

**Comments Template on EIOPA-XX-16-XXX
Discussion Paper on Potential harmonisation of recovery and resolution
frameworks for insurers**

**Deadline
28.02.2017
23:59 CET**

Name of company:	Institut des ACTuaires	
Disclosure of comments:	<p>EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential.</p> <p>Please indicate if your comments should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.</p>	Public
<p>Please follow the instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ <u>Do not change the numbering</u> in 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 CP-16-009@eiopa.europa.eu, by 28 February 2017.</p> <p>Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the questions correspond with the questions included in the Discussion Paper on Potential harmonisation of recovery and resolution frameworks for insurers.</p>		
Reference	Comment	
General comment	<p>Globally, Institut des Actuaire fully supports AAE's comments. Please refer to AAE's comments.</p> <p>Plus one remark: crisis are always different from expectations. Deciding in advance who is the local R & R authority, what are specific tools to cope with problems, define international cooperation is advisable. Spending time and money on precise plans should be limited.</p>	

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Q1		
Q2		
Q3		
Q4	Institut des Actuaire suggests two additions to AAE's comments: In block 1, consider or enforce pre-emptive measures as re-organizations to strengthen defense against adverse circumstances In block 3, distinguish resolution before insolvency and after insolvency	
Q5		
Q6		
Q7		
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Q11		
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Q15		
Q16		
Q17		
Q18		
Q19		
Q20		
Q21		
Q22	Yes, Member States should consider the designation of an administrative resolution authority for the resolution of insurers. Who is the local authority should be a local decision.	

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Q23		
Q24		
Q25		
Q26		
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Q28		
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