		Deadline
Comments Template on		**Deadline**
Consultation Paper on Proposal for Guidelines on submission of information to national competent authorities		**19-Jun-13**
		12:00 CET
Name of Company:	Gard Group	
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 Technical Annexes II and III.

Reference	Comment	Resolution

	General Comments		
		The Gard Group

Gard was founded on 9 October 1907 as a P&I club, and is today the world's second largest marine insurer. As per 20 February 2013 Gard had a 16% market share in P&I, with a tonnage in excess of 230 m gt. Gard's marine and energy businesses have roots back to the mid-19th century, and has been continually in the offshore energy sector for 40 years. On 20 February 2013 the marine book insured more than 7000 vessels, and Gard accounted for 31% of the nordic hull premium. Gard has today 13 offices around the world employing more than 400 people.

General comments on the Consultation

This document sets out the comments of the Gard Group on the EIOPA call to comments on CP 13/010 - Consultation Paper on the Proposal for Guidelines on submission of information to national competent authorities. The response is submitted by the Regulatory Reporting Team of the Gard Group.

We strongly support the overall approach taken by EIOPA of emphasising the need for insurance and reinsurance undertakings, as well as national competent authorities, to start early with the preparatory work towards Solvency II compliance.

In this preparatory phase we have chosen not to comment on the detailed list of quantitative reporting items as set out in Technical Annex II, but rather to focus on providing our comments to the Impact Assessment part of the consultation. | |
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	SCR - B2A - cell B7		

	SCR - B2A - cell A07		
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	SCR - B2A - cell B10		
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	SCR - B2A - cell A12		
	SCR - B2A - cell A13		
	SCR - B2A - cell A013		
	SCR - B2A - cell A14A		
	SCR - B2A - cell A14C		
	SCR - B2A - cell A8		
	SCR - B2A - cell A9		
	SCR - B2A - cell A17		
	SCR - B2A - cell A15		
	SCR - B2A - cell A15A		
	SCR - B2A - cell A15B		
	SCR - B2A - cell A15C		
	SCR - B2A - cell A16		
	SCR - B2A - cell A18		
	SCR - B2A - cell A20		
	SCR - B2A - cell A21		
	SCR - B2A - cell A14B		
	SCR - B2A - cell A14		
	SCR - B2A - cell A11A		
	SCR - B2A - cell A11B		
	SCR - B2B – General Comment		
	SCR - B2B- cell A1		
	SCR - B2B- cell A1A		
	SCR - B2B- cell A1B		
	SCR - B2B- cell A1C		

	SCR - B2B- cell B1		
	SCR - B2B- cell C1		
	SCR - B2B- cell B2		
	SCR - B2B- cell C2		
	SCR - B2B- cell B3		
	SCR - B2B- cell C3		
	SCR - B2B- cell B4		
	SCR - B2B- cell C4		
	SCR - B2B- cell B5		
	SCR - B2B- cell B6		
	SCR - B2B- cell B7		
	SCR - B2B- cell C5		
	SCR - B2B- cell C6		
	SCR - B2B- cell B8		
	SCR - B2B- cell B8AA		
	SCR - B2B- cell B8A		
	SCR - B2B- cell A11A		
	SCR - B2B- cell A11B		
	SCR - B2C – General Comment		
	SCR - B2C- cell A1		
	SCR - B2C- cell A1A		
	SCR - B2C- cell A1B		
	SCR - B2C- cell A1C		
	SCR - B2C- cell B1		
	SCR - B2C- cell C1		
	SCR - B2C- cell B2		
	SCR - B2C- cell C2		
	SCR - B2C- cell B3		
	SCR - B2C- cell C3		

	SCR - B2C- cell B4		
	SCR - B2C- cell C4		
	SCR - B2C- cell B5		
	SCR - B2C- cell B6		
	SCR - B2C- cell B7		
	SCR - B2C- cell B7A		
	SCR - B2C- cell B7B		
	SCR - B2C- cell B7C		
	SCR - B2C- cell B8		
	SCR - B2C- cell B9		
	SCR - B2C- cell B10		
	SCR - B2C- cell B12		
	SCR - B2C- cell B13		
	SCR - B2C- cell C5		
	SCR - B2C- cell C6		
	SCR - B2C- cell B14		
	SCR - B2C- cell B14AA		
	SCR - B2C- cell B14A		
	SCR - B2C- cell A11A		
	SCR - B2C- cell A11B		
	SCR - B3A – General Comment		
	SCR - B3A – cell A00		
	SCR - B3A – cell AA01		
	SCR - B3A – cell AA02		
	SCR - B3A – cell AA03		
	SCR - B3A – cel A30		
	SCR - B3A- cell C0		
	SCR - B3A- cell D0		
	SCR - B3A- cell A1		

	SCR - B3A- cell A2		
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	SCR - B3A- cell A2A		
	SCR - B3A- cell B1		
	SCR - B3A- cell B2		
	SCR - B3A- cell B1A		
	SCR - B3A- cell B2A		
	SCR - B3A- cell C1		
	SCR - B3A- cell C2		
	SCR - B3A- cell B1B		
	SCR - B3A- cell B2B		
	SCR - B3A- cell D1		
	SCR - B3A- cell D2		
	SCR - B3A- cell C3		
	SCR - B3A- cell D3		
	SCR - B3A- cell A4		
	SCR - B3A- cell A4A		
	SCR - B3A- cell B4		
	SCR - B3A- cell B4A		
	SCR - B3A- cell C4		
	SCR - B3A- cell B4B		
	SCR - B3A- cell D4		
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	SCR - B3A- cell B8A		
	SCR - B3A- cell C8		
	SCR - B3A- cell B8B		
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	SCR - B3A- cell A9		
	SCR - B3A- cell B9		
	SCR - B3A- cell A10		
	SCR - B3A- cell B10		
	SCR - B3A- cell A11		
	SCR - B3A- cell B11		
	SCR - B3A- cell A12		
	SCR - B3A- cell A12A		
	SCR - B3A- cell B12		
	SCR - B3A- cell B12A		
	SCR - B3A- cell C12		
	SCR - B3A- cell B12B		
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	SCR - B3A- cell D13		
	SCR - B3A- cell A14		
	SCR - B3A- cell A14A		
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	SCR - B3A- cell B14A		
	SCR - B3A- cell C14		
	SCR - B3A- cell B14B		
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	SCR - B3A- cell A16A		
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	SCR - B3A- cell B16A		
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	SCR - B3A- cell B16B		
	SCR - B3A- cell D16		
	SCR - B3A- cell A17		
	SCR - B3A- cell A17A		
	SCR - B3A- cell B17		
	SCR - B3A- cell B17A		
	SCR - B3A- cell C17		
	SCR - B3A- cell B17B		
	SCR - B3A- cell D17		
	SCR - B3A- cell A18		
	SCR - B3A- cell A18A		
	SCR - B3A- cell B18		
	SCR - B3A- cell B18A		
	SCR - B3A- cell C18		
	SCR - B3A- cell B18B		
	SCR - B3A- cell D18		
	SCR - B3A- cell A19		
	SCR - B3A- cell A19A		
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	SCR - B3A- cell D19		
	SCR - B3A- cell A20		
	SCR - B3A- cell A20A		
	SCR - B3A- cell C20		

	SCR - B3A- cell D20		
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	SCR - B3A- cell D22		
	SCR - B3A- cell C23		
	SCR - B3A- cell D23		
	SCR - B3B – General Comment		
	SCR - B3B – cell A00		
	SCR - B3B – cell A001		
	SCR - B3B – cell A30		
	SCR - B3B – cell A10		
	SCR - B3B- cell A1		
	SCR - B3B- cell B1		
	SCR - B3B- cell C0		
	SCR - B3B- cell C1		
	SCR - B3B- cell A2		
	SCR - B3B- cell A3		
	SCR - B3B- cell C3		
	SCR - B3B- cell D4		
	SCR - B3B- cell C4		
	SCR - B3C – General Comment		
	SCR - B3C – cell A01		
	SCR - B3C – cell A02		
	SCR - B3C – cell A03		
	SCR - B3C – cell A04		
	SCR - B3C – cell A05		
	SCR - B3C - cell A06		
	SCR - B3C – cell A001		
	SCR - B3C – cell A30		
	SCR - B3C- cell A1		

	SCR - B3C- cell A1A		
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	SCR - B3C- cell B1A		
	SCR - B3C- cell C1		
	SCR - B3C- cell B1B		
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	SCR - B3C- cell A2		
	SCR - B3C- cell A2A		
	SCR - B3C- cell B2		
	SCR - B3C- cell B2A		
	SCR - B3C- cell C2		
	SCR - B3C- cell B2B		
	SCR - B3C- cell D2		
	SCR - B3C- cell A3		
	SCR - B3C- cell A3A		
	SCR - B3C- cell B3		
	SCR - B3C- cell B3A		
	SCR - B3C- cell C3		
	SCR - B3C- cell B3B		
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	SCR - B3C- cell C04		
	SCR - B3C- cell D04		
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	SCR - B3C- cell A4A		
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	SCR - B3C- cell B4A		
	SCR - B3C- cell C4		
	SCR - B3C- cell B4B		
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	SCR - B3C- cell B5B		
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	SCR - B3C- cell A6		
	SCR - B3C- cell A6A		
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	SCR - B3C- cell B6A		
	SCR - B3C- cell C6		
	SCR - B3C- cell B6B		
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	SCR - B3C- cell A7A		
	SCR - B3C- cell B7		
	SCR - B3C- cell B7A		
	SCR - B3C- cell C7		
	SCR - B3C- cell B7B		
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	SCR - B3C- cell A8A		
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	SCR - B3C- cell B8A		
	SCR - B3C- cell C8		
	SCR - B3C- cell B8B		
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	SCR - B3C- cell D10		
	SCR - B3C- cell C11		
	SCR - B3C- cell D11		
	SCR - B3D – General Comment		
	SCR - B3D – cell A01		
	SCR - B3D – cell A02		
	SCR - B3D – cell A03		
	SCR - B3D – cell A04		
	SCR - B3D – cell A05		
	SCR - B3C – cell A001		
	SCR - B3C – cell A30		
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	SCR - B3D- cell B1A		
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	SCR - B3D- cell B1B		
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	SCR - B3D- cell B2A		

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	SCR - B3D- cell B3B		
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	SCR - B3D- cell B7B		
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	SCR - B3D- cell F14		
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	SCR - B3D- cell D15		
	SCR - B3D- cell E15		
	SCR - B3D- cell F15		
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	SCR - B3D- cell F16		
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	SCR - B3D- cell B18		
	SCR - B3D- cell B18B		
	SCR - B3D- cell D18		
	SCR - B3D- cell D19		
	SCR - B3D- cell D20		
	SCR - B3D- cell B21		
	SCR - B3D- cell A21		
	SCR - B3D- cell B22		
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	SCR - B3D- cell B27		
	SCR - B3D- cell A27		
	SCR - B3E – General Comment		
	SCR - B3E- cell A001		
	SCR - B3E- cell A30		
	SCR - B3E- cell C1		
	SCR - B3E- cell D1		
	SCR - B3E- cell E1		
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	SCR - B3E- cell C2		
	SCR - B3E- cell D2		
	SCR - B3E- cell E2		
	SCR - B3E- cell F2		
	SCR - B3E- cell C3		
	SCR - B3E- cell D3		
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	SCR - B3E- cell D6		

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	SCR - B3E- cell D10		
	SCR - B3E- cell E10		
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	SCR - B3E- cell F13		
	SCR - B3E- cell A14		

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	SCR - B3E- cell B15A		
	SCR - B3E- cell C15		
	SCR - B3E- cell A16		
	SCR - B3E- cell A17		
	SCR - B3E- cell A18		
	SCR - B3F – General Comment		
	SCR - B3F- cell A1		
	SCR - B3F- cell A2-A6		
	SCR - B3F- cell A7		
	SCR - B3F- cell B1		
	SCR - B3F- cell B2-B6		
	SCR - B3F- cell B7		
	SCR - B3F- cell C1		
	SCR - B3F- cell C2-C6		
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	SCR - B3F- cell A10-A15		
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	SCR - B3F- cell C17		
	SCR - B3F- cell C18		
	SCR - B3F- cell A19		
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	SCR - B3F- cell B22		
	SCR - B3F- cell B23-B25		
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	SCR - B3F- cell C22		
	SCR - B3F- cell C23-C25		
	SCR - B3F- cell C26		
	SCR - B3F- cell AA1-AA20		
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	SCR - B3F- cell AA22-AA35		
	SCR - B3F- cell AA36		

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	SCR - B3F- cell AG1-AG20			
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	SCR - B3F- cell AG36			
	SCR - B3F- cell AG37			
	SCR - B3F- cell AH1-AH20			
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	SCR - B3F- cell AH36			
	SCR - B3F- cell AH37			
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	SCR - B3F- cell BA36		
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	SCR - B3F- cell BB22-BB35		
	SCR - B3F- cell BB36		
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	SCR - B3F- cell BE38		
	SCR - B3F- cell BE39		
	SCR - B3F- cell BF1-BF20		
	SCR - B3F- cell BF21		
	SCR - B3F- cell BF36		
	SCR - B3F- cell BF37		
	SCR - B3F- cell BG1-BG20		
	SCR - B3F- cell BG21		
	SCR - B3F- cell BG36		

	SCR - B3F- cell BG37		
	SCR - B3F- cell BH1-BH20		
	SCR - B3F- cell BH21		
	SCR - B3F- cell BH36		
	SCR - B3F- cell BH37		
	SCR - B3F- cell BH38		
	SCR - B3F- cell BH39		
	SCR - B3F- cell CA1-CA14		
	SCR - B3F- cell CA15		
	SCR - B3F- cell CA16-CA29		
	SCR - B3F- cell CA30		
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	SCR - B3F- cell OI21		
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	MCR - B4B- cell A30		
	G01-General Comments		
	G01- cell A1		
	G01- cell B1		
	G01- cell C1		
	G01- cell D1		
	G01- cell E1		
	G01- cell F1		
	G01- cell G1		
	G01- cell H1a		
	G01- cell H1b		
	G01- cell H1c		
	G01- cell I1a		
	G01- cell I1b		
	G01- cell J1		
	G01- cell K1		
	G01- cell L1		
	G01- cell M1		
	G01- cell N1		
	G01- cell O1		
	G01- cell P1		
	G01- cell Q1		
	G01- cell R1		
	G01- cell S1		
	G01- cell T1		

	G01- cell U1		
	G03 – General Comments		
	G03- cell A1		
	G03- cell A2		
	G03- cell B1		
	G03- cell B2		
	G03- cell B3		
	G03- cell B4		
	G03- cell B5		
	G03- cell B6		
	G03- cell B7		
	G03- cell C1		
	G03- cell D1		
	G03- cell F1		
	G03- cell G1		
	G03- cell H1		
	G03- cell N1		
	G03- cell O1		
	G03- cell P1		
	G04 – General Comments		
	G04- cell A1		
	G04- cell A2		
	G04- cell A3		
	G04- cell B1		
	G04- cell C1		
	G04- cell D1		
	G04- cell E1		
	G14- General Comments		
	G14- cell A1		

	G14- cell B1		
	G14- cell S1		
	G14- cell C1,F1,I1,L1,O1		
	G14- cell D1,G1,J1,M1,P1		
	G14- cell E1,H1,K1,N1,Q1		
	G14- cell R1		
	Technical Annex IV General Comments		
	Technical Annex V General Comments		
	Technical Annex VI General Comments		
	Technical Annex VII General Comments		
	CAS1		
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	QCGS1		
	Instructions		
	Impact Assessment – General Coments	We have taken this opportunity to provide Gard's preferred options to the questions listed in Annex I Impact Assessment	
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	Question 1	Should EIOPA issue Guidelines for preparation of submission of information to NCA's?	
	Question 1 – Option 1		

	Question 1 – Option 2	Like EIOPA Gard believes option 2 is the best approach: To issue Guidelines for a preparatory phase. Comment: We find it beneficial to have a gradual adjustment towards Solvency II compliance and therefore think it necessary with the early preparation work. This will allow us to take lessons from the first step and facilitate improvements for the next steps.	
	Question 2	What should be the scope of the information submitted in the preparatory phase?	
	Question 2 – Option 1		
	Question 2 – Option 2	Like EIOPA Gard believes option 2 is the best option: Use the subset of templates as defined in Appendix 1 as well as relevant narrative information but excluding financial stability specific templates, Cover A1Q and certain group-specific templates i.e. Intra Group Transactions and Risk Concentration (as identified in Appendix 2). Comment: We prefer this option because of the reduction of the most detailed information, excluding the information specific for financial stability during the preparatory phase, but still including the Solvency Capital Requirement calculation which is considered crucial for Solvency II preparations.	
	Question 2 – Option 3		
	Question 2 – Option 4		
	Question 3	What should be the information frequency during the preparatory phase?	
	Question 3 – Option 1		

	Question 3 – Option 2	Like EIOPA Gard believes that option 2 is the best approach for monitoring Solvency II preparation during the preparatory phase: Annual information submission with quarterly information submission beginning in Quarter 3 2015. Comment: We find it beneficial to have a gradual phasing-in of quarterly information and prefer to start with the quarterly reporting a bit later than the annual reporting, as suggested in this option.	
	Question 3 – Option 3		
	Question 4	Should application thresholds be used in the preparatory phase?	
	Question 4 – Option 1		
	Question 4 – Option 2		
	Question 4 – Option 3	Like EIOPA Gard believes that option 3 is the best approach for reaching a satisfying coverage at European level, while being proportionate during the preparatory phase: Minimum thresholds based on national market share coverage (gross technical provisions for life undertakings, gross written premiums for non-life undertakings). For solo annual information submission this should be at least 80% market share, for solo quarterly information submission this should be at least 50% market share. For group information submission it should be € 12 billion or an equivalent in another national currency of total assets in the consolidated accounting balance-sheet. If in a Member State no group reaches the threshold the national competent authority should decide whether a group is subject to group information submission. Comment: In order to cover various types of insurance and reinsurance undertakings, the minimum thresholds of the above mentioned 80% national market share for annual information and 50% for quarterly information should be applied per industry segment. We also believe there should be a common set of rules or guidelines behind the national competent authorities' decisions to whether a group is subject to group	

		information submission.	
	Question 4 – Option 4		
	Question 4 – Option 5		
	Question 5	What level of information submission should be required for insurance and reinsurance undertakings in the pre-application process for internal models regarding the Solvency Capital Requirement component of the risks categories/sub-categories/major business units calculated using an internal model during the preparatory phase up to Solvency II implementation?	

	Question 5 – Option 1	To this question Gard prefers option 1: For the periodical submission of information insurance and reinsurance undertakings under pre-application will be required to provide figures to the most granular level as calculated by their internal model and at the same time they will need to provide an estimate of the calculation as per the standard formula but without the same level of granularity as the calculation using the model. This will be done through both harmonised set of information and ad-hoc templates agreed with National Competent Authorities. Comment: As Gard has already been in a pre-application process with the Norwegian national competent authority for some time, and our goal is an approved internal model, we find it desirable only to report figures to the most granular level calculated by the internal model, while reporting figures on a less granular level calculated by the standard model.	
	Question 5 – Option 2		
	Question 6	What should be the approach with group information submission and third country equivalence?	
	Question 6 – Option 1		
	Question 6 – Option 2	Like EIOPA Gard believes that option 2 is the best approach for the purposes of dealing with third country equivalence issues and allows groups to use calculations under local rules: Group supervisors may allow groups to use calculations under local rules for their third country undertakings, as necessary, where the deduction and aggregation method is applied. Comment: We believe this option to be the most beneficial because of the flexible approach during the preparatory phase.	
	Question 6 – Option 3		
	Question 6 – Option 4		

	Question 7	What should be the approach on items requiring approval i.e. ancillary own funds, undertaking specific parameters and diversification between ring-fenced funds?	
	Question 7 – Option 1		
	Question 7 – Option 2	Like EIOPA Gard believes option 2 is the best approach for the preparatory phase submission: Allow the inclusion of items in the preparatory phase which are subject to approval under Solvency II but only in case they are already permitted under Solvency I (some of which are subject to approval under Solvency I). Comment: We find this question a bit difficult to answer in this early phase. However, for continuity reasons, with the approach taken in QIS5 as well as in the Long Term Guarantee Assessment regarding ancillary own funds and no new items being introduced, we believe option 2 would provide a more gradual adjustment to Solvency II. In addition we believe it could be helpful to have some guidelines on how to obtain pre-approval of items for use in the preparatory phase.	
	Question 7 – Option 3		
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	Appendix 1		
	Appendix 2		
	Appendix 3		