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The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the Technical Annexes II and III.

Reference	Comment
General Comments	The ECIIA (The European Confederation of Institutes of Internal Auditing) would like to thank EIOPA for the opportunity to comment on the Consultation paper 13-010. As the representative of the profession of internal auditors in Europe ECIIA very much appreciates the important role Solvency II and EIOPA allows to Internal Audit in the system of governance. ECIIA is happy to support EIOPA in this task to any extent. ECIIA’s comments are focused on Internal Audit. As stated in the Solvency II Directive Internal Audit is a key function in the system of governance. Therefore ECIIA is astonished, that it is not mentioned at all in this Guidelines, whereas other functions or systems of the system of governance are explicitly
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SCR - B2C- cell A1A	
SCR - B2C- cell A1B	
SCR - B2C- cell A1C	
SCR - B2C- cell B1	
SCR - B2C- cell C1	
SCR - B2C- cell B2	
SCR - B2C- cell C2	
SCR - B2C- cell B3	
SCR - B2C- cell C3	
SCR - B2C- cell B4	
SCR - B2C- cell C4	
SCR - B2C- cell B5	

SCR - B2C- cell B6	
SCR - B2C- cell B7	
SCR - B2C- cell B7A	
SCR - B2C- cell B7B	
SCR - B2C- cell B7C	
SCR - B2C- cell B8	
SCR - B2C- cell B9	
SCR - B2C- cell B10	
SCR - B2C- cell B12	
SCR - B2C- cell B13	
SCR - B2C- cell C5	
SCR - B2C- cell C6	
SCR - B2C- cell B14	
SCR - B2C- cell B14AA	
SCR - B2C- cell B14A	
SCR - B2C- cell A11A	
SCR - B2C- cell A11B	
SCR - B3A – General Comment	
SCR - B3A – cell A00	
SCR - B3A – cell AA01	
SCR - B3A – cell AA02	
SCR - B3A – cell AA03	
SCR - B3A – cel A30	
SCR - B3A- cell C0	
SCR - B3A- cell D0	
SCR - B3A- cell A1	
SCR - B3A- cell A2	
SCR - B3A- cell A1A	
SCR - B3A- cell A2A	
SCR - B3A- cell B1	
SCR - B3A- cell B2	
SCR - B3A- cell B1A	
SCR - B3A- cell B2A	
SCR - B3A- cell C1	
SCR - B3A- cell C2	
SCR - B3A- cell B1B	
SCR - B3A- cell B2B	
SCR - B3A- cell D1	
SCR - B3A- cell D2	
SCR - B3A- cell C3	
SCR - B3A- cell D3	
SCR - B3A- cell A4	
SCR - B3A- cell A4A	

SCR - B3A- cell B4	
SCR - B3A- cell B4A	
SCR - B3A- cell C4	
SCR - B3A- cell B4B	
SCR - B3A- cell D4	
SCR - B3A- cell A5	
SCR - B3A- cell B5	
SCR - B3A- cell A6	
SCR - B3A- cell B6	
SCR - B3A- cell A7	
SCR - B3A- cell B7	
SCR - B3A- cell A8	
SCR - B3A- cell A8A	
SCR - B3A- cell B8	
SCR - B3A- cell B8A	
SCR - B3A- cell C8	
SCR - B3A- cell B8B	
SCR - B3A- cell D8	
SCR - B3A- cell A9	
SCR - B3A- cell B9	
SCR - B3A- cell A10	
SCR - B3A- cell B10	
SCR - B3A- cell A11	
SCR - B3A- cell B11	
SCR - B3A- cell A12	
SCR - B3A- cell A12A	
SCR - B3A- cell B12	
SCR - B3A- cell B12A	
SCR - B3A- cell C12	
SCR - B3A- cell B12B	
SCR - B3A- cell D12	
SCR - B3A- cell C13	
SCR - B3A- cell D13	
SCR - B3A- cell A14	
SCR - B3A- cell A14A	
SCR - B3A- cell B14	
SCR - B3A- cell B14A	
SCR - B3A- cell C14	
SCR - B3A- cell B14B	
SCR - B3A- cell D14	
SCR - B3A- cell C15	
SCR - B3A- cell D15	
SCR - B3A- cell A16	

SCR - B3A- cell A16A	
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SCR - B3A- cell B16B	
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SCR - B3A- cell A17	
SCR - B3A- cell A17A	
SCR - B3A- cell B17	
SCR - B3A- cell B17A	
SCR - B3A- cell C17	
SCR - B3A- cell B17B	
SCR - B3A- cell D17	
SCR - B3A- cell A18	
SCR - B3A- cell A18A	
SCR - B3A- cell B18	
SCR - B3A- cell B18A	
SCR - B3A- cell C18	
SCR - B3A- cell B18B	
SCR - B3A- cell D18	
SCR - B3A- cell A19	
SCR - B3A- cell A19A	
SCR - B3A- cell C19	
SCR - B3A- cell D19	
SCR - B3A- cell A20	
SCR - B3A- cell A20A	
SCR - B3A- cell C20	
SCR - B3A- cell D20	
SCR - B3A- cell C22	
SCR - B3A- cell D22	
SCR - B3A- cell C23	
SCR - B3A- cell D23	
SCR - B3B – General Comment	
SCR - B3B – cell A00	
SCR - B3B – cell A001	
SCR - B3B – cell A30	
SCR - B3B – cell A10	
SCR - B3B- cell A1	
SCR - B3B- cell B1	
SCR - B3B- cell C0	
SCR - B3B- cell C1	
SCR - B3B- cell A2	
SCR - B3B- cell A3	

SCR - B3B- cell C3	
SCR - B3B- cell D4	
SCR - B3B- cell C4	
SCR - B3C – General Comment	
SCR - B3C – cell A01	
SCR - B3C – cell A02	
SCR - B3C – cell A03	
SCR - B3C – cell A04	
SCR - B3C – cell A05	
SCR - B3C - cell A06	
SCR - B3C – cell A001	
SCR - B3C – cell A30	
SCR - B3C- cell A1	
SCR - B3C- cell A1A	
SCR - B3C- cell B1	
SCR - B3C- cell B1A	
SCR - B3C- cell C1	
SCR - B3C- cell B1B	
SCR - B3C- cell D1	
SCR - B3C- cell A2	
SCR - B3C- cell A2A	
SCR - B3C- cell B2	
SCR - B3C- cell B2A	
SCR - B3C- cell C2	
SCR - B3C- cell B2B	
SCR - B3C- cell D2	
SCR - B3C- cell A3	
SCR - B3C- cell A3A	
SCR - B3C- cell B3	
SCR - B3C- cell B3A	
SCR - B3C- cell C3	
SCR - B3C- cell B3B	
SCR - B3C- cell D3	
SCR - B3C- cell C04	
SCR - B3C- cell D04	
SCR - B3C- cell A4	
SCR - B3C- cell A4A	
SCR - B3C- cell B4	
SCR - B3C- cell B4A	
SCR - B3C- cell C4	
SCR - B3C- cell B4B	
SCR - B3C- cell D4	
SCR - B3C- cell A5	

SCR - B3C- cell A5A	
SCR - B3C- cell B5	
SCR - B3C- cell B5A	
SCR - B3C- cell C5	
SCR - B3C- cell B5B	
SCR - B3C- cell D5	
SCR - B3C- cell A6	
SCR - B3C- cell A6A	
SCR - B3C- cell B6	
SCR - B3C- cell B6A	
SCR - B3C- cell C6	
SCR - B3C- cell B6B	
SCR - B3C- cell D6	
SCR - B3C- cell A7	
SCR - B3C- cell A7A	
SCR - B3C- cell B7	
SCR - B3C- cell B7A	
SCR - B3C- cell C7	
SCR - B3C- cell B7B	
SCR - B3C- cell D7	
SCR - B3C- cell A8	
SCR - B3C- cell A8A	
SCR - B3C- cell B8	
SCR - B3C- cell B8A	
SCR - B3C- cell C8	
SCR - B3C- cell B8B	
SCR - B3C- cell D8	
SCR - B3C- cell A9	
SCR - B3C- cell A9A	
SCR - B3C- cell B9	
SCR - B3C- cell B9A	
SCR - B3C- cell C9	
SCR - B3C- cell B9B	
SCR - B3C- cell D9	
SCR - B3C- cell C10	
SCR - B3C- cell D10	
SCR - B3C- cell C11	
SCR - B3C- cell D11	
SCR - B3D – General Comment	
SCR - B3D – cell A01	
SCR - B3D – cell A02	
SCR - B3D – cell A03	
SCR - B3D – cell A04	

	SCR - B3D – cell A05	
	SCR - B3C – cell A001	
	SCR - B3C – cell A30	
	SCR - B3D- cell A1	
	SCR - B3D- cell A1A	
	SCR - B3D- cell B1	
	SCR - B3D- cell B1A	
	SCR - B3D- cell C1	
	SCR - B3D- cell B1B	
	SCR - B3D- cell D1	
	SCR - B3D- cell A2	
	SCR - B3D- cell A2A	
	SCR - B3D- cell B2	
	SCR - B3D- cell B2A	
	SCR - B3D- cell C2	
	SCR - B3D- cell B2B	
	SCR - B3D- cell D2	
	SCR - B3D- cell A3	
	SCR - B3D- cell A3A	
	SCR - B3D- cell B3	
	SCR - B3D- cell B3A	
	SCR - B3D- cell C3	
	SCR - B3D- cell B3B	
	SCR - B3D- cell D3	
	SCR - B3D- cell C04	
	SCR - B3D- cell D04	
	SCR - B3D- cell A4	
	SCR - B3D- cell A4A	
	SCR - B3D- cell B4	
	SCR - B3D- cell B4A	
	SCR - B3D- cell C4	
	SCR - B3D- cell B4B	
	SCR - B3D- cell D4	
	SCR - B3D- cell A5	
	SCR - B3D- cell A5A	
	SCR - B3D- cell B5	
	SCR - B3D- cell B5A	
	SCR - B3D- cell C5	
	SCR - B3D- cell B5B	
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	SCR - B3D- cell B6	

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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	
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SCR - B3D- cell B8A	
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SCR - B3D- cell C9	
SCR - B3D- cell D9	
SCR - B3D- cell C10	
SCR - B3D- cell D10	
SCR - B3D- cell C12	
SCR - B3D- cell D12	
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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	
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	SCR - B3D- cell B18	
	SCR - B3D- cell B18B	
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	SCR - B3D- cell B21	
	SCR - B3D- cell A21	
	SCR - B3D- cell B22	
	SCR - B3D- cell A22	
	SCR - B3D- cell B23	
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	SCR - B3D- cell B26	
	SCR - B3D- cell A26	
	SCR - B3D- cell B27	
	SCR - B3D- cell A27	
	SCR - B3E – General Comment	
	SCR - B3E- cell A001	
	SCR - B3E- cell A30	
	SCR - B3E- cell C1	
	SCR - B3E- cell D1	
	SCR - B3E- cell E1	
	SCR - B3E- cell F1	
	SCR - B3E- cell C2	
	SCR - B3E- cell D2	
	SCR - B3E- cell E2	
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	SCR - B3E- cell F3	
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SCR - B3E- cell D11	
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SCR - B3E- cell D12	
SCR - B3E- cell E12	
SCR - B3E- cell F12	
SCR - B3E- cell A13	
SCR - B3E- cell F13	
SCR - B3E- cell A14	
SCR - B3E- cell A15	
SCR - B3E- cell A15A	
SCR - B3E- cell B15	
SCR - B3E- cell B15A	
SCR - B3E- cell C15	
SCR - B3E- cell A16	
SCR - B3E- cell A17	
SCR - B3E- cell A18	
SCR - B3F – General Comment	
SCR - B3F- cell A1	
SCR - B3F- cell A2-A6	
SCR - B3F- cell A7	
SCR - B3F- cell B1	

SCR - B3F- cell B2-B6	
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SCR - B3F- cell C1	
SCR - B3F- cell C2-C6	
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SCR - B3F- cell C8	
SCR - B3F- cell A9	
SCR - B3F- cell A10-A15	
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SCR - B3F- cell B9	
SCR - B3F- cell B10-B15	
SCR - B3F- cell B16	
SCR - B3F- cell C9	
SCR - B3F- cell C10-C15	
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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	
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SCR - B3F- cell AA21	

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	SCR - B3F- cell AA37	
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	SCR - B3F- cell AB36	
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	SCR - B3F- cell AF38	
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	SCR - B3F- cell AG37	
	SCR - B3F- cell AH1-AH20	
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	SCR - B3F- cell AH36	
	SCR - B3F- cell AH37	
	SCR - B3F- cell AI1-AI20	
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	SCR - B3F- cell BB37	

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SCR - B3F- cell BG21	
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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	
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SCR - B3F- cell CD15	
SCR - B3F- cell CE1-CE14	
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	SCR - B3F- cell CG1-CG14	
	SCR - B3F- cell CG15	
	SCR - B3F- cell CG30	
	SCR - B3F- cell CG31	
	SCR - B3F- cell CH1-CH14	
	SCR - B3F- cell CH15	
	SCR - B3F- cell CH30	
	SCR - B3F- cell CH31	
	SCR - B3F- cell CI1-CI14	
	SCR - B3F- cell CI15	
	SCR - B3F- cell CI30	
	SCR - B3F- cell CI31	
	SCR - B3F- cell CI32	
	SCR - B3F- cell CI33	
	SCR - B3F- cell DA1-DA9	
	SCR - B3F- cell DA10	
	SCR - B3F- cell DA11-DA24	
	SCR - B3F- cell DA25	
	SCR - B3F- cell DA26	
	SCR - B3F- cell DB1-DB9	
	SCR - B3F- cell DB10	
	SCR - B3F- cell DB11-DB24	
	SCR - B3F- cell DB25	
	SCR - B3F- cell DB26	
	SCR - B3F- cell DC1-DC9	
	SCR - B3F- cell DC10	
	SCR - B3F- cell DD1-DD9	
	SCR - B3F- cell DD10	
	SCR - B3F- cell DE1-DE9	
	SCR - B3F- cell DF1-DF9	
	SCR - B3F- cell DF10	
	SCR - B3F- cell DF25	
	SCR - B3F- cell DF26	
	SCR - B3F- cell DF27	
	SCR - B3F- cell DF28	
	SCR - B3F- cell DG1-DG9	
	SCR - B3F- cell DG10	
	SCR - B3F- cell DG25	
	SCR - B3F- cell DG26	
	SCR - B3F- cell DH1-DH9	
	SCR - B3F- cell DH10	

SCR - B3F- cell DH25	
SCR - B3F- cell DH26	
SCR - B3F- cell DI1-DI9	
SCR - B3F- cell DI10	
SCR - B3F- cell DI25	
SCR - B3F- cell DI26	
SCR - B3F- cell DI27	
SCR - B3F- cell DI28	
SCR - B3F- cell EA1	
SCR - B3F- cell EB1	
SCR - B3F- cell EC1	
SCR - B3F- cell ED1	
SCR - B3F- cell EE1	
SCR - B3F- cell EE2	
SCR - B3F- cell EE3	
SCR - B3F- cell EF1	
SCR - B3F- cell EG1	
SCR - B3F- cell EH1	
SCR - B3F- cell EH2	
SCR - B3F- cell EH3	
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SCR - B3F- cell FB1	
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Deadline **19. Jun 13** **12:00 CET**
Public
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Resolution

In accordance with Articles 35 and 254 of
