

<b>Comments Template on Consultation Paper on Proposal for Guidelines on Pre-application for Internal Models</b>		<b>Deadline 19 June 2013 12:00 CET</b>
Name of Company:	RSA Insurance Group	
Disclosure comments:	of 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>⇒ <u>Do not change the numbering</u> 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-13-011@eiopa.europa.eu">CP-13-011@eiopa.europa.eu</a>. Our IT tool does not allow processing of any other formats.</b></p>		
Reference	Comment	Resolution
<b>General Comment</b>	<p>We consider that there is value in having guidelines which require national competent authorities to operate a pre-application process and which provide a framework for the functioning of colleges in the pre-application process.</p> <p>We see no value in guidelines which effectively replicate rules contained in the Draft Level 2 text. Such guidelines will either be a faithful restatement of the Level 2 rules, in which case they are redundant, or they will be different, in which case they will cause confusion and may breach the fundamental principle that Level 3 guidance must not extend the scope of Level 2 rules. As an example we would point to Guideline 57 on the user manual which introduces a criterion for internal model documentation which is inconsistent with that in the Level 2 text. Accordingly, guidelines 4 to 67 should be omitted.</p>	

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<b>Introduction. General Comment</b>		
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<b>Section I. General Comments</b>		
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<b>Section II. General Comments</b>		
<b>Chapter 1. General Comments</b>		
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<b>Chapter 2. General Comments</b>		
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<b>Chapter 3. General Comments</b>		
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<b>Chapter 4. General</b>		

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<b>Chapter 5. General Comments</b>		

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<b>Chapter 6. General Comments</b>		
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<b>Chapter 7. General Comments</b>		

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<b>Chapter 8. General Comments</b>		
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<b>Chapter 9. General Comments</b>		

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<b>Chapter 10. General Comments</b>		
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1.150.	This guideline introduces a criterion for internal model documentation which is inconsistent with the principle in the draft Level 2 text that the documentation should be sufficient to enable any independent knowledgeable third party to be able to understand the design and operational details of the internal model and form a sound judgement as to its compliance with Solvency II rules. Documentation to enable the third party to "operate and run" the internal model is clearly more extensive than that required to enable the third party to "understand" and "form a sound judgement" of its compliance. The guideline represents an unwarranted extension of the Level 2 requirements and should be deleted.	
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<b>Chapter 11. General Comments</b>		
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<b>Chapter 12. General Comments</b>		
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<b>Compliance and Reporting Rules</b>		
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<b>Impact Assessment</b>		

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