

**Comments Template on  
Consultation Paper on on the Proposal for Guidelines  
on the System of Governance**

**Deadline  
19 June 2013  
12:00 CET**

Name of Company:	Insurance Ireland	
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, in Word Format, to <a href="mailto:CP-13-008@eiopa.europa.eu">CP-13-008@eiopa.europa.eu</a>. Our IT tool does not allow processing of any other formats.</b></p> <p>The numbering of the paragraphs refers to this Consultation Paper, the numbering of cells refers to the Technical Annexes II and III.</p>		
<b>Reference</b>	<b>Comment</b>	<b>Resolution</b>
<b>General Comment</b>	<p>Insurance Ireland broadly welcomes the draft Guidelines and their aim of promoting a consistent structure across Europe in advance of the implementation of Solvency II. This consistency is particularly important for insurers operating on a cross border basis.</p> <p>Please clarify, for the avoidance of potential confusion, that it is intended that the Guidelines and the Directive will apply on a stand-alone basis and that draft Level 2 and Level 3 guidance which may have been circulated previously are not</p>	

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relevant under the interim regime. It would also be helpful if it could be confirmed that Level 2 and Level 3 guidance finalised during the interim phase would not impact on the interim regime.

Some (re)insurance entities may be planning a revised organisational structure with effect from the full implementation of Solvency II to optimise capital efficiency. Local NCAs should have the flexibility to anticipate these changes when applying the guidelines.

**Introduction General  
Comment**

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**Section I. General**

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<b>Comments</b>		
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<b>Section II. General Comments</b>		
<b>Chapter I General Comments</b>		
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<b>Chapter II General Comments</b>		
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<b>Chapter III General Comments</b>		
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<b>Chapter IV General Comments</b>		
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<b>Chapter V General Comments</b>		
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<b>Chapter VI General Comments</b>		
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<b>Chapter VII General Comments</b>		
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<b>Chapter VIII General Comments</b>		
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<b>Chapter IX General Comments</b>		
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<b>Section III. General Comments</b>		
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<b>Compliance and Reporting Rules General Comments</b>		
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<b>Impact Assessment – General Coments</b>		
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