

Comments Template on EIOPA-CP-14-057 Draft proposal for for Implementing Technical Standards with regard to the lists of regional governments and local authorities exposures to whom are to be treated as exposures to the central government		Deadline 02.Mar.2015 23:59 CET
Company name:	AMICE	
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"> ⇒ <u>Do not change the numbering</u> in column "Reference". ⇒ 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>. ⇒ 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"> ○ 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. ○ If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment itself. <p>Please send the completed template to Consultation_Set2@eiopa.europa.eu, in MSWord Format, (our IT tool does not allow processing of any other formats).</p> <p>The paragraph numbers below correspond to Consultation Paper No. EIOPA-CP-14-057.</p>		
Reference	Comment	
General Comment	AMICE welcomes the opportunity to comment on the EIOPA ITS with regards to the lists of regional governments and local authorities to be treated as central government exposures. We would like to emphasize the potential lack of level playing field between the insurance and banking	

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	<p>legislation where the following is stated:</p> <p><i>According to Article 10(1e ii) of the Delegated Act of 10.10.2014 to supplement Regulation (EU) 575/2013, a promotional lender for the purpose of this article is defined as any credit institution whose purpose is to advance the public policy objectives of the Union or of the central or regional government or local authority in a Member State predominantly through the provision of promotional loans on a non-competitive, not for profit basis, provided that at least 90% of the loans that it grants are directly or indirectly guaranteed by the central or regional government or local authority and that any exposure to that regional government or local authority, as applicable, is treated as an exposure to the central government of the Member State in accordance with Article 115(2) of Regulation (EU) No 575/2013.</i></p>	
Article 1	<p>In Finland, the federation of municipalities is missing from the list. To provide some social and health services (e.g. special health care and in the special care of the mentally disabled) municipalities must belong to a federation of municipalities, which arranges these services among them.</p> <p>The article should be amended as follows:</p> <p>(d) in the republic of Finland: (i) community (kunta/kommun) (ii) city (kaupunki/stad) (iii) province of Aland (Ahvenanmaan maakunta/Landskapet Aland) (iv) <u>Kuntayhtymä</u></p>	
Article 2		
Impact Assessment		