

<b>Comments Template on EIOPA-CP-14-052</b>		<b>Deadline</b>
<b>Draft proposal for ITS on the templates for the submission of information to the supervisory authorities</b>		<b>02.Mar.2015 23:59 CET</b>
Company name:	<b>AMICE</b>	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential. Please indicate if your comments on this CP should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.	Public/Confidential
<p>Please follow the instructions for filling in the template:</p> <ul style="list-style-type: none"> <li>⇒ <u>Do not change the numbering</u> in column “Reference”.</li> <li>⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph, keep the row <u>empty</u>.</li> <li>⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below. <ul style="list-style-type: none"> <li>o If your comment refers to multiple paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other paragraphs this also applies.</li> <li>o If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment itself.</li> </ul> </li> </ul> <p><b>Please send the completed template to <a href="mailto:Consultation_Set2@eiopa.europa.eu">Consultation_Set2@eiopa.europa.eu</a>, in MSEXcel Format, (our IT tool does not allow processing of any other formats).</b></p> <p>The paragraph numbers below correspond to Consultation Paper No. EIOPA-CP-14-052.</p>		
<b>Reference</b>	<b>Comment</b>	

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		<p style="text-align: center;"><b>02.Mar.2015</b>  <b>23:59 CET</b></p>
<p>General Comment</p>	<p>1. We believe that the proposed reporting templates will put a <b>heavy burden on the undertakings</b>. There will be a permanent increase in costs of changing IT systems for reporting and extra additional human resources will be required in all company functions involved in reporting. The drivers for this additional need of resources are</p> <ul style="list-style-type: none"> <li>• the rather large amount of data that needs to be collected (from different systems/departments),</li> <li>• the necessary controlling of the templates, and</li> <li>• the governance involved at all levels, including the development, documentation and maintenance of policies and procedures. We are not at all sure that the benefits for supervisors will outweigh the cost to the undertakings, and thus for policyholders, which will be substantial.</li> </ul> <p>2. National Supervisory Authorities should take into consideration the <b>amount of changes made to the proposed templates</b> as to the published 2012 and the preparatory phase reporting and the delay in the publication of the final package (expected by October 2015 in all official languages). NSAs should therefore allow proxies and simplifications to be applied in the first year of entry into force of Solvency II.</p> <p>3. <b>ECAIs</b>: To access the rating of the ECAIs, all firms reporting under Solvency will be required to buy licenses from the ECAIs; The process is as follows: the issuer pays to be noted , the client (an asset manager for example) to view the rating and the end user (insurance undertaking subject to SII) to store and download the data. Moreover, the fact that not a single ECAIs registered in the EU is able to provide all the necessary data and the fact that the contracts with ECAIs do not allow to supply some securities with one provider (i.e S&amp;P) and other securities with another provider (i.e Moody’s) results in the need to contract with more than one ECAI and to go for the larger ones (S&amp;P, Moody’s and Fitch). The total cost of the contracts to cover all the securities for which an ECAI is needed is huge (e.g the cost of an ECAIs subscription amounts to 50,000-65,000 euro per year for a small insurance undertaking with less than 500 asset lines). This outcome justifies the growing concern among the industry on the request to submit the information about the "nominated ECAI".</p>	
Recital 1		
Recital 2		
Recital 3		
Recital 4		
Recital 5	<p>Please add to this recital that the ad-hoc informations only refer to information necessary for the Solvency II reporting.</p>	
Recital 6		
Recital 7		
Recital 8		
Article 1		
Article 2		
Article 3		
Article 4		

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Article 5		
Article 6		
Article 7	We fully support this article stating that proxies and simplifications can be applied on the quarterly reporting calculation. However, article 7 (Solo) and article 11 (Groups) should not limit the application of simplifications for annual reporting. Firms should be allowed to use proxies and simplifications on annual reporting.	
Article 8		
Article 9		
Article 10		
Article 11	We fully support this article stating that proxies and simplifications can be applied on the quarterly reporting calculation. However, article 7 (Solo) and article 11 (Groups) should not limit the application of simplifications for annual reporting. Firms should be allowed to use proxies and simplifications on annual reporting.	
Article 12		
Article 13		
Article 14		
Article 15		
Annex I - S.01.01 Opening submission		
Annex I - S.01.02 Opening submission		
Annex I - S.01.03 Opening submission		
Annex I - S.02.01 Opening submission		
Annex I - S.23.01 Opening submission		
Annex I - S.25.01 Opening submission		

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Annex I - S.25.02 Opening submission		
Annex I - S.25.03 Opening submission		
Annex I - S.28.01 Opening submission		
Annex I - S.28.02 Opening submission		
Annex I - S.32.01 Opening submission		
Annex I - S.33.01 Opening submission		
Annex I - S.34.01 Opening submission		
Annex I - S.01.01 Individual entities		
Annex I - S.01.02 Individual entities		
Annex I - S.01.03 Individual entities		

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<p>Annex I - S.02.01 Individual entities</p>	<p>The LOG file refers to a cell Z0010 Fund Number. As this cell is not relevant for this template, we suggest the cell to be deleted. These remarks also apply to all S.02.01 templates.</p> <p>The LoG instructions in cells C0010-C0020/R0170 and cells C0010-C0020/R0180 introduce a new type of coding for the investment instruments. We suggest to use the CIC mapping instead to avoid confusion and unnecessary changes in the investment systems.</p> <p>Collective Investment Undertakings (cells C0010- C0020/R0180): when a Collective Investment Undertaking is also a Related Undertaking (as defined in Article 212(1)(b)), where should it then be reported on the Solvency II Balance Sheet (S.02.01 (a-n): under "Participations and related undertakings" (cell A6/R0090) or under "Collective Investment Undertakings" (cell A9/R0180).</p> <p>Derivatives (cells C0010-C0020/R0190): The LOG file contains a definition of derivatives that is not in line with the Directive and the Delegated Acts. Can you please explain whether this difference is intentional?</p> <p>Reinsurance recoverables not recognised for TP calculation (cells C0010-C0020/R0350): Can EIOPA confirm that this new item contains the amounts recoverable from reinsurance contracts which do not directly compensate insurance events and unsettled insurance claims (According to article 41)?</p> <p>Contingent liabilities (cells C0010- C0020/R0740): The LOG file should be aligned with Article 11 of the Delegated Acts. The LOG file refers to contingent liabilities where the obligation cannot be measured with sufficient reliability. This type of contingent liability is not quantifiable and therefore cannot be recognized on the balance sheet, but to be reported on the relevant template in the set.</p>	
<p>Annex I - S.02.02 Individual entities</p>		
<p>Annex I - S.03.01 Individual entities</p>		
<p>Annex I - S.03.02 Individual entities</p>		
<p>Annex I - S.03.03 Individual entities</p>		
<p>Annex I - S.04.01 Individual entities</p>		

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Annex I - S.04.02 Individual entities		
Annex I - S.05.01 Individual entities	It would be useful if the LoG document can indicate that the definition of "premiums written" and "premiums earned" provided in the Directive 91/674/EEC is consistent with the such definitions in the Delegated Acts (Article 1).	
Annex I - S.05.02 Individual entities		
Annex I - S.06.01 Individual entities		
Annex I - S.06.02 Individual entities	<p>(Cell C0330) <b>Nominated ECAI:</b> To access the rating of the ECAIs, all firms reporting under Solvency will be required to buy licenses from the ECAIs; The process is as follows: the issuer pays to be noted , the client (an asset manager for example) to view the rating and the end user (insurance undertaking subject to SII) to store and download the data. Moreover, the fact that not a single ECAIs registered in the EU is able to provide all the necessary data and the fact that the contracts with ECAIs do not allow to supply some securities with one provider (i.e S&amp;P) and other securities with another provider (i.e Moody's) results in the need to contract with more than one ECAI and to go for the larger ones (S&amp;P, Moody's and Fitch).</p> <p>The total cost of the contracts to cover all the securities for which an ECAI is needed is huge (e.g the cost of an ECAIs subscription amounts to 50,000-65,000 euro per year for a small insurance undertaking with less than 500 asset lines). This outcome justifies the growing concern among the industry on the request to submit the information about the "nominated ECAI". And this is not a problem for mutual undertakings only but to all firms.</p>	
Annex I - S.06.03 Individual entities	<b>Collective investment undertakings:</b> The requirement to report the country of issue (C0070) of each asset category rather than geographical zone will significantly increase the complexity of this template. Can EIOPA please confirm which is the reasoning behind this change?	
Annex I - S.07.01 Individual entities		
Annex I - S.08.01 Individual entities	There is a lack of consistency between these reporting templates and the reporting obligations under EMIR.	
Annex I - S.08.02 Individual entities		
Annex I - S.09.01 Individual entities		

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Annex I - S.10.01 Individual entities		
Annex I - S.11.01 Individual entities		
Annex I - S.12.01 Individual entities	<p>In this template it is requested to detail the effect of the LTG measures by line of business and an allocation between the risk margin and the best estimate. This requirement goes beyond the Level 1 text. <b>Risk Margin and LTG measures:</b> Article 38 of the Delegated Acts states that future SCR should be discounted at the basic risk-free rate (i.e no LTG measures are allowed). However, when firms decide to use simplifications to calculate the risk margin and decide to apply method 2 described in “Guideline 61 – Methods to calculate the risk margin” paragraph 1.114 in the Guidelines on Valuation of Technical Provisions, the best estimate is calculated according to paragraph 77 of the Level 1 text (i.e discounted at the relevant risk-free rate). This should be clarified in the LoG files. <b>Co-insurance</b> Firms should be allowed to use the information from their own portfolio to populate the templates when the administrator does not provide the information in a timely manner. This information will have to be adjusted as soon as the information is received. We suggest EIOPA accepts this approach as an approximation or simplification.</p>	
Annex I - S.12.02 Individual entities		
Annex I - S.12.03 Individual entities		
Annex I - S.13.01 Individual entities		
Annex I - S.14.01 Individual entities		
Annex I - S.15.01 Individual entities		
Annex I - S.15.02 Individual entities		
Annex I - S.16.01 Individual entities		

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<p>Annex I - S.17.01 Individual entities</p>	<p>In this template it is requested to detail the effect of the LTG measures by line of business and an allocation between the risk margin and the best estimate. This requirement goes beyond the Level 1 text.  <b>Risk Margin and LTG measures:</b> Article 38 of the Delegated Acts states that future SCR should be discounted at the basic risk-free rate (i.e no LTG measures are allowed). However, when firms decide to use simplifications to calculate the risk margin and decide to apply method 2 described in “Guideline 61 – Methods to calculate the risk margin” paragraph 1.114 in the Guidelines on Valuation of Technical Provisions, the best estimate is calculated according to paragraph 77 of the Level 1 text (i.e discounted at the relevant risk-free rate). This should be clarified in the LoG files.</p>	
<p>Annex I - S.17.02 Individual entities</p>		
<p>Annex I - S.17.03 Individual entities</p>		
<p>Annex I - S.18.01 Individual entities</p>		
<p>Annex I - S.19.01 Individual entities</p>	<p>Co-insurance: Firms should be allowed to use the information from their own portfolio to populate the templates when the administrator does not provide the information in a timely manner. This information will have to be adjusted as soon as the information is received. We suggest EIOPA accepts this approach as an approximation or simplification.</p>	
<p>Annex I - S.20.01 Individual entities</p>		
<p>Annex I - S.21.01 Individual entities</p>		
<p>Annex I - S.21.02 Individual entities</p>		
<p>Annex I - S.21.03 Individual entities</p>		
<p>Annex I - S.22.01 Individual entities</p>		
<p>Annex I - S.22.02 Individual entities</p>		
<p>Annex I - S.22.03 Individual entities</p>		



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Annex I - S.22.04 Individual entities	The requirement to submit the technical provisions split by different interest rates is extremely challenging. The reason behind is that there are products with profit participation features and surplus funds. Moreover, this split does not follow the homogeneous risk groups.	
Annex I - S.22.05 Individual entities		
Annex I - S.23.01 Individual entities	As S.23.01a and S.23.01b are identical, is it possible to delete one of them and state that there is only one QRT for Own Funds which should be disclosed both annually and quarterly? Is it possible to include the details on the reconciliation reserve (now at the bottom of the QRT) in the basic Own Fund (at top of the QRT)?	
Annex I - S.23.02 Individual entities		
Annex I - S.23.03 Individual entities		
Annex I - S.23.04 Individual entities		
Annex I - S.24.01 Individual entities		
Annex I - S.25.01 Individual entities		
Annex I - S.25.02 Individual entities		
Annex I - S.25.03 Individual entities		
Annex I - S.26.01 Individual entities		
Annex I - S.26.02 Individual entities		
Annex I - S.26.03 Individual entities		
Annex I - S.26.04 Individual entities		

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<p>Annex I - S.26.05 Individual entities</p>		
<p>Annex I - S.26.06 Individual entities</p>		
<p>Annex I - S.26.07 Individual entities</p>	<p><b>Nominated ECAI:</b> To access the rating of the ECAIs, all firms reporting under Solvency will be required to buy licenses from the ECAIs; The process is as follows: the issuer pays to be noted , the client (an asset manager for example) to view the rating and the end user (insurance undertaking subject to SII) to store and download the data. Moreover, the fact that not a single ECAIs registered in the EU is able to provide all the necessary data and the fact that the contracts with ECAIs do not allow to supply some securities with one provider (i.e S&amp;P) and other securities with another provider (i.e Moody's) results in the need to contract with more than one ECAI and to go for the larger ones (S&amp;P, Moody's and Fitch). The total cost of the contracts to cover all the securities for which an ECAI is needed is huge (e.g the cost of an ECAIs subscription amounts to 50,000-65,000 euro per year for a small insurance undertaking whith less than 500 asset lines). This outcome justifies the growing concern among the industry on the request to submit the information about the "nominated ECAI". And this is not a problem for mutual undertakings only but to all firms.</p>	
<p>Annex I - S.27.01 Individual entities</p>	<p><b>Non-life Catastrophe risk:</b> The problem arises as firms could apply RI covers in so many ways that a standard QRT will not be able to capture them all. We need to bear in mind that Reinsurance covers should be applied according to :</p> <ol style="list-style-type: none"> <li>1) the order of application of the treaties, the way they are in place in the reporting insurance undertaking/group</li> <li>2) the nature of the reinsurance covers, which implies having recourse to the reinsurance guidelines to apply the risk mitigation technique at the proper nodes or branch of the CATnl tree</li> </ol> <p>As a consequence, it would not always be possible to find from the reporting templates how the risk mitigation has been derived.</p> <p>For instance (see Technical Annex 1) method 1 implies that a gross loss will be disaggregated back to lower level of the trees for RI cover application. In that case, the diversification effects have been applied to the gross values before disaggregation and the RI covers will be applied on diversified disaggregated gross losses. Accordingly, the net of RI resulting values should not be reaggreated back with correlation matrices but rather simply added in order not to diversify twice. And this issue might have been overlooked when designing the templates.</p>	

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Annex I - S.28.01 Individual entities		
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Annex I - S.29.01 Individual entities	<p><b>Variation Analysis template:</b> Some of the information requested in the variation analysis template will not be available in the first year of implementation of Solvency II ( i.e 2016 data). Can EIOPA clarify as to whether a delay in the submission of these templates is envisaged? This would mean that the VA templates are first reported in the 2017 Regular Supervisory Report. The Variation analysis (S29.01 till S29.04) is based on two different methods, results based and cash flow based's methods. In our opinion it would be difficult to get structured information out of an analysis if it is based on two different methods.</p> <p>Please include the formulas (where applicable) in the LoG files or QRTs for fields that can be derived from information already included in other QRTs.</p>	
Annex I - S.29.02 Individual entities		
Annex I - S.29.03 Individual entities		
Annex I - S.29.04 Individual entities		
Annex I - S.30.01 Individual entities		
Annex I - S.30.02 Individual entities		
Annex I - S.30.03 Individual entities		
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Annex I - S.31.01 Individual entities		
Annex I - S.31.02 Individual entities		
Annex I - S.36.01 Individual entities		

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Annex I - S.36.02 Individual entities		
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Annex I - S.36.04 Individual entities		
Annex I - S.01.01 Groups		
Annex I - S.01.02 Groups		
Annex I - S.01.03 Groups		
Annex I - S.02.01 Groups		
Annex I - S.02.02 Groups		
Annex I - S.03.01 Groups		
Annex I - S.03.02 Groups		
Annex I - S.03.03 Groups		
Annex I - S.05.01 Groups	It would be useful if the LoG document can indicate that the definition of "premiums written" and "premiums earned" provided in the Directive 91/674/EEC is consistent with the such definitions in the Delegated Acts (Article 1).	
Annex I - S.05.02 Groups		
Annex I - S.06.01 Groups		
Annex I - S.06.02 Groups		
Annex I - S.06.03 Groups	<b>Collective investment undertakings:</b> The requirement to report the country of issue (C0070) of each asset category rather than geographical zone will significantly increase the complexity of this template. Can EIOPA please confirm which is the reasoning behind this change?	

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Annex I - S.07.01 Groups		
Annex I - S.08.01 Groups		
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Annex I - S.09.01 Groups		
Annex I - S.10.01 Groups		
Annex I - S.11.01 Groups		
Annex I - S.15.01 Groups		
Annex I - S.15.02 Groups		
Annex I - S.22.01 Groups		
Annex I - S.23.01 Groups	<p>S23.01.f and S23.01g are identical: Is it correct to assume that these two QRTs are identical? If so, it is possible to delete one of them and state that there is only one QRT for the Own Funds, which should be disclosed annually and quarterly?</p> <p>Is it possible to split the QRT in a default QRT (when method 1 is used and only EEA business is written) and a separate QRT for groups that do not follow the default method (method 2 or a combination and or outside EEA)? This split reduces the number of QRT fields for companies following default Method 1.</p>	
Annex I - S.23.02 Groups		
Annex I - S.23.03 Groups		
Annex I - S.23.04 Groups		
Annex I - S.25.01 Groups		

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Annex I - S.25.03 Groups		
Annex I - S.26.01 Groups		
Annex I - S.26.02 Groups		
Annex I - S.26.03 Groups		
Annex I - S.26.04 Groups		
Annex I - S.26.05 Groups		
Annex I - S.26.06 Groups		
Annex I - S.26.07 Groups		
Annex I - S.27.01 Groups		
Annex I - S.31.01 Groups		
Annex I - S.31.02 Groups		
Annex I - S.32.01 Groups		
Annex I - S.33.01 Groups		
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Annex I - S.36.02 Groups		
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Annex I - S.36.04 Groups		
Annex I - S.37.01 Groups		
Annex II - S.01.01 Opening submission		
Annex II - S.01.02 Opening submission		
Annex II - S.01.03 Opening submission		
Annex II - S.02.01 Opening submission		
Annex II - S.23.01 Opening submission		
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Annex II - S.25.02 Opening submission		
Annex II - S.25.03 Opening submission		
Annex II - S.28.01 Opening submission		

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Annex II - S.28.02 Opening submission		
Annex II - S.32.01 Opening submission		
Annex II - S.33.01 Opening submission		
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Annex II - S.01.01 Individual entities		
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<p>Annex II - S.02.01 Individual entities</p>	<p>The LOG file refers to a cell Z0010 Fund Number. As this cell is not relevant for this template, we suggest the cell to be deleted. These remarks also apply to all S.02.01 templates.</p> <p>The LoG instructions in cells C0010-C0020/R0170 and cells C0010-C0020/R0180 introduce a new type of coding for the investment instruments. We suggest to use the CIC mapping instead to avoid confusion and unnecessary changes in the investment systems.</p> <p>Collective Investment Undertakings (cells C0010- C0020/R0180): when a Collective Investment Undertaking is also a Related Undertaking (as defined in Article 212(1)(b)), where should it then be reported on the Solvency II Balance Sheet (S.02.01 (a-n): under "Participations and related undertakings" (cell A6/R0090) or under "Collective Investment Undertakings" (cell A9/R0180).</p> <p>Derivatives (cells C0010-C0020/R0190): The LOG file contains a definition of derivatives that is not in line with the Directive and the Delegated Acts. Can you please explain whether this difference is intentional?</p> <p>Reinsurance recoverables not recognised for TP calculation (cells C0010-C0020/R0350): Can EIOPA confirm that this new item contains the amounts recoverable from reinsurance contracts which do not directly compensate insurance events and unsettled insurance claims (According to article 41)?</p> <p>Contingent liabilities (cells C0010- C0020/R0740): The LOG file should be aligned with Article 11 of the Delegated Acts. The LOG file refers to contingent liabilities where the obligation cannot be measured with sufficient reliability. This type of contingent liability is not quantifiable and therefore cannot be recognized on the balance sheet, but to be reported on the relevant template in the set.</p>	
<p>Annex II - S.02.02 Individual entities</p>		
<p>Annex II - S.03.01 Individual entities</p>		
<p>Annex II - S.03.02 Individual entities</p>		
<p>Annex II - S.03.03 Individual entities</p>		
<p>Annex II - S.04.01 Individual entities</p>	<p>We believe the LoG file definitions contain an error: earned/incurred vs received/paid (Acquisition expenses paid). We advise that the term "on an accrual basis" be used for all the templates containing flows to avoid confusion.</p>	

<b>Comments Template on EIOPA-CP-14-052</b>		<b>Deadline</b>
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Annex II - S.04.02 Individual entities	We believe the LoG file definitions contain an error: earned/incurred vs received/paid (Acquisition expenses paid). We advise that the term "on an accrual basis" be used for all the templates containing flows to avoid confusion.	
Annex II - S.05.01 Individual entities	It would be useful if the LoG document can indicate that the definition of "premiums written" and "premiums earned" provided in the Directive 91/674/EEC is consistent with the such definitions in the Delegated Acts (Article 1).	
Annex II - S.05.02 Individual entities		
Annex II - S.06.01 Individual entities		
Annex II - S.06.02 Individual entities	<p><b>List of assets (Cell C0330) Nominated ECAI:</b> To access the rating of the ECAIs, all firms reporting under Solvency will be required to buy licenses from the ECAIs; The process is as follows: the issuer pays to be noted , the client (an asset manager for example) to view the rating and the end user (insurance undertaking subject to SII) to store and download the data. Moreover, the fact that not a single ECAIs registered in the EU is able to provide all the necessary data and the fact that the contracts with ECAIs do not allow to supply some securities with one provider (i.e S&amp;P) and other securities with another provider (i.e Moody's) results in the need to contract with more than one ECAI and to go for the larger ones (S&amp;P, Moody's and Fitch).</p> <p>The total cost of the contracts to cover all the securities for which an ECAI is needed is huge (e.g the cost of an ECAIs subscription amounts to 50,000-65,000 euro per year for a small insurance undertaking whith less than 500 asset lines). This outcome justifies the growing concern among the industry on the request to submit the information about the "nominated ECAI".</p> <p>C0350 refers to internal ratings only "to the extent that the external ratings are used in their internal modelling" - We support this text as it is very unlikely that an undertaking using the standard formula would generate internally credit ratings.</p>	
Annex II - S.06.03 Individual entities	<b>Collective investment undertakings:</b> The requirement to report the country of issue (C0070) of each asset category rather than geographical zone will significantly increase the complexity of this template. Can EIOPA please confirm which is the reasoning behind this change? We seek clarification on the treatment of collective investment undertakings (UCITs) at solo level. Our understanding is that UCITs are subject to the look-through at solo level even when they are participations. This treatment at solo level is not consistent with the one envisaged at group level thereby UCITs are not fully consolidated but treated as an asset and subject to equity and concentration risk. Can EIOPA confirm whether this treatment is correct?	
Annex II - S.07.01 Individual entities		

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Annex II - S.08.01 Individual entities	Cell C0140 (A16) refers to the buyer or seller of derivatives. The only type of derivative where the buying or selling position makes a relevant change to the risks involved is with options. For all other derivatives, we propose not to include this designation.	
Annex II - S.08.02 Individual entities	Cell C0130 (A16) refers to the buyer or seller of derivatives. The only type of derivative where the buying or selling position makes a relevant change to the risks involved is with options. For all other derivatives, we propose to not include this designation.	
Annex II - S.09.01 Individual entities		
Annex II - S.10.01 Individual entities		
Annex II - S.11.01 Individual entities		
Annex II - S.12.01 Individual entities	<p>In this template it is requested to detail the effect of the LTG measures by line of business and an allocation between the risk margin and the best estimate. This requirement goes beyond the Level 1 text. Risk Margin and LTG measures: Article 38 of the Delegated Acts states that future SCR should be discounted at the basic risk-free rate (i.e no LTG measures are allowed). However, when firms decide to use simplifications to calculate the risk margin and decide to apply method 2 described in “Guideline 61 – Methods to calculate the risk margin” paragraph 1.114 in the Guidelines on Valuation of Technical Provisions, the best estimate is calculated according to paragraph 77 of the Level 1 text (i.e discountional)?</p> <p>Reinsurance recoverables not recognised for TP calculation (cells C0010-C0020/R0350): Can EIOPA confirm that this new item contains the amounts recoverable from reinsurance contracts which do not directly compensate insurance events and unsettled insurance claims (According to article 41)?</p>	
Annex II - S.12.02 Individual entities		
Annex II - S.12.03 Individual entities		
Annex II - S.13.01 Individual entities		
Annex II - S.14.01 Individual entities		
Annex II - S.15.01 Individual entities		
Annex II - S.15.02 Individual entities		

<p style="text-align: center;"><b>Comments Template on EIOPA-CP-14-052</b>  <b>Draft proposal for ITS on the templates for the submission of</b>  <b>information to the supervisory</b>  <b>authorities</b></p>		<p style="text-align: center;"><b>Deadline</b>   <b>02.Mar.2015</b>  <b>23:59 CET</b></p>
Annex II - S.16.01 Individual entities		
Annex II - S.17.01 Individual entities	<p>In this template it is requested to detail the effect of the LTG measures by line of business and an allocation between the risk margin and the best estimate. This requirement goes beyond the Level 1 text. Risk Margin and LTG measures: Article 38 of the Delegated Acts states that future SCR should be discounted at the basic risk-free rate (i.e no LTG measures are allowed). However, when firms decide to use simplifications to calculate the risk margin and decide to apply method 2 described in “Guideline 61 – Methods to calculate the risk margin” paragraph 1.114 in the Guidelines on Valuation of Technical Provisions, the best estimate is calculated according to paragraph 77 of the Level 1 text (i.e discounted at the relevant risk-free rate). This should be clarified in the LoG files.</p>	
Annex II - S.17.02 Individual entities		
Annex II - S.17.03 Individual entities	<p>The LoG document should clarify that in the non-life business, the matching adjustment can only be applied to "annuities stemming from non-life obligations". The LoG document can be amended as follows: "The best estimate should be reported, without taking into account <u>in the annuities stemming from non-life obligations, any matching adjustment</u>".</p>	
Annex II - S.18.01 Individual entities		
Annex II - S.19.01 Individual entities	<p>In our view the external expenses and fees connected with the claim files would have to be reported in these triangles. This would allow the scope to be consistent with that of reinsurance. The LoG document should be amended as follows: « The Gross Claims Paid, net of salvage and subrogation, including <u>part of expenses to be consistent with the reinsurance recoveries</u>, in a triangle showing the developments of the gross claims payment already made: for each of the accident/underwriting years from N-14 (and prior) and all previous reporting periods to – including - N (last reporting year) report the payments already made corresponding at each development year (which is the delay between the accident/underwriting date and the payment date). The data are in absolute amount, non-cumulative and undiscounted. »</p> <p><b>Co-insurance:</b> Firms should be allowed to use the information from their own portfolio to populate the templates when the administrator does not provide the information in a timely manner. This information will have to be adjusted as soon as the information is received. We suggest EIOPA accepts this approach as an approximation or simplification.</p>	
Annex II - S.20.01 Individual entities	<p>Undertakings should also be exempted to report on co-insurance business. This should be clearly stated in the LoG files.</p>	
Annex II - S.21.01 Individual entities		

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Annex II - S.21.02 Individual entities		
Annex II - S.21.03 Individual entities		
Annex II - S.22.01 Individual entities	<b>Impact of long term guarantees and transitional measures</b> <u>Technical Provisions:</u> C0030/R0010: It should be clarified in the LOG document that the technical provisions without transitionals include the Volatility Adjustment; C0050/R0010: It should be clarified in the LOG document that the technical provision without transitional include the Volatility Adjustment.	
Annex II - S.22.02 Individual entities		
Annex II - S.22.03 Individual entities		
Annex II - S.22.04 Individual entities		
Annex II - S.22.05 Individual entities	Firms will be able to calculate the value of the TP for Solvency I in those jurisdictions where its value is the same as under local GAAP. However, if a recalculation on the basis of article 308d(3) is requested, it would not be possible to distinguish between the portfolio that was in place in 2016 and the new business since the calculation of the TP is done as a whole and not per contract. The challenge would even be bigger for the risk margin since an "as-if calculation" for the SCR with only the portfolio existing in 2016 would have to be conducted. EIOPA should therefore allow for proxies and simplifications provided a recalculation on the basis of article 308d(3) is being requested.	
Annex II - S.23.01 Individual entities		
Annex II - S.23.02 Individual entities		
Annex II - S.23.03 Individual entities		
Annex II - S.23.04 Individual entities		
Annex II - S.24.01 Individual entities		
Annex II - S.25.01 Individual entities		
Annex II - S.25.02 Individual entities		

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Annex II - S.25.03 Individual entities		
Annex II - S.26.01 Individual entities		
Annex II - S.26.02 Individual entities		
Annex II - S.26.03 Individual entities		
Annex II - S.26.04 Individual entities		
Annex II - S.26.05 Individual entities	<u>Solvency Capital Requirement: Non-life underwriting risk</u> : Please introduce in the LoG document the title "Non-life catastrophe risk" before the cell R0500/C0160(A16).	
Annex II - S.26.06 Individual entities		
Annex II - S.26.07 Individual entities		
Annex II - S.27.01 Individual entities	The LoG document should be split between Non-life and Health catastrophe risk. It should be otherwise clarified that this LoG document embarks non-life and health catastrophe risk. In any case, and in order to avoid any sort of misunderstanding, Health Catastrophe Risk applies to both SLT Health and Non-SLT Health. This should be stated in the LoG file.	
Annex II - S.28.01 Individual entities	<u>Minimum Capital Requirement (except for composite undertakings)</u> : it is stated that the “definition of written premiums is consistent with the definition of premiums receivable”. It would be very helpful if reference is made here to the definition of "premiums receivable" provided in the EIOPA Guidelines on Valuation of Technical Provisions - Guideline 68.	
Annex II - S.28.02 Individual entities	<u>Minimum Capital Requirement (composite undertakings)</u> : it is stated that the “definition of written premiums is consistent with the definition of premiums receivable”. It would be very helpful if reference is made here to the definition of "premiums receivable" provided in the EIOPA Guidelines on Valuation of Technical Provisions - Guideline 68.	
Annex II - S.29.01 Individual entities		
Annex II - S.29.02 Individual entities		
Annex II - S.29.03 Individual entities		

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Annex II - S.29.04 Individual entities		
Annex II - S.30.01 Individual entities		
Annex II - S.30.02 Individual entities	<b>Facultative covers (Cell C0310) Nominated ECAI:</b> To access the rating of the ECAIs, all firms reporting under Solvency will be required to buy licenses from the ECAIs; The process is as follows: the issuer pays to be noted , the client (an asset manager for example) to view the rating and the end user (insurance undertaking subject to SII) to store and download the data. This outcome justifies the growing concern among the industry on the request to submit the information about the "nominated ECAI".	
Annex II - S.30.03 Individual entities		
Annex II - S.30.04 Individual entities	<b>Outgoing Reinsurance Program in the next reporting year (Cell C0220) Nominated ECAI:</b> To access the rating of the ECAIs, all firms reporting under Solvency will be required to buy licenses from the ECAIs; The process is as follows: the issuer pays to be noted , the client (an asset manager for example) to view the rating and the end user (insurance undertaking subject to SII) to store and download the data. This outcome justifies the growing concern among the industry on the request to submit the information about the "nominated ECAI".	
Annex II - S.31.01 Individual entities		
Annex II - S.31.02 Individual entities		
Annex II - S.36.01 Individual entities		
Annex II - S.36.02 Individual entities		
Annex II - S.36.03 Individual entities		
Annex II - S.36.04 Individual entities		
Annex II - S.01.01 Groups		

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Annex II - S.01.02 Groups		
Annex II - S.01.03 Groups		
Annex II - S.02.01 Groups		
Annex II - S.02.02 Groups		
Annex II - S.03.01 Groups		
Annex II - S.03.02 Groups		
Annex II - S.03.03 Groups		
Annex II - S.05.01 Groups		
Annex II - S.05.02 Groups		
Annex II - S.06.01 Groups		
Annex II - S.06.02 Groups		
Annex II - S.06.03 Groups	<p><b>Collective investment undertakings:</b> The requirement to report the country of issue (C0070) of each asset category rather than geographical zone will significantly increase the complexity of this template. Can EIOPA please confirm which is the reasoning behind this change? We seek clarification on the treatment of collective investment undertakings (UCITs) at solo level. Our understanding is that UCITs are subject to the look-through at solo level even when they are participations. This treatment at solo level is not consistent with the one envisaged at group level thereby UCITs are not fully consolidated but treated as an asset and subject to equity and concentration risk. Can EIOPA confirm whether this treatment is correct?</p>	
Annex II - S.07.01 Groups		
Annex II - S.08.01 Groups		
Annex II - S.08.02 Groups		



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Annex II - S.09.01 Groups		
Annex II - S.10.01 Groups		
Annex II - S.11.01 Groups		
Annex II - S.15.01 Groups		
Annex II - S.15.02 Groups		
Annex II - S.22.01 Groups		
Annex II - S.23.01 Groups	<p>The description of the Ratio of Eligible Own Funds to Group SCR (excluding other financial sectors and D&amp;A undertakings) in cell R0630/C0010 (A54A) is confusing. It is not clear what the difference is between a Group SCR and a Consolidated Group SCR or are these equivalent? Please provide clarification.</p>	
Annex II - S.23.02 Groups		
Annex II - S.23.03 Groups		
Annex II - S.23.04 Groups		
Annex II - S.25.01 Groups		
Annex II - S.25.02 Groups		
Annex II - S.25.03 Groups		
Annex II - S.26.01 Groups		
Annex II - S.26.02 Groups		
Annex II - S.26.03 Groups		

<p style="text-align: center;"><b>Comments Template on EIOPA-CP-14-052</b>  <b>Draft proposal for ITS on the templates for the submission of</b>  <b>information to the supervisory</b>  <b>authorities</b></p>		<p style="text-align: center;"><b>Deadline</b>   <b>02.Mar.2015</b>  <b>23:59 CET</b></p>
Annex II - S.26.04 Groups		
Annex II - S.26.05 Groups		
Annex II - S.26.06 Groups		
Annex II - S.26.07 Groups		
Annex II - S.27.01 Groups		
Annex II - S.31.01 Groups		
Annex II - S.31.02 Groups		
Annex II - S.32.01 Groups		
Annex II - S.33.01 Groups	<p><b>Undertaking Specific Parameters</b> are limited to Non-Life &amp; NSLT Premium and Reserve Risk, Non-Proportional Reinsurance and Live and SLT Revision Risk. <b>Cell C0150 (E1) Use of undertaking specific parameters</b> should be amended as follows: When an undertaking uses undertaking specific parameters for calculating individual SCR, report the area(s) for which these parameters are used. The following closed list shall be used: 1 – Life underwriting risk / mortality risk 2 – Life underwriting risk / longevity risk 3 – Life underwriting risk / disability-morbidity risk 4 – Life underwriting risk / lapse risk 5 – Life underwriting risk / life expense risk 6 – Life underwriting risk / revision risk 7 – Life underwriting risk / life catastrophe risk 8 – Health SLT underwriting risk / mortality risk 9 – Health SLT underwriting risk / longevity risk 10 – Health SLT underwriting risk / disability-morbidity risk (medical expenses) 11 – Health SLT underwriting risk / disability-morbidity risk (income protection) 12 – Health SLT underwriting risk / lapse risk 13 – Health SLT underwriting risk / expense risk 14 – Health SLT underwriting risk / revision risk 15 – Health NSLT premium and reserve risk, 16 – Health NSLT lapse risk, 17 – Health NSLT catastrophe risk 18 – Non Life premium and reserve risk, 19 – Non life lapse risk, 20 – Non Life catastrophe risk Include as many options as needed, separated by a “;”</p>	
Annex II - S.34.01 Groups		

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Annex II - S.35.01 Groups		
Annex II - S.36.01 Groups		
Annex II - S.36.02 Groups		
Annex II - S.36.03 Groups		
Annex II - S.36.04 Groups		
Annex II - S.37.01 Groups		
Annex III		
Annex IV		
Annex V		
Impact Assessment General Comment		
Impact Assessment 1.1		
Impact Assessment 1.2		
Impact Assessment 1.3		
Impact Assessment 1.4		
Impact Assessment 1.5		

<b>Comments Template on EIOPA-CP-14-052</b> <b>Draft proposal for ITS on the templates for the submission of</b> <b>information to the supervisory</b> <b>authorities</b>		<b>Deadline</b>
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Impact Assessment 1.6		
Impact Assessment 1.7		
Impact Assessment 1.8		
Impact Assessment 1.9		
Impact Assessment 1.10		
Impact Assessment 1.11		
Impact Assessment 1.12		
Impact Assessment 1.13		
Impact Assessment 1.14		
Impact Assessment 1.15		
Impact Assessment 1.16		

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Impact Assessment 1.17		
Impact Assessment 1.18		
Impact Assessment 1.19		
Impact Assessment 1.20		
Impact Assessment 1.21		
Impact Assessment 1.22		
Impact Assessment 1.23		
Impact Assessment 1.24		
Impact Assessment 1.25		
Impact Assessment 1.26		
Impact Assessment 1.27		

<b>Comments Template on EIOPA-CP-14-052</b> <b>Draft proposal for ITS on the templates for the submission of</b> <b>information to the supervisory</b> <b>authorities</b>		<b>Deadline</b>
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Impact Assessment 1.28		
Impact Assessment 1.29		
Impact Assessment 1.30		
Impact Assessment 1.31		
Impact Assessment 1.32		
Impact Assessment 1.33		
Impact Assessment 1.34		
Impact Assessment 1.35		
Impact Assessment 1.36		
Impact Assessment 1.37		
Impact Assessment 1.38		

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Impact Assessment 1.39		
Impact Assessment 1.40		
Impact Assessment 1.41		
Impact Assessment 1.42		
Impact Assessment 1.43		
Impact Assessment 1.44		
Impact Assessment 1.45		
Impact Assessment 1.46		
Impact Assessment 1.47		
Impact Assessment 1.48		
Impact Assessment 1.49		

<p style="text-align: center;"><b>Comments Template on EIOPA-CP-14-052</b>  <b>Draft proposal for ITS on the templates for the submission of</b>  <b>information to the supervisory</b>  <b>authorities</b></p>		<p style="text-align: center;"><b>Deadline</b></p>
		<p style="text-align: center;"><b>02.Mar.2015</b>  <b>23:59 CET</b></p>
Impact Assessment 1.50		
Impact Assessment 1.51		
Impact Assessment 1.52		
Impact Assessment 1.53		
Impact Assessment 1.54		
Impact Assessment 1.55		
Impact Assessment 1.56		
Impact Assessment 1.57		
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Impact Assessment 1.59		
Impact Assessment 1.60		



<b>Comments Template on EIOPA-CP-14-052</b> <b>Draft proposal for ITS on the templates for the submission of</b> <b>information to the supervisory</b> <b>authorities</b>		<b>Deadline</b>
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Impact Assessment 1.61		
Impact Assessment 1.62		
Impact Assessment 1.63		
Impact Assessment 1.64		
Impact Assessment 1.65		
Impact Assessment 1.66		
Impact Assessment 1.67		
Impact Assessment 1.68		
Impact Assessment 1.69		
Impact Assessment 1.70		
Impact Assessment 1.71		

<b>Comments Template on EIOPA-CP-14-052</b> <b>Draft proposal for ITS on the templates for the submission of</b> <b>information to the supervisory</b> <b>authorities</b>		<b>Deadline</b>
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Impact Assessment 1.72		
Impact Assessment 1.73		
Impact Assessment 1.74		
Impact Assessment 1.75		
Impact Assessment 1.76		
Impact Assessment 1.77		
Impact Assessment 1.78		
Impact Assessment 1.79		
Impact Assessment 1.80		
Impact Assessment 1.81		
Impact Assessment 1.82		

<b>Comments Template on EIOPA-CP-14-052</b> <b>Draft proposal for ITS on the templates for the submission of</b> <b>information to the supervisory</b> <b>authorities</b>		<b>Deadline</b>
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Impact Assessment 1.83		
Impact Assessment 1.84		
Impact Assessment 1.85		
Impact Assessment 1.86		
Impact Assessment 1.87		
Impact Assessment 1.88		
Impact Assessment 1.89		
Impact Assessment 1.90		
Impact Assessment 1.91		
Impact Assessment 1.92		
Impact Assessment 1.93		

<b>Comments Template on EIOPA-CP-14-052</b> <b>Draft proposal for ITS on the templates for the submission of</b> <b>information to the supervisory</b> <b>authorities</b>		<b>Deadline</b>
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Impact Assessment 1.94		
Impact Assessment 1.95		
Impact Assessment 1.96		
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Impact Assessment 1.98		
Impact Assessment 1.99		
Impact Assessment 1.100		
Impact Assessment 1.101		
Impact Assessment 1.102		
Impact Assessment 1.103		
Impact Assessment 1.104		

<b>Comments Template on EIOPA-CP-14-052</b> <b>Draft proposal for ITS on the templates for the submission of</b> <b>information to the supervisory</b> <b>authorities</b>		<b>Deadline</b>
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Impact Assessment 1.105		
Impact Assessment 1.106		
Impact Assessment 1.107		
Impact Assessment 1.108		
Impact Assessment 1.109		
Impact Assessment 1.110		
Impact Assessment 1.111		
Impact Assessment 1.112		
Impact Assessment 1.113		
Impact Assessment 1.114		
Impact Assessment 1.115		

<b>Comments Template on EIOPA-CP-14-052</b> <b>Draft proposal for ITS on the templates for the submission of</b> <b>information to the supervisory</b> <b>authorities</b>		<b>Deadline</b>
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Impact Assessment 1.116		
Impact Assessment 1.117		
Impact Assessment 1.118		
Impact Assessment 1.119		
Impact Assessment 1.120		
Impact Assessment 1.121		
Impact Assessment 1.122		
Impact Assessment 1.123		
Impact Assessment 1.124		
Impact Assessment 1.125		
Impact Assessment 1.126		

<b>Comments Template on EIOPA-CP-14-052</b> <b>Draft proposal for ITS on the templates for the submission of</b> <b>information to the supervisory</b> <b>authorities</b>		<b>Deadline</b>
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Impact Assessment 1.127		
Impact Assessment 1.128		
Impact Assessment 1.129		
Impact Assessment 1.130		
Impact Assessment 1.131		
Impact Assessment 1.132		
Impact Assessment 1.133		
Impact Assessment 1.134		
Impact Assessment 1.135		
Impact Assessment 1.136		
Impact Assessment 1.137		

<b>Comments Template on EIOPA-CP-14-052</b> <b>Draft proposal for ITS on the templates for the submission of</b> <b>information to the supervisory</b> <b>authorities</b>		<b>Deadline</b>
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Impact Assessment 1.138		
Impact Assessment 1.139		
Impact Assessment 1.140		
Impact Assessment 1.141		
Impact Assessment 1.142		
Impact Assessment 1.143		
Impact Assessment 1.144		
Impact Assessment 1.145		
Impact Assessment 1.146		
Impact Assessment 1.147		
Impact Assessment 1.148		



<b>Comments Template on EIOPA-CP-14-052</b> <b>Draft proposal for ITS on the templates for the submission of</b> <b>information to the supervisory</b> <b>authorities</b>		<b>Deadline</b>
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Impact Assessment 1.149		
Impact Assessment 1.150		
Impact Assessment 1.151		
Impact Assessment 1.152		
Impact Assessment 1.153		
Impact Assessment 1.154		
Impact Assessment 1.155		
Impact Assessment 1.156		
Impact Assessment 1.157		
Impact Assessment 1.158		
Impact Assessment 1.159		

<b>Comments Template on EIOPA-CP-14-052</b> <b>Draft proposal for ITS on the templates for the submission of</b> <b>information to the supervisory</b> <b>authorities</b>		<b>Deadline</b>
		<b>02.Mar.2015</b> <b>23:59 CET</b>
Impact Assessment 1.160		
Impact Assessment 1.161		
Impact Assessment 1.162		
Impact Assessment 1.163		
Impact Assessment 1.164		
Impact Assessment 1.165		
Impact Assessment 1.166		
Impact Assessment 1.167		
Impact Assessment 1.168		
Impact Assessment 1.169		
Impact Assessment 1.170		

<b>Comments Template on EIOPA-CP-14-052</b> <b>Draft proposal for ITS on the templates for the submission of</b> <b>information to the supervisory</b> <b>authorities</b>		<b>Deadline</b>
		<b>02.Mar.2015</b> <b>23:59 CET</b>
Impact Assessment 1.171		
Impact Assessment 1.172		
Impact Assessment 1.173		
Impact Assessment 1.174		