

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> - Do not change the numbering in the column “reference”; if you change numbering, your comment cannot be processed by our IT tool - Please do not insert or delete any row. If you have no comment on a paragraph or a cell, keep the row empty. - Leave the last column empty. - Please fill in your comment in the relevant row. - Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <ul style="list-style-type: none"> o Certain rows represent a group of cells with similar information (ex : TP-E1- cells A43-L43) o If your comment refers to multiple cells or paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other cells or paragraphs this also applies. o If your comment refers to subparagraphs or specific cells within a group, please indicate this in the comment itself. <p>Please send the completed template, in Word Format, to CP-13-010@eiopa.europa.eu. Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the Technical Annexes II and III.</p>		
Reference	Comment	Resolution
General Comments	<p>We welcome the preparatory guidelines on reporting as a contribution to ensuring suitable and harmonised preparation by the insurance industry for the new Solvency II regime. However, we have concerns about the additional burden that this preparatory phase will place upon undertakings and actuaries, given the ongoing continual requirement to report to NCA's under existing regulatory regimes.</p> <p>Our main concerns are:</p> <p>(i) The randomness of the impact on actuaries due to the "all or nothing" requirement to participate in the preparatory phase. Actuaries working in insurers not participating will be 'outside' of a gradual and phased upskilling process. Instead we would suggest a graduated scale of participation with smaller/lower risk companies submitting fewer templates and perhaps only annual templates.</p> <p>(ii) The selection based on market share is ambiguous, leaving room for different interpretations by NCAs and possibly difficult to implement. From our viewpoint this will mean that actuaries (and similarly other professionals / managers) in otherwise similar insurers may or may not be participating depending on the relevant NCA.</p> <p>(iii) The timeframes proposed for the submission of the annual and quarterly information are short specially as parallel compliance with Solvency I is still required. We would suggest an expanded timeframe in the preparatory phase.</p> <p>(iv) On going uncertainty about the final shape of Pillar 1. It could be advantageous to focus more preparatory activity on those elements where reported financials will not be impacted in a major way by the uncertainties within the LTGA debate as well as other open issues on the Pillar I requirements. Actuaries working with long-term guarantees and involved in the debates around the risk free rates have some reluctance to prioritise detailed reporting preparations.</p> <p>(v) Double burden on reporting requirements for companies applying for an internal model. The workloads are potentially higher in 2014 – 2015 than they will become when an insurer has Solvency II in full force and a model approved. The workload question is particularly acute where actuarial teams are involved in all of technical provisions restatements, standard formula calculations and dynamic capital models.</p> <p>(vi) Timely availability of the proposed XBRL reporting tools in the preparatory phase to avoid insurers needing to re-engineer the process in 2016.</p> <p>We have concentrated on the guidelines around reporting rather than the content and structure of the reporting templates themselves.</p>	

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	Additional remarks: 1) The preparatory Reporting is not only on an annual basis but also (partially) on a quarterly basis. Given that the aim is to support and catalyze implementation, and that current Solvency I reporting requirements are still in place, the question is whether the added value of quarterly reporting is such that it should be added to the annual reporting. We could imagine that until the full and formal implementation of Solvency II a more stepwise approach could be taken. 2) It is appreciated that EIOPA has constructed the set of report templates in such a way that it is supposed to meet the requirements of the ECB. In the cover note, this is described as an intention, which gives still ample space for additional data requests from the ECB. Is the requested information based on either ECB or EIOPA requirements? How will ECB and EIOPA requirements be aligned in the future? 3) It is clear that for the moment it is not possible to prepare the full technical specifications, since important issues have still not been decided. However, there should be a clear and early announced moment in time, at which EIOPA publishes the specifications, to allow timely implementation by insurance companies.	
Introduction General Comments		
1,1	A reference is made to the EIOPA regulation article 16 of Regulation 1094/2010. It is not clear to what extent this regulation requires the amount of information to be disclosed as described in this consultation document. Is there a legal basis for the information (in the proposed level of detail) asked for in this document? This is not clear from the references made in the first paragraphs of this document.	
1,2		
1,3	We will emphasize the important issue that national competent authorities should not develop different national solutions at this stage of implementing Solvency II. There is still a lot of uncertainty regarding different principles in the framework and there is a danger that national solutions could lead to inconsistencies in different markets which might need to be revised later, creating unnecessary double work.	
1,4		
1,5	We agree with the EIOPA view that early preparation is key if firms are to comply with the Solvency II disclosure requirements when they come into force. Given the statement from EIOPA in July 2012 that the set of reporting templates released at that time represented “a stable view of the level of granularity of the information that supervisory authorities will need to receive” we are disappointed to see a number of changes in the templates now being proposed e.g. OF – B1Q and TP – F1. Whilst the changes in their own right are not contentious, changes arising without clear notification to firms increases the risk that firms will decide to put implementation measures in place only once the requirements are finalised. We would request that any changes from the July 2012 templates are flagged and a rationale for the change provided	
1,6		
1,7	We note that NCA's are due to report to EIOPA by 28 February on progress in the implementation of the guidelines. The usefulness of this reporting may be limited to the extent that no information will have been submitted by undertakings at that point.	
1,8		
1,9	The requirement that only a significant share (and thus not all insurance entities) need to be included in this preparatory phase makes a distinction between insurers that are required to participate and companies that are not. This does not lead to a level playing field as would be desired. How do EIOPA and the NCA's assure that actuaries of companies that are not required to participate will be sufficiently prepared for Solvency II? In our view all insurance companies that will be regulated by Solvency II should, to a certain degree , participate in this preparatory phase. However, we can envisage that the requirements differ by company depending on their size or risk profile. For example we would suggest a graduated scale of participation with smaller/lower risk companies submitting fewer templates and perhaps only annual templates.	
1.10	The guideline says NCAs will "not be expected to take enforcement or regulatory action". However this doesn't exclude the possibility that they will do so. In our view NCA's should not take actions related to capital requirements based on results of the preparatory phase as pillar I requirements are not yet finalised or inforce. Further we expect that allaying this concern this would lead to a better buy-in and open communication of results.	

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1,11	At the end of 2013 a decision will be made whether (based on expected implementation of SII as per 1-1-2016), submissions will need to be made in 2015 over accounting year 2014 as well as two quarterly reports. It is not clear from the document which two quarters are actually foreseen. See also our remarks at 1.28 and 1.79.	
1,12		
1,13	<p>For companies applying for an IM reporting on both the Standard Formula and IM bases will be very burdensome for actuaries and requires more effort than would apply under Solvency II itself. The report for internal model calculations could be postponed and taken care of in the pre-application dialogue with the supervisory authorities.</p> <p>This states explicitly that the aim of reporting in the preparatory phase is different to that post Solvency II implementation. The paragraph then explains how it is different, however, there is no explanation as to the intent behind this difference. This difference potentially will lead actuaries to develop systems and processes which may well be obsolete following implementation of Solvency II.</p> <p>It is not clear from the wording in this paragraph whether those companies that are in the pre-application process of an internal model by definition should be included in the group of insurance companies for the preparatory phase and what the requirements are for companies applying for a partial internal model.</p>	
1,14	We welcome the recognition of the additional burden created by dual reporting in the preparatory phase and concur that this partial approach will allow for some preparations, which will smooth any transition to full Solvency II.	
1,15		
1,16	We welcome that reporting will not be required during the preparatory phase at the level of each ring-fenced fund.	
1,17	Given that preparatory reporting is planned by EIOPA for 2015, it would also be useful that local NCA's have their system supporting XBRL fully in place in line with final Solvency II requirements. This would help insurance companies to develop required interfaces only once, and submit the requested information in the right and consistent way.	
1,18	Specific data checks to be applied in the preparatory phase should be identified and itemised. Exact specification of which data checks are required in the preparatory phase would be helpful.	
1,19	The combined effect of guidelines 1.19 and 1.54 is that, if the Group Supervisor and the concerned supervisors agree to the use of the Deduction and Aggregation (D&A) method, then third countries can be consolidated into the Group balance sheet on the assumption that the third country is equivalent. Although this assumption of equivalence is helpful, it is dependent upon the D&A method decision which lies with the Group supervisor and is therefore uncertain. The EC and supervisors have already set the expectation that major third countries, such as the USA and Canada, will be equivalent. It would create a simpler and more streamlined approach if all third countries were automatically consolidated on an equivalent basis using the D&A method for the purpose of these guidelines. The effect of this would be to give firms certainty and ensure they do not build reporting tools and processes which may not later be needed.	
1,20		
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1,23	<p>It seems that only the SCR calculated with the (partial) internal model needs to be reported, the risk margin based on internal model calculations seems not to be part of the preparatory reporting package.</p> <p>Is this correct, as the market consistent balance sheet can be different for the standard model as compared to the internal model (due to the risk margin)? Which version of the balance sheet will need to be reported?</p>	
1,24		
1,25	<p>1. We note the intention to implement the guideline from 1 January 2014. Despite this being on a preparatory basis we note that this is a challenging timeframe for undertakings (and NCAs) as this is the first time some of this information has been issued publically. NCA's will require time to consider how, and indeed, whether (as envisaged by paragraphs 2.4 - 2.6 of the cover note), to implement the guidelines in their territory. This will create an additional communication delay and a further content uncertainty for undertakings. Clearly, this will impact on their ability and the time needed to respond to the requirements fully.</p> <p>2. Additional clarity must be given as to the expectations of EIOPA and NCAs as at 1st January 2014. The cover letter implies that the requirements will be gradually phased in over the 'preparatory phase' and refers to specific and general phasing-in requirements. However, the consultation papers have a stronger statement that the requirements hold from 1 January 2014.</p>	

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Section I. General Comments		
1,26		
1,27	It is unclear if the systems and structures required to deliver the high quality information need to be built and ready for 1 January 2014 (or at least substantially ready for application) or if there is a (current) two-year window for specification and building. It will be very challenging for the former to be achieved in point of the short timescale from now and the regulations still being in consultation form.	
1,28	If, as described in paragraph 1.11, insurers are to report on two quarter-ends and one year-end and in advance of the start of Solvency II, then these dates are likely to be quarter-end September 2015, quarter-end December 2015 and year-end 2015. If this is the case, what progress can NCAs be expected to report by February 2015? See also our remark in paragraphs 1.11 and 1.79.	
Section II. General Comments		
1,29	<p>The selection based on market share is ambiguous, leaving room for different interpretations and possibly difficult to implement. See also our remark on paragraph 1.9.</p> <p>1) For national markets where cross-border activities play an important role, the local NCAs should cooperate so that the results will reflect the situation in the market. The definition of market share might need to include specific definitions on local or international business.</p> <p>2) The objective is to support both NCAs and undertakings in their preparation for the Solvency II requirements. From participation rates in previous QIS studies, it seemed that particularly smaller companies face difficulties in their Solvency II preparations. The objective of an 80% market share, might not lead to an appropriate view of the status of the market as a whole.</p> <p>3) It is possible in smaller insurance markets that the 80% threshold would capture relatively small companies which would not be required to report if they were situated in larger member states. An additional threshold based on absolute size of company would be useful.</p> <p>4) Companies in run-off which would not expected to be captured under Solvency II from 2016 should be exempt in the preparatory phase.</p>	
1.30	How are composite insurers to be treated? Will they report on all templates if they are captures by either the life or non-life thresholds?	
1,31	The guidelines should make clear the treatment of cross border business in calculating "national market shares"	
1,32		
1,33	We observe that the reserve (for Life) is not necessarily the right indicator to measure market share and/or the risk profile. Calculating Life Market Shares by reference to (Solvency I) technical provisions will potentially include many lower-risk companies writing unit linked business and thereby may exclude companies with a relatively higher-risk profile.	
1,34	Premium volume (for non-life) is not necessarily the right indicator to measure market share, since also long tailed business could contain relatively high risks.	
1,35	Eleven months for an NCA to provide notice of submission requirements being due seems a reasonable time period for action to be taken by the insurer / reinsurer. We note this could be more difficult where an undertaking is required to submit information for the first time.	
1,36	A 12 billion Euro threshold for total assets appears high for a non-life company. Is the focus of the requirements intended to be biased towards a certain sector of the industry?	
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1,47	The level of detail on assets is extensive. We question whether this information should be requested to this extent and this frequency. Is this request driven by ECB requirements or is it based on a specific Solvency II requirement? In particular for groups with small undertakings in different countries, this and similar requirements, may imply that in countries where the NCA explains why not to comply, groups may still have to do the reporting.	
1,48	The requirement, where relevant, that firms applying for an internal model submit information for both the internal model and standard formula calculations is very onerous, particularly given these undertakings will also be submitting information to NCA's under existing regulatory regimes. We would encourage an extension of the timeframes for submitting information in recognition of the dual reporting burdens that undertakings will face.	
Section III. General Comments		
1,49	It is acknowledged that an internal model can have a different structure (categorization of risks) than the standard formula. Results of the internal model need to be submitted to the NCA's based on specific templates agreed with the respective NCA. Given that insurance companies are still in the pre-application phase with the submission of internal models, it is questionable if agreements on submission of information on internal models can be implemented on a timely manner for the first submission beginning of 2015.	
1.50	We welcome that reporting will not be required during the preparatory phase at the level of each ring-fenced fund. Are we correct to understand from paragraphs 1.16 and 1.50 that, while the calculation of solvency capital requirement for the undertaking as a whole will allow for any Ring Fenced Funds, there will be no requirement to consolidate ring fenced funds on the one hand and to consolidate solo accounts on the other (which would require two different sets of reports).	
1,51		
1,52	The level of detail on assets is extensive. We question whether this information should be requested to this extent and this frequency. Quarterly Information: There are fewer templates to populate for the quarterly returns but it should be noted that the same level of calculation work is required as the annual return. The draft guideline are silent on whether / which what proxies can be used for the quarterly information.	
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1.60	The narrative reporting requirements appear reasonable will help companies to prepare for their SFCR/RSR reports and of importance to explain results of the Solvency II reporting to stakeholders. However the requirements can be onerous if the processes have not been created / implemented yet within the undertaking.	
1,61	See 1.60	
1,62	See 1.60 In relation to item E, will the information provided by EIOPA to justify the assumptions underlying the Standard Formula SCR include commentary of the use of credit assessments that will assist undertakings in providing the information sought under this bullet point?	
Section IV. General Comments	On balance, the level of reporting envisaged by the guidelines (particularly, sections IV and V) is complicated and onerous for the undertaking who has not implemented this yet. To fulfil these requirements to that level of detail will require significant resource investment.	
1,63	See 1.60	
1,64	See 1.60	
1,65	See 1.60	
1,66	See 1.60	
1,67	See 1.60	
1,68		

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Section V. General Comments	See Section IV general comments	
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1,72	The requirement to justify the actuarial methodologies and assumptions should, in addition to the references to the nature, scale and complexity of risks, also facilitate the many undertakings who are likely to use simplifications in the preparatory phase as a means to being fully ready for more accurate methods by the time of the full launch of Solvency II.	
Section VI. General Comments		
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1,78	It is not clear why this requirement is specified for solo entities only and not also for groups.	
1,79	Paragraph 1.11 says it is EIOPA's intention that "annual information is submitted once before Solvency II is applicable". However Guideline 34 appears to require an annual information return for financial years ending on or after 31 December 2014. This would imply at least two such returns, both submission over financial year 2014 and 2015. This conflicts with the text in paragraph 1.11. The guideline should recognise the fact that insurers will also be reporting under the existing Solvency I regime at the same time. Because of this it would be appropriate to extend the 20 week timeline.	
1,80	The guideline should recognise the fact that insurers will also be reporting under the existing Solvency I regime at the same time. Because of this it would be appropriate to extend the 8 week timeline.	
Section VII. General Comments		
1,81		
Section VIII. General Comments	There is just one year of preparation before the full implementation of the directive (2015 if Omnibus II is passed and the implementation is still 1/1/2016). It should be specified that the date in this section (i.e. financial year ending 31/12/2014) is subject to Omnibus II and also what will happen if Omnibus II is delayed	
1,82	Narrative reporting: The same comment applies as per 1.79.	
1,83		
1,84		
1,85	Is it intended that the reports would be submitted in spreadsheet format or will the proposed XBRL reporting tools be available in the preparatory phase? It would be very desirable that the XBRL reporting tools to be used when Solvency II goes live are available for the preparatory phase, so as to avoid insurers needing to re-engineer the process in 2016.	
1,86		
Section IX. General Comments		
1,87		
1,88	We expect the local NCA to specify which specific data checks companies must perform. The technical list in Annex VII is comprehensive. It is not possible to verify that these data checks are consistent prior to the actual test reporting.	
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1,91	Companies will wish to know what their NCA intends to do at the earliest possible date.	
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Compliance and Reporting Rules		
General Comments		
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Technical Annex I General Comments	<p>We have concentrated on the guidelines around reporting rather than the content and structure of the reporting templates themselves. For the remainder of the report we give some initial views of individual member associatioins of the Groupe without detailed analyses or discussion.</p> <p>We would welcome the opportunity to review the fine detail of the templates in a technical sense at a later date.</p>	
BI-1		
BS-C1-2	The production of this template should be relatively straightforward once the Pillar I calculations are complete. However, annual reporting of this sheet seems to be sufficient. A quarterly reporting will be burdensome and costly.	
BS-C1-3		
BS-C1D-4	This template is relatively straightforward on the assumption that unit-linked business is not required to be split by currency of the underlying securities on a look through basis.	
AS-D1-5	We repeat the previous comment that we do not agree with the need for a security-by-security listing for UL funds, and that asset category details (in line with that required for form D4 under full Solvency 2 reporting) should provide adequate information. It would be helpful if EIOPA could confirm that where the undertaking holds assets in the form of units or shares in investment funds operated by third-parties, that such assets are not subject to the look-through requirement applicable to directly-held assets of the undertaking.	
AS-D1-6		
AS-D2O-7	Same comment as AS-D1 above.	
AS-D2O-8		
TP-F1-9		
TP-E1-10	<p>b) (DCH): Split of technical provisions among countries based on the localization of risk which is required for the following LoBs might be difficult. We would appreciate more exact guideline on localization of risk.</p> <ul style="list-style-type: none"> - Medical expense - Income protection - Workers' compensation - Fire and other damage to property - Credit and surety ship <p>The example is medical expense insurance. The extreme case might look like the following - Czech policyholder concluded policy in Austria with coverage in the whole Europe, falls ill in Hungary, and is hospitalised in Slovakia. What would be the country under which the TP should be presented?</p>	
TP-F1Q-11		
TP-E1Q-12		
OF-B1Q-13	<p>This template appears a combination of the previous solo OF-B1 template and the previous OF-B1 group template. We suggest splitting it into the original 2 templates as was the case in the set published by EIOPA in 2012.</p> <p>We disagree with the detailed level of the public disclosure requirements proposed for both the preparatory phase and live environment. It is much too detailed. In particular we don't agree to the idea of public disclosure the EPIFP. We support the approach of including EPIFP in Tier 1 as part of the reconciliation reserve. Any tiering of EPIFP would result in double-counting of risks which are already taken into consideration in the calculation of both technical provisions and the SCR. While we acknowledge the importance of liquidity risk management in general, we do not understand the rationale behind monitoring EPIFP separately from other cash inflows and cash outflows. We do not think it would make sense to identify EPIFP separately as the concept of EPIFP seems to be contradictory to the economic balance sheet approach under Solvency II. It appears to be unclear which concern the concept of EPIFP is trying to address and why the identification of this particular aspect of expected cash inflows is necessary to achieve the Solvency II objectives.</p>	
SCR-B2A-14	The same holds for this template as for the OF-B1Q as remarked above.	
SCR-B2A-15		

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Name of Company:	Groupe Consultatif Actuariel Européen	
SCR-B2B-16		
SCR-B2B-17		
SCR-B2C-18		
SCR-B2C-19		
SCR-B3A-20	<p>The requirement to produce asset and liability values pre and post shock should relate to the full assets and liabilities as opposed to that portion which is impacted by the stress. The process of identifying the portion of assets and liabilities impacted by the stress is very involved and does not add value.</p> <p>The sub module CCP-risk is explicitly excluded from the requested information in the template. The LTGA study has been set up to particularly to investigate the CCP (and MA). As a consequence, this is currently a relevant part of the SCR and should not be missing.</p>	
SCR-B3A-21		
SCR-B3B-22		
SCR-B3B-23		
SCR-B3C-24	Same comment as SCR-B3A above.	
SCR-B3C-25		
SCR-B3D-26	Same comment as SCR-B3A above.	
SCR-B3D-27		
SCR-B3E-28	Why should insurers not report USPs in the preparatory phase? Given that Internal Model SCR figures should be reported, it seems inconsistent not to report USPs as well.	
SCR-B3E-29		
SCR-B3F-30		
SCR-B3F-31		
SCR-B3G-32		
SCR-B3G-33		
MCR-B4A-34		
MCR-B4B-35		
G01-36	For (re)insurance undertakings does "total amount of Solvency II balance sheet" (cell H1) mean cell A30 on BS-C1? If so this should be stated. Also cells J1, K1 and L1 should be clarified. Should "performance" also be on a Solvency II basis (as for balance sheet)?	
G03-37		
G03-38		
G03-39		
G04-40		
G14-41		
Technical Annex II General Comments		
Technical Annex III General Comments		
BI - General Comments		
BI- cell A1		
BI- cell A2		
BI- cell A3		
BI- cell A4		
BI- cell A5		
BI- cell A6		
BI- cell A7		
BI- cell A8		
BI- cell A9		
BI- cell A10		

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Name of Company:	Groupe Consultatif Actuariel Européen	
BS-C1 - General Comment		
BS-C1- cell AS1		
BS-C1- cell AS24		
BS-C1- cell A2		
BS-C1- cell A26		
BS-C1- cell A25B		
BS-C1- cell A3		
BS-C1- cell A4		
BS-C1- cell A5		
BS-C1- cell A6		
BS-C1- cell A7B		
BS-C1- cell A7		
BS-C1- cell A7A		
BS-C1- cell A8E		
BS-C1- cell A8		
BS-C1- cell A8A		
BS-C1- cell A8C		
BS-C1- cell A8D		
BS-C1- cell A9		
BS-C1- cell A10A		
BS-C1- cell A10B		
BS-C1- cell A11		
BS-C1- cell A12		
BS-C1- cell A14		
BS-C1- cell A14B		
BS-C1- cell A14C		
BS-C1- cell A14A		
BS-C1- cell A16		
BS-C1- cell A17A		
BS-C1- cell A17		
BS-C1- cell A18		
BS-C1- cell A19B		
BS-C1- cell A18A		
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BS-C1- cell A29		
BS-C1- cell A30		
BS-C1- cell LS0		
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BS-C1- cell L3		

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Name of Company:	Groupe Consultatif Actuariel Européen	
BS-C1- cell L4		
BS-C1- cell L4A		
BS-C1- cell L5		
BS-C1- cell L6		
BS-C1- cell LS6F		
BS-C1- cell L6B		
BS-C1- cell L6C		
BS-C1- cell L6D		
BS-C1- cell L6E		
BS-C1- cell L7		
BS-C1- cell L7A		
BS-C1- cell L8		
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BS-C1D- cell A4		
BS-C1D- cell A5		
BS-C1D- cell A5A		
BS-C1D- cell A6		
BS-C1D- cell A7		
BS-C1D- cell A7A		
BS-C1D- cell A8		
BS-C1D- cell A9		
BS-C1D- cell A10		
BS-C1D- cell A11		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
BS-C1D- cell A12		
BS-C1D- cell A13		
BS-C1D- cell A14		
BS-C1D- cell A15		
AS-D1- General Comment		
AS-D1- cell A1	It would be helpful if EIOPA could confirm that where the undertaking holds assets in the form of units or shares in investment funds operated by third-parties, that such assets are not subject to the look-through requirement applicable to directly-held assets of the undertaking.	
AS-D1- cell A2	The requirement to report the fund number for each asset held in a ring-fenced or internal fund suggests that for a given security that is part of the investments of multiple unit-linked funds, the security will be reported on as many lines as the number of unit-linked funds where the security is present. We believe this is unnecessarily complicated and does not enhance understanding of the risks associated with the unit-linked business.	
AS-D1- cell A3		
AS-D1- cell A4		
AS-D1- cell A5		
AS-D1- cell A6		
AS-D1- cell A7		
AS-D1- cell A8		
AS-D1- cell A9		
AS-D1- cell A10		
AS-D1- cell A11		
AS-D1- cell A12		
AS-D1- cell A13		
AS-D1- cell A15		
AS-D1- cell A16		
AS-D1- cell A17		
AS-D1- cell A18		
AS-D1- cell A20		
AS-D1- cell A22		
AS-D1- cell A23		
AS-D1- cell A24		
AS-D1- cell A25		
AS-D1- cell A26		
AS-D1- cell A28		
AS-D1- cell A30		
AS-D1- cell A50		
AS-D20- General Comments		
AS-D20- cell A1		
AS-D20- cell A2		
AS-D20- cell A3		
AS-D20- cell A4		
AS-D20- cell A5		
AS-D20- cell A6		
AS-D20- cell A7		
AS-D20- cell A8		
AS-D20- cell A9		
AS-D20- cell A10		
AS-D20- cell A11		
AS-D20- cell A13		

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Name of Company:	Groupe Consultatif Actuariel Européen	
AS-D20- cell A14		
AS-D20- cell A15		
AS-D20- cell A16		
AS-D20- cell A17		
AS-D20- cell A19		
AS-D20- cell A20		
AS-D20- cell A21		
AS-D20- cell A22		
AS-D20- cell A23		
AS-D20- cell A24		
AS-D20- cell A25		
AS-D20- cell A26		
AS-D20- cell A27		
AS-D20- cell A28		
AS-D20- cell A29		
AS-D20- cell A31		
AS-D20- cell A32		
AS-D20- cell A33		
AS-D20- cell A34		
AS-D20- cell A35		
AS-D20- cell A50		
TP-F1- General Comments	<p>We welcome the phasing in of the detailed technical provision information i.e. gross best estimate information required for the annual template. The level of detail is increased for the quarterly templates required closer to SII implementation. This allows firms to improve quality of data submitted over the phasing in period and attempts to make the annual information required during the phasing in period less burdensome.</p> <p>While attempts have been made to make technical provision reporting less burdensome by not including the risk margin and recoveries, we note the risk margin is required both for template BS-C1 and for narrative reporting (see guideline 29). We would question whether the level of detail should be similar across all reporting requirements.</p> <p>We would welcome more precise guideline on classification of more complicated Life products to LoBs. E.g. for products with possibility to invest in both UL and guaranteed funds and with possible subsequent change to the proportion of those investments. In which category of the following LoBs - Insurance with profit</p>	
TP-F1- cell J1,J2,J4,J6,J7,J9,J10,J12,J13,J14		
TP-F1- cell JA1,JA2,JA4,JA6,JA7,JA9,JA10,JA12,JA13,JA14		
TP-F1- cell JE1,JE2,JE4,JE6,JE7,JE9,JE10,JE12,JE13,JE14		
TP-F1- cell JF1,JF2,JF4,JF6,JF7,JF9,JF10,JF12,JF13,JF14		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
TP-E1- General Comments	As for TP-F1, we welcome the phasing in of the detailed technical provision information i.e. gross best estimate information required for the annual template.	
	While attempts have been made to make technical provision reporting less burdensome by not including the risk margin and recoveries, we note the risk margin is required for template BS-C1 and both the risk margin and recoveries are required for narrative reporting (see guideline 29).	
	The minimum segmentation required to calculate technical provisions is by line of business. We feel the split by country is forcing an additional degree of segmentation which may not be straightforward for all business, for example: - For LOBs that are considered global (e.g. marine/aviation/transport business) and multi-territory policies. - Where different territories that are considered homogenous and are projected in aggregate. - Where business is written on a delegated authority basis.	
	We note that no technical provision information is collected in respect of accepted non-proportional reinsurance.	
TP-E1- cells A43-L43		
TP-E1- cells A44-L44		
TP-E1- cells A45-L45		
TP-E1- cells A46-L46		
TP-E1- cells Q43-Q46		
TP-F1Q- General Comments	See comments in relation to TP-F1.	
TP-F1Q- cells A1		
TP-F1Q- cells A3	We suggest renaming this cell A2 instead of A3 to be consistent with cells E2 and F2.	
TP-F1Q- cells A5		
TP-F1Q- cells A6		
TP-F1Q- cells A7		
TP-F1Q- cells A7A		
TP-F1Q- cells A7B		
TP-F1Q- cells A7C		
TP-F1Q- cells A9		
TP-F1Q- cells A10		
TP-F1Q- cells A12		
TP-F1Q- cells A13		
TP-F1Q- cells A14		
TP-F1Q- cells B1		
TP-F1Q- cells B2		
TP-F1Q- cells B3		
TP-F1Q- cells B4		
TP-F1Q- cells B5		
TP-F1Q- cells B6		
TP-F1Q- cells B7		
TP-F1Q- cells B9		
TP-F1Q- cells B10		
TP-F1Q- cells B11		
TP-F1Q- cells B12		
TP-F1Q- cells B13		
TP-F1Q- cells B14		
TP-F1Q- cells C1		
TP-F1Q- cells C2		
TP-F1Q- cells C3		
TP-F1Q- cells C4		
TP-F1Q- cells C5		
TP-F1Q- cells C6		

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Name of Company:	Groupe Consultatif Actuariel Européen	
TP-F1Q- cells C7		
TP-F1Q- cells C9		
TP-F1Q- cells C10		
TP-F1Q- cells C11		
TP-F1Q- cells C12		
TP-F1Q- cells C13		
TP-F1Q- cells C14		
TP-F1Q- cells E1		
TP-F1Q- cells E2		
TP-F1Q- cells E4		
TP-F1Q- cells E6		
TP-F1Q- cells E7		
TP-F1Q- cells E9		
TP-F1Q- cells E10		
TP-F1Q- cells E12		
TP-F1Q- cells E13		
TP-F1Q- cells E14		
TP-F1Q- cells F1		
TP-F1Q- cells F2		
TP-F1Q- cells F4		
TP-F1Q- cells F6		
TP-F1Q- cells F7		
TP-F1Q- cells F9		
TP-F1Q- cells F10		
TP-F1Q- cells F12		
TP-F1Q- cells F13		
TP-F1Q- cells F14		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
TP-E1Q- General Comments	<p>Split of the reinsurance recoverables into the prescribed lines of business might be difficult. The insurers are able to conclude one reinsurance contract with cover for more than one LoB (e.g. one stop loss contract covering more LoBs). We would appreciate examples how this kind of contracts should be split among the particular lines of business.</p> <p>In Pillar 1 the calculation requirements are principle-based, not going into details. So basically the company can calculate the BE liabilities by any method that fits the principles (for example, RI shall be applied, but it is up to the company to come up with a method of estimation of the RI effect). Only in the end the company must be able to report the net liabilities in this split by LoB - and that's where further guidance may be needed.</p> <p>Example: the insurer is covered by a stop-loss treaty reinsurance covering for example 3 LoBs:</p> <ul style="list-style-type: none">- Other motor (Casco),- Fire and property,- Accepted non-proportional property reinsurance. <p>The stop-loss conditions say: if total losses from these LoBs (in total) exceed given limit, the excess will be covered by reinsurer.</p> <p>How shall the effect of this reinsurance be allocated to individual LoBs? Based on premium? Based on losses in each of the LoB? Based on other criteria?</p> <p>Split of the effect of some RI treaties covering e.g. the above 3 LoBs and having a complex commission/profit sharing/reinstatement rules might also be difficult.</p> <p>We feel quarterly reporting of the risk margin at a line of business level is arbitrary. We would welcome consideration of reporting of the quarterly risk margin at an overall level.</p> <p>We note in the quarterly non-life technical provision template there is no split of the claims provision between outstanding claims and IBNR. We believe this split, at a high level, would be useful to determine changes in reserving strength. We note the split can be derived in the annual templates based on information in TP-E3.</p>	
TP-E1Q- cells A1-P1		
TP-E1Q- cells Q1		
TP-E1Q- cells A5-P5		
TP-E1Q- cells A12-P12		
TP-E1Q- cells A13-P13		
TP-E1Q- cells Q5-Q13		
TP-E1Q- cells A14-P14		
TP-E1Q- cells A21-P21		
TP-E1Q- cells A22-P22		
TP-E1Q- cells Q14-Q22		
TP-E1Q- cells A23-P23		
TP-E1Q- cells A24-P24		
TP-E1Q- cells A25-P25		
TP-E1Q- cells Q23		
TP-E1Q- cells Q24		
TP-E1Q- cells Q25		
TP-E1Q- cells A26-P26		
TP-E1Q- cells A27-P27		
TP-E1Q- cells A28-P28		
TP-E1Q- cells Q26		
TP-E1Q- cells Q27		
TP-E1Q- cells Q28		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
OF-B1Q – General Comments	<p>The design of the Own Funds template requires a granular level of data. All Own Funds items have to be shown in detail on the reporting date. Given that the July 2012 templates were communicated as being largely final with the exception of certain specified outstanding items, we do not understand why the level of detail in OF-B1Q has changed from the previous version. This increases the uncertainty of firms regarding the final templates that will be implemented.</p> <p>The Own Funds reporting requirements will create a costly, burdensome and hard-to-handle process for the European insurance industry. Therefore to our view the Own Fund reporting should be revised; the reporting need only focus on data that will allow supervising authorities to derive “quality and quantity” (as stated in the Directive 2009/138). All add on and unnecessary data for this aim must be deleted (e.g. information concerning: EPIFP, nominal values, buy back during the year etc.). Furthermore cost-benefits aspects and materiality must be considered.</p> <p>We disagree with the detailed level of the public disclosure requirements proposed for live environment. It is much too detailed. In particular we don’t agree to the idea of public disclosure the EPIFP. We support the approach of including EPIFP in Tier 1 as part of the reconciliation reserve. Any tiering of EPIFP would result in double-counting of risks which are already taken into consideration in the calculation of both technical provisions and the SCR. While we acknowledge the importance of liquidity risk management in general, we do not understand the rationale behind monitoring EPIFP separately from other cash inflows and cash outflows. We do not think it would make sense to identify EPIFP separately as the concept of EPIFP seems to be contradictory to the economic balance sheet approach under Solvency II. It appears to be unclear which concern the concept of EPIFP is trying to address and why the identification of this particular aspect of expected cash inflows is necessary to achieve the Solvency II objectives.</p> <p>Tiering limits on Own Funds as detailed in Article 98 SII-Directive and Article 72 EOF1 delegated acts give room for interpretation. In our view it should be clarified that all available own funds are eligible as long as they conform with Article 98 SII-Directive, i.e. if tier 1-capital is at least 50% of the SCR and tier 3-capital is not exceeding 1/3 the SCR all other own funds are completely eligible. Limiting own funds (i.e. own funds are not allowed to use to cover the SCR) is not in line with the directive.</p>	
OF-B1Q- cell A1		
OF-B1Q- cell B1		
OF-B1Q- cell C1		
OF-B1Q- cell A1A		
OF-B1Q- cell C1A		
OF-B1Q- cell A2		
OF-B1Q- cell B2		
OF-B1Q- cell C2		
OF-B1Q- cell A3		
OF-B1Q- cell B3		
OF-B1Q- cell C3		
OF-B1Q- cell A4		
OF-B1Q- cell B4		
OF-B1Q- cell C4		
OF-B1Q- cell D4		
OF-B1Q- cell A5		
OF-B1Q- cell B5		
OF-B1Q- cell C5		
OF-B1Q- cell D5		
OF-B1Q- cell A6		
OF-B1Q- cell B6		
OF-B1Q- cell A7		
OF-B1Q- cell B7		
OF-B1Q- cell A8		
OF-B1Q- cell B8		
OF-B1Q- cell C8		

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Name of Company:	Groupe Consultatif Actuariel Européen	
OF-B1Q- cell D8		
OF-B1Q- cell A9		
OF-B1Q- cell B9		
OF-B1Q- cell C9		
OF-B1Q- cell D9		
OF-B1Q- cell A10		
OF-B1Q- cell B10		
OF-B1Q- cell C10		
OF-B1Q- cell D10		
OF-B1Q- cell A11		
OF-B1Q- cell B11		
OF-B1Q- cell C11		
OF-B1Q- cell D11		
OF-B1Q- cell A12		
OF-B1Q- cell B12		
OF-B1Q- cell A12A		
OF-B1Q- cell B12A		
OF-B1Q- cell A13		
OF-B1Q- cell B13		
OF-B1Q- cell C13		
OF-B1Q- cell D13		
OF-B1Q- cell A14		
OF-B1Q- cell B14		
OF-B1Q- cell C14		
OF-B1Q- cell D14		
OF-B1Q- cell A15		
OF-B1Q- cell D15		
OF-B1Q- cell A15A		
OF-B1Q- cell D15A		
OF-B1Q- cell A16		
OF-B1Q- cell B16		
OF-B1Q- cell B16A		
OF-B1Q- cell C16		
OF-B1Q- cell D16		
OF-B1Q- cell A17		
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OF-B1Q- cell B17A		
OF-B1Q- cell C17		
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OF-B1Q- cell A18		
OF-B1Q- cell B18		
OF-B1Q- cell B18A		
OF-B1Q- cell C18		
OF-B1Q- cell D18		
OF-B1Q- cell A19		
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OF-B1Q- cell C19		
OF-B1Q- cell D19		

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Name of Company:	Groupe Consultatif Actuariel Européen	
OF-B1Q- cell B502		
OF-B1Q- cell A503		
OF-B1Q- cell B503		
OF-B1Q- cell C503		
OF-B1Q- cell D503		
OF-B1Q- cell A603		
OF-B1Q- cell B603		
OF-B1Q- cell C603		
OF-B1Q- cell D603		
OF-B1Q- cell A604		
OF-B1Q- cell B604		
OF-B1Q- cell C604		
OF-B1Q- cell D604		
OF-B1Q- cell E604		
OF-B1Q- cell A605		
OF-B1Q- cell B605		
OF-B1Q- cell C605		
OF-B1Q- cell D605		
OF-B1Q- cell E605		
OF-B1Q- cell A606		
OF-B1Q- cell B606		
OF-B1Q- cell C606		
OF-B1Q- cell D606		
OF-B1Q- cell E606		
OF-B1Q- cell A607		
OF-B1Q- cell B607		
OF-B1Q- cell C607		
OF-B1Q- cell D607		
OF-B1Q- cell E607		
OF-B1Q- cell A20		
OF-B1Q- cell B20		
OF-B1Q- cell B20A		
OF-B1Q- cell C20		
OF-B1Q- cell D20		
OF-B1Q- cell A21		
OF-B1Q- cell B21		
OF-B1Q- cell B21A		
OF-B1Q- cell C21		
OF-B1Q- cell D21		
OF-B1Q- cell A42		
OF-B1Q- cell C42		
OF-B1Q- cell D42		
OF-B1Q- cell A43		
OF-B1Q- cell C43		
OF-B1Q- cell D43		
OF-B1Q- cell A44		
OF-B1Q- cell C44		
OF-B1Q- cell D44		
OF-B1Q- cell A46		

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Name of Company:	Groupe Consultatif Actuariel Européen	
OF-B1Q- cell B46		
OF-B1Q- cell C46		
OF-B1Q- cell D46		
OF-B1Q- cell E46		
OF-B1Q- cell A47		
OF-B1Q- cell B47		
OF-B1Q- cell C47		
OF-B1Q- cell D47		
OF-B1Q- cell A50		
OF-B1Q- cell B50		
OF-B1Q- cell C50		
OF-B1Q- cell D50		
OF-B1Q- cell E50		
OF-B1Q- cell A51		
OF-B1Q- cell B51		
OF-B1Q- cell C51		
OF-B1Q- cell D51		
OF-B1Q- cell A52		
OF-B1Q- cell A53		
OF-B1Q- cell A45		
OF-B1Q- cell A45A		
OF-B1Q- cell A45B		
OF-B1Q- cell A45C		
OF-B1Q- cell A45D		
OF-B1Q- cell B45D		
OF-B1Q- cell C45D		
OF-B1Q- cell D45D		
OF-B1Q- cell E45D		
OF-B1Q- cell A45E		
OF-B1Q- cell B45E		
OF-B1Q- cell C45E		
OF-B1Q- cell D45E		
OF-B1Q- cell E45E		
OF-B1Q- cell A48		
OF-B1Q- cell B48		
OF-B1Q- cell C48		
OF-B1Q- cell D48		
OF-B1Q- cell E48		
OF-B1Q- cell A49		
OF-B1Q- cell B49		
OF-B1Q- cell C49		
OF-B1Q- cell D49		
OF-B1Q- cell A50A		
OF-B1Q- cell B50A		
OF-B1Q- cell C50A		
OF-B1Q- cell D50A		
OF-B1Q- cell E50A		
OF-B1Q- cell A51A		
OF-B1Q- cell B51A		

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Name of Company:	Groupe Consultatif Actuariel Européen	
OF-B1Q- cell C51A		
OF-B1Q- cell D51A		
OF-B1Q- cell A52A		
OF-B1Q- cell A53A		
OF-B1Q- cell A53B		
OF-B1Q- cell B23		
OF-B1Q- cell B24		
OF-B1Q- cell B25		
OF-B1Q- cell B26		
OF-B1Q- cell B27		
OF-B1Q- cell B28		
OF-B1Q- cell B29		
OF-B1Q- cell B29A		
OF-B1Q- cell A30		
OF-B1Q- cell A31		
OF-B1Q- cell A32		
SCR - B2A – General Comment		
SCR - B2A - cell A1		
SCR - B2A - cell B1		
SCR - B2A - cell A01		
SCR - B2A - cell A2		
SCR - B2A - cell B2		
SCR - B2A - cell A02		
SCR - B2A - cell A3		
SCR - B2A - cell B3		
SCR - B2A - cell A03		
SCR - B2A - cell A4		
SCR - B2A - cell B4		
SCR - B2A - cell A04		
SCR - B2A - cell A5		
SCR - B2A - cell B5		
SCR - B2A - cell A05		
SCR - B2A - cell A6		
SCR - B2A - cell B6		
SCR - B2A - cell A7		
SCR - B2A - cell B7		
SCR - B2A - cell A07		
SCR - B2A - cell A10		
SCR - B2A - cell B10		
SCR - B2A - cell A11		
SCR - B2A - cell A12		
SCR - B2A - cell A13		
SCR - B2A - cell A013		
SCR - B2A - cell A14A		
SCR - B2A - cell A14C		
SCR - B2A - cell A8		
SCR - B2A - cell A9		
SCR - B2A - cell A17		
SCR - B2A - cell A15		

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Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B2A - cell A15A		
SCR - B2A - cell A15B		
SCR - B2A - cell A15C		
SCR - B2A - cell A16		
SCR - B2A - cell A18		
SCR - B2A - cell A20		
SCR - B2A - cell A21		
SCR - B2A - cell A14B		
SCR - B2A - cell A14		
SCR - B2A - cell A11A		
SCR - B2A - cell A11B		
SCR - B2B – General Comment		
SCR - B2B- cell A1		
SCR - B2B- cell A1A		
SCR - B2B- cell A1B		
SCR - B2B- cell A1C		
SCR - B2B- cell B1		
SCR - B2B- cell C1		
SCR - B2B- cell B2		
SCR - B2B- cell C2		
SCR - B2B- cell B3		
SCR - B2B- cell C3		
SCR - B2B- cell B4		
SCR - B2B- cell C4		
SCR - B2B- cell B5		
SCR - B2B- cell B6		
SCR - B2B- cell B7		
SCR - B2B- cell C5		
SCR - B2B- cell C6		
SCR - B2B- cell B8		
SCR - B2B- cell B8AA		
SCR - B2B- cell B8A		
SCR - B2B- cell A11A		
SCR - B2B- cell A11B		
SCR - B2C – General Comment		
SCR - B2C- cell A1		
SCR - B2C- cell A1A		
SCR - B2C- cell A1B		
SCR - B2C- cell A1C		
SCR - B2C- cell B1		
SCR - B2C- cell C1		
SCR - B2C- cell B2		
SCR - B2C- cell C2		
SCR - B2C- cell B3		
SCR - B2C- cell C3		
SCR - B2C- cell B4		
SCR - B2C- cell C4		
SCR - B2C- cell B5		
SCR - B2C- cell B6		

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Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B2C- cell B7		
SCR - B2C- cell B7A		
SCR - B2C- cell B7B		
SCR - B2C- cell B7C		
SCR - B2C- cell B8		
SCR - B2C- cell B9		
SCR - B2C- cell B10		
SCR - B2C- cell B12		
SCR - B2C- cell B13		
SCR - B2C- cell C5		
SCR - B2C- cell C6		
SCR - B2C- cell B14		
SCR - B2C- cell B14AA		
SCR - B2C- cell B14A		
SCR - B2C- cell A11A		
SCR - B2C- cell A11B		
SCR - B3A – General Comment		
SCR - B3A – cell A00		
SCR - B3A – cell AA01		
SCR - B3A – cell AA02		
SCR - B3A – cell AA03		
SCR - B3A – cell A30		
SCR - B3A- cell C0		
SCR - B3A- cell D0		
SCR - B3A- cell A1		
SCR - B3A- cell A2		
SCR - B3A- cell A1A		
SCR - B3A- cell A2A		
SCR - B3A- cell B1		
SCR - B3A- cell B2		
SCR - B3A- cell B1A		
SCR - B3A- cell B2A		
SCR - B3A- cell C1		
SCR - B3A- cell C2		
SCR - B3A- cell B1B		
SCR - B3A- cell B2B		
SCR - B3A- cell D1		
SCR - B3A- cell D2		
SCR - B3A- cell C3		
SCR - B3A- cell D3		
SCR - B3A- cell A4		
SCR - B3A- cell A4A		
SCR - B3A- cell B4		
SCR - B3A- cell B4A		
SCR - B3A- cell C4		
SCR - B3A- cell B4B		
SCR - B3A- cell D4		
SCR - B3A- cell A5		
SCR - B3A- cell B5		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3A- cell A6		
SCR - B3A- cell B6		
SCR - B3A- cell A7		
SCR - B3A- cell B7		
SCR - B3A- cell A8		
SCR - B3A- cell A8A		
SCR - B3A- cell B8		
SCR - B3A- cell B8A		
SCR - B3A- cell C8		
SCR - B3A- cell B8B		
SCR - B3A- cell D8		
SCR - B3A- cell A9		
SCR - B3A- cell B9		
SCR - B3A- cell A10		
SCR - B3A- cell B10		
SCR - B3A- cell A11		
SCR - B3A- cell B11		
SCR - B3A- cell A12		
SCR - B3A- cell A12A		
SCR - B3A- cell B12		
SCR - B3A- cell B12A		
SCR - B3A- cell C12		
SCR - B3A- cell B12B		
SCR - B3A- cell D12		
SCR - B3A- cell C13		
SCR - B3A- cell D13		
SCR - B3A- cell A14		
SCR - B3A- cell A14A		
SCR - B3A- cell B14		
SCR - B3A- cell B14A		
SCR - B3A- cell C14		
SCR - B3A- cell B14B		
SCR - B3A- cell D14		
SCR - B3A- cell C15		
SCR - B3A- cell D15		
SCR - B3A- cell A16		
SCR - B3A- cell A16A		
SCR - B3A- cell B16		
SCR - B3A- cell B16A		
SCR - B3A- cell C16		
SCR - B3A- cell B16B		
SCR - B3A- cell D16		
SCR - B3A- cell A17		
SCR - B3A- cell A17A		
SCR - B3A- cell B17		
SCR - B3A- cell B17A		
SCR - B3A- cell C17		
SCR - B3A- cell B17B		
SCR - B3A- cell D17		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3A- cell A18		
SCR - B3A- cell A18A		
SCR - B3A- cell B18		
SCR - B3A- cell B18A		
SCR - B3A- cell C18		
SCR - B3A- cell B18B		
SCR - B3A- cell D18		
SCR - B3A- cell A19		
SCR - B3A- cell A19A		
SCR - B3A- cell C19		
SCR - B3A- cell D19		
SCR - B3A- cell A20		
SCR - B3A- cell A20A		
SCR - B3A- cell C20		
SCR - B3A- cell D20		
SCR - B3A- cell C22		
SCR - B3A- cell D22		
SCR - B3A- cell C23		
SCR - B3A- cell D23		
SCR - B3B – General Comment		
SCR - B3B – cell A00		
SCR - B3B – cell A001		
SCR - B3B – cell A30		
SCR - B3B – cell A10		
SCR - B3B- cell A1		
SCR - B3B- cell B1		
SCR - B3B- cell C0		
SCR - B3B- cell C1		
SCR - B3B- cell A2		
SCR - B3B- cell A3		
SCR - B3B- cell C3		
SCR - B3B- cell D4		
SCR - B3B- cell C4		
SCR - B3C – General Comment		
SCR - B3C – cell A01		
SCR - B3C – cell A02		
SCR - B3C – cell A03		
SCR - B3C – cell A04		
SCR - B3C – cell A05		
SCR - B3C - cell A06		
SCR - B3C – cell A001		
SCR - B3C – cell A30		
SCR - B3C- cell A1		
SCR - B3C- cell A1A		
SCR - B3C- cell B1		
SCR - B3C- cell B1A		
SCR - B3C- cell C1		
SCR - B3C- cell B1B		
SCR - B3C- cell D1		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3C- cell A2		
SCR - B3C- cell A2A		
SCR - B3C- cell B2		
SCR - B3C- cell B2A		
SCR - B3C- cell C2		
SCR - B3C- cell B2B		
SCR - B3C- cell D2		
SCR - B3C- cell A3		
SCR - B3C- cell A3A		
SCR - B3C- cell B3		
SCR - B3C- cell B3A		
SCR - B3C- cell C3		
SCR - B3C- cell B3B		
SCR - B3C- cell D3		
SCR - B3C- cell C04		
SCR - B3C- cell D04		
SCR - B3C- cell A4		
SCR - B3C- cell A4A		
SCR - B3C- cell B4		
SCR - B3C- cell B4A		
SCR - B3C- cell C4		
SCR - B3C- cell B4B		
SCR - B3C- cell D4		
SCR - B3C- cell A5		
SCR - B3C- cell A5A		
SCR - B3C- cell B5		
SCR - B3C- cell B5A		
SCR - B3C- cell C5		
SCR - B3C- cell B5B		
SCR - B3C- cell D5		
SCR - B3C- cell A6		
SCR - B3C- cell A6A		
SCR - B3C- cell B6		
SCR - B3C- cell B6A		
SCR - B3C- cell C6		
SCR - B3C- cell B6B		
SCR - B3C- cell D6		
SCR - B3C- cell A7		
SCR - B3C- cell A7A		
SCR - B3C- cell B7		
SCR - B3C- cell B7A		
SCR - B3C- cell C7		
SCR - B3C- cell B7B		
SCR - B3C- cell D7		
SCR - B3C- cell A8		
SCR - B3C- cell A8A		
SCR - B3C- cell B8		
SCR - B3C- cell B8A		
SCR - B3C- cell C8		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3C- cell B8B		
SCR - B3C- cell D8		
SCR - B3C- cell A9		
SCR - B3C- cell A9A		
SCR - B3C- cell B9		
SCR - B3C- cell B9A		
SCR - B3C- cell C9		
SCR - B3C- cell B9B		
SCR - B3C- cell D9		
SCR - B3C- cell C10		
SCR - B3C- cell D10		
SCR - B3C- cell C11		
SCR - B3C- cell D11		
SCR - B3D – General Comment		
SCR - B3D – cell A01		
SCR - B3D – cell A02		
SCR - B3D – cell A03		
SCR - B3D – cell A04		
SCR - B3D – cell A05		
SCR - B3C – cell A001		
SCR - B3C – cell A30		
SCR - B3D- cell A1		
SCR - B3D- cell A1A		
SCR - B3D- cell B1		
SCR - B3D- cell B1A		
SCR - B3D- cell C1		
SCR - B3D- cell B1B		
SCR - B3D- cell D1		
SCR - B3D- cell A2		
SCR - B3D- cell A2A		
SCR - B3D- cell B2		
SCR - B3D- cell B2A		
SCR - B3D- cell C2		
SCR - B3D- cell B2B		
SCR - B3D- cell D2		
SCR - B3D- cell A3		
SCR - B3D- cell A3A		
SCR - B3D- cell B3		
SCR - B3D- cell B3A		
SCR - B3D- cell C3		
SCR - B3D- cell B3B		
SCR - B3D- cell D3		
SCR - B3D- cell C04		
SCR - B3D- cell D04		
SCR - B3D- cell A4		
SCR - B3D- cell A4A		
SCR - B3D- cell B4		
SCR - B3D- cell B4A		
SCR - B3D- cell C4		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3D- cell B4B		
SCR - B3D- cell D4		
SCR - B3D- cell A5		
SCR - B3D- cell A5A		
SCR - B3D- cell B5		
SCR - B3D- cell B5A		
SCR - B3D- cell C5		
SCR - B3D- cell B5B		
SCR - B3D- cell D5		
SCR - B3D- cell A6		
SCR - B3D- cell A6A		
SCR - B3D- cell B6		
SCR - B3D- cell B6A		
SCR - B3D- cell C6		
SCR - B3D- cell B6B		
SCR - B3D- cell D6		
SCR - B3D- cell A7		
SCR - B3D- cell A7A		
SCR - B3D- cell B7		
SCR - B3D- cell B7A		
SCR - B3D- cell C7		
SCR - B3D- cell B7B		
SCR - B3D- cell D7		
SCR - B3D- cell A8		
SCR - B3D- cell A8A		
SCR - B3D- cell B8		
SCR - B3D- cell B8A		
SCR - B3D- cell C8		
SCR - B3D- cell B8B		
SCR - B3D- cell D8		
SCR - B3D- cell C9		
SCR - B3D- cell D9		
SCR - B3D- cell C10		
SCR - B3D- cell D10		
SCR - B3D- cell C12		
SCR - B3D- cell D12		
SCR - B3D- cell E12		
SCR - B3D- cell F12		
SCR - B3D- cell C13		
SCR - B3D- cell D13		
SCR - B3D- cell E13		
SCR - B3D- cell F13		
SCR - B3D- cell C14		
SCR - B3D- cell D14		
SCR - B3D- cell E14		
SCR - B3D- cell F14		
SCR - B3D- cell C15		
SCR - B3D- cell D15		
SCR - B3D- cell E15		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3D- cell F15		
SCR - B3D- cell A16		
SCR - B3D- cell F16		
SCR - B3D- cell A17		
SCR - B3D- cell A18		
SCR - B3D- cell A18A		
SCR - B3D- cell B18		
SCR - B3D- cell B18B		
SCR - B3D- cell D18		
SCR - B3D- cell D19		
SCR - B3D- cell D20		
SCR - B3D- cell B21		
SCR - B3D- cell A21		
SCR - B3D- cell B22		
SCR - B3D- cell A22		
SCR - B3D- cell B23		
SCR - B3D- cell A23		
SCR - B3D- cell B24		
SCR - B3D- cell A24		
SCR - B3D- cell B25		
SCR - B3D- cell A25		
SCR - B3D- cell B26		
SCR - B3D- cell A26		
SCR - B3D- cell B27		
SCR - B3D- cell A27		
SCR - B3E – General Comment		
SCR - B3E- cell A001		
SCR - B3E- cell A30		
SCR - B3E- cell C1		
SCR - B3E- cell D1		
SCR - B3E- cell E1		
SCR - B3E- cell F1		
SCR - B3E- cell C2		
SCR - B3E- cell D2		
SCR - B3E- cell E2		
SCR - B3E- cell F2		
SCR - B3E- cell C3		
SCR - B3E- cell D3		
SCR - B3E- cell E3		
SCR - B3E- cell F3		
SCR - B3E- cell C4		
SCR - B3E- cell D4		
SCR - B3E- cell E4		
SCR - B3E- cell F4		
SCR - B3E- cell C5		
SCR - B3E- cell D5		
SCR - B3E- cell E5		
SCR - B3E- cell F5		
SCR - B3E- cell C6		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3E- cell D6		
SCR - B3E- cell E6		
SCR - B3E- cell F6		
SCR - B3E- cell C7		
SCR - B3E- cell D7		
SCR - B3E- cell E7		
SCR - B3E- cell F7		
SCR - B3E- cell C8		
SCR - B3E- cell D8		
SCR - B3E- cell E8		
SCR - B3E- cell F8		
SCR - B3E- cell C9		
SCR - B3E- cell D9		
SCR - B3E- cell E9		
SCR - B3E- cell F9		
SCR - B3E- cell C10		
SCR - B3E- cell D10		
SCR - B3E- cell E10		
SCR - B3E- cell F10		
SCR - B3E- cell C11		
SCR - B3E- cell D11		
SCR - B3E- cell E11		
SCR - B3E- cell F11		
SCR - B3E- cell C12		
SCR - B3E- cell D12		
SCR - B3E- cell E12		
SCR - B3E- cell F12		
SCR - B3E- cell A13		
SCR - B3E- cell F13		
SCR - B3E- cell A14		
SCR - B3E- cell A15		
SCR - B3E- cell A15A		
SCR - B3E- cell B15		
SCR - B3E- cell B15A		
SCR - B3E- cell C15		
SCR - B3E- cell A16		
SCR - B3E- cell A17		
SCR - B3E- cell A18		
SCR - B3F – General Comment		
SCR - B3F- cell A1		
SCR - B3F- cell A2-A6		
SCR - B3F- cell A7		
SCR - B3F- cell B1		
SCR - B3F- cell B2-B6		
SCR - B3F- cell B7		
SCR - B3F- cell C1		
SCR - B3F- cell C2-C6		
SCR - B3F- cell C7		
SCR - B3F- cell A8		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3F- cell B8		
SCR - B3F- cell C8		
SCR - B3F- cell A9		
SCR - B3F- cell A10-A15		
SCR - B3F- cell A16		
SCR - B3F- cell B9		
SCR - B3F- cell B10-B15		
SCR - B3F- cell B16		
SCR - B3F- cell C9		
SCR - B3F- cell C10-C15		
SCR - B3F- cell C16		
SCR - B3F- cell A17		
SCR - B3F- cell A18		
SCR - B3F- cell B17		
SCR - B3F- cell B18		
SCR - B3F- cell C17		
SCR - B3F- cell C18		
SCR - B3F- cell A19		
SCR - B3F- cell A20		
SCR - B3F- cell A21		
SCR - B3F- cell B19		
SCR - B3F- cell B20		
SCR - B3F- cell B21		
SCR - B3F- cell C19		
SCR - B3F- cell C20		
SCR - B3F- cell C21		
SCR - B3F- cell A22		
SCR - B3F- cell A23-A25		
SCR - B3F- cell A26		
SCR - B3F- cell B22		
SCR - B3F- cell B23-B25		
SCR - B3F- cell B26		
SCR - B3F- cell C22		
SCR - B3F- cell C23-C25		
SCR - B3F- cell C26		
SCR - B3F- cell AA1-AA20		
SCR - B3F- cell AA21		
SCR - B3F- cell AA22-AA35		
SCR - B3F- cell AA36		
SCR - B3F- cell AA37		
SCR - B3F- cell AB1-AB20		
SCR - B3F- cell AB21		
SCR - B3F- cell AB22-AB35		
SCR - B3F- cell AB36		
SCR - B3F- cell AB37		
SCR - B3F- cell AC1-AC20		
SCR - B3F- cell AC21		
SCR - B3F- cell AD1-AD20		
SCR - B3F- cell AD21		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3F- cell AE1-AE20		
SCR - B3F- cell AF1-AF20		
SCR - B3F- cell AF21		
SCR - B3F- cell AF36		
SCR - B3F- cell AF37		
SCR - B3F- cell AF38		
SCR - B3F- cell AF39		
SCR - B3F- cell AG1-AG20		
SCR - B3F- cell AG21		
SCR - B3F- cell AG36		
SCR - B3F- cell AG37		
SCR - B3F- cell AH1-AH20		
SCR - B3F- cell AH21		
SCR - B3F- cell AH36		
SCR - B3F- cell AH37		
SCR - B3F- cell AI1-AI20		
SCR - B3F- cell AI21		
SCR - B3F- cell AI36		
SCR - B3F- cell AI37		
SCR - B3F- cell AI38		
SCR - B3F- cell AI39		
SCR - B3F- cell BA1-BA20		
SCR - B3F- cell BA21		
SCR - B3F- cell BA22-BA35		
SCR - B3F- cell BA36		
SCR - B3F- cell BA37		
SCR - B3F- cell BB1-BB20		
SCR - B3F- cell BB21		
SCR - B3F- cell BB22-BB35		
SCR - B3F- cell BB36		
SCR - B3F- cell BB37		
SCR - B3F- cell BC1-BC20		
SCR - B3F- cell BC21		
SCR - B3F- cell BD1-BD20		
SCR - B3F- cell BD21		
SCR - B3F- cell BE1-BE20		
SCR - B3F- cell BE21		
SCR - B3F- cell BE36		
SCR - B3F- cell BE37		
SCR - B3F- cell BE38		
SCR - B3F- cell BE39		
SCR - B3F- cell BF1-BF20		
SCR - B3F- cell BF21		
SCR - B3F- cell BF36		
SCR - B3F- cell BF37		
SCR - B3F- cell BG1-BG20		
SCR - B3F- cell BG21		
SCR - B3F- cell BG36		
SCR - B3F- cell BG37		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3F- cell BH1-BH20		
SCR - B3F- cell BH21		
SCR - B3F- cell BH36		
SCR - B3F- cell BH37		
SCR - B3F- cell BH38		
SCR - B3F- cell BH39		
SCR - B3F- cell CA1-CA14		
SCR - B3F- cell CA15		
SCR - B3F- cell CA16-CA29		
SCR - B3F- cell CA30		
SCR - B3F- cell CA31		
SCR - B3F- cell CB1-CB14		
SCR - B3F- cell CB15		
SCR - B3F- cell CB16-CB29		
SCR - B3F- cell CB30		
SCR - B3F- cell CB31		
SCR - B3F- cell CC1-CC14		
SCR - B3F- cell CC15		
SCR - B3F- cell CD1-CD14		
SCR - B3F- cell CD15		
SCR - B3F- cell CE1-CE14		
SCR - B3F- cell CF1-CF14		
SCR - B3F- cell CF15		
SCR - B3F- cell CF30		
SCR - B3F- cell CF31		
SCR - B3F- cell CF32		
SCR - B3F- cell CF33		
SCR - B3F- cell CG1-CG14		
SCR - B3F- cell CG15		
SCR - B3F- cell CG30		
SCR - B3F- cell CG31		
SCR - B3F- cell CH1-CH14		
SCR - B3F- cell CH15		
SCR - B3F- cell CH30		
SCR - B3F- cell CH31		
SCR - B3F- cell CI1-CI14		
SCR - B3F- cell CI15		
SCR - B3F- cell CI30		
SCR - B3F- cell CI31		
SCR - B3F- cell CI32		
SCR - B3F- cell CI33		
SCR - B3F- cell DA1-DA9		
SCR - B3F- cell DA10		
SCR - B3F- cell DA11-DA24		
SCR - B3F- cell DA25		
SCR - B3F- cell DA26		
SCR - B3F- cell DB1-DB9		
SCR - B3F- cell DB10		
SCR - B3F- cell DB11-DB24		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3F- cell DB25		
SCR - B3F- cell DB26		
SCR - B3F- cell DC1-DC9		
SCR - B3F- cell DC10		
SCR - B3F- cell DD1-DD9		
SCR - B3F- cell DD10		
SCR - B3F- cell DE1-DE9		
SCR - B3F- cell DF1-DF9		
SCR - B3F- cell DF10		
SCR - B3F- cell DF25		
SCR - B3F- cell DF26		
SCR - B3F- cell DF27		
SCR - B3F- cell DF28		
SCR - B3F- cell DG1-DG9		
SCR - B3F- cell DG10		
SCR - B3F- cell DG25		
SCR - B3F- cell DG26		
SCR - B3F- cell DH1-DH9		
SCR - B3F- cell DH10		
SCR - B3F- cell DH25		
SCR - B3F- cell DH26		
SCR - B3F- cell DI1-DI9		
SCR - B3F- cell DI10		
SCR - B3F- cell DI25		
SCR - B3F- cell DI26		
SCR - B3F- cell DI27		
SCR - B3F- cell DI28		
SCR - B3F- cell EA1		
SCR - B3F- cell EB1		
SCR - B3F- cell EC1		
SCR - B3F- cell ED1		
SCR - B3F- cell EE1		
SCR - B3F- cell EE2		
SCR - B3F- cell EE3		
SCR - B3F- cell EF1		
SCR - B3F- cell EG1		
SCR - B3F- cell EH1		
SCR - B3F- cell EH2		
SCR - B3F- cell EH3		
SCR - B3F- cell FA1		
SCR - B3F- cell FB1		
SCR - B3F- cell FC1		
SCR - B3F- cell FD1		
SCR - B3F- cell FE1		
SCR - B3F- cell GA1		
SCR - B3F- cell GA2		
SCR - B3F- cell GA3		
SCR - B3F- cell GA4		
SCR - B3F- cell GA5		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3F- cell GA6		
SCR - B3F- cell HA1		
SCR - B3F- cell HB1		
SCR - B3F- cell HC1		
SCR - B3F- cell HD1		
SCR - B3F- cell HE1		
SCR - B3F- cell HF1		
SCR - B3F- cell HG1		
SCR - B3F- cell HH1		
SCR - B3F- cell HA2-HE2		
SCR - B3F- cell HF2		
SCR - B3F- cell HG2		
SCR - B3F- cell HH2		
SCR - B3F- cell HI2		
SCR - B3F- cell HJ2		
SCR - B3F- cell HA3		
SCR - B3F- cell HB3		
SCR - B3F- cell HC3		
SCR - B3F- cell HA4		
SCR - B3F- cell HB4		
SCR - B3F- cell HC4		
SCR - B3F- cell HA5		
SCR - B3F- cell HB5		
SCR - B3F- cell HC5		
SCR - B3F- cell IA1-IB1		
SCR - B3F- cell IC1		
SCR - B3F- cell ID1		
SCR - B3F- cell IE1		
SCR - B3F- cell IF1		
SCR - B3F- cell JA1		
SCR - B3F- cell JA2		
SCR - B3F- cell JA3		
SCR - B3F- cell JA4		
SCR - B3F- cell KA1-KE1		
SCR - B3F- cell KA2-KE2		
SCR - B3F- cell KA3-KE3		
SCR - B3F- cell KA4-KE4		
SCR - B3F- cell KA5-KE5		
SCR - B3F- cell KA6-KE6		
SCR - B3F- cell KA7-KE7		
SCR - B3F- cell KF1		
SCR - B3F- cell KF4		
SCR - B3F- cell KF5		
SCR - B3F- cell KF6		
SCR - B3F- cell KF7		
SCR - B3F- cell KA8		
SCR - B3F- cell KB8		
SCR - B3F- cell KC8		
SCR - B3F- cell KA9		

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Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3F- cell KB9		
SCR - B3F- cell KC9		
SCR - B3F- cell KA10		
SCR - B3F- cell KB10		
SCR - B3F- cell KC10		
SCR - B3F- cell LA1-LB1		
SCR - B3F- cell LC1		
SCR - B3F- cell LA2-LB2		
SCR - B3F- cell LC2		
SCR - B3F- cell LA3-LB3		
SCR - B3F- cell LC3		
SCR - B3F- cell LA4-LB4		
SCR - B3F- cell LC4		
SCR - B3F- cell LA5-LB5		
SCR - B3F- cell LC5		
SCR - B3F- cell LA6-LB6		
SCR - B3F- cell LC6		
SCR - B3F- cell LA7		
SCR - B3F- cell LA8		
SCR - B3F- cell LA9		
SCR - B3F- cell LA10		
SCR - B3F- cell LA11		
SCR - B3F- cell LA12		
SCR - B3F- cell LB12		
SCR - B3F- cell LC12		
SCR - B3F- cell LA13		
SCR - B3F- cell LB13		
SCR - B3F- cell LC13		
SCR - B3F- cell LA14		
SCR - B3F- cell LB14		
SCR - B3F- cell LC14		
SCR - B3F- cell MA1-ME1		
SCR - B3F- cell MA2-ME2		
SCR - B3F- cell MF2		
SCR - B3F- cell MG2		
SCR - B3F- cell MH2		
SCR - B3F- cell MF3		
SCR - B3F- cell MG3		
SCR - B3F- cell MH3		
SCR - B3F- cell MF4		
SCR - B3F- cell MG4		
SCR - B3F- cell MH4		
SCR - B3F- cell NA1,NC1,NE1,NG1,NI1		
SCR - B3F- cell NB1,ND1,NF1,NH1,NJ1		
SCR - B3F- cell NK1		
SCR - B3F- cell NK32		
SCR - B3F- cell NK33		

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Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3F- cell NK34		
SCR - B3F- cell NL1		
SCR - B3F- cell NL32		
SCR - B3F- cell NM1		
SCR - B3F- cell NM32		
SCR - B3F- cell NN1		
SCR - B3F- cell NN32		
SCR - B3F- cell NN33		
SCR - B3F- cell NN34		
SCR - B3F- cell OA1		
SCR - B3F- cell OB1,OC1,OD1,OE1,OF1		
SCR - B3F- cell OG1		
SCR - B3F- cell OG21		
SCR - B3F- cell OG22		
SCR - B3F- cell OG23		
SCR - B3F- cell OH1		
SCR - B3F- cell OH21		
SCR - B3F- cell OI1		
SCR - B3F- cell OI21		
SCR - B3F- cell OJ1		
SCR - B3F- cell OJ21		
SCR - B3F- cell OJ22		
SCR - B3F- cell OJ23		
SCR - B3F- cell PA21		
SCR - B3F- cell PB21		
SCR - B3F- cell PC1		
SCR - B3F- cell PD1,PF1,PH1		
SCR - B3F- cell PE1, PG1, PI1		
SCR - B3F- cell PJ1		
SCR - B3F- cell PJ21		
SCR - B3F- cell PK21		
SCR - B3F- cell PL21		
SCR - B3F- cell PM21		
SCR - B3G – General Comments		
SCR - B3G- cell A30		
SCR - B3G- cell A1		
SCR - B3G- cell A2		
SCR - B3G- cell A3		
SCR - B3G- cell A4		
SCR - B3G- cell A5		
SCR - B3G- cell A6		
SCR - B3G- cell A7		
SCR - B3G- cell A8		
SCR - B3G- cell A9		
SCR - B3G- cell A10		
SCR - B3G- cell A11		
SCR - B3G- cell A12		
SCR - B3G- cell A13		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
SCR - B3G- cell A14		
SCR - B3G- cell A15		
SCR - B3G- cell A16		
MCR - B4A – General Comments		
MCR - B4A- cell A1		
MCR - B4A- cell B2		
MCR - B4A- cell C2		
MCR - B4A- cell B3		
MCR - B4A- cell C3		
MCR - B4A- cell B4		
MCR - B4A- cell C4		
MCR - B4A- cell B5		
MCR - B4A- cell C5		
MCR - B4A- cell B6		
MCR - B4A- cell C6		
MCR - B4A- cell B7		
MCR - B4A- cell C7		
MCR - B4A- cell B8		
MCR - B4A- cell C8		
MCR - B4A- cell B9		
MCR - B4A- cell C9		
MCR - B4A- cell B10		
MCR - B4A- cell C10		
MCR - B4A- cell B11		
MCR - B4A- cell C11		
MCR - B4A- cell B12		
MCR - B4A- cell C12		
MCR - B4A- cell B13		
MCR - B4A- cell C13		
MCR - B4A- cell B14		
MCR - B4A- cell C14		
MCR - B4A- cell B15		
MCR - B4A- cell C15		
MCR - B4A- cell B16		
MCR - B4A- cell C16		
MCR - B4A- cell B17		
MCR - B4A- cell C17		
MCR - B4A- cell A18		
MCR - B4A- cell B19		
MCR - B4A- cell B20		
MCR - B4A- cell B21		
MCR - B4A- cell B22		
MCR - B4A- cell C23		
MCR - B4A- cell A24		
MCR - B4A- cell A25		
MCR - B4A- cell A26		
MCR - B4A- cell A27		
MCR - B4A- cell A28		
MCR - B4A- cell A29		

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Name of Company:	Groupe Consultatif Actuariel Européen	
MCR - B4A- cell A30		
MCR - B4B – General Comments		
MCR - B4B- cell B1		
MCR - B4B- cell C1		
MCR - B4B- cell D2		
MCR - B4B- cell E2		
MCR - B4B- cell F2		
MCR - B4B- cell G2		
MCR - B4B- cell D3		
MCR - B4B- cell E3		
MCR - B4B- cell F3		
MCR - B4B- cell G3		
MCR - B4B- cell D4		
MCR - B4B- cell E4		
MCR - B4B- cell F4		
MCR - B4B- cell G4		
MCR - B4B- cell D5		
MCR - B4B- cell E5		
MCR - B4B- cell F5		
MCR - B4B- cell G5		
MCR - B4B- cell D6		
MCR - B4B- cell E6		
MCR - B4B- cell F6		
MCR - B4B- cell G6		
MCR - B4B- cell D7		
MCR - B4B- cell E7		
MCR - B4B- cell F7		
MCR - B4B- cell G7		
MCR - B4B- cell D8		
MCR - B4B- cell E8		
MCR - B4B- cell F8		
MCR - B4B- cell G8		
MCR - B4B- cell D9		
MCR - B4B- cell E9		
MCR - B4B- cell F9		
MCR - B4B- cell G9		
MCR - B4B- cell D10		
MCR - B4B- cell E10		
MCR - B4B- cell F10		
MCR - B4B- cell G10		
MCR - B4B- cell D11		
MCR - B4B- cell E11		
MCR - B4B- cell F11		
MCR - B4B- cell G11		
MCR - B4B- cell D12		
MCR - B4B- cell E12		
MCR - B4B- cell F12		
MCR - B4B- cell G12		
MCR - B4B- cell D13		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
MCR - B4B- cell E13		
MCR - B4B- cell F13		
MCR - B4B- cell G13		
MCR - B4B- cell D14		
MCR - B4B- cell E14		
MCR - B4B- cell F14		
MCR - B4B- cell G14		
MCR - B4B- cell D15		
MCR - B4B- cell E15		
MCR - B4B- cell F15		
MCR - B4B- cell G15		
MCR - B4B- cell D16		
MCR - B4B- cell E16		
MCR - B4B- cell F16		
MCR - B4B- cell G16		
MCR - B4B- cell D17		
MCR - B4B- cell E17		
MCR - B4B- cell F17		
MCR - B4B- cell G17		
MCR - B4B- cell B18		
MCR - B4B- cell C18		
MCR - B4B- cell D19		
MCR - B4B- cell F19		
MCR - B4B- cell D20		
MCR - B4B- cell F20		
MCR - B4B- cell D21		
MCR - B4B- cell F21		
MCR - B4B- cell D22		
MCR - B4B- cell F22		
MCR - B4B- cell E23		
MCR - B4B- cell G23		
MCR - B4B- cell A24		
MCR - B4B- cell A25		
MCR - B4B- cell A26		
MCR - B4B- cell A27		
MCR - B4B- cell A28		
MCR - B4B- cell A29		
MCR - B4B- cell A30		
G01-General Comments		
G01- cell A1		
G01- cell B1		
G01- cell C1		
G01- cell D1		
G01- cell E1		
G01- cell F1		
G01- cell G1		
G01- cell H1a		
G01- cell H1b		
G01- cell H1c		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
G01- cell I1a		
G01- cell I1b		
G01- cell J1		
G01- cell K1		
G01- cell L1		
G01- cell M1		
G01- cell N1		
G01- cell O1		
G01- cell P1		
G01- cell Q1		
G01- cell R1		
G01- cell S1		
G01- cell T1		
G01- cell U1		
G03 – General Comments		
G03- cell A1		
G03- cell A2		
G03- cell B1		
G03- cell B2		
G03- cell B3		
G03- cell B4		
G03- cell B5		
G03- cell B6		
G03- cell B7		
G03- cell C1		
G03- cell D1		
G03- cell F1		
G03- cell G1		
G03- cell H1		
G03- cell N1		
G03- cell O1		
G03- cell P1		
G04 – General Comments		
G04- cell A1		
G04- cell A2		
G04- cell A3		
G04- cell B1		
G04- cell C1		
G04- cell D1		
G04- cell E1		
G14- General Comments		
G14- cell A1		
G14- cell B1		
G14- cell S1		
G14- cell C1,F1,I1,L1,O1		
G14- cell D1,G1,J1,M1,P1		
G14- cell E1,H1,K1,N1,Q1		
G14- cell R1		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
Technical Annex IV General Comments		
Technical Annex V General Comments		
Technical Annex VI General Comments		
Technical Annex VII General Comments		
CAS1		
CAS2		
CAS3		
CAS4		
CAS5		
CAS6		
CAS7		
CAS8		
CAS9		
CAS10		
CAS11		
CAS12		
CAS13		
CAS14		
CAS15		
CAS16		
CAS17		
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CAS41		
CAS42		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
CAS43		
CAS44		
CAS45		
CAS46		
CAS47		
CAS48		
CAS49		
CAS50		
CAS51		
CAS52		
CAS53		
CAS54		
CAS55		
CAS56		
CAS57		
CAS58		
CAS59	We believe the current formula does not capture well the case in which the TPs in MCR_B4A and TP_E1Q sheets will be both positive but of different values. We would rather change the formula in the following way: MCR_B4A.B2 = max(0;TP_E1Q.A24).	
CAS60	See comment for CAS 59.	
CAS61	See comment for CAS 59.	
CAS62	See comment for CAS 59.	
CAS63	See comment for CAS 59.	
CAS64	See comment for CAS 59.	
CAS65	See comment for CAS 59.	
CAS66	See comment for CAS 59.	
CAS67	See comment for CAS 59.	
CAS68	See comment for CAS 59.	
CAS69	See comment for CAS 59.	
CAS70	See comment for CAS 59.	
CAS71	See comment for CAS 59.	
CAS72	See comment for CAS 59.	
CAS73	See comment for CAS 59.	
CAS74	See comment for CAS 59.	
CAS75	See comment for CAS 59.	
CAS76	See comment for CAS 59.	
CAS77	See comment for CAS 59.	
CAS78		
CQS1		
CQS2		
CQS3		
CQS4		
CQS5		
CQS6		
CQS7		
CQS8		
CQS9		
CQS10		
CQS11		

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
CQS12		
CQS13		
CQS14		
CQS15		
CQS16		
CQS17		
CQS18		
CQS19		
CQS20		
CQS21		
CQS22		
CQS23		
CQS24		
CQS25		
CQS26		
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CQS29		
CQS30		
CQS31		
CQS32		
CQS33		
CQS34		
CQS35		
CQS36		
CQS37		
CQS38		
CQS39		
CQS40		
CQS41		
CQS42		
CQS43		
CQS44		
CQS45	We believe the current formula does not capture well the case in which the TPs in MCR_B4A and TP_E1Q sheets will be both positive but of different values. We would rather change the formula in the following way: MCR_B4A.B2 = max(0;TP_E1Q.A24).	
CQS46	See comment for CQS 45.	
CQS47	See comment for CQS 45.	
CQS48	See comment for CQS 45.	
CQS49	See comment for CQS 45.	
CQS50	See comment for CQS 45.	
CQS51	See comment for CQS 45.	
CQS52	See comment for CQS 45.	
CQS53	See comment for CQS 45.	
CQS54	See comment for CQS 45.	
CQS55	See comment for CQS 45.	
CQS56	See comment for CQS 45.	
CQS57	See comment for CQS 45.	
CQS58	See comment for CQS 45.	

Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
CQS59	See comment for CQS 45.	
CQS60	See comment for CQS 45.	
CQS61		
CQS62		
CQS63		
CGS1		
CGS2		
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CGS9		
CGS10		
CGS11		
CGS12		
CGS13		
CGS14		
CGS15		
CGS16		
CGS17		
CGS18		
CGS19		
CGS20		
CGS21		
QCGS1		
Instructions		
Impact Assessment – General Comments		
2,1		
2,2	It seems this article suggests that apart from Omnibus II, also the Level 2 and Level 3 have to be final before the application of these guidelines. Is it realistic that Level 2 and Level 3 will be agreed sufficiently in advance to enable insurers timely implementation for reporting based on 2014 data? Will there be any guidance in case the Level 2 and Level 3 will not yet be approved?	
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Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
Question 1		
Question 1 – Option 1		
Question 1 – Option 2		
Question 2		
Question 2 – Option 1		
Question 2 – Option 2		
Question 2 – Option 3		
Question 2 – Option 4		
Question 3		
Question 3 – Option 1		
Question 3 – Option 2		
Question 3 – Option 3		
Question 4		
Question 4 – Option 1		
Question 4 – Option 2		
Question 4 – Option 3		
Question 4 – Option 4		
Question 4 – Option 5		
Question 5		
Question 5 – Option 1		
Question 5 – Option 2		
Question 6		
Question 6 – Option 1		
Question 6 – Option 2		
Question 6 – Option 3		
Question 6 – Option 4		
Question 7		
Question 7 – Option 1		
Question 7 – Option 2		
Question 7 – Option 3		
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Comments Template on Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		Deadline 19. Jun 13 12:00 CET
Name of Company:	Groupe Consultatif Actuariel Européen	
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Appendix 1		
Appendix 2		
Appendix 3		