

**Comments Template on Consultation Paper on the proposal for
implementing technical standards on internal models approval processes**

**Deadline
30 June 2014
23:59 CET**

Name of Company:	Financial Supervisory Authority of Romania (ASF)	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ Do not change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool ⇒ Leave the last column <u>empty</u>. ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph or a cell, keep the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <p>Please send the completed template, in Word Format, to CP-14-005@eiopa.europa.eu. Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the paragraphs refers to Consultation Paper on the proposal for implementing technical standards with regard to the procedures to be used for granting supervisory approval for the use of ancillary own-fund items.</p>		
Reference	Comment	
General Comments	It is better to devide the text in two sections: I. the procedure to be followed for the approval of applications II. the procedure to be followed for the approval of the applications concerning major changes and changes to the policy for changing the internal model	
Recital (1)		
Recital (2)		
Recital (3)		

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Recital (4)		
Recital (5)		
Recital (6)		
Recital (7)		
Recital (8)		
Recital (9)		
Recital (10)		
Article 1		
Article 2 (1)		
Article 2 (2)		
	(a) v. - art. 308a (2) does not list any items, it refers to the powers of the supervisors; maybe 308a (1)?	
	(k) a the directory of data used in the internal model, [...]	
Article 2 (3)	(q) an identification of those parts of the business of the insurance or reinsurance undertaking which have been classified as a major business unit [...] - what is understood by business unit ?	
Article 2 (4)		
Article 2 (5)		
Article 3		
Article 4 (1)		
Article 4 (2)		
Article 4 (3)		
Article 4 (4)		
Article 4 (5)		
Article 4 (6)		

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Article 4 (7)		
Article 4 (8)		
Article 4 (9)		
Article 5		
Article 6 (1)		
Article 6 (2)		
Article 6 (3)		
Article 6 (4)		
Article 6 (5)		
Article 6 (6)		
Article 7 (1)		
Article 7 (2)		
Article 7 (3)		
Article 8 (1)		
Article 8 (2)		
Article 8 (3)		
Article 9 (1)		
Article 9 (2)		
Article 10		
Annex I		