

EIOPAOK		Comments Template on EIOPA-CP-14-045 Draft proposal for Guidelines on reporting for financial stability purposes		Deadline 02.Mar.2015 23:59 CET
Company name:	OP Group.			
Disclosure of comments:	<p>EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential.</p> <p>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.</p>			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 Consultation_Set2@eiopa.europa.eu, 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-14-045.</p>				
Reference	Comment			
General Comment	<p>We note that the Guidelines are not clear in the case where the insurance undertakings belong to the group of the mixed financial holding company which is exempted from the Solvency II group supervision according to Article 213(4 or 5) of the Directive and only the provisions of the Directive 2002/87/EC (FICOD) are applied in the group level. In this case it is possible that the undertaking belongs also to the insurance or reinsurance group but which is not reporting according to Solvency II. If this exemption is applied in Solvency II the same</p>			

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	<p>exemption shall be applied also in the Financial Stability Reporting in order that the undertakings shall not be reporting Solvency II in the level of the individual undertaking but Financial Stability in the level of the group. Financial Stability Reporting should supplement the Solvency II reporting. If the reporting levels differ there s nothing to be supplemented.</p>	
Introduction		
Guideline 1	<p>Guideline 1 specifies the level of the reporting. In the way the insurance group is defined by articles 212 and 213 of the Directive the individual insurance undertaking may belong to the insurance group being part of the mixed financial holding company which might have been exempted from the Solvency II group supervision. According to 1.13 or 1.14 these undertakings should report consolidated data or not report individually, and if reporting, it means they shall report as a member of the group. We propose to amend paragraph to the guideline 1: 1.15. If the individual insurance and reinsurance undertakings belongs to insurance or reinsurance group and has as its ultimate parent undertaking a mixed financial company which is exempted from the Solvency II group supervision according to Article 213(4 or 5) of Directive then paragraph 1.12 for the individual reporting applies .</p>	
Guideline 2		
Guideline 3		
Guideline 4		
Guideline 5		
Guideline 6	<p>1.30 (b) It can be that the individual insurance undertaking is supervised by the NSA and the undertaking belongs to the insurance or reinsurance group which is <u>not</u> supervised by any SA, national or foreign, because the undertaking belongs to the non-insurance group which is supervised according to FICOD. Is it the purpose that this undertaking is eligible to be included to the list according to the total assets of the group, and which insurance or non-insurance group, or according to the assets of the individual undertaking?</p>	
Guideline 7		
Guideline 8		
Guideline 9		
Guideline 10		

EIOPAOK	Comments Template on EIOPA-CP-14-045 Draft proposal for Guidelines on reporting for financial stability purposes	Deadline 02.Mar.2015 23:59 CET
Guideline 11		
Guideline 12		
Guideline 13		
Guideline 14		
Guideline 15		
Guideline 16		
Guideline 17		
Guideline 18		
Guideline 19		
Guideline 20		
Guideline 21		
Guideline 22		
Guideline 23		
Annex 1: IA Section 1		
Annex 1: IA Section 2		
Annex 1: IA Section 3		
Annex 1: IA Section 4		
Annex 1: IA Section 5		
Annex 1: IA Section 6		
Annex 1: IA		

EIOPAOK	Comments Template on EIOPA-CP-14-045 Draft proposal for Guidelines on reporting for financial stability purposes	Deadline 02.Mar.2015 23:59 CET
Section 7		
Technical Annex A - Content-S.01.01.c		
Technical Annex A - BI-S.01.02.c		
Technical Annex A - AS-D4-S.06.03.c		
Technical Annex A - AS-D3-S.09.01.c		
Technical Annex A - AS-D5-S.10.01.c		
Technical Annex A - S.25.04.c	There's wrong title S.25.04.h.	
Technical Annex A - Re-J3-S.31.01.c		
Technical Annex A - P&L-S.39.01.c		
Technical Annex A - Lapses-S.41.01.c		
Technical Annex A - Content-S.01.01.d		
Technical Annex A - BI-S.01.02.d		
Technical Annex A - TP - F3-S.14.01.d		
Technical Annex A - Re-J2_basic-S.30.03.d		
Technical Annex A - Re-		

EIOPAOK	Comments Template on EIOPA-CP-14-045 Draft proposal for Guidelines on reporting for financial stability purposes	Deadline 02.Mar.2015 23:59 CET
J2_shares-S.30.04.d		
Technical Annex A - Duration L-S_38.01.d	There's wrong title of S.31.01.c S.31.01.c, Share of reinsurers (including Finite Reinsurance and SPV's	
Technical Annex A - PL sharing-S.40.01.d		
Technical Annex A - Content-S.01.01.h		
Technical Annex A - BI-S.01.02.h		
Technical Annex A - BS-S.02.01.h		
Technical Annex A - Cover-A1Q-S.05.01.h		
Technical Annex A - Assets-D1-S.06.02.h		
Technical Annex A - AS-D4-S.06.03.h		
Technical Annex A - AS-D20-S.08.01.h		
Technical Annex A - AS-D3-S.09.01.h		
Technical Annex A - AS-D5-S.10.01.h		
Technical Annex A - OF - B1Q-S.23.01.h		
Technical Annex A - S.25.04.h		
Technical Annex A - Re-J3-S.31.01.h		

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Technical Annex A - P&L-S.39.01.h		
Technical Annex A - Lapses-S.41.01.h		
Technical Annex A - Content-S.01.01.i		
Technical Annex A - BI-S.01.02.i		
Technical Annex A - TP - F3-S.14.01.i		
Technical Annex A - Re-J2_basic-S.30.03.i		
Technical Annex A - Re-J2_shares-S.30.04.i		
Technical Annex A - Duration L-S_38.01.i		
Technical Annex A - PL sharing-S.40.01.i		
Technical Annex B - S_01_01_h_i_LOG		
Technical Annex B - S_01_02_h_i_LOG		
Technical Annex B - S_14_01_d_i_LOG		
Technical Annex B - S_30_03_d_i_LOG		
Technical Annex B - S_30_04_d_i_LOG		

EIOPAOK	Comments Template on EIOPA-CP-14-045 Draft proposal for Guidelines on reporting for financial stability purposes	Deadline 02.Mar.2015 23:59 CET
Technical Annex B - S_38_01_d_i_LOG		
Technical Annex B - S_40_01_d_i_LOG		
Technical Annex B - S_39_01_c_h_LOG		
Technical Annex B - S_06_03_c_h_LOG		
Technical Annex B - S_09_01_c_h_LOG		
Technical Annex B - S_10_01_c_h_LOG		
Technical Annex B - S_25_04_c_h_LOG		
Technical Annex B - S_31_01_c_h_LOG		
Technical Annex B - S_41_01_c_h_LOG		
Technical Annex B - S_02_01_h_LOG		
Technical Annex B - S_05_01_h_LOG		
Technical Annex B - S_06_02_h_LOG		
Technical Annex B - S_08_01_h_LOG		
Technical Annex B - S_23_01_h_LOG		

EIOPAOK	Comments Template on EIOPA-CP-14-045 Draft proposal for Guidelines on reporting for financial stability purposes	Deadline 02.Mar.2015 23:59 CET
Technical Annex B - S_01_01_c_d_LOG		
Technical Annex B - S_01_02_c_d_LOG		
Technical Annex C		

Virhe. Automaattista tekstiä ei ole määritetty.