

AMICE Response EIOPA Reporting Package, 8 May 2017

AMICE welcomes the opportunity to provide feedback on EIOPA's Reporting and Disclosure ITS annual corrections. The short deadline consultation has not allowed a sufficient due process. Additional comments may be submitted once they have been addressed by members.

I. AMICE Comments

- **S.01.01:** No selection offered for companies that do not report S.20.01, S.21.01, S21.02, S21.03, S17.02 (pure reinsurers). We propose to include a selection "*not reported; no primary insurance business*" to avoid the selection "*not reported by other reasons*" – the latter one would make a separate explanation mandatory.
- **S.26.01.01:** Inconsistency on infrastructure business; on page 5 pdf reader R0600_C0020 is declared open, on page 22 it is declared closed.
- **S.29.01:** AMICE believes that the definitions of LoB 37 and 38 are wrong. It should be $\text{LoB 37} = \text{LoB 30} + \text{LoB 31} + \text{LoB 32} + \text{LoB 34} + \text{LoB 36}$ and $\text{LoB 38} = \text{LoB 29} + \text{LoB 33} + \text{LoB 35}$.
This means, LoB 29 and 33 should appear in LoB 38 (Health), LoB 36 should appear in LoB 37 (Life).
- **S.06.03** – “look through”: We support the new approach to compute the look-through. However, in order to simplify the approach the 5% threshold should be removed.
- **Nominated ECAIs in several templates:** We believe that the list of subsidiaries from parent ECAIs should be provided in the close list.
