

Comments Template on EIOPA-CP-14-058 Draft proposal proposal for Implementing Technical Standards on the equity index for the symmetric adjustment of the equity capital charge		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-14-058.</p>		
Reference	Comment	
General Comment	<p>The explanation for the calibration weights should be included in a Technical Annex for transparency reasons - this is now included only in the Impact Assessment.</p> <p>We believe EIOPA should have in place a process to update the weights and indices. The proposed weights are outdated given that it is based on Q1 2013 data, particularly considering the SII implementation date on 1 January 2016. The allowance in the weightings for Type 2 equities may</p>	

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	<p>need particular attention.</p> <p>There should be a commitment from EIOPA regarding the exact timeline for the publication of the symmetric adjustment or the constructed index. For example, the working day 3 after the quarter end.</p>	
Article 1		
Article 2		
Article 3		
Impact Assessment		