

Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II		Deadline 31 July 2012 18:00 CET
Name of Company:	Versorgungskasse des Norddeutschen Lloyd, Bremen	
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	<ul style="list-style-type: none"> - In our our pension fund we presently have 1.180 insured persons. We operate our business since 1926. - Our pension fund will not be able to comment on technical specifications due to lack of time, a small staff, costs, know-how and language. - With regard to the proposed new regulations we are afraid to face substantial additional administrative tasks, leading to additional costs. - We are afraid that we may not be able to continue our prosperous business without more ado if such new regulations will be applied. - We therefore strictly object to the considerations of the EU. 	

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