

Comments Template on EIOPA-CP-14-044 Draft proposal for Level 3 Guidelines on methods for determining the market share for reporting		Deadline 02.Mar.2015 23:59 CET
Company name:	AMICE	
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 <u>Consultation Set2@eiopa.europa.eu</u>, 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-14-044.</p>		
Reference	Comment	
General Comment	AMICE welcomes the opportunity to comment on the EIOPA Guidelines on methods for determining the market share for reporting. The supervisor should, when considering cancelling the exemption on quarterly and/or on item-by-item reporting of a firm which has been granted an exemption until the latest reporting date, be	

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	<p>allowed to extend the original submission period; Insurance firms that were granted the exemption on quarterly and/or on item-by-item reporting but that at the end of the financial year fall out of the 20% exemption threshold, should submit the set of quarterly quantitative information starting in the third quarter of the following financial year. National supervisory authorities should notify those insurance firms which will no longer be exempted within a reasonable time before the first reporting.</p> <p>Guideline 5 should be deleted as it is not aligned with the Directive. Guideline 7 should be also deleted as it does not serve the purpose of this paper.</p>	
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1.16.	<p>Guideline 5 should be deleted as it is not in line with Article 35 paragraph 6 of the Level 1 text. The Directive states that the limitation to regular supervisory reporting shall be granted to undertakings that do not represent more than 20% of a MS's life and non-life market <u>respectively</u>.</p>	

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1.17.		
1.18.		
1.19.	Guideline 7 should be deleted as it does not serve the purpose of this paper.	
1.20.		
Annex I - 1.1.		
Annex I - 1.2.		
Annex I - 1.3.		
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Annex I - 1.19.		
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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.		
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Annex I - 1.37.		
Annex I - 1.38.		
Annex I - 1.39.		
Annex I - 1.40.		