

Comments Template on EIOPA-CP-14-61 Draft proposal for Implementing Technical Standards on the procedures for the application of article 308b(13) of Directive 2009/138/EC		Deadline 02.Mar.2015 23:59 CET
Company name:	GDV	
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-14-061.</p>		
Reference	Comment	
General Comment	GDV welcomes the opportunity to comment on the draft proposal for implementing technical standards on the procedures for the application of article 308b(13) of Directive 2009/138/EC. Use of the standard risk factor right from the start We welcome that article 1 applies only to undertakings which do not increase the weight for the	

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	<p>standard parameter to 100% during the year 2016. Thereby it is clarified that undertakings may – at their own discretion – increase the weight faster than the bottom line given by Article 308b(13) of the directive (at least linearly from 2016 to 2023). In particular, it is permitted to use the full standard risk factor right from the start.</p>	
Article 1	<p>Wording</p> <p>The wording has to be corrected: “Where insurance and reinsurance undertakings do not increase <u>the weight</u> for the parameter referred to in Article 308b(13)(b) of Directive 2009/138/EC to 100% during the year 2016...”</p> <p>Reporting before 2016</p> <p>The article makes clear, that the application of the transitional measure is optional for undertakings starting from 2. January 2016. For consistency reasons, undertakings that do not intend to use the transitional measure from 2. January 2016 onwards should not be required to use it for any reporting before this date as well.</p>	
Article 2		
Impact Assessment		