

**Comments Template on  
CP8 -Draft proposal for Guidelines on ORSA**

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

Name of Company:	Willis Global Captive Practice	
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"> <li>⇒ Do <b>not</b> change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool</li> <li>⇒ Leave the last column <u>empty</u>.</li> <li>⇒ 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>.</li> <li>⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below.</li> </ul> <p><b>Please send the completed template, in Word Format, to <a href="mailto:cp008@eiopa.europa.eu">cp008@eiopa.europa.eu</a>. Our IT tool does not allow processing of any other formats.</b></p> <p>The numbering of the paragraphs refers to Consultation Paper 008.</p>		
<b>Reference</b>	<b>Comment</b>	
General Comment		
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3.31.	This paragraph states that the group ORSA should include both (re)insurance and non-(re)insurance undertakings, both regulated and non-regulated entities, situated in the EEA and	

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	<p>outside the EEA.</p> <p>A significant number of (re)insurance entities have been established by non-(re)insurance entities to underwrite the risks of the parent and associated companies and/or the risks of employees and/or clients of the group. These could be loosely defined as captive (re)insurers.</p> <p>Can EIOPA confirm that it is not the intention that a group ORSA is required where the (re)insurer is established to underwrite the risks of its parent and associated companies, and/or the risks of the clients and/or employees of the parent and associated companies, and where the group is not a (re)insurance group?</p>	
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