

**Comments Template on EIOPA-CP-15-004
Consultation Paper on
the Call for Advice from the European Commission on the identification and calibration
of infrastructure investment risk categories**

**Deadline
09.August.2015
23:59 CET**

Company name:	FTC Capital GmbH (FTC)	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential. 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.	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 CP-15-004@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-15-004.</p>		
Reference	Comment	
General comments		
Section 1.1.		
Section 1.2.		
Section 1.3.		

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Section 3.1.	<p>We would appreciate it if also the following types of infrastructure investments could be considered to qualify for the revised calibrations ("qualifying infrastructure"):</p> <ul style="list-style-type: none"> • ELTIF (according to the Regulation (EU) 2015/760 on European long-term investment funds) • Infrastructure Debt Funds managed by AIFM according to the directive 2011/61/EU on Alternative Investment fund Managers that invest in infrastructure debt assets and/or purchase bank originated loans issued for infrastructure projects (i.e. refinancing bank loans of existing infrastructure projects, take over existing bank infrastructure debt). 	
Section 3.2.		
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