

**Comments Template on EIOPA-CP-14-053
 Consultation Paper on the draft proposal for Implementing Technical Standards on
 capital add-ons**

**Deadline
 02.Mar.2015
 23:59 CET**

Company name:	ACTUAM S.à.r.l, Actuarial and Risk Services Luxembourg	
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"> ⇒ Do not change the numbering 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-14-053.</p>		
Reference	Comment	
General Comment		
Recital 1		
Recital 2		
Recital 3		
Article 1 (1)		

Comments Template on EIOPA-CP-14-053 Consultation Paper on the draft proposal for Implementing Technical Standards on capital add-ons		Deadline 02.Mar.2015 23:59 CET
Article 1 (2)		
Article 1 (3)		
Article 2		
Article 3 (1)		
Article 3 (2)		
Article 4 (1)		
Article 4 (2)	Regarding the amount of the capital add-on, does EIOPA intend to put in place formal capital buffers under Pillar 2 by risk? In fact for specific risks of the undertakings (i.e. with specific frequency and severity) capital buffers could be considered when capital add-on is assessed.	Public
Article 5		
Article 6 (1)		
Article 6 (2)		
Article 7		
Article 8 (1)		
Article 8 (2)		
Article 9 (1)		
Article 9 (2)		
Annex I general		
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