

Comments Template on EIOPA-CP-14-61 Draft proposal for Implementing Technical Standards on the procedures for the application of article 308b(13) of Directive 2009/138/EC		Deadline 02.Mar.2015 23:59 CET
Company name:	Insurance and Reinsurance Stakeholder Group (IRSG)	
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"> ⇒ <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-14-061.</p>		
Reference	Comment	
General Comment	The ITS should make clear that, as permitted under the Delegated Acts (Article 84(3)), Undertakings are allowed to use approximations, such as the asset allocation, to identify indirect Type 1 equity exposures in collective investment funds in order to meet the "look-through" requirements.	

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	The purchasing date of equities from third-party asset managers may not be readily available; as it may be that the equities were purchased far into the past, estimates should therefore be permitted.	
Article 1		
Article 2		
Impact Assessment		