		
Assets - D20- cell A4		
Assets - D20- cell A5		
Assets - D20- cell A6		
Assets - D20- cell A7		
Assets - D20- cell A8		
Assets - D20- cell A9		
Assets - D20- cell A10		
Assets - D20- cell A11		
Assets - D20- cell A13		
Assets - D20- cell A14		
Assets - D20- cell A15		
Assets - D20- cell A16		
Assets - D20- cell A17		
Assets - D20- cell A19		
Assets - D20- cell A20		
Assets - D20- cell A21		
Assets - D20- cell A22		
Assets - D20- cell A23		
Assets - D20- cell A24		
Assets - D20- cell A25		
Assets - D20- cell A26		
Assets - D20- cell A27		
Assets - D20- cell A28		
Assets - D20- cell A29		
Assets - D20- cell A31		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

Assets - D20- cell A32		
Assets - D20- cell A33		
Assets - D20- cell A34		
Assets - D20- cell A35		
Assets - D3- cell A1		
Assets - D3- cell A3		
Assets - D3- cell A4		
Assets - D3- cell A6		
Assets - D3- cell A7		
Assets - D3- cell A8		
Assets - D3- cell A15		
Assets - D4- cell A1		
Assets - D4- cell A2		
Assets - D4- cell A3		
Assets - D4- cell A4		
Assets - D4- cell A5		
Assets - D4- cell A6		
Assets - D4- cell A7		
Assets - D4- cell A8		
Assets - D5- cell A1		
Assets - D5- cell A2		
Assets - D5- cell A3		
Assets - D5- cell A4		
Assets - D5- cell A5		
Assets - D5- cell A6		
Assets - D5- cell A7		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

Assets - D5- cell A8		
Assets - D5- cell A9		
Assets - D5- cell A10		
Assets - D5- cell A11		
Assets - D5- cell A12		
Assets - D5- cell A13		
Assets - D5- cell A14		
TP - F1Q- cell A1		
TP – F1Q- cell A3		
TP – F1Q- cell A5		
TP – F1Q- cell A6		
TP – F1Q- cell A7		
TP – F1Q- cell A9		
TP – F1Q- cell A10		
TP – F1Q- cell A12		
TP – F1Q- cell A13		
TP – F1Q- cell A14		
TP - F1Q- cell B1		
TP - F1Q- cell B2		
TP - F1Q- cell B3		
TP - F1Q- cell B4		
TP - F1Q- cell B5		
TP - F1Q- cell B6		
TP - F1Q- cell B7		
TP - F1Q- cell B9		
TP - F1Q- cell B10		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

TP - F1Q- cell B11		
TP - F1Q- cell B12		
TP - F1Q- cell B13		
TP - F1Q- cell B14		
TP - F1Q- cell C1		
TP - F1Q- cell C2		
TP - F1Q- cell C3		
TP - F1Q- cell C4		
TP - F1Q- cell C5		
TP - F1Q- cell C6		
TP - F1Q- cell C7		
TP - F1Q- cell B9		
TP - F1Q- cell C10		
TP - F1Q- cell C11		
TP - F1Q- cell C12		
TP - F1Q- cell C13		
TP - F1Q- cell C14		
TP - F1Q- cell E1		
TP - F1Q- cell E2		
TP - F1Q- cell E4		
TP - F1Q- cell E6		
TP - F1Q- cell E7		
TP - F1Q- cell E9		
TP - F1Q- cell E10		
TP - F1Q- cell E12		
TP - F1Q- cell E13		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

TP - F1Q- cell E14		
TP - F3- cell A21	Is it a total Best Estimate (all HRG combined) ?	
TP - F3- cell A30		
TP - E1Q- cell A11		
TP -E1Q- cell B11		
TP -E1Q- cell C11		
TP - E1Q- cell D11		
TP -E1Q- cell E11		
TP -E1Q- cell F11		
TP - E1Q- cell G11		
TP -E1Q- cell H11		
TP -E1Q- cell I11		
TP - E1Q- cell L11		
TP -E1Q- cell M11		
TP -E1Q- cell N11		
TP - E1Q- cell P11		
TP - E1Q- cell P11		
TP -E1Q- cell Q11		
TP - E1Q- cell R11		
TP - E1Q- cell Q11		
TP - E1Q- cell A12		
TP -E1Q- cell B12		
TP -E1Q- cell C12		
TP - E1Q- cell D12		
TP -E1Q- cell E12		
TP -E1Q- cell F12		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

TP - E1Q- cell G12		
TP -E1Q- cell H12		
TP -E1Q- cell I12		
TP - E1Q- cell L12		
TP -E1Q- cell M12		
TP -E1Q- cell N12		
TP - E1Q- cell O12		
TP - E1Q- cell P12		
TP -E1Q- cell Q12		
TP - E1Q- cell R12		
TP - E1Q- cell Q12		
TP - E1Q- cell A13		
TP -E1Q- cell B13		
TP -E1Q- cell C13		
TP - E1Q- cell D13		
TP -E1Q- cell E13		
TP -E1Q- cell F13		
TP - E1Q- cell G13		
TP -E1Q- cell H13		
TP -E1Q- cell I13		
TP - E1Q- cell L13		
TP -E1Q- cell M13		
TP -E1Q- cell N13		
TP - E1Q- cell O13		
TP - E1Q- cell P13		
TP -E1Q- cell Q13		

**Comments Template on Proposal for
Quantitative Reporting Templates for Financial Stability Purposes**

**Deadline
20 February 2012**

TP - E1Q- cell R13		
TP - E1Q- cell Q13		
Re - J2- cell H1		
Re - J2- cell X1		
Re - J2- cell Y1		
Re - J2- cell AG1		
Re - J2- cell AP1		
Re - J3- cell B1		
Re - J3- cell N1		
Re - J3- cell O1		
Re - J3- cell S1		