

**Comments Template on
CP9 – GR - Reporting**

**Deadline
20 January 2012
12:00 CET**

Name of Company:	AFA Sjukförsäkring, AFA Trygghetsförsäkring, AFA Livförsäkring	
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 cp009@eiopa.europa.eu. Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the paragraphs refers to this Consultation Paper.</p>		
Reference	Comment	
General Comment	Overall, we find the reporting templates encompass information on a much too detailed level. It is important that the cost of providing the information is taken into account when specifying the reporting requirements and that focus is on the information absolutely needed for supervisory purposes. One suggestion could be to have less detailed reporting requirements for companies fulfilling SCR and MCR requirements. Companies not fulfilling SCR and MCR could instead be obliged to report more detailed data and on a continuous basis.	
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