



IRSG response to the EIOPA infrastructure investments consultation

IRSG meeting October 2015

Main comments scope and criteria



- Corporates should be included
- Criteria should be more flexible
- Detailed suggestions on individual criteria

Main comments on proposed debt calibration



- Use of internal ratings should be allowed
- Assumed probability of sale in liquidity approach too high
- Credit and liquidity approach should be combined
- Alternative suggestion spread adjustment

IRSG proposal for counterparty default risk calibration



- Constructive approach by industry
- But EIOPA deems counterparty default risk module no feasible option. Main concerns:
 - Volatility of basic own funds over one year possibly considerably underestimated
 - Implicit assumption of a zero probability of sale or no loss in case of sale

Main comments equity calibration



- There should be specific treatment for unlisted equities
- Low correlation with other assets should be recognised

Main comments risk management EIOPA

- Concerns about unnecessary costs



Thank you
