Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes		Deadline 20 February 2012
Name of Company:	European Central Bank – Directorate General Statistics	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public

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The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the accompanying spreadsheets and LOGs.

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Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes		
Reference	**Comment**	
General Comment	The Directorate General Statistics (DG-S) of the European Central Bank (ECB) welcomes the opportunity to provide its comments on the Consultation Paper EIOPA-CP-11/011. For further information on ECB requirements and comments see also the letter dated 18 October 2011 sent by the Director General Statistics of the ECB, Mr Aurel Schubert, to the Chairperson of EIOPA, Mr. Gabriel Bernardino. The comments provided in this consultation are consistent with the information provided in the letter. Furthermore, a separate response has been provided on the first Consultation Paper EIOPA-CP-11/009b on quantitative reporting templates. Given the close links between the two consultations, the two answers by the ECB should be taken in conjunction. Insurers corporations are important investors in the European financial markets and therefore enhanced statistics on them are essential for the monitoring of systemic fragilities in the EU. At the same time, the ECB/ESCB acknowledges the importance of limiting the reporting burden on the insurance industry, in particular by combining the statistical requirements with the supervisory requirements under Solvency II, to the extent possible, and by considering lighter requirements for smaller insurers. Against this background the European System of Central Banks (ESCB) has recently launched the first publication of quarterly euro area statistics on assets and liabilities of insurance corporations (and pension funds) based on available national data. As the quality, coverage, breakdowns and type of data published are insufficient to fulfil the policy and analytical needs, the ESCB has engaged into a longer term approach for harmonised statistics on insurance corporations, based on an ECB regulation. Such a regulation is planned to be submitted to the ECB Governing Council for adoption in early 2013; it will be based on Council Regulation (EC) 2533/98 as amended and will cover statistics required for monetary and macro-economic, as well as financial stability analyses. While ECB regulations in the field of statistics contain reporting requirements which are binding for reporting agents resident in the euro area, the statistical reporting requirements can be met, in part or in full, through a re-use of suitable existing or forthcoming other, e.g. supervisory, reporting requirements. While the statistics will be produced by the responsible areas of National Central Banks	

	(NCBs), experts in these areas will need access to reports provided by insurance corporations. Subject to national arrangements, NCBs may re-use supervisory reports based on Solvency II to derive (national and euro area) statistics and aggregate the data according to different criteria (type of business, size classes etc.). No individual information will be disseminated and a strict confidentiality regime is in place. Hence, with a view to minimising the reporting burden of insurance corporations, the ESCB intends to the extent possible to build its statistics on an appropriate sub-set of the Solvency II quantitative reporting templates (QRT), and also intends to re-use the new security-by-security reporting under Solvency II. Other ESCB statistical requirements will, following a detailed assessment of their merits and costs and subject to the approval of the Governing Council, be collected from the insurance sector based on an ECB regulation. In order to assess the ESCB and European Systemic Risk Board (ESRB, established by Regulation 1092/2010) requirements, the ESCB Statistics Committee (STC) consulted other ESCB committees (the Monetary Policy Committee, Financial Stability Committee, Market Operations Committee and International Relations Committee), the ESRB Advisory Technical Committee and the European Commission (via Eurostat). The present comments are therefore consistent with the user requirements expressed by these committees. Furthermore, as the data would also serve as input to the production of other ESCB statistics, the STC itself expressed its own needs, with the assistance of its Working Groups. From a macro-prudential perspective, the following issues should be highlighted: (a) First, the fact that insurers are important institutional investors in European financial markets implies that changes in their **holdings of financial assets** or investment strategies may have a significant impact on the markets, which, in some circumstances, may also have systemic consequences: ▪ The ECB/ESCB considers it essential to have **detailed information about the investment** assets of insurers, on an **security-by-security basis** (in particular in the framework of the ESCB's work towards a Securities Holdings Statistics) in	

	order to be able to monitor their evolution and to assess systemic risks. Granular reporting of the portfolios of insurers will, following the appropriate aggregations (by counterpart sector or by country of issuer, among others) are made, enable to monitor and interpret changes in this portfolio, the interlinkages between financial institutions and the assessment of risks. This granular reporting would also reduce the need to launch ad-hoc requests, with the subsequent reduction in the reporting burden of entities. **Detailed balance sheet** information is also needed for understanding developments in the risk-taking behaviour of the insurance sector. ▪ Information on derivatives contracts is important as these can significantly alter the exposure profile of institutions. ▪ Ideally, a look-through principle should be possible for assets holdings, where necessary, to ensure a proper view of counterparties and risks. ▪ In order to complement the picture on risks on the asset side of the balance sheets, items such as structured **credit, collateralised (asset-backed) securities and investments in property other than own use** are of relevance. ▪ In addition, a segregation of financial assets for **unit-linked contracts** from the investment portfolio is necessary. ▪ Detailed information on **remaining maturities** on both the asset and liability sides would enable maturity mismatch analysis, which is important given its significance for risk management in insurance business. Information on long maturities is particularly important, as insurance (in particular life insurance) liabilities are typically of very long-term nature. ▪ Information on **sectors of counterparts** is necessary not only for following the risk-taking behaviour of insurers but also to be able to analyse linkages with other sectors. For example, insurers are important investors in equity and debt instruments issued by banks, which creates important linkages that need to be analysed. The use of a harmonized sector classification will undoubtedly increase the value added by this information. ▪ The importance of information on **minimum guarantees** to policyholders is highlighted: in a low return environment, insurers might face difficulties in meeting such guarantees, which might have systemic stability consequences.	

- Finally, information on liquidity risks for the sector regarding the use of liquidity swaps and derivatives requiring collateral would be useful for macroprudential purposes as well.

(b) Second, the financial stability of the insurance sector is highly dependent on its financial performance and soundness. In this regard, a comprehensive set of **profit and loss** as well as **capital adequacy data** is needed for standard ratio analysis and for a forward-looking analysis on the impact of financial performance and soundness of insurance corporations on the stability of the sector and its impact on financial markets and counterparts. The requested information includes not only the composites of key performance ratios (e.g. loss and combined ratio, return on equity and assets), but also items necessary for the monitoring of the evolution of reserves.

(c) Third, macro-prudential analysis, surveillance and assessment is typically carried out on the basis of **consolidated financial information of insurance groups** in order to capture all the risks that may arise from its business lines and affiliates. From a systemic risk perspective, **large insurance groups** should receive special attention in this regard and therefore timely consolidated reporting would be a minimum requirement for the ECB.

(d) Fourth, enhanced monitoring requires **timely data on quarterly basis**. In order for the data to feed into the regular input required by the ECB/ESCB, the concept of timeliness could be operationalised to at most 45 calendar days after the reference date, for availability to the final users (implying availability at the ECB for statistical production at around T+33 calendar days). For macro-prudential policy, the latest information available is of the utmost importance and this information should be made available to policy makers on a timely basis. Market conditions may change abruptly in short periods of time and the macro-prudential authorities must not lag behind the markets in regarding the availability of information. Deviations from the quarterly reporting frequency should be based on the result of an orderly cost assessment which shows that quarterly reporting is excessively costly for a particular item.

(e) Fifth, the ECB is also required to provide statistical support to the ESRB, whose

	scope covers the EU and not only the euro area. Therefore, **harmonized and fully comparable information** on insurers of all countries in the EU is essential for the macro-prudential tasks of the ECB. (f) Finally, from a systemic risk perspective, **reinsurance activities**, as far as they imply a transfer of risks, and the securitization of insurance risks deserve special attention since they may threat the financial stability of the sector in a different way. Accordingly, specific reporting could be needed to monitor this segment of the insurance business, which is in some aspects different from the classical life and non-life activities (namely data on exposures to reinsurers, guarantees provided for reinsurance recoverable and upcoming reinsurance programs).	
3.1	See 7.1 Q3	
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3.6		
3.7	See 7.1 Q5	
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4.1	See 7.1 Q3	
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4.4	See 7.1 Q5	
4.5	The timely transmission of the information to EIOPA, as well as the timely release of information to the national central banks and the ECB who also provide statistical and	

	analytical support for the ESRB, is deemed as very important.	
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6.16	Complete and harmonised information is a precondition for using supervisory data statistical purposes. The ECB/ESCB stresses the importance of harmonisation and compatibility also with a view to minimising duplicated efforts and risk of error.	
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6.20	The ECB strongly supports the proposal for quarterly information on Solvency Capital Requirements which is essential for a timely and continuous monitoring of the sector.	
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6.28	A calculation method that reflects the major source of quarterly changes of SCRs and keeps, for the purpose of simplification, elements that are sufficiently stable constant during the year would be acceptable.	
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7.1		
7.1 Q1	From a systemic risk perspective, as a minimum requirement, consolidated quarterly reporting of SCR and other capital adequacy information would be required for large insurance groups. The ECB is aware of the costs that the calculation of the whole SCR on a quarterly basis would have, so it can also support option 2, whereby only the most volatile parts of the SCR would be updated on a quarterly basis (see 6.28).	
7.1 Q2	The ECB welcomes the inclusion of public accounting profit and loss figures, in particular for those profit and loss items that cannot be (at least indirectly) derived from existing Solvency II templates. The impact of using public accounting figures on the comparability of the data needs, however, to be analysed.	

	In general, the profit and loss items that the ECB would need are: • Premiums earned – by type of scheme and pension plan; • Claims incurred; • Net change in technical reserves: reserve for premiums unearned, reserves for life insurance, reserve for claims outstanding; • Other operating income: commissions received, real estate income, operating income; • Investment income and Premium supplements: interest received on deposits, debt securities, financial derivatives, listed/unlisted shares; • Gains/losses, value adjustments on financial assets; • Profit/loss on ordinary activities; • Tax; • Profit/loss.	
7.1 Q3	The ECB understands that the scope of the current proposal under consultation covers only large insurance groups and large solo undertakings not belonging to a group. Therefore it is acknowledged that using thresholds in terms of absolute balance sheet figures will, in some countries with small insurance sectors, exclude from the quarterly reporting for financial stability purposes all but those undertakings that belong to multinational groups having total assets in the balance sheet of more than EUR 6 bn. According to information available from EIOPA, the EUR 6 bn threshold would ensure a coverage of around 90 - 95% of total group assets at euro area level, which would be suitable for statistical purposes. However, further studies would be needed to clarify how this threshold would impact items which are not covered elsewhere in the reporting (e.g. profit and loss, duration of liabilities). A threshold of EUR 6 bn will then have a serious impact on the sector coverage for small and medium sized countries. For these variables a threshold relative to the national sector size could be assessed by EIOPA, ensuring that a representative coverage of the market is achieved in all countries while not increasing significantly the reporting burden of insurers. In order to have a reporting population as stable as possible, the ECB/ESCB welcomes	

	the proposal to grant admission or deletion from the sample using a phasing in/out process. Also, the current proposal of 6bn could be revised after some time in order to guarantee that it is still appropriate, after the first years of use.	
7.1 Q4	In order to minimise as much as possible the reporting burden of insurers, the ECB intends to base to the extent possible its analysis on statistics derived from an appropriate sub-set of the Solvency II quantitative reporting templates. While the information needs of supervisors (micro-perspective) may differ from statistical and macroprudential requirements, the reporting burden on undertakings can be reduced by aligning supervisory (both micro and macro) and statistical reporting to the extent possible, with differences (in concepts and definitions) being clearly identified. The ECB supports all efforts to avoid possible dual data collection from reporting agents. Timely quarterly reports are an essential precondition for using Solvency II quantitative data for financial stability purposes. The ECB supports that smaller insurers report at semi-annual or even annual frequency. However, no complete exemptions should exist at annual level, as annual benchmark results will be needed from all undertakings, in order to be able to use grossing-up methods for incomplete quarterly reporting.	
7.1 Q5	Quarterly information both on a solo and group basis is essential for macroprudential analysis. Experience from other statistics shows that regular reporting – after the implementation work is finalised – may be less burdensome than frequent and changing ad hoc requests, and may provide results that are also of use for the industry. The ECB/ESCB welcomes the proposal to set the same deadline for the submission of the information for financial stability purposes as for solo undertakings fulfilling other supervisory reporting requirements. However, the timeliness highlighted as important by the ECB is T+45 calendar days to the final users (implying availability at the ECB for statistical production at around T+33 calendar days). It is understood that quarterly solo reporting is planned to be	

	provided by undertakings with a deadline of 8 weeks after the reporting period from 1 January 2014 till 1 January 2015, 7 weeks from 1 January 2015 till 1 January 2016, 6 weeks from 1 January 2016 till 1 January 2017 and 5 weeks after 1 January 2017. Taking into account the requirements of the ECB/ESCB, it is important to note that even the 5 weeks deadline would imply a delay in the planned reporting timeliness required by the ECB/ESCB. Moreover, in order to minimise possible delays and to maximise the benefit of the statistics, an efficient co-operation and sharing of data between supervisory and NCB compilers of statistics will be important.	
Technical Annex		
FS 1 - A1	The ECB/ESCB welcomes the inclusion of quarterly lapse/surrender rate indicators, to monitor potential liquidity drains (see also answer to FS1 – A2).	
FS 1 – A2	The ECB/ESCB welcomes the inclusion of quarterly lapse/surrender rate indicators, to monitor potential liquidity drains, and considers that information on the ratio of *volume* of contracts lapsed to average volume of contracts is more useful than the analogue information for the *number* of lapsed contracts.	
FS 1 – A3	(See also reply to question 2). Profit and loss items are not always clearly identifiable within the draft templates, which makes it difficult to distinguish internal financing developments based on them. The inclusion of profit and loss information would help bridge this gap. The information needs of the ECB/ESCB with respect to profit and loss items may be fulfilled either by providing profit and loss data from statutory accounts or, to some extent, through the provision of the Variation Analysis (VA) templates for financial stability purposes (i.e. group data with quarterly frequency and reduced time lag).	
FS 1 – A4	(See also the reply to question 2 and FS 1 – A3) The ECB/ESCB welcomes the inclusion of statutory balance sheet information, as a complement to profit and loss statutory accounts.	

FS 1 – A5	(See also the reply to question 2 and FS 1 – A3) The ECB/ESCB welcomes the inclusion of statutory information on capital and reserves information, as a complement to profit and loss statutory accounts.	
FS 1 – A6	The ECB/ESCB welcomes the inclusion of a measure of the pass through ratio of losses/gains – however, we propose to have this indicator on a quarterly basis.	
FS 1 – A7	The ECB/ESCB welcomes the inclusion of information on the duration of life insurance liabilities for the reasons set out by EIOPA.	
FS 1 – A8	The ECB/ESCB welcomes the inclusion of information on the duration of non-life insurance liabilities for the reasons set out by EIOPA.	
FS 1 – A9	(See also reply to question 1) Quarterly information on solvency capital requirements (SCR) is an essential requirement for financial stability analysis. Therefore the ECB/ESCB welcomes the proposal to request SCR information on a quarterly basis for large groups. For financial stability purposes quarterly aggregations of the SCR should be available for size classes, countries, and insurance types (life, non-life, reinsurance, composite).	
Overview FS Needs - all tab	The ECB/ESCB welcomes the initiative to have more information, in a timely and frequent manner, for large insurance groups. In particular, we strongly support the EIOPA proposals of having the following data sets with quarterly frequency and with a reduced time lag: (a) Data on premiums, claims and expenses; (b) Information on SCR; (c) Information on investments, in particular on an security-by-security basis (Assets – D); (d) Profit and Loss data – which can be derived either from statutory accounts or from the Variation Analysis (VA) templates;	

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	(e) Information on reinsurance.	
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Assets - D1Q- cell A9 (list)	The ECB/ESCB requires asset components to be reported either as aggregates or as a detailed list of items, broken down by institutional sector according to the European System of Accounts (ESA classification; a classification by activity/NACE is not a high priority), as it would further align this reporting with the information collected for statistical purposes. Furthermore, a breakdown of invested amounts by geographic counterpart, financial instrument and maturity should also be considered. A possibility is to keep the complementary identification code (CIC) and the other items as defined by EIOPA and provide conversion tables and rules for bridging between EIOPA classifications and ECB/ESCB classification following international statistical standards (e.g. revised ESA).	

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TP - F1Q- cell E13		
TP - F1Q- cell E14		
TP - F3- cell A21		
TP - F3- cell A30		
TP - E1Q- cell A11		

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
TP -E1Q- cell B11		
TP -E1Q- cell C11		
TP - E1Q- cell D11		
TP -E1Q- cell E11		
TP -E1Q- cell F11		
TP - E1Q- cell G11		
TP -E1Q- cell H11		
TP -E1Q- cell I11		
TP - E1Q- cell L11		
TP -E1Q- cell M11		
TP -E1Q- cell N11		
TP - E1Q- cell P11		
TP - E1Q- cell P11		
TP -E1Q- cell Q11		
TP - E1Q- cell R11		
TP - E1Q- cell **Q11**		
TP - E1Q- cell A12		
TP -E1Q- cell B12		
TP -E1Q- cell C12		
TP - E1Q- cell D12		
TP -E1Q- cell E12		
TP -E1Q- cell F12		
TP - E1Q- cell G12		
TP -E1Q- cell H12		
TP -E1Q- cell I12		
TP - E1Q- cell L12		

	Comments Template on Proposal for Quantitative Reporting Templates for Financial Stability Purposes	Deadline 20 February 2012
TP -E1Q- cell M12		
TP -E1Q- cell N12		
TP - E1Q- cell O12		
TP - E1Q- cell P12		
TP -E1Q- cell Q12		
TP - E1Q- cell R12		
TP - E1Q- cell **Q12**		
TP - E1Q- cell A13		
TP -E1Q- cell B13		
TP -E1Q- cell C13		
TP - E1Q- cell D13		
TP -E1Q- cell E13		
TP -E1Q- cell F13		
TP - E1Q- cell G13		
TP -E1Q- cell H13		
TP -E1Q- cell I13		
TP - E1Q- cell L13		
TP -E1Q- cell M13		
TP -E1Q- cell N13		
TP - E1Q- cell O13		
TP - E1Q- cell P13		
TP -E1Q- cell Q13		
TP - E1Q- cell R13		
TP - E1Q- cell **Q13**		
Re - J2- cell H1		
Re - J2- cell X1		

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Re - J2- cell Y1		
Re - J2- cell AG1		
Re - J2- cell AP1		
Re - J3- cell B1		
Re - J3- cell N1		
Re - J3- cell O1		
Re - J3- cell S1		