

<b>Comments Template on EIOPA-CP-14-044  Draft proposal for Level 3 Guidelines on  methods for determining the market  share for reporting</b>		<b>Deadline  02.Mar.2015  23:59 CET</b>
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
Please follow the instructions for filling in the template: <ul style="list-style-type: none"> <li>⇒ <u>Do not change the numbering</u> in column "Reference".</li> <li>⇒ 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>.</li> <li>⇒ 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"> <li>○ 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.</li> <li>○ If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment itself.</li> </ul> </li> </ul> <p><b>Please send the completed template to <a href="mailto:Consultation_Set2@eiopa.europa.eu">Consultation_Set2@eiopa.europa.eu</a>, in MSWord Format, (our IT tool does not allow processing of any other formats).</b></p> <p>The paragraph numbers below correspond to Consultation Paper No. EIOPA-CP-14-044.</p>		
Reference	Comment	
General Comment	Guideline 5 should be deleted as it goes against the spirit of Article 35(6)(a) in that it requires a composite undertaking that would normally qualify for the reporting exemption in one business line, for example life, to still report on that part because it exceeds in the other business line, for example non-life, the 20% threshold  Guideline 8 should be deleted as it is unclear what its purpose is.	

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	<p>The Guidelines could usefully deal with some other issues such as:</p> <ul style="list-style-type: none"> <li>- how will the proportionality test referred to in Article 35(8) of the Solvency II Framework Directive be applied by supervisory authorities</li> <li>- an obligation for the supervisory authorities to inform companies about granting or cancelling the exemption on quarterly reporting in advance</li> <li>- how to determine a transition period for implementing the reporting process in the company when the exemption on quarterly reporting no longer applies</li> <li>- how supervisory authorities intend to publish the annual market share thresholds for the purposes of transparency</li> </ul>	
1.1.		
1.2.		
1.3.		
1.4.		
1.5.		
1.6.		
1.7.		
1.8.		
1.9.		
1.10.		
1.11.		
1.12.		
1.13.		
1.14.		
1.15.	GL 4: ...with a different financial year than the calendar year in the market”	
1.16.	“...or reinsurance undertaking which <b>has</b> business...not be exempted from reporting if the <b>undertaking’s</b> business is...”	

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1.17.		
1.18.		
1.19.	"...of the deadline <b>for requesting a limitation of</b> regular..."	
1.20.	"...while assessing the request for exemption <b>from</b> insurance or reinsurance..."	
Annex I - 1.1.		
Annex I - 1.2.		
Annex I - 1.3.		
Annex I - 1.4.		
Annex I - 1.5.		
Annex I - 1.6.		
Annex I - 1.7.		
Annex I - 1.8.		
Annex I - 1.9.		
Annex I - 1.10.		
Annex I - 1.11.		
Annex I - 1.12.		
Annex I - 1.13.		
Annex I - 1.14.		
Annex I - 1.15.		
Annex I - 1.16.		
Annex I - 1.17.		
Annex I - 1.18.		
Annex I - 1.19.		
Annex I - 1.20.		
Annex I - 1.21.		

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Annex I - 1.22.		
Annex I - 1.23.		
Annex I - 1.24.		
Annex I - 1.25.		
Annex I - 1.26.		
Annex I - 1.27.		
Annex I - 1.28.		
Annex I - 1.29.		
Annex I - 1.30.		
Annex I - 1.31.		
Annex I - 1.32.		
Annex I - 1.33.		
Annex I - 1.34.		
Annex I - 1.35.		
Annex I - 1.36.		
Annex I - 1.37.		
Annex I - 1.38.		
Annex I - 1.39.		
Annex I - 1.40.		