

**Comments Template on  
Discussion Paper on the review of specific items in the Solvency II  
Delegated Regulation**

**Deadline  
3 March 2017  
23:59 CET**

Name of Company:	WABERER	
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, <u>in Word Format</u>, to <a href="mailto:CP-16-008@eiopa.europa.eu">CP-16-008@eiopa.europa.eu</a></b></p> <p><b>Our IT tool does not allow processing of any other formats.</b></p> <p>The numbering of the questions refers to the discussion paper on the review of specific items in the Solvency II Delegated Regulation.</p>		
<b>Reference</b>	<b>Comment</b>	
General Comment		
Q1.1		
Q1.2		
Q1.3		
Q1.4		
Q1.5		

<b>Comments Template on Discussion Paper on the review of specific items in the Solvency II Delegated Regulation</b>		<b>Deadline 3 March 2017 23:59 CET</b>
Q1.6		
Q1.7		
Q1.8		
Q1.9		
Q1.10		
Q1.11		
Q1.12		
Q1.13		
Q1.14		
Q1.15		
Q1.16		
Q1.17		
Q1.18		
Q1.19		
Q1.20		
Q1.21		
Q1.22		
Q1.23		
Q1.24	In our view, it is difficult to apply the risk mitigating effects. Risk management usually takes actions to mitigate the risk of human mistakes, internal processes and moral risk. According to our opinion, standard formula does not take into account the effects of these actions in calculating capital requirement of operational risk. Although the present version is a well developed and simplified formula to calculate capital requirement, we kindly suggest an overthink of introducing a factor for the mentioned effects.	
Q1.25		
Q1.26		

<b>Comments Template on Discussion Paper on the review of specific items in the Solvency II Delegated Regulation</b>		<b>Deadline 3 March 2017 23:59 CET</b>
Q2.1		
Q2.2		
Q2.3		
Q2.4		
Q2.5		
Q2.6		
Q2.7		
Q2.8		
Q2.9		
Q2.10		
Q3.1		
Q3.2		
Q3.3		
Q3.4		
Q3.5		
Q3.6		
Q3.7		
Q3.8		
Q3.9		
Q3.10		
Q3.11		
Q3.12		
Q4.1		
Q4.2		
Q5.1		
Q5.2		

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Q5.3		
Q5.4		
Q5.5		
Q5.6		
Q6.1		
Q7.1		
Q7.2		
Q7.3		
Q7.4		
Q7.5	According to our experience some of the flood risk factors are higher than its necessary. For example zone 20 (Csongrad) is 99,5 times riskier than zone 14 (Pest), which is not realistic proportion. We do not understand the calculating method behind these clusters.	
Q7.6		
Q7.7		
Q7.8		
Q7.9		
Q7.10		
Q7.11		
Q7.12		
Q7.13		
Q8.1		
Q8.2		
Q8.3		
Q8.4		
Q8.5		
Q8.6		

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Q8.7		
Q8.8		
Q8.9		
Q8.10		
Q8.11		
Q8.12		
Q9.1		
Q9.2		
Q9.3		
Q9.4		
Q9.5		
Q10.1		
Q10.2		
Q10.3		
Q10.4		
Q10.5		
Q10.6		
Q10.7		
Q10.8		
Q10.9		
Q10.10		
Q11.1		
Q11.2		
Q11.3		
Q11.4		
Q11.5		

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Q11.6		
Q11.7		
Q11.8		
Q11.9		
Q12.1		
Q12.2		
Q12.3		
Q12.4		
Q12.5		
Q12.6		
Q12.7		
Q13.1		
Q13.2		
Q13.3		
Q13.4		
Q13.5		
Q13.6		
Q14.1		
Q14.2		
Q14.3		
Q14.4		
Q14.5		
Q14.6		
Q14.7		
Q14.8		
Q14.9		

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Q14.10		
Q14.11		
Q14.12		
Q15.1		
Q15.2		
Q15.3		
Q15.4		
Q16.1		
Q16.2		
Q16.3		
Q16.4		
Q16.5		
Q16.6		
Q16.7		
Q16.8		
Q16.9		
Q17.1		
Q17.2		
Q17.3		
Q17.4		
Q17.5		
Q17.6		
Q17.7		
Q17.8		
Q17.9		
Q17.10		

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Q17.11		
Q17.12		
Q17.13		
Q17.14		
Q17.15		
Q17.16		
Q18.1		
Q18.2		
Q18.3		
Q18.4		
Q18.5		
Q18.6		
Q18.7		
Q18.8		
Q18.9		
Q18.10		
Q18.11		
Q18.12		
Q18.13		
Q18.14		
Q18.15		
Q18.16		
Q19.1		
Q19.2		
Q19.3		
Q19.4		



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Q20.1		
Q20.2		
Q20.3		
Q20.4		
Q20.5		
Q20.6		
Q20.7		
Q20.8		
Q20.9		
Q21.1		
Q21.2		
Q21.3		
Q21.4		
Q21.5		
Q21.6		
Q21.7		