

**Comments Template on
Consultation Paper on EIOPA's first set of advice to the European
Commission on specific items in the Solvency II Delegated Regulation**

**Deadline
31 August 2017
23:59 CET**

Name of Company:	ACTUAM	
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, <u>in Word Format</u>, to CP-17-004@eiopa.europa.eu</p> <p>Our IT tool does not allow processing of any other formats.</p> <p><u>The numbering of the reference refers to the sections</u> of the consultation paper on EIOPA's first set of advice to the European Commission on specific items in the Solvency II Delegated Regulation. Please indicate to which paragraph(s) your comment refers to.</p>		
Reference	Comment	
General Comment		
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3.1	<p>For the counterparty default risk Calculation (risk mitigation techniques) in case the reinsurer is both rated by a credit rating agency and subject to Solvency II (calculating a SCR – Solvency II ratio) the following could be suggested:</p> <ul style="list-style-type: none"> - Instead of using the credit rating of the reinsurer obtained from rating agencies methods could be performed to consider the SCR – Solvency II ratio of the reinsurer for its exposure to counterparty default risk. For example the use of the equivalence provided by the EIOPA (the use of the SCR – Solvency II ratio which is allowed currently for unrated companies) but to use it not only for unrated companies but also for companies having an SCR – Solvency II ratio even if they are rated by a credit rating agency. <p>For the counterparties (e.g.: banks) which have no credit rating instead of using the “unrated” feature the use of the credit rating of the parent in case based on analysis on Annual Reports for example one proves that the parent is committed to support the unrated bank.</p>	
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