## EIOPA Stress Test 2014

## **Questions & Answers**



## 04 June 2014

ID	Document	Торіс	No. Para	Question	Answer
		Reporting template			
1	eiopa-14-216-st14- templates.xls		BS+.Assets(CF)	Could you please explain in more detail what is to be entered here, I found no advice in the Technical Specifications, etc Are there any explanations for this survey?	You find information on the expected cash flows to be reported in paragraph 29, 56 and 57. The cash flows should be undiscounted. Cell B6 in spreadsheet "BS+.Assets(CF)" should state "Year (projection of undiscounted expected cash- flows)", this will be updated accordingly in the next published version of the template.
2	eiopa-14-216-st14- templates.xls		BS+.Assets(CF)	We assume, the goal is to list here all assets with secure future cash flows. For an equity investment fund that is not possible, of course. That is why "Total" (cell C6) does not also mean the sum of all assets in the market value balance sheet, correct?	This is correct. Any assets allowing for secure cash flow projections should be added here. In case dividend payments on equity are voluntary and not predictable on a stable best effort basis they should not be added.
3	eiopa-14-216-st14- templates.xls		BS+.Assets(CF)	What is "Other (unrated) fixed income", this name does not appear in the market value balance sheet?	With "Other (unrated) fixed income" any cash flows related to fixed income not related to: a) government bonds, b) corporate bonds, c) structured noted and d) collaterized securities are meant here. The reference to "unrated" is obsolete and will be removed in the next published version of the reporting template. In general, all qualifying cash flows, independent of ratings, can be entered here.
4	eiopa-14-216-st14- templates.xls		BS+ / III - Property exposure	Is the total required allocation here the sum of the market value balance sheet items "property (other than for own use)" as well as the property subset of "Property, plant & equipment held for own use"? Without the position of "real estate funds"? Is that right?	This is not correct. It is expected that any investments in real estate funds should be added to the given categories on the real estate exposure, i.e. the best solution would be to apply a look-through approach. In case a look-through approach is not possible, the second best solution is a relative distribution on a best effort basis among the categories (e.g. 20% residental and 80% commercial). If a clear investment focus of a particular real estate fund is not given, it is proposed to add the investments of the fund fully to the commercial property sum.
8	Stress Test 2014 Reporting Template			ABC insurance Group and ABC Life (solo) have been asked to participate in the stress test, namely ABC Group for the core module and ABC Life for the low yield exercise. For both the core test and the low yield exercise, the tabs BS and BS+ need to be filted in in the reporting template. In the case where a Group and a related solo entity are both participating in the Stress Test/ Low Yield exercise, do we need to fill in the template twice and send two spreadsheets in, or can we duplicate the tabs BS and BS+ in one reporting template and send in one spreadsheet?	In these cases EIOPA is expecting two templates to be submitted.
20	eiopa-14-216-st14- templates.xls		BS	In the sum of total assets not all values are included. Cell C39 is not part in the sum of C73. Cell D39 and D56 are not part in the sum of D73.	Version 2 of the spreadsheet introduce a formula in C28:D28 (Investments) suming among other C39:D39 (Investment funds) and fix the formula in C73:D73 (total assets).
21	eiopa-14-216-st14- templates.xls		BS	Cell C116 and D116 aren't linked, so C116 should be C73 minus C114 and D116 should be D73 minus D114.	Correct and fixed in version 2 of the spreadsheet.
22	eiopa-14-216-st14- templates.xls			Calculations without LTG – firm is unable to estimate stresses without LTG as necessary information not readily available within the tight timeline. Figure re-runs will be required which is very time consuming. Is this acceptable to EIOPA?	EIOPA expects templates to be fully filled for the stress test exercise. As stated in the specification document, providing LTGA figures is optional. Please provide figures "without LTGA" if you are unable to provide them separately as "with" and "without" LTGA.We can accept 'figures without LTGA' only, but we can not accept 'figures with LTGA' only
23	eiopa-14-216-st14- templates.xls		BS cell C39	Firm does not have a breakdown of investment funds easily available. Can they provide the total only?	Please provide a breakdown of investment funds. As a minimum we require a "look through" to ascertain approximate percentages for investment fund as a minimum in line with Solvency guidelines. Alternatively all funds can be allocated to "private equity" in total.
24	eiopa-14-216-st14- templates.xls		BS cell C73	There is a formulae error in a cell BS C73. Will EIOPA issue a patch/correction to the template?	Please have a look at Q20.
31				In paragraph 29 of stress test specification, the required cash-flows "are those that once discounted with the relevant risk-free curve provide the best estimate value of the technical provisions when summed?". That implies that both cash-flows and best estimate can be calculated by applying the volatility adjustment. However, risk-free curves in the complementary spread sheet is given without VA for satellite-module. Could you indicate if calculations are expected with or without constant VA application and which kind of LTG measures is applicable for this module?	As spreads remain constant after stress within the low yield module, all LTG measures (VA, MA, Transitional) should be kept constant when applying the low yield scenarios. The excel sheet with the curves will be changed and published by EIOPA.
34				In sheets BS.CA1 and BS.CA2 part I.3 in spreadsheet template, could you indicate if rows 137-143 should contain: - the effects on asset and liability after marginal shock on each financial variable or - the breakdown of the overall effect of stress scenario per source of risk?	It is the latter, i.e. a breakdown by source of risk.
35				The model of Group cash-flows projection is based on 50 years or the template is requested on 60 years. Is it possible to fill for years 50 the final outflow, and between 51 and 60 years to fill zero?	The preferred solution in this case would be an estimation of the cash flows for years 51-60. If this is not possible, it would be acceptable to fill the final outflow for years 50+ in year 50. But please leave the minus "." sign in the cells for years 51 and up to allow us differentiating between a real lump sum in year 50 followed by no remaining cash flows from an absence of information for years 51 and up.

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36				What does "LAC " mean? Especially why does "allowing LAC of technical provisions " for assets mean ? What does "Values after stress (with LAC of TP/DT)" for Technical provisions ?	"LAC" stands for "Loss Absorbing Capacity". TP stands for "Technical Provisions". "DT" stands for "Deferred Tax".
41	Reporting template		S+ II.1 - Bond Portfolio Structure	Supranational issuers and EU institutions are missing in the drop down boxes, we could place them by the placement of the headquarters, but that seems incorrect/misleading?	Version 2 of the spreadsheet will reserve rows 93 (last row from the EEA countries area) and 106 (last row from the Non- EEA countries area) for Supranational issuers and EU institutions.
45	Reporting template		BS	Missing formulas in cell C28 and D28 total investments. Wrong formula in cell C73 and D73 total assets, investment funds are not included.	Please see Q20 and Q21.
46	Reporting template		BS	Missing formulas in C116 and D116 Excess of assets over liabilities	Please see Q21.
47	Reporting template		S+ II.1 - Bond Portfolio Structure	Total duration in cell H108 is calculated as a simple sum, shouldn't be an average duration like in section II.3 - Durations cells E128 to K128?	True. Formula removed in version 2 of the spreadsheet.
45	Reporting template		BS	Missing formulas in cell C28 and D28 total investments. Wrong formula in cell C73 and D73 total assets, investment funds are not included.	Please see Q20 and Q21.
46	Reporting template		BS	Missing formulas in C116 and D116 Excess of assets over liabilities	Please see Q21.
47	Reporting template		S+ II.1 - Bond Portfolio Structure	Total duration in cell H108 is calculated as a simpel sum, shouldn't be an average duration like in section II.3 - Durations cells E128 to K128?	True. Formula removed in version 2 of the spreadsheet.
51	Reporting template	ß	3S (cell G176)	Floor to the Group SCR Eligible - the stress test reporting template requires us to complete an eligible own funds section for both the SCR and the Floor to the Group SCR. For the Floor to the Group SCR section, the Tier 3 element has been shaded out, implying that MCR tiering limits should be applied. We cannot find a reference to apply MCR tiering to the Group Floor SCR in the technical specification. Please can you provide clarification for the basis of this requirement.	This part of the reporting template is aligned with the content of the Guideline on submission of information to supervisors, published last November. More precisely, row 176 for groups implement the content published in row 77 of the sheet "OF-B1A-S.23.01.g" of the technical appendix 1. In this, the Tier 3 cell (G77) is shadowed. This is consistent with the technical specifications for the preparatory phase, section G.2.6, paragraph G.51, fourth builet point
53			SFIS	Can you confirm that the technical provisions in lines 211, 234 & 238 this sheet are gross of reinsurance and include risk margin?	We confirm that the technical provisions in lines 211, 234 & 258 are gross of reinsurance and include risk margin.
54			SFIS	Can you confirm that the technical provisions in lines 212, 235, & 239 in this sheet are net of reinsurance and include risk margin?	We confirm that the technical provisions in lines 212, 235 & 259 are net of reinsurance and include risk margin.
55			SFIS	Can you confirm that the "Best Estimate of products with a surrender option" input in row 213 is the net of reassurance technical provisions excluding risk margin for products which have a surrender value?	Confirmed.
58		BS	S Rows 279 to 288	Can the information required in the cells headed "Code of single name exposure", "Loss given default" and "Probability of default" be clarified please? The QRT references to the right of these cells does not appear to crrespond with the column headings. Also, can you confirm whether additional lines should be added where there are more than 10 exposures.	QRT reference are indeed wrong. In these, the S.26.01 prefix should be replaced by S.26.02. Please consult the technical annex II of the preparatory guideline for detailed explanation on content to be reported for template S.26.02 (Starts in page 68 of the english version). E.g.: this covers the top 10 exposures only, so no additional row should be added.
62			BS+	What is the meaning of (modified) duration in tabsheet "BS+"? Is it an interest rate or credit duration?	The aim of this cell is to have a workable information on the sensitivity of the market value of bonds to changes in market rates. One of the most used metrics is the 'modified duration' (in general, Macaulay duration / (1+i) )
70				Do you consider public sector bonds as sovereign bonds. If so, in which cell of the reporting template should we populate the features of the type of bond? Same question for supranational bonds (bond issued by the European Investment Bank for example).	Public sector bonds should be treated as Sovereign/ Other Exposures, i.e. going into column G of Sheet BS+ Section II.1. The updated reporting template version has a separate row reserved for "Supranational (EEA)" and "Supranational (non- EEA)" bonds under "Other exposures".
76	Stress Test 2014 Reporting Template		Tab: "BS" Cells: C365 - D370	We would like to confirm that the "Gross" and "Net" capital requirements, refer to gross and net of loss absorbing capacity of technical provisions, rather than gross and net positions relating to risk mitigation (i.e. Reinsurance)	We confirm that the Gross and Net positions stated here are referring to gross and net of LAC of TP only. Implicitly these positions are all net of reinsurance.
77	eiopa-14-216-st14-templates			Mortgage and other loans are not considered to be impacted by the shocks on the yield curve. They are being included in the category "Assets not directly subject to the stress assumptions"? How can this be explained? It is quite strange that mortgage loans and other loans are considered as not being impacted by the low yield scenarios. Should there be a new field for mortgage loans and other loans? Is this an omission in the template?	The categorisation "Assets not directly subject to the stress assumptions" (hereafter (a)) and "Assets stressed under the scenario assumptions" (hereafter (b)) does not imply that assets not listed under (b) do not need to be stressed. All assets affected by the stresses (directly or indirectly) should be stressed. In the example of mortgages and loans, no explicit stress is applied to these assets, but their valuation could be indirectly affected e.g. by an interest rate stress. Therefore, mortgages and loans are expected to be incorporated into (a) taking into account any valuation changes post-stress.
78	eiopa-14-216-st14-templates			Shares are considered to be impacted by the shock on the yield curve. Why should the yield curve impact the market value of the shares?	The reporting template was designed in a way that would keep the formatting as consistent as possible throughout the different stresses, i.e. core (CA) and low yield (LY) stresses. Therefore, the equity position was not removed from the LY sheets.

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79	eiopa-14-216-st14-templates			A. & B. Size of relevant business in terms of Technical Provisions (TP) plus development over past 5 years	This is a mistake in the template and has been corrected for the latest published version of the reporting template.
				(potentially using the product categories below) and duration of assets & liabilities	
				In life the following product categories are defined:	
				<ul> <li>Contracts without options and guarantees</li> <li>Contracts with options and guarantees without surrender value</li> </ul>	
				- Contracts without options and guarantees with surrender value	
				What about contracts with options and guarantees with surrender value? (cfr. Categories non-life) In life there are contracts with options and guarantees with surrender value. Where should those be classified? Is it	
				allowed to make changes to the different product categories?	
80	eiopa-14-216-st14-templates			C. Buckets of guarantee levels / fixed discount rates for Long-term Guarantess (LTG) and other low yield	BEL is the preferred measure here. However, if it is not available by bucket of guarantee, please use a suitable alternative volume measure such as statutory provisions.
				exposed business plus development over past 5 years	·····
				How is the "portion of the business" being defined? Can the company make use of the statutory mathematical provision to define the portion of the business by bucket of guarantee level? BEL are not available by bucket of	
				guarantee.	
		Qualitative Question - Low Yield			
5	eiopa-14-216-st14-		LY.Q	Do you have to consider new business expected for the next 10 years?	New business is only to be included to the extend that it falls within the contract boundaries as defined under Solvency II.
	templates.xls		Question F		
7	eiopa-14-216-st14- templates.xls		LY.Q Frage C & F	Some member states have implemented special reserves for guarantee products in the context of the low yield environment. How are these special reserves to be treated, e.g. in questions C and F?	No assumptions on those additional reserves for guarantee products or their potential impact on guarantee rates should be made for the future, i.e. the guaranteed rates should be determined on the basis of the rates mentioned within the
	templatesixis		indge e di i		insurance contracts, not taking into account the impact of any 'additional national reserves' for these guaranteed
	C				products.
10	Stress Test 2014 Reporting Template		Tab LY.Q/A-B	In Tab LY.Q, under A-B, we are asked to provide the split of the technical provisions. In column B, for Life insurance, except unit-linked and index linked, 3 types contracts are defined namely 'Contracts without	The templates will be updated as follows:
				options and guarantees', 'Contracts with options and guarantees without surrender value', 'Contracts without options and guarantees	Contracts without options and guarantees     Contracts with options and guarantees without surrender value
				with surrender value'. We are wondering whether the last contract type is actually meant to be 'Contracts with	Contracts with options and guarantees without surrender value     Contracts with options and guarantees with surrender value
				options and guarantees with surrender value'. This way the whole technical provisions are covered.	
11	Stress Test 2014 Reporting		Tab LY.Q/C	In Tab LY.Q under C, we are asked to fill in the percentages of different contract types. We are wondering how	Columns C-G of tables in section C should be filled with TP figures in local currency. All TP values in a row should then add
	Template			these need to be filled. For instance, must cells C24-G24 sum to 100%?	up to the respective figure in section A&B, e.g. cells C24-G24 should add up to cell C9 or cells C80-G80 should add up to cell G9.
12	Stress Test 2014 Reporting		Tab LY.Q/C	In Tab LY.Q under C, how should we fill in column H? Should it be the average guarantee rate level for this	It should be the TP-weighted average guarantee rate.
	Template			line?	
32				In paragraph 29 of stress test specification, the required cash-flows "are those that once discounted with the relevant risk-free curve provide the best estimate value of the technical provisions when summed". However,	The liability cash flows associated with the base risk free curve are expected to be sent in, with the recognition that once discounted and added up they do not reproduce the best estimate from stochastic modelling in case optionality is present.
				the discounting with the relevant risk-free curve of undiscounted average cash flows doesn't provide the best	Future asset reinvestments should not be considered for the assets valuation purposes. Neither should the future asset
				estimate as cash-flows and financial risks are associated. For some participants, the difference is significant (around 10%). This is especially true for life insurance with participation. Regarding asset cash-flows,	reinvestments be considered for the purposes of projecting the cash flows required in the low yield module. Furthermore, both the liability and asset cash flows should be the expected (as opposed to nominal) cash flows given the observed
				specifications do not indicate whether it is needed to consider future assets reinvestments. Could you give	market reference rate. Examples include liability benefit payout cash flows reduced by lapse and/or mortality; or nominal
				more details regarding the definition of required cash-flows on asset & liability sides ?	coupons reduced the expected default.
37				Please note, that there is a difference of more then 10% between :	It is recognised that such a difference can exist. This is acceptable.
				The Best Estimate based on stochastic and risk neutral and	
				The sum of expected cash-flows of Liabilities discounted with the risk free curve. Then we think that the request is not consistent.	
82	eiopa-14-216-st14-templates			G. Under a 'runoff' assumption, at what point in time could asset returns be insufficient to cover guarantees (if	Assumption underlying this response should be aligned with the assumptions used for the undertakings' business planning
				at all)?	with the exception that new business is assumed to be zero going forward.
				This question is not clear. Does this question have to be seen in relation with the default risk and the equity	
				risk? If, at any time, there is a large default or if the stock markets are performing really poor, the return on assets can change quite significantly. What assumptions have to be taken when answering this question?	
83	eiopa-14-216-st14-templates			usses can enough quice symmatricity, what assumptions have to be taken when answering this question:	
05	clope 14 210 sti4 templates			Do the asset cash flows related to the unit-linked business have to be part of the assets in this sheet of the	As the unit-linked liability CFs have to be provided, also the related asset CFs have to be disclosed in the Asset CF sheet of
				template?	the low yield module.
91	LY.Q		E.	How the average guaranteed rate should be calculated (e.g. weighted by number of policies as there is usually no technical provision at the beginning of the contract)?	The average guaranteed rate should be calculated/weighted based on the outstanding amount of technical provisions (in any case).
92				The participant has a question regarding Low Yield Questionaire, part A, B & C, whether there should be filled	any case). The amount of TP should be filled according to SII rules (based on the Stress test 2014 specification document). In principle
				the amount of technical provisions calculated under Solvency II or technical provisions according to local	all data should be provided however the 'best effort principle' applies and in case, that the undertaking is not able to fully

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	EIOPA stress test 2014 (low		p. 17, 56	According to paragraphf 56 a "going concern" is to be used. Does this mean that the cash flow should include	No, please see answer to question 32.
95	yield exercise)			realistic assumptions of reinvestments?	
		Application - Low Yield			
38				Could you please confirm that the two low-yield stress scenarios (satellite module) should be considered as	The two low yield scenarios are indeed to be considered 'stressed' base IR curves (not as 'new base curves')
50				shocks on the base IR curve (hence higher market values at t=0) and not as new base curves (hence equal	The two low yield scenarios are indeed to be considered scressed base in curves (not as new base curves )
				market values at t=0 than as at end of 2013 calculation)	
39				Could you please confirm that the baseline to which we have to compare the two low-yield stress scenarios (satellite module) is the baseline curve in file "eiopa-14-217-stress_test_2014_annex_dc1.xlsx" sheet	Volatility adjustment is a currency or country specific measure, rather than a undertaking specific. Therefore all participants are requested to use the curves provided by EIOPA in the "eiopa-14-217-stress_test_2014_annex_dc1.xlsx",
				Main_RFR, "baseline" selected, without VA, and not the one with VA or the one we used for YE2013	both for the baseline as well as for the stressed scenarios. Whether the curve used for the baseline includes the volatility
				calculation (which is with the VA corresponding to our portfolio, taking into account our with profit / non- profit specific allocation, and with credit adjustment) ?	adjustment or not is an option for participants. Should a participant decides to use the baseline curve with volatility adjustment, information on the impact without the volatility adjustment should be provided as well.
					adjustinent, information on the impact without the volatinty adjustment should be provided as wen.
56			BS+ LYA	Is our assumption correct that equities and property do not fall into the category of 'assets for which a cash-	This is partially correct. Any assets allowing for secure cash flow projections on a best effort basis should be added here.
			Assets(CF)	flow profile can be obtained' and as such should not be reported?	For example, in case dividend payments on equity are voluntary and not predictable on a stable best effort basis they
					should not be added. The same principle applies for all other asset cash flows which are not predictable on a stable best effort basis. Also see the answer to question 2.
					enor basis. Also see the answer to question 2.
57			BS+ LYA	Can you provide some examples of changes you would expect to see in the asset flows under the low yield	See Q32. Examples include default risk and the value of options.
			Assets(CF)	scenarios if the starting portfolio of assets does not change?	
96	EIOPA stress test 2014 (low yield exercise)		p. 17, 56	What should the assumption be for asset like stocks where it's not possible explicit to create a cash flow. If we just assume there is no cashflow then the value of these assets would be zero in the analysis.	Partially true, please see answers to question 2 and 56.
	yield excreisey			just assume uncreis no casimow and are value of anose assets would be sero in the analysis.	
		Application - Core module			
6	Specifications for EIOPA	module	2.1.2 Single-	Are the insurance stresses proposed to be used only in the EU or Worldwide?	The insurance stresses are to be applied to all business, i.e. worldwide.
	Stress Test 2014		factor-insurance		
			stress		
17	EIOPA stress test 2014			The adverse 1 and adverse 2 scenarios for equity risk provide us with a shock on the MSCI Europe index. Does this imply that only the European stocks are in the scope of the shock and that non-MSCI listed stocks are not	The MSCI Europe index is used for calibration purposes only. The shocks which were derived on the basis of this index should be applied on all equity exposures. (type 1 and type 2 equity).
				affected or does the shock imply that all equities (regardless of their location) are affected?	
18	EIOPA stress test 2014			The adverse 1 and adverse 2 scenarios for mortality risk provide us with a change in mortality rates. Does	This is a one-off "instantaneous" shock and mortality assumptions would return to normal in the next year.
10	LIOFA SUESS LEST 2014			EIOPA imply that the changes are a permanent change or are the meant to indicate a 1 year shock only?	This is a one-off instantaneous shock and mortality assumptions would return to normal in the next year.
25	eiopa-14-216-st14-		Risk Margin	Can we assume that the risk margin as well as the SCR remains unchanged post any shocks please?	Recalculation of the SCR and corresponding risk margin is optional for firms. However, any curve discounting may need to
	templates.xls		_		be considered which could affect the risk margin which the participating firm may wish to allow for.
26	eiopa-14-216-st14-		Market Stresses	Can we assume no interaction between the market stress? Firm cannot run simultaneously. If this is not	EIOPA expects participating firms to run the market stresses simultaneously. EIOPA agreed not to provide a correlation
20	templates.xls		Warket Stresses	acceptable can EIOPA provide a correlation matrix instead?	matrix for the 2014 stress test exercise.
27	eiopa-14-216-st14-		Core Stresses	Can we assume that the diversification benefit remains unchanged post any shocks please?	Recalculation of the SCR and thus corresponding diversification is optional for firms (i.e. only in those cases in which the
	templates.xls				SCR is recalculated after the stresses the diversification could change after the stresses).
28				According to the ESRB/EIOPA note on market scenario, "the shocks to government and corporate bond	Yes, we confirm that the stresses given (though derived from 2y bond data) are to be applied to all maturities.
28				According to the ESRB/EIOPA note on market scenario, "the shocks to government and corporate bond spreads apply to all maturities". On the other hand, Table 1 in stress test specification expresses these shocks	res, we comminished the stresses given (though derived nom 2y bond data) are to be applied to an maturities.
				in terms of 2Y German bond. The second formulation is confusing. Could you confirm that the same shocks	
				must apply to all maturities?	
30				The equity stresses for the core module is defined as a stress on the MSCI Europe index. Could you give more	Please also see Q17
				guidance to apply equity stresses on others indices?	
33				Regarding to core-module and satellite-module, could you confirm that transitional on technical provisions, equity and own fund remain constant on the post stress situation?	Yes, we confirm that transitionals remain unchanged post stress.
40	Specifications for the EIOPA		2.1.1 (11)	The 2 adverse scenarios, according to the stress test specifications, include a spread stress. Please specify if	For valuation of assets after the shocks proposed in the core module, spread stresses refer only to Government and
	Stress Test 2014			these stresses apply to term deposits as well or if this is just for corporate bonds. If it applies to deposits as well, please specify if the stress parameter for covered or uncovered bonds applies to deposits and if the	corporate bonds, but do not apply to deposits.
				minimum duration of 1 year (which is assumed under the spread risk SCR) applies here as well.	
48	EIOPA Stress Test 2014			Equity stress is specified for MSCI Europe. How the non-European equities are stressed?	Please also see Q17.

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52	Stress Test Specifications				The non-life insurance stresses should be applied to all the non-life lines of business, i.e all obligations of liability as
52	stress rescopectionations			Definition of liabilities in liability inflation stresses -please can you confirm whether this stress is in relation to	defined (in paragraphs TP.1.15-17 and TP.1.27?) in the technical specifications. This includes the non-SLT health lines of
				liabilities lines (SII LoBs 4 and 8 and associated prop and non prop equivalent) or all liabilities (All SII LoBs).	business (medical expenses, income protection, and workers compensation).
59			2.1.1	For both adverse scenarios we used the shocks specified in the "eiopa-14-	For the core module of the stress test, a 'double hit' approach needs to be applied i.e.:
				215_stress_test_2014_specifications.pdf".	• (1) When applying the spread shock for Core Adverse 1, the shock should be added (as a delta shock) to the total
				In general we used the following notation:	yield as observed @ 31/12/2013. In your first example 6% + 2% = 8%. In your second example, 8% + 3.16% = 11.16%.
				a) Government Bonds Yield Change = Interest Rates Stresses + Sovereign Bond Stresses Example: (Adverse 1) Assume a Cyprus Government Bond with 2 years to maturity and	<ul> <li>(2) When applying the interest rate shock for Core Adverse 1 after the spread shock, one should assume the total yield to stay constant while decreasing the basic risk free curve (notice that this increases the spread). In your first</li> </ul>
				current yield 6.00%	example: 8% remains unchanged but the basic risk free curve is lowered by 0.56% and the spread is increased with the
				Yield Change = -0.56% + 2.00%	same amount. In your second example, 11.16% remains unchanged but the basic risk free curve is lowered by 0.67% and
				Yield after shock = 7.44%	the spread is increased with the same amount.
				b) Corporate Bonds Yield Change = Interest Rates Stresses + Corporate Bond Stresses	
				Example: (Adverse 1) Assume a Cyprus Financial Corporate Bond with 3 year to maturity, BBB rating and	The methodology for the Core Adverse stresses has been designed in this way in order to ensure that all government
				currently trading at 8.00% yield.	bonds are stressed including German Bund. It should be noted that the recalculated Volatility Adjustment figures take this
				Yield Change = -0.67% + 3.16%	methodology into account.
				Yield after shock = 10.49%	
				We are wondering if this is the correct method to use.	Please also note that the approach taken for the low yield module is different: the low yield shocks do lower the total yield
					(spread is not assumed to change).
					Finally, the "Note_on_market_adverse_scenarios_for_the_core_module_in_the_2014_EIOPA_stress_test[1].pdf" as
					published on EIOPA's website as a background document could be misleading as bond spread stresses over swap rates are
					provided (for a 2 year maturity). In cases of doubt or inconsistencies, EIOPA's Technical Specifications should give the guidance.
					guiuance.
63					The symmetric equity adjustment (or equity dampener) changes post stress. Please assume an adjustment of -10% in the
				Could you please indicate if symetric adjustment on equity should be reassessed in post shock situation?	case of the equity market stress of 41% (Adverse 1) and -5% in the case of the equity market stress of 21% (Adverse 2).
64					We confirm that the recalculation of the Risk Margin after shock is optional for all stresses.
04				Could you confirm that the recalculation of the Risk Margin after shock is optional (for all stress tests of core	we continue that the recalculation of the Risk Margin after shock is optional for all stresses.
				module and low yield module)?	
65					Also see Q59. For the specific example, the shock is calculated as follows:
				In Table 1 of the "EIOPA Stress Test 2014" document, the stress test parameter for sovereign bond is 38 bps in	• When applying the spread shock for Core Adverse 2, the shock should be added (as a delta shock) to the total yield
				Core module Adverse 2 for France. Can you confirm that this stress should be added to 42 bps (2-year	as observed @ 31/12/2013. In your example (X being the pre stress yield of a 5 yr FR government bond), X% + 0.38%.
				Germand bund) for every maturity ?	• When applying the interest rate shock for Core Adverse 2 after the spread shock, one should assume the total yield
				For example, is it correct that the rate for 5 years France sovereign bond is 1,99% after shock (1,19% + 0,42% +	to stay constant while decreasing the basic risk free curve (notice that this increases the spread). In your example: X% +
				0,38%) ? What is the rate before stress then ?	0.38% remains unchanged but the basic risk free curve is lowered by 0.09% (IR shock for 5 years maturity) and the spread
					is increased with the same amount.
66					Also see Q59. For the specific example, the shock is calculated as follows:
					<ul> <li>When applying the spread shock for Core Adverse 1, the shock should be added (as a delta shock) to the total yield</li> </ul>
				In Table 1 of the "EIOPA Stress Test 2014" document, the stress test parameter for corporate bond is 24 bps in	
				scenario Adverse 1 for Financials AAA.	When applying the interest rate shock for Core Adverse 1 after the spread shock, one should assume the total yield
				Our understanding is that this shock should be added to 56 bps (2-year Germand bund) for every maturity. For example, is it correct that the rate for 10 years AAA Financial bond is 2,07% after shock (1,28% + 0,56 % +	to stay constant while decreasing the basic risk free curve (notice that this increases the spread). In your example: Y% +
				0,24%) ? What is the rate before before stress then ?	0.24% remains unchanged but the basic risk free curve is lowered by 0.91 % (IR shock for 10 years maturity) and the spread is increased with the same amount.
					spread is increased martice same amount.
68				Could you please indicate if the equity stresses (equity stress - adverse 1 = -41% and equity stress - adverse 2 =	We confirm that equity stresses also apply to strategic participations
				-21%) in Core module A are also applied on strategic participations ?	
72	Specifications for the EIOPA		65	This states that SCR does not need to be recalculation post-stress, however the Excel tool to assist with	We confirm that no SCR recalculation post-stress is required, but it is optional.
	Stress Test 2014			producing curves does provide post-ECR-stress curves in "stress 1" and "stress 2". Can we confirm that no SCR	
				recalculation post-stress is required.	
73	Specifications for the EIOPA		Excel tool	The Excel tool to assist with producing curves suggests that, in "stress 1" and "stress 2", German gilt rates are	
/5	Stress Test 2014		LACEI LOUI	the same as in "baseline" despite the fact that the risk-free rate has moved. Can we confirm that German gilt	We confirm the German gilt rates remain unchanged post the Adverse 1 and Adverse 2 stresses. However, the risk free rate
	50.055 1050 2014			rates should remain equal to risk-free rates in both stresses?	changes and thus a spread is created implicitly for German government bonds post stress. Please also see Q59 for
					clarifications on the general approach to determining post stress government yields.
75	Specifications for the EIOPA		pg 6-11	Which of the stresses (if any) in para 23, Table 1 should be applied to securitised assets in the two Market	Securitised assets shall be treated using the shocks for the 'Financial corporate bonds' in table 1 of technical specifications.
	Stress Test 2014		Market Stress Scenarios	Stress Scenarios?	
69			Scenarios	Could you give us the cost of the single factor insurance stresses (especially the windstorm scenario in	The aggregate value of the windstorm event is EUR 15bn. A revised windstorm scenario will be provided clarifying the
				Northern Europe) for each national market? We need this information to compute properly the effect of	relevant countries to model. As an example an event more extreme than "Windstorm Daria" is foreseen to achieve the
				stress scenarios.	aggregate value required.
74	Specifications for the EIOPA		Annex 3	The contents of this approv (strassed longevity table) does not appear to match the signastice of what the vide	
/4	Specifications for the EIOPA Stress Test 2014		Annex 3	The contents of this annex (stressed longevity table) does not appear to match the signposting of what should be there (detail on non-life catastrophes). Can we clarify what the purpose of Annex 3 is?	The annex was for illustrative purposes only.
	501C55 1C51 2014			oc there focus on non-me catastrophes), can we clamy what the purpose of Annex 5 is:	

ID	Document	Topic	No. Para	Question	Answer
84	Technical Specifications	торіс	80, 81	Core module single factor insurance stress: Which year of birth should be the basis for calculating an increase of life expectancy of 10% or 18% at ages 65 and 75?	See Annex 3 (provided for illustrative purposes) assumes that the stress should start form 50 years old. Therefore the suggested year of birth is 1964 for calculating an increase of life expectancy for this stress.
87	Technical Specifications			Core module stress 1 and 2: Do the spread stresses generate a parallel shift of the observable (31.12.2013) sector and rating specific spread curves, which are in line with maturity, or should we assume that post-stress spreads are independent of maturity compared to swaps.	The yield after stresses for government bonds shall be the sum of the yield in the baseline scenario (before stress) plus the specified shock for each Member (the one referred on page 10 of Stress Test Technical Specifications). This shock applies to all maturities in other words, the yield curve for government bonds after stress is the result of a parallel shift of the yield curve before the stress. The same applies to corporate bonds. In particular, the relevant stress for a certain type of corporate bond and credit quality (as set out in page 9 of Stress Test Technical Specifications), applies to all maturities of bonds belonging to the same type of bond and credit quality (i.e. increasing the yield before stress of each maturity).
97	Specifications for the EIOPA Stress Test 2014		73	Undertaking Specific Cat Event: does the 1/100 and 1/200 firm specific event have to be determined on a gross (before reinsurance) or net (after reinsurance) basis?	For the specific extreme event for the 1/100 and 1/200 return period the event should be reported on a gross (before reinsurance) and net (after reinsurance) basis for the stress test. In order to determine the event, a net view is the preferred approach.
98	Specifications for the EIOPA Stress Test 2014		78	Provision deficiency test: does the 1% or 3% p.a. claim inflation have to be applied only on the claim itself or, also, on all other claim related costs? What about the premiums in case of premium provisions?	For the provision deficiency test the claims inflation should be applied to all aspects affecting the claims value, i.e the actual claim reserves and all associated claims costs and including premium provisions as per the template.
		Risk Free curves			
9	(1) eiopa-14-217- stress_test_2014_annex_dc1 .xlsx. (2) eiopa-14- 215_stress_test_2014_specif ications.pfd		Specification; Tab Main_RFR in	In 'eiopa-14-215_stress_test_2014_specifications.pfd', Paragraph 23, Table 1, the stresses are shown. In the spreadsheet 'eiopa-14-217-stress_test_2014_annex_dc1.xtsx' the needed shocks are shown. If in Tab Main_RFR, The Netherlans is selected, then we expect that the differences between the curve with no VA baseline and the curve with no VA Stress 1 agree with the shocks on in para 23 Table 1 in the Specicification. However, this is not the case. Please could you explain how this should be understood.	The stresses for the euro of Table 1 in the pdf file 'eiopa-14-215_stress_test_2014_specifications.pfd' apply to the observed par swap interest rate term structure (unadjusted). The risk-free interest rates term structures in excel file 'eiopa- 14-217-stress_test_2014_annex_dc1.xlsx' are a zero coupon curves credit risk adjusted. The comparison you refer to, delivers differences 'consistent' with the stresses of the aforementioned Table 1, but not exactly the same figures.
15	EIOPA stress test 2014			Would it be possible to provide us (the industry) with a table similar to the one provided to us on page 9 with respect to the low yield scenarios? The current scenario is only provided by in the spreadsheet but that is difficult to process.	The spreadsheet containing the yield curves as provided by EIOPA includes hidden sheets containing this data. Those sheets can be unhidden by participants. For the low yield scenarios the relevant sheet names start with "LY1" for low yield scenario 1 and "LY2" for low yield scenario 2.
16	EIOPA stress test 2014			The adverse 1 and adverse 2 scenarios for interest rate risk provide us with a shock on the swap curve. Does this also imply a similar shock on all other discount rates used by the insurer?	The shocks on swap rates as derived in the adverse 1 and adverse 2 scenario affect the basic risk free curves (as provided by EIOPA) and, as such, should influence both asset and liability values (the same principle as is applied in the interest rate risk module of the standard formula).In case the question relates to currencies where stresses have not been provided by the Stress Test Specifications, please assume that no stress is applied for those currencies.
19	Spreadsheet discount rates			Would it be possisble to get the password for the discount rate spreadsheet in order to process the discount rates for maturities not provided by EIOPA?	This is not possible. However, if participants require certain maturities not provided by EIOPA, they should inform EIOPA about the missing maturities and EIOPA will try to provide them
42	eiopa-14-217- stress_test_2014_annex_dc1		Main_RFR	Which durations (within the first 20 years) are used as liquid points to determine the curve used?	This depends on the currency. This assessment has been based on the information currently available on depth, liquidity and transparency of trading for each maturity
50	eiopa-14-216-st14- templates.xls			The CRA assumption used in the derivation of the base curves does not appear to be included in Annex DC1	This is correct; In general, figures derived for ST purposes based on methodologies that can potentially vary as to meet the final S2 Delegated acts are provided as a working assumption but not explicitly disclosed in order to avoid parallel discussions. This is the case for the CRA as well as VA, since the methodology cannot be considered definite until the work on Delegated acts is finalised.
43	eiopa-14-217- stress_test_2014_annex_dc1		Main_RFR	Which CRA's are used in the different scenarios. We think it is -10 bp in the base scenario and 0 in all 4 stress scenarios. Is this correct?	For Core stress scenarios, the credit risk adjustment of the baseline is explicitly retained. For Low yield scenarios the credit risk adjustment is considered to be implicit in the selection of the curves described in the technical documentation
44	eiopa-14-217- stress_test_2014_annex_dc1		Main_RFR	Which Volatility adjustments are used in the scenarios? We think it is 22 bp in the base scenario, 99 bp in stress 1; 83 bp in stress 2 and 0 in the both low yield scenarios. Is this correct?	The VA results from the comparison of 1y term with and without VA. Regarding Low Yield stressed scenarios, the excel file will be completed adding the risk free curves with the VA (which for simplicity is understood to be the same of the baseline)
50	eiopa-14-216-st14- templates.xls			The CRA assumption used in the derivation of the base curves does not appear to be included in Annex DC1	This is correct; In general, figures derived for ST purposes based on methodologies that can potentially vary as to meet the final S2 Delegated acts are provided as a working assumption but not explicitly disclosed in order to avoid parallel discussions. This is the case for the CRA as well as VA, since the methodology cannot be considered definite until the work on Delegated acts is finalised.
61			Excel Table to support generation of risk free curves	A consistency question: we noticed that a 10bps credit spread adjustment is deducted in the base line curve, while this is not the case under stress 1 and 2. Also negative rates are not allowed after shock for the EURO, while for the USD, in year 1 negative rates are allowed in stress 2. For the latter we have the concern that this scenario is not realistic as no one will invest in negative rates. We tend to argue that negative rates should be floored to zero.	<ul> <li>(a) The calculation of risk free rates curves in core stressed scenarios has taken into account the benchmark used for the calibration of the stresses (2 year non-adjusted euro swap rate).</li> <li>(b) Empirical evidence shows the possibility of negative rates in the short maturities of the interest rates term structures</li> </ul>

ID	Document	Торіс	No. Para	Question	Answer
67				In Table 1 of the "EIOPA Stress Test 2014" document, the stress test parameter for interest rate is -56 bps (maturity 2 years in Core module, scénario Adverse 1). In the spreadsheet 'eiopa-14-217- stress_test_2014_annex_dc1' for this same maturity, the IR is 0,44% in baseline scenario and 0,12% in scenario adverse 1 (for eurozone), so the shock seems to be -32 bps. Why are the 2 figures unconsistent ? What is the correct IR in scenario adverse 1 for 2 years maturity ?	Notice that, in general, the stresses are applied to the par swap rates. Afterwards, the zero coupon curve (i.e. the basic risk free curves) were calculated (see also question 9). On top of that, in order for the shape of the basic risk free curve for the euro to be plausible and realistic, the shock for the 2 YR maturity for the core stress 1 scenario was dampened.
71	Specifications for the EIOPA Stress Test 2014			The numbers in Table 1 appear to contradict the Excel tool to assist with producing curves. If "Germany" is selected on "Main_RFR" and the scenario is cycled between "baseline" and "stress 1" it can be seen that the rate at duration 2y moves from 0.44% to 0.12% (hence -32bps) by rather than -56bps suggested in the document	See question 67.
86	eiopa-14-216-st14- templates.xls			Low yield module: The given basic risk free curves do not make use of the Smith-Wilson-Interpolation to reach the E-ultimate forward rate. Should we apply such a extrapolation for the valuation of our insurance obligations (technical provisions)?	The relevant risk-free interest rate term structures provided as part of Stress Test specifications, contain for all scenarios the interest rates to apply from 1 to 150 years term maturity. Therefore participants should not apply any extrapolation regarding such curves.
89	Specifications for the EIOPA Stress Test 2014		2.1.1 (23), Table	"In the Excel file "elopa-14-217-stress_test_2014_annex_dc1" the spread of Brazilian government bonds, for example, appears to be zero (in particular: Adverse1/2 = "No stress"). Is it correct that only government spreads of countries listed in the document "elopa-14-215_stress_test_2013_specifications" (page 10) have to be shocked and no proxy mapping have to be applied? In addition, we are not sure whether to shock all swap curves, or swap curve for countries listed in the appendix ""ANNEX DC1"" only. For instance, what kind of shock should be applied on the swap curves of countries in the Middle East (e.g. OMR, SAR, AED). "	EIOPA Stress Test 2014 only stresses the currencies of EEA, the Swiss franc, the Japanese Yen and the US dollar. For the rest of currencies no stress is prescribed. For comparability, undertakings should not apply their own stresses.
90	Specifications for the EIOPA Stress Test 2014		2.1.1 (23), Table	The specification table in the document "eiopa-14-215_stress_test_2013_specifications" (page 9) includes a footnote where it is stated that the participants shall use the stressed currency specific term structure provided in the complementary spread sheet "eiopa-14-217-stress_test_2014_annex_dc1". We could reproduce the values in the specification document for all maturities, except for the maturity of 2 year (Adverse 1). We obtained a shock size of 41 bp. Is it correct?	Please see answers to questions 61 and 67 .
		Other			
29				A reference in stress test specifications is missing as the source is not found . Please correct this error.	This is correct. The missing reference is to 'Table 1' in the document. An updated version of the specification will be uploaded.
49	EIOPA/ESRB adverse financial market scenarios			In the small table about the equity risk there is the last column EU weighted. We cannot find any reference in the text to this column. What is the purpose of this column?	This is for information only.
49	EIOPA/ESRB adverse financial market scenarios			In the small table about the equity risk there is the last column EU weigthed. We cannot find any reference in the text to this column. What is the purpose of this column?	This is for information only.
94	Stress Test Specifications			Standard Formula Risk Margin - We intend to apply for internal model approval and, as such, have calculated the risk margin using the internal model to calculate the reference undertaking SCRs. This has already been performed for year end 2013. Please can you indicate whether we are required to recalculate these reference undertaking SCRs and corresponding risk margins using the standard formula.	Indeed, calculations based on the standard formula are required for the situation before the stress, both for SCR as well as for the Risk Margin. Regarding the post stress situation the recalculation of SCR and Risk Margin are on voluntary basis only, however consistent approach should be adopted regarding the calculation of the SCR post stress and the Risk Margin post stress based both on the standard formula or both on the internal model.