

Comments Template on EIOPA-CP-14-050 Draft proposal for Level 3 Guidance on exchange of information on a systematic basis within colleges of supervisors		Deadline 02.Mar.2015 23:59 CET
Company name:	Insurance Europe	
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-14-050.</p>		
Reference	Comment	
General Comment	Insurance Europe welcomes the opportunity to comment on the guidelines on exchange of information on a systematic basis within colleges. However, we believe that this guidance would be better fit in EIOPA Guidelines on the operational functioning of colleges of supervisors, instead of having two separate documents.	

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	<p>EIOPA's objective is to have two different documents to address the two types of exchange of information: on a systematic basis and ad-hoc exchange of information.</p> <p>The aims of these two sets of guidelines are the same: to facilitate colleges' activities and to ensure a consistent approach to deciding the scope of information to be exchanged within the colleges. We therefore do not see the purpose of having two different sets of guidelines to deal with the same issues.</p> <p>There would be added value in combining these into a single document, divided into chapters covering the two types of information exchange.</p>	
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1.7.	<p>Guideline 1</p> <p>This Guideline should be deleted.</p> <p>The criteria used within the college to assess the information not needed to be exchanged in a systematic basis should not be subject to a Guideline that can be binding. It is up to the college to decide which criteria is the most appropriate. The list is exhaustive which could not be adequate for some colleges.</p> <p>In addition, the last bullet point ("<i>The existence and relevance of cross-border intra-group transactions that could possibly raise contagion risk within the group</i>") can be an important reason for exchanging information within the college. We do not see the reason of having this criteria in the list. The last bullet point should be deleted.</p>	

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1.8.		
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1.15.		
Technical Annex 1, point 1		
Technical Annex 1, point 2		
Technical Annex 1, point 3		
Technical Annex 1, point 4		
Technical Annex 2, point 1		
Technical Annex 2, point 2		
Technical Annex 2, point 3		
Technical Annex 2, point 4		
Technical Annex 3, point 1		

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Technical Annex 3, point 2		
Technical Annex 3, point 3		
Technical Annex 3, point 4		
Technical Annex 3, point 5		
Technical Annex 3, point 6		
Technical Annex 3, point 7		
Technical Annex 3, point 8		
Technical Annex 3, point 9		
Technical Annex 3, point 10		
Technical Annex 3, point 11		
Technical Annex 3, point 12		
Technical Annex 3, point 13		
Technical Annex 3, point 14		
4.1.		
4.2.		

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