

Comments Template on CP8 -Draft proposal for Guidelines on ORSA		Deadline 20 January 2012 12:00 CET
Name of Company:	MACIF ŻYCIE TOWARZYSTWO UBEZPIECZEŃ WZAJEMNYCH	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
Please follow the following instructions for filling in the template: ⇒ 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. Please send the completed template, in Word Format, to cp008@eiopa.europa.eu. Our IT tool does not allow processing of any other formats. The numbering of the paragraphs refers to Consultation Paper 008.		
Reference	Comment	
General Comment		
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3.15.	Small insurers with a slight participation in the market could have doubts that without more details about principle of proportionality they could be constrained to convey much more documentations	
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3.19.	Will be there more advices or list of required documentations ?	
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3.25.	Long-term projections for risks with insignificant influence into activity could be onerous for smaller insurers. What about principle of proportionality ?	
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4.53.	How “significant deviations” will be measured? Who will decide that “significant” is significant?	
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