

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

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

Name of Company:	Danish Insurance Association	
Disclosure of comments:		Public
Reference	Comment	
General Comment	<p>We appreciate the opportunity to comment on the Consultation Paper on the draft proposal for Guidelines on Narrative Public Disclosure etc.</p> <p>We find that the guidelines on the SFCR and RSR seem much less problematic than the Quantitative Reporting Templates. We do however have a few examples of requirements that seem excessive, especially when the volume of information of the QRTs are taken into account.</p>	
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3.38.	Reinsurance is already reported on QRTs J1 and J2. The reporting requirements regarding reinsurance in total is duplicative reporting and we ask EIOPA to consider eliminating or simplifying these requirements.	
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3.63.	We believe "guarantee" actually creates an unrealistic requirement, especially where estimates are employed. "Provide proportionately reasonable comfort" might be a more suitable alternative.	
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4.110.	See above regarding "guarantee". Furthermore although the Guideline no longer refers to "accuracy", 4.110 still does – this needs to be changed.	
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