

<b>Comments Template on EIOPA-CP-14-044</b> <b>Draft proposal for Level 3 Guidelines on methods for determining the market share for reporting</b>		<b>Deadline</b> <b>02.Mar.2015</b> <b>23:59 CET</b>
Company name:	GDV	
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
<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>○ 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>○ 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 MSWord 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-14-044.</p>		
<b>Reference</b>	<b>Comment</b>	
General Comment	GDV welcomes the opportunity to comment on the proposal for guidelines on methods for determining the market share for reporting.  GDV principally shares the views expressed by Insurance Europa. In addition to those comments already submitted by Insurance Europe we would like to address our issues of concern in the following.	

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	<p><b>In our view important details are missing such as the following:</b></p> <ul style="list-style-type: none"> <li>• An approach regarding how the proportionality criteria in Art. 35 (8) of the Directive will be applied by National Supervisory Authorities (NSA) in a transparent manner</li> <li>• How NSAs are going to publish the annual market share thresholds for the purposes of transparency</li> <li>• An obligation of the NSA to inform companies about granting or cancelling the exemption of the quarterly reporting in advance (adequate harmonised time slot required)</li> <li>• The allotted transition period to implement the reporting process within the undertaking when the exemption of the quarterly reporting will be cancelled</li> </ul> <p>Furthermore, explanatory texts are non-binding explanations and clarifications. This is why they are not and have not been part of the consultations. This should be clarified by EIOPA.</p>	
1.1.		
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1.3.		
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1.5.		
1.6.		
1.7.		
1.8.	<p>A transparent process for the exemption from quarterly reporting is needed. At least companies need time in advance to implement all needed processes for quarterly reporting. There must be detailed rules for implementation periods if the exemption from quarterly reporting of a company should be cancelled.</p>	
1.9.		

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1.10.		
1.11.		
1.12.		
1.13.	<b>Guideline 2</b> To increase transparency the annual market share threshold of the Live Market should be published.	
1.14.	<b>Guideline 3</b> To increase transparency the annual market share threshold of the Non-Live Market should be published.	
1.15.		
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1.19.		
1.20.		
Annex I - 1.1.		
Annex I - 1.2.		
Annex I - 1.3.		
Annex I - 1.4.		
Annex I - 1.5.		
Annex I - 1.6.		
Annex I - 1.7.		
Annex I - 1.8.		
Annex I - 1.9.		
Annex I - 1.10.		

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Annex I - 1.11.		
Annex I - 1.12.		
Annex I - 1.13.		
Annex I - 1.14.		
Annex I - 1.15.		
Annex I - 1.16.		
Annex I - 1.17.		
Annex I - 1.18.		
Annex I - 1.19.		
Annex I - 1.20.		
Annex I - 1.21.		
Annex I - 1.22.		
Annex I - 1.23.		
Annex I - 1.24.		
Annex I - 1.25.		
Annex I - 1.26.		
Annex I - 1.27.		
Annex I - 1.28.		
Annex I - 1.29.		
Annex I - 1.30.		
Annex I - 1.31.		
Annex I - 1.32.		
Annex I - 1.33.		
Annex I - 1.34.		
Annex I - 1.35.		

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Annex I - 1.36.		
Annex I - 1.37.		
Annex I - 1.38.		
Annex I - 1.39.		
Annex I - 1.40.		