

Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II		Deadline 31 July 2012 18:00 CET
Name of Company:	Investment and life Assurance Group Ltd	
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, in Word Format, to CP-12-003@eiopa.europa.eu. Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the paragraphs refers to Consultation Paper 12-003.</p>		
Reference	Comment	
General Comment	We note that the scope of the QIS is confined to the numeric calculations. Important questions are not tackled. For example, what are the the disclosure requirements and what will the numbers be used for. These will be important considerations and it is hard to understand the impact of the calculations without this context.	
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Q16.	This section will be familiar to participants who are preparing for Solvency II. If they have completed QIS 4 and QIS 5 then they will have a good understanding of the intention of this section. For other participants it may be more of a challenge. The amount of time necessary to complete this QIS should not be underestimated.	
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Q18.	It is stated in SCR2.9 that the gross calculation does not reflect reality. It must therefore be questioned whether it is an appropriate method for avoiding double counting.	
Q19.	A simple formula is welcomed but we believe that more research is necessary to justify the choice of inputs and the calibration.	
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