

Comments Template on EIOPA-CP-14-048 Draft proposal for Level 3 Guidelines on the supervision of thir-country insurance undertakings		Deadline 02.Mar.2015 23:59 CET
Company name:	CFO Forum and CRO Forum	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential. Please indicate if your comments on this CP should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.	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". ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph, keep the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below. <ul style="list-style-type: none"> ○ If your comment refers to multiple paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other paragraphs this also applies. ○ If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment itself. <p>Please send the completed template to Consultation_Set2@eiopa.europa.eu, in MSWord Format, (our IT tool does not allow processing of any other formats).</p> <p>The paragraph numbers below correspond to Consultation Paper No. EIOPA-CP-14-048.</p>		
Reference	Comment	
General Comment	The focus of responses in respect of reporting on QRTs has been in relation to CP-14-052. However many of the comments raised in response to that CP are equally valid in respect of CP -14-048 (where relevant). Accordingly applicable comments have been replicated in this response template to ensure consistency with the comments in respect of regular QRTs within the response to CP-14-052. 1. Producing Q4 reporting to much shorter deadlines in addition to annual reporting of the	

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quantitative templates creates an additional reporting burden. We would suggest removing duplication between annual and quarterly reporting and requiring all information to be provided according to the annual deadlines.

2. We understand that changes in the QRTs were introduced following Omnibus II (LTG package), Implementing measures changes and Q&A process. However, we notice that every single template has been modified and such a number of changes was not expected. The impact of the changes on the implementation of Pillar 3 will be extremely significant, because not only additional data have been requested but also the design of the templates and the definitions of existing data have been changed. This will impact on IT tools as well as processes and interfaces, and will lead to additional costs and will raise issues regarding the timeline of the Pillar 3 project with potential delay in the implementation of the requirements by insurers, in particular given that the changes to the templates will not in fact be final before the end of June 2015. Moreover, the proposed templates are different from those used for the preparatory phase reporting, meaning work will be required on 2 different processes in parallel. For all the reasons presented above, we believe that NSAs should take into consideration these very late changes when they engage with undertakings on Pillar 3. In practice, the preparatory phase reporting requirements including national specificities should be re-considered in this respect allowing for proxies, shortcuts and limitations in the scope of entities to be covered. Finally, more time should be provided to undertakings in order to implement the final Pillar 3 requirements allowing them to use best efforts, proxies and shortcuts on the QRTs even after Solvency 2 enters into force in 2016.

3. The format of the LOG files (PDF) makes data processing and analysis rather difficult. It would be easier to handle if LOG files are delivered in Excel and the format within the templates is consistent.

4. For analysing EIOPA requirements it would be helpful if formulae remain within the templates (like in the July 2012 Consultation) or at least within the description field in the LOG file. The validation sheet is difficult to handle and some formulae are missing.

5. In order to avoid inconsistencies between QRTs and LOG files and also within QRTs and within LOG files it would be helpful to have one "Consolidated LOG file" for every QRT. A benefit for

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undertakings is that the requirements are easier to analyse. An example can be provided if helpful.

6. Please mark clearly any change in the QRTs / LOG files which has been done compared to the QRTs / LOG files subject to consultation.

7. In the Note "Navigating through the Solvency II reporting and disclosure package" it is stated on page 9, point 4.7., that the codification of validations will be changed. Is this change also planned to be performed for the templates themselves? We would appreciate if the codification remains as in the consultation. Every (even small) changes in numbering, codifications etc. creates a very time consuming burden to undertakings as documentation has to be updated.

8. Wherever third party names are required (e.g. issuer name in the asset listing template, counterparty in the derivative listing template) EIOPA's preference is to receive the name of third parties as set out in the LEI data base. In the early stage of Solvency II implementation, LEI coverage is expected to be very low and hence flexibility to apply alternative approaches and simplifications will be needed (for example, using the legal name of those undertakings).

9. We have noted several inconsistencies throughout our analysis between the QRTs and LOG files, and also within the QRTs and LOGs. Please note that we have raised specific examples against specific QRTs for your reference.

10. The templates issued as part of this consultation exclude any formulae. This makes it significantly more difficult to understand exactly what is required to be input into an individual cell. As a result reliance is being placed on the formulae that were provided in the set of templates issued in 2012. This is far from ideal, and leads to a greater risk of misinterpretation. When does EIOPA intend to provide formulae so that the QRT/requirements are finalised (this impacts, for example, systems built).

11. Many QRTs (BS-C1B, Cover-A1A, OF-B1A, VA-C2C, TP-F1 and TP-E1) have been divided into several QRTs without changing the information content (except for the currency). These modifications will strongly impact our IT tools and will lead to additional costs. We are also concerned as regards the delay of such implementations, which doesn't fit with the timeline of the

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	<p>third pillar. We suggest keeping the old formats of these QRTs. (s.03.01/02/03 & s.05.01/02 & s.23.01/03 & s.29.03/04 & s.12.01/02/03 & s.17.01/02/03 : Division of a QRT into several QRTs)</p> <p>12. We have provided detailed comments below on the individual QRTs provided by EIOPA. Where those comments arise on several variants of the same template (including across different consultation papers) we have provided the comment with respect to each relevant variant of the template.</p>	
1.1.		
1.2.		
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1.8.		
1.9.		
1.10.		
1.11.		
1.12.		
Guideline 1 - 1.13		
Guideline 1 - 1.14		
Guideline 2 - 1.15		
Guideline 3 - 1.16		
Guideline 4 - 1.17		
Guideline 4 - 1.18		
Guideline 5 - 1.19		

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Guideline 6 - 1.20		
Guideline 7 - 1.21		
Guideline 7 - 1.22		
Guideline 7 - 1.23		
Guideline 8 - 1.24		
Guideline 9 - 1.25		
Guideline 10 - 1.26		
Guideline 11 - 1.27		
Guideline 12 - 1.28		
Guideline 13 - 1.29		
Guideline 14 - 1.30		
Guideline 15 - 1.31		
Guideline 16 - 1.32		
Guideline 16 - 1.33		
Guideline 17 - 1.34		
Guideline 17 - 1.35		
Guideline 18 - 1.36		
Guideline 18 - 1.37		
Guideline 18 - 1.38		
Guideline 19 - 1.39		
Guideline 20 - 1.40		
Guideline 20 - 1.41		
Guideline 21 - 1.42		
Guideline 22 - 1.43		
Guideline 23 - 1.44		

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Guideline 24 - 1.45		
Guideline 25 - 1.46		
Guideline 26 - 1.47		
Guideline 27 - 1.48		
Guideline 28 - 1.49		
Guideline 29 - 1.50		
Guideline 30 - 1.51		
Guideline 31 - 1.52		
Guideline 32 - 1.53		
Guideline 33 - 1.54		
Guideline 34 - 1.55		
Guideline 35 - 1.56		
Guideline 36 - 1.57		
Guideline 37 - 1.58		
Guideline 38 - 1.59		
Guideline 38 - 1.60		
Guideline 38 - 1.61		
Guideline 39 - 1.62		
Guideline 39 - 1.63		
Guideline 40 - 1.64		
Guideline 40 - 1.65		
Guideline 40 - 1.66		
Guideline 40 - 1.67	<p>1. It is difficult to apply the requirement relating to using exchange rates issued by the European Central bank or the National Central Bank due to the following reasons: FX rates published by the BOE do not cover the total population of FX rates that may be needed for reporting – e.g. FX rate for Indonesian rupiah, Vietnamese dong, Philippine peso, Cambodian riel, Ghana cedi etc. are not published by the BOE. The European Central bank (ECB) published FX rates are only between Euro (base currency) and other currencies. UK</p>	

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	<p>insurers need FX rates between Pounds and other currencies. We also note there is a coverage issue with ECB rates as well. Furthermore, the application of ECB/NCB rates would be inconsistent with FX rates currently used for all other purposes / systems, e.g. for statutory accounting. The relevant market data sources have been carefully chosen and feed into audited reports. Introducing a separate data source just for Solvency II purpose would increase complexity and create additional costs.</p> <p>We propose the following wording (in case EIOPA regards a specification on FX rates to be necessary): (4) The conversion into the Solvency II reporting currency as referred to in paragraph 1 and 2 shall be calculated by applying an exchange rate which is available from reliable market data sources such as those used for the statutory reporting or reported by the European Central Bank or the relevant national central bank.</p>	
Guideline 41 - 1.68		
Guideline 42 - 1.69		
Guideline 43 - 1.70		
Guideline 44 - 1.71		
Guideline 44 - 1.72		
Guideline 45 - 1.73		
Guideline 45 - 1.74		
Guideline 46 - 1.75		
Guideline 46 - 1.76		
Guideline 47 - 1.77		
Guideline 47 - 1.78		
Guideline 47 - 1.79		
Guideline 48 - 1.80		
Guideline 49 - 1.81		
Guideline 50 - 1.82		
Guideline 51 - 1.83		
Guideline 52 - 1.84		

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Guideline 53 - 1.85		
Guideline 54 - 1.86		
Guideline 55 - 1.87		
Guideline 56 - 1.88		
Guideline 57 - 1.89		
Guideline 58 - 1.90		
Guideline 58 - 1.91		
Guideline 59 - 1.92		
Guideline 60 - 1.93		
Guideline 61 - 1.94		
Guideline 62 - 1.95		
TA I (1)		
TA I (2)		
TA I (3)		
TA I (4)		
TA I (5)		
TA I (6)		
TA I (7)		
TA I (8)		
TA I (9)		
TA I (10)		
TA I (11)		
TA I (12)		
TA I (13)		
TA I (14)		

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TA I (55)		
TA I (56)		
TA I (57)		
TA I (58)		
TA I (59)		
TA I (60)		
TA II		
TA III – S.01.02 Opening submission	1. Row reference C0010/R0080 is used inconsistently between different template versions (“Reporting submission date” vs. “Language of reporting”).	
TA III – S.02.01	1. The definitions for the fields no longer contain the reference to the CIC categories and the	

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crosschecks. It is useful to have these.

2. Reinsurance recoverable not recognized for TP calculation - it is not clear what items should be reported here. The definition seems to overlap with that of Reinsurance receivables, that is same items, required under both - payments in relation to other events or settled insurance claims. By definition, amounts not recognized are not part of any balance sheet. As such, we would request clarification from EIOPA.

3. The LOG file refers to a cell Z0010 "Fund Number". This cell is not relevant for this template, and as such we suggest EIOPA delete this to avoid confusion.

4. L23 (Contingent liabilities) is an off-balance sheet item under IFRS. There should therefore be no entry in the statutory accounts value column of row R0740 / C0020, and we would suggest that the relevant cell be struck through for clarity, consistent with other cells in the template where no value is expected.

5. S.02.01 requires now that property under construction for own use be reported as part of line item Property, plant & equipment held for own use, and no longer under Property (other than for own use) as in the Preparatory Phase. However, property under construction both for own use and for investment is included in one CIC category 94. We believe this should be split, as we should not have one CIC category being reported in 2 different lines on the balance sheet. Further, this will create an issue for the data point model.

6. Would EIOPA confirm that the new Asset Category 0 created for "Other Assets not elsewhere shown" corresponds to Balance Sheet Item C0010-C0020/R0430 (A29) rather than the "Other Investments" line on the Balance Sheet (C0010-C0020/R0210 (A11)).

7. For opening reporting, we believe that the column "Solvency I - C0030", should correspond instead to C0020 ("Statutory accounts value) just as for the regular balance sheet template

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	templates, meaning that statutory balance sheet figures would be provided. Furthermore, the reference C0030 is absent from the corresponding LOG.	
TA III – S.23.01 Opening submission	<p>1. There is no LOG file description for R0230/C0010 until C0040. It is therefore unclear how the cell is to be completed. We suggest a cross-reference (CT) may be missing to S.24.01. E.g. R0230/C0010 until C0040 = S.24.01.b.R0060/C0370 until C0400</p> <p>Further examples where a cross-reference (CT) would be helpful are: R0590/C0010; R0270/C0010; R0580/C0010; R0590/C0010; R0600/C0010; R0610/C0010; R0700/C0010; R0710/C0010; R0740/C0010.</p> <p>2. In several cases formulae have been deleted from the templates. Some formulae are self-explanatory. However in several cases, additional guidance would be helpful, especially when it comes to ratios.</p> <p>Examples: R0560/C0010 until C0040 (ratio eligible OF); R0570/C0010 until C0040 (ratio eligible OF); R0630/C0010 (figure "solvency ratio"); R0670/C0010 (figure "solvency ratio").</p> <p>3. Some cells are not included in the template, however they are mentioned in the validation sheet: R0730/C0020; R0760/C0020; R0790/C0020.</p>	
TA III – S.01.01		
TA III – S.01.02	1. Row reference C0010/R0080 is used inconsistently between different template versions ("Reporting submission date" vs. "Language of reporting").	
TA III – S.02.01	<p>1. The definitions for the fields no longer contain the reference to the CIC categories and the crosschecks. It is useful to have these.</p> <p>2. Reinsurance recoverable not recognized for TP calculation - it is not clear what items should be reported here. The definition seems to overlap with that of Reinsurance receivables, that is same items, required under both - payments in relation to other events or settled insurance claims. By</p>	

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	<p>definition, amounts not recognized are not part of any balance sheet. As such, we would request clarification from EIOPA.</p> <p>3. The LOG file refers to a cell Z0010 "Fund Number". This cell is not relevant for this template, and as such we suggest EIOPA delete this to avoid confusion.</p> <p>4. L23 (Contingent liabilities) is an off-balance sheet item under IFRS. There should therefore be no entry in the statutory accounts value column of row R0740 / C0020, and we would suggest that the relevant cell be struck through for clarity, consistent with other cells in the template where no value is expected.</p> <p>5. S.02.01 requires now that property under construction for own use be reported as part of line item Property, plant & equipment held for own use, and no longer under Property (other than for own use) as in the Preparatory Phase. However, property under construction both for own use and for investment is included in one CIC category 94. We believe this should be split, as we should not have one CIC category being reported in 2 different lines on the balance sheet. Further, this will create an issue for the data point model.</p> <p>6. Would EIOPA confirm that the new Asset Category 0 created for "Other Assets not elsewhere shown" corresponds to Balance Sheet Item C0010-C0020/R0430 (A29) rather than the "Other Investments" line on the Balance Sheet (C0010-C0020/R0210 (A11)).</p>	
TA III – S.02.03		
TA III – S.06.02	<p>1. Many field names have been modified in the new QRTs, in particular for QRT S.06.02, without improving the global understanding of QRTs architecture. We suggest keeping the old field names for all of QRTs.</p> <p>2. We assume that EIOPA has introduced cell C0300 (infrastructure investments) to understand the quantum of investments by the European insurance industry within infrastructure investments.</p>	

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	<p>We suggest that EIOPA collects this information at a higher level of granularity on a different template rather than collecting the information on an asset-by-asset basis on a complex template that has already been built.</p> <p>3. CIC 0/09 has been introduced for "Other Assets not elsewhere shown" (Balance Sheet line ref: C0010-C0020/R0430 (A29)), and would now bring these assets into scope for template S.06.02. Is this CIC actually intended to capture "Other Investments," which are still not reported on S.06.02 (i.e. S.02.01 balance sheet item Ref: C0010-C0020/R0210 (A11))?</p> <p>4. We believe there to be an inconsistency regarding Country of Custody (and possibly Issuer Country) for Property CIC 9. The regulations say in respect of Country of Custody: "Regarding CIC Category 9, excluding CIC 95 – Plant and equipment (for own use), the issuer country is assessed by the address of the property". CIC 9 was previously considered out of scope for Country of Custody, as properties are not held in Custody; we interpret the above to suggest it is required. The regulations however refer to "Issuer Country" rather than Country of Custody, so this could have been intended for the "Issuer Country" item. In either of these cases, a change would be required.</p>	
TA III – S.23.01	<p>1. There is no LOG file description for R0230/C0010 until C0040. It is therefore unclear how the cell is to be completed. We suggest a cross-reference (CT) may be missing to S.24.01. E.g. R0230/C0010 until C0040 = S.24.01.b.R0060/C0370 until C0400</p> <p>Further examples where a cross-reference (CT) would be helpful are: R0590/C0010; R0270/C0010; R0580/C0010; R0590/C0010; R0600/C0010; R0610/C0010; R0700/C0010; R0710/C0010; R0740/C0010.</p> <p>2. In several cases formulae have been deleted from the templates. Some formulae are self-explanatory. However in several cases, additional guidance would be helpful, especially when it</p>	

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	<p>comes to ratios.</p> <p>Examples: R0560/C0010 until C0040 (ratio eligible OF); R0570/C0010 until C0040 (ratio eligible OF); R0630/C0010 (figure "solvency ratio"); R0670/C0010 (figure "solvency ratio").</p> <p>3. Some cells are not included in the template, however they are mentioned in the validation sheet: R0730/C0020; R0760/C0020; R0790/C0020.</p>	
TA III – S.23.03		
TA III – S.29.01	<p>1. The Variation analysis (S29.01 till S29.04) is based on two different methods, results based and cash flow based. In our opinion it isn't possible to get structured information out of an analysis if it is based on two different methods.</p> <p>We would also please request that EIOPA include the formulas (where applicable) in the log files or QRT for fields that can be derived from other information already included in the QRT. As also the case in the previous Log files.</p> <p>The analysis is based on the information reported in template S23.01. In S.29.01, we believe there is one line missing which is part of the information in template S23.01;"Share premium account related to preference shares" and would suggest EIOPA update the template to reflect this.</p> <p>Under "Variation of components of reconciliation reserve _Items reported in 'Own Funds' "there are the elements:</p> <ul style="list-style-type: none"> - "Excess of assets over liabilities (Variation of BOF explained by Variation Analysis Templates). <p>We would note that we have been unable to find an explanation of Variations of BOF for this template and would request that EIOPA clarify.</p> <p>"Restricted own funds items due to ring fencing" - we would suggest EIOPA change this to read</p>	

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	<p>“Restricted own funds items due to ring fencing and matching.”</p> <p>We are also having difficulty understanding the relation between "Summary Analysis of Variation of Excess of Assets over liabilities" sum of V17 till V23 and Excess of assets over liabilities V12, and would therefore request further clarification from EIOPA.</p> <p>We would suggest that EIOPA consider using industry standard reports such as cash flow statements for reporting of the analysis of movements in balance sheet positions, except where EIOPA identifies a specific need to deviate from established movement overviews, and provides a set of standards to achieve the stated purpose.</p>	
<p>TA IV – S.01.02 Opening submission</p>		
<p>TA IV – S.02.01 Opening submission</p>	<ol style="list-style-type: none"> 1. The definitions for the fields no longer contain the reference to the CIC categories and the crosschecks. It is useful to have these. 2. Reinsurance recoverable not recognized for TP calculation - it is not clear what items should be reported here. The definition seems to overlap with that of Reinsurance receivables, that is same items, required under both - payments in relation to other events or settled insurance claims. By definition, amounts not recognized are not part of any balance sheet. As such, we would request clarification from EIOPA. 3. The LOG file refers to a cell Z0010 “Fund Number”. This cell is not relevant for this template, and as such we suggest EIOPA delete this to avoid confusion. 4. L23 (Contingent liabilities) is an off-balance sheet item under IFRS. There should therefore be no entry in the statutory accounts value column of row R0740 / C0020, and we would suggest that the relevant cell be struck through for clarity, consistent with other cells in the template where no value is expected. 5. S.02.01 requires now that property under construction for own use be reported as part of line 	

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	<p>item Property, plant & equipment held for own use, and no longer under Property (other than for own use) as in the Preparatory Phase. However, property under construction both for own use and for investment is included in one CIC category 94. We believe this should be split, as we should not have one CIC category being reported in 2 different lines on the balance sheet. Further, this will create an issue for the data point model.</p> <p>6. Would EIOPA confirm that the new Asset Category 0 created for "Other Assets not elsewhere shown" corresponds to Balance Sheet Item C0010-C0020/R0430 (A29) rather than the "Other Investments" line on the Balance Sheet (C0010-C0020/R0210 (A11)).</p>	
TA IV – S.23.01 Opening submission	<p>1. Some QRTs still appear to be work in progress (e.g. cells with references and a strike-through). In addition many of the Log Files contain typos and errors, such as (non-exhaustive list):</p> <ul style="list-style-type: none"> - Group log file for s.23.01 contains references to cells A12 and B12, while in the QRT only A12A and B12A exist. - Group log file description for s.23.01 for cell B603 states 'tier 1 restricted' this should be 'tier 1 unrestricted' -Descriptions for cells B586 and C586 in Group log file for s.23.01 do not match with intended content of these cells. - For cells A605 to E605 in group log file s.23.01 the description is equal for all cells, which is not expected. - Group log file for s.23.01 contains references to cells A20 to D20, while in the QRT only A21 and D21 exist. - In group log file for s.23.01 cell C45D is referred to as tier 1 - unrestricted, while this should be tier 1 - restricted. 	

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	<p>- Group log file description for s.23.01 for cell C51A states 'tier 1 unrestricted' this should be 'tier 1 restricted'</p> <p>- Group log file for s.23.01 contains references to cells B29, while in the QRT only B29A exist.</p> <p>- The description of A54A in variants f and g leads to confusion. It is not clear what the difference is between a Group SCR and a consolidated Group SCR or is this equivalent? Please define these terms.</p> <p>The description of Cells A37 to D38 in the Log file contains a wrong reference. The reference mentioned is 2006/48/EC. Is this correct, or should this be 2009/138/EC?</p> <p>Cell B1A is included in the log file but can't be found on the template, where do we fill in this information?</p> <p>R0220/C0020 in the log file does not have a reference to a cell in the QRT. Is this a field, as in the previous version of the QRT this one did not exist.</p>	
TA IV – S.01.01 Regular		
TA IV – S.01.02 Regular		
TA IV – S.02.01 Regular	<ol style="list-style-type: none"> 1. R0260 Loans and mortgages – we believe the cell definition should be amended to include reference to R0250 as well: “Financial assets created when creditors lend funds to debtors – others, not classifiable in item R0240 and R0250, with collateral or not, including cash pools.” 2. We would suggest that cells C0010-C0020/R0170 and C0010-C0020/R0180 be defined by reference to CIC codes instead of the criteria presented in the LOG file, to avoid confusion and unnecessary capital expenditure in investment systems. 3. We consider the definition provided for line C0010- C0020/R0740 (contingent liabilities) to be 	

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	<p>inconsistent with Article 11 of the delegated acts. We suggest EIOPA align the LOG file to the delegated acts.</p> <p>4. The LOG file for line C0010- C0020/R0740 (contingent liabilities) refers to contingent liabilities where the obligation cannot be measured with sufficient reliability. This type of contingent liability will not be quantifiable and therefore we will not recognise it on the balance sheet, but report it on the relevant template elsewhere in the set.</p>	
TA IV – S.02.03 Regular		
TA IV – S.06.02 Regular		
TA IV – S.23.01 Regular	<p>1. Some QRTs still appear to be work in progress (e.g. cells with references and a strike-through). In addition many of the Log Files contain typos and errors, such as (non-exhaustive list):</p> <ul style="list-style-type: none"> - Group log file for s.23.01 contains references to cells A12 and B12, while in the QRT only A12A and B12A exist. - Group log file description for s.23.01 for cell B603 states 'tier 1 restricted' this should be 'tier 1 unrestricted' - Descriptions for cells B586 and C586 in Group log file for s.23.01 do not match with intended content of these cells. - For cells A605 to E605 in group log file s.23.01 the description is equal for all cells, which is not expected. - Group log file for s.23.01 contains references to cells A20 to D20, while in the QRT only A21 and D21 exist. - In group log file for s.23.01 cell C45D is referred to as tier 1 - unrestricted, while this should be 	

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	<p>tier 1 - restricted.</p> <ul style="list-style-type: none"> - Group log file description for s.23.01 for cell C51A states 'tier 1 unrestricted' this should be 'tier 1 restricted' - Group log file for s.23.01 contains references to cells B29, while in the QRT only B29A exist. - The description of A54A in variants f and g leads to confusion. It is not clear what the difference is between a Group SCR and a consolidated Group SCR or is this equivalent? Please define these terms. <p>The description of Cells A37 to D38 in the Log file contains a wrong reference. The reference mentioned is 2006/48/EC. Is this correct, or should this be 2009/138/EC?</p> <p>Cell B1A is included in the log file but can't be found on the template, where do we fill in this information?</p> <p>R0220/C0020 in the log file does not have a reference to a cell in the QRT. Is this a field, as in the previous version of the QRT this one did not exist.</p>	
TA IV – S.23.03 Regular		
TA IV – S.29.01 Regular		