

Comments Template on EIOPA-CP-14-047		Deadline
Draft proposal for Level 3 Guidelines on reporting and public disclosure		02.Mar.2015 23:59 CET
Company name:	Nordea Life & Pensions	
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-14-047.</p>		
Reference	Comment	
General Comment	<ul style="list-style-type: none"> • "Pre-defined events" leading to immediate notification to the supervisory authorities is very wide: includes changes in business strategy, internal organisational restructure, new or emerging risk. The timescales for updating all/part of the supervisory reporting can be discussed on a case-by-case basis with supervisory authorities. This could be applied inconsistently by local supervisors causing problems for a group company. We would 	

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	appreciate clarity whether a local pre-defined event would affect group reporting.	
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Annex I ¹		

¹ If you have specific comments on Technical Annex 1 – Validations, please provide them line by line.