		Comments Template on Consultation Paper on EIOPA's proposals for Solvency II 2020 review Package on Supervisory Reporting and Public Disclosure	**Deadline 18 October 2019 23:59 CET**
Name of Company:		**AMICE**	
Disclosure of comments:		Please indicate if your comments should be treated as confidential:	Confidential/Public
		Please follow the following instructions for filling in the template: ⇨ Do **not** change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool ⇨ Leave the last column empty. ⇨ Please fill in your comment in the relevant row. If you have no comment on a paragraph or a cell, keep the row empty. ⇨ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. **Please send the completed template to CP-19-004@eiopa.europa.eu, in MSExcel Format, (our IT tool does not allow processing of any other formats).Our IT tool does not allow processing of any other formats.** **The numbering of the reference refers to the sections** of the consultation paper on EIOPA's second set of advice to the European Commission on specific items in the Solvency II Delegated Regulation. Please indicate to which paragraph(s) your comment refers to.	
Reference	**Paragraph or other detailed reference**	**Comment**	
Initial Remark	Field testing	EIOPA launched the field-testing of the proposed new templates and of the templates which have been amended significantly while the public consultation was still running. Industry comments and remarks would therefore not be taken into	

		account. An analysis by EIOPA of the comments submitted by the industry to the proposed new templates should have been conducted before launching the field-testing exercise. Any comments made by participants in the field test should be read in conjunction with the comments made in this consultation.	
EIOPA Proposals	General Comments	General Comments to the EIOPA´s proposal to review the reporting package: • **Proportionality:** The waivers foreseen in Article 35(6) (7) of the Solvency II Directive should be made mandatory instead of optional. We welcome the proposed risk-based thresholds, however in their current form they will not represent a significant relief for undertakings. The proposed thresholds are too restrictive and they would not decrease the burden on insurance companies. Further risk-based thresholds, in addition to the ones proposed by EIOPA, should be developed; Furthermore, some of the new proposed risk-based thresholds should be improved so that they have an impact in terms of reducing the burden for insurers. • **Deadlines:** the current accelerating reporting deadlines imposed by Solvency II leads to an unwieldy administrative burden and ever-increasing compliance costs on insurers as each deadline change necessitates a re-design of their processes. Given that 2019 will mark the end of the transitional period foreseen in the Solvency II Directive, we would like to reiterate our position that the review of the accelerating deadlines needs to be prioritised, swiftly undertaken and that the implementation of its outcome should be made as soon as possible, not waiting for the end of the 2020 review of Solvency II.	

		• **Deleted QRTs:** We welcome the deletion of some of the templates but the deleted templates would not represent a big saving in terms of work. In order to lessen the burden for small and medium size undertakings, we propose that other non-core QRTs also be deleted. • **EIOPA is proposing additions and changes to many existing templates:** However, the industry had requested no changes in the design of the QRTs as already implemented. We request EIOPA to reassess whether the proposed small changes are really needed. • **New templates:** EIOPA's new proposals would require an enormous additional effort for insurers both in terms of human resources and changes in their IT systems. • **Proposed Changes to S.14.01 – Life Insurance Obligations:** Computing the best estimate at product level would be a very demanding exercise. • **New template on look-through:** We do not see the need for a reduced scope or for the inclusion of a new template for CIU which are under control of the reporting entity. We believe that few companies would fall in the scope of this template in any case; We query the usefulness of developing an additional template be for very few insurers. • **New template on non-life products**: The requested information would be very difficult to produce. The proposed template should be removed. • **New template on cyber risk:** Reporting on cyber risk may be justified for companies which develop a significant exposure. Instead of requesting a regular template, EIOPA could launch a thematic review.	

		• **Proposed Changes to Variation analysis templates:** We welcome the deletion of S.29.01 and S.29.02 and the proposed new templates S.29.05 and S.29.06 as the current proposals better reflect the actuarial practice in the analysis of Best Estimate movements. We also welcome the separation of the variation analysis template between life and non-life business. However, EIOPA’s Proposal for VA is more granular than the current templates. The current proposal should therefore be simplified. • **Solvency and Financial Condition Report (SCFR):** We welcome the proposal to split the report between the policyholder part and the professional part. However, for cooperatives/mutuals whose only stakeholders are the policyholders, EIOPA’s proposal for the policyholder part only should apply. • **External Audit:** AMICE members have strong concerns regarding EIOPA´s proposal to request an external audit of some of the Solvency II information. The Solvency II Directive should not require any form of external scrutiny or audit of Solvency II. • **Integrated Reporting:** In the current market practice there are many initiatives regarding the disclosure of all kind of relevant information from the (re-)insurer towards the various stakeholders. One example is the so called integrated reporting. This will enable stakeholders to have one comprehensive report in which all needed information is embedded in a logical manner. However, the SFCR has a mandatory content as required by Article 290 of Regulation 2015/35 (reference made to Annex XX). This Article should be changed to accommodate for all the envisaged improvements.	

General issues on Supervisory Reporting and Public Disclosure (EIOPA-BoS-019-300)			
Principle of Proportionality			
Principle of Proportionality	EIOPA Proposal - Blue Box	The provisions that allow Member States to exempt smaller undertakings from quarterly reporting are particularly important for many AMICE members. Most national supervisors have not to date implemented the proposed application thresholds (in terms of the market share covered) and only a handful of Member States apply the exemption. In this respect, we request EIOPA to reconsider our proposal to replace "may" in Article 35 6) and (7) to a "shall" and request Member States to grant an exception if the conditions are met. Risk-based thresholds We welcome the differentiation between core and non-core templates but further guidance is needed as to why EIOPA has not developed risk-based thresholds for core templates. The risk-based thresholds should be defined in a simple way so that it can calculated in a straightforward manner. The proposed thresholds are too restrictive and they would not decrease the burden on insurance companies. Further risk-based thresholds, in addition to the ones proposed by EIOPA, should be developed; Furthermore, some of the new proposed risk-based thresholds should be improved so that they have an impact in terms of reducing the burden for insurers. We request EIOPA to assess the suitability of the risk-based thresholds on a regular basis and to include the conclusions in EIOPA's "Report on the use of Limitations and Exemptions on reporting performed" as published in 2017 and 2018.	

Principle of Proportionality	Further alignment Pillar I and Pillar III	Following EIOPA's publication of its Supervisory Statement on the application of proportionality, an SCR sub-module is considered immaterial for the purposes of the SCR calculation when its amount is not relevant for the decision-making process or the judgement of the undertaking itself or the supervisory authorities. According to this principle, even if materiality needs to be assessed on a case-by-case basis, EIOPA recommends that materiality is assessed considering the weight of the sub-modules in the total BSCR and that each sub-module subject to this approach should not represent more than 5% of the BSCR or all sub-modules should not represent more than 10% of the BSCR. This should be recognized in the related QRTs and RSR.	
Deadlines			
Deadlines	EIOPA Advice (Blue Box)	The significant acceleration of deadlines for both annual and quarterly reporting submissions is not realistic, and it is particularly expensive and difficult as not only does the information have to be generated but the reports also need the approval of the insurers' administrative, management or supervisory body (AMSB) and in some jurisdictions need to be validated by external auditors before being submitted to the national competent authority. Moreover, the fact that the Implementing Technical Standards relating to supervisory reporting QRTs and public disclosure QRTs have been amended every year and that a new taxonomy laying out changes and corrections to the QRTs and log files has been implemented in shortened timescales, has endangered the possibility of improving the quality of the data submitted. Quarterly and annual reporting deadlines should be reviewed. The reporting deadlines	

		should be aligned with the reporting deadlines applicable for 2018. Furthermore, at the end of the transitional period there would be an overlap between the annual submission of the quantitative information (annual QRTs), the narrative information (both SFCR and RSR provided it is being submitted on an annual basis) and the quarterly QRTs (Q4 and Q1). In order to reduce the burden, insurers could be allowed to submit the quantitative information first and the different narrative reports could be submitted one month later.	
Deadlines	1.5.3 – Blue Box – EIOPA recommendation - Working days	We request EIOPA to reconsider our proposal to replace the reference to weeks by working days; As indicated in our comments to the Call for input, the fact that the reporting deadlines for quarterly submissions (5 weeks or 25 workings days to submit the quarterly information) have been translated into fixed submission dates for the whole European market, does not allow the possibility to take into account national holidays. This implies a reengineering of the whole reporting production process in order to cope with the reduced deadlines.	
Deadlines	1.5.3 – paragraph 76 – Working days	The statement in paragraph 76 pointing out that the change from weeks to working days would create a material misalignment of the reporting deadlines is exaggerated. The potential misalignment could be overcome by fixing the reporting deadlines for both annual and quarterly submissions taking into account the national holidays in all European Member States. If any jurisdiction in Europe has a public holiday in any of the months when data has to be submitted, those holidays would have to be taken into account when fixing the deadlines. This approach would ensure that the national holidays are taken into account and at the same time all	

		undertakings in Europe will be sending the information within the same deadlines.	
Deadlines	Deadlines quarterly reporting	The shortening of the deadlines is obliging insurers to resort more and more to proxies and simplifications in order to meet the required deadlines. The reporting deadlines could be aligned with the reporting deadlines applicable for 2018.	
Deadlines	1.5.3 – Reporting deadlines for financial reporting purposes - paragraph 72	The reporting deadlines for financial reporting purposes are particularly challenging. We believe that they should be part of the options considered by EIOPA. The information is normally scrutinized by the first, second and third line of defense. The internal governance procedures also take time which is inappropriately considered in the current timelines. The submission of the Financial Stability templates only 2 weeks after the solo quarterly reporting is very challenging. We request that the deadlines be extended by one week.	
Deadlines	Deadlines for Single SFCR – Section 1.5.3 – paragraph 72 –	As from 2019 onwards, the annual QRTs and narrative reports (if they apply) are required to be submitted within 14 weeks and the Solvency and Financial Condition Reports (SFCRs) must be available on the company's website on this date. Firms producing a Single SFCR will have to make it available within 14 weeks after the transitional period, thus being published before the group information is submitted to the supervisory authority. We urge EIOPA and the European Commission to propose a quick fix of the Solvency II Directive to address this problem and not to wait for the 2020 review of the Solvency II Directive. EIOPA´s proposal to keep one report but to define two audiences for the SFCR would not interfere with the proposed change in the Directive to modify the deadlines for the Single SFCR. The fact	

		that there would be two sections, one for policyholders and another one for professional users, would allow for the accommodation of the change in the Directive.	
Deadlines	Q4 Reporting	We would like to reiterate that we see some merits in the Q4 reporting as we understand the supervisory authorities are aiming at obtaining preliminary information about the insurer´s year-end figures. However, Q4 submissions fall in the middle of the year-end production figures and producing the requested figures is very challenging, particularly for small and medium sized undertakings. The Q4 reporting data are normally based on estimates which may have to be amended later in the process following some business/management decisions, findings from the external auditors or any other reason. Some insurers have to re-submit the Q4 figures to their supervisory authorities once the year-end reporting information has been finalised. In normal circumstances, Q3 data could be extrapolated to approximate what the Q4 submission would be. The removal of Q4 reporting requirements should not lead to an increase in ad-hoc reporting. The removal of Q4 for SMEs would provide more time and resources to dedicate to the annual and Q1 submissions.	
Individual Quantitative Reporting Templates (EIOPA-BoS-019-305) and Annexes (EIOPA-BoS-019-330 to 357)			
QRTs Review	General Comments	EIOPA has proposed a significant number of additions and changes to the QRTs; We had proposed an approach by which the templates which have already been implemented are not modified and only those which have already been identified as not useful for supervision, are removed from the reporting package. We propose that EIOPA reassess whether the suggested changes are really needed. We welcome the removal of some QRTs from the reporting package; However, we have concerns that the deleted QRTs are	

		kept in the taxonomy and the templates which have been removed would not represent a big saving in terms of work. We believe that EIOPA should be more ambitious in their analysis and that further templates should be deleted. EIOPA also proposes that some information be reported in more granular form; the granularity proposed would lead inevitably to more data quality issues.	
QRTs Review	S.01.02 – Basic Information – EIOPA Advice (Blue Box)	We agree with the proposed changes.	
QRTs Review	S.01.02 – Basic Information – Run-off business – EIOPA Advice (Blue Box)	The possibility that only part of the business is run-off business should be included. For example, several insurance undertakings write new business, but also own a 'run off-portfolio'. Further clarification would be needed as to whether this row would have to be selected or not.	
QRTs Review	S.01.02 – Basic Information – M&A during the period – EIOPA Advice (Blue Box)	M&A could be interpreted as only 'acquisitions', but disposals of activities should also be adressed. This can be solved by including 'and disposals' or by rewording the new row into 'acquisition or disposal of activities'. Furthermore, it could be indicated which threshold is to be used. For example, it is currently not clear whether the purchase of a small insurance portfolio should be regarded as 'M&A'.	
QRTs Review	S.02.01 – Balance Sheet – Proposed details on debts – EIOPA Advice (Blue Box)	EIOPA requests the inclusion of details of the residence of the institutions to which the debts are owed. We query why such detailed information is really needed. The contractual agreements between the insurance undertaking and the institution are the basis for the contractual obligations of the insurance undertaking (and therefore risks). The residence of	

		the institution is not relevant for the risks the insurance undertaking is facing.	
QRTs Review	S.02.01 – Balance sheet – Equity Investments	On the Balance Sheet, EIOPA differentiates within the equity investment between listed and unlisted equity despite this information not being used elsewhere. We propose that EIOPA remove this granularity and keep "equity investments" only.	
QRTs Review	S.02.01 – Balance sheet – Own Shares	On the Balance Sheet template, EIOPA defines "own shares" as assets and subsequently the same amount is deleted in the own funds' balance sheet. This approach increases the amount of the total balance sheet while not providing any added value and it is also not in line with accounting practices. We propose that the insurer´s own shares are deducted from the own funds and not separately presented as an asset.	
QRTs Review	S.02.01 – Balance sheet – Subordinated liabilities	On the Balance Sheet template any subordinated liability which is part of the basic own funds has to be reported as a liability. The subordinated liability part of the BOF is also added in other templates. This approach increases the balance sheet total, while not providing any added value. We propose that EIOPA excludes the subordinated liability information from S 02.01 and makes subsequent corrections in the other templates where relevant.	
QRTs Review	S.02.02 – Assets and Liabilities by currency – EIOPA Advice (Blue Box)	We agree with the proposed changes.	
QRTs Review	S.03.01 – Off balance sheet –	In general we agree with the changes as proposed. However, we query how the "maximum with an unlimited guarantee" would be calculated. The thresholds and subsequent	

	EIOPA Advice (Blue Box)	requirements for unlimited guarantees are always met as the guarantee is unlimited. To overcome this, we propose that the thresholds do not apply for unlimited guarantees and thus no Solvency II value is reported. Otherwise, we urge EIOPA to provide clear guidance as to how the maximum should be calculated for unlimited guarantees.	
QRTs Review	S.03.01 – Off balance sheet items – Proposed thresholds	Regarding the value of collateral held/pledged, we expect that the economic value at the reference date, and not the risk adjusted value, would have to be included. Could this clarification be clearly indicated in the final instructions?	
QRTs Review	S.03.01 – Off balance sheet items – Proposed thresholds	It is not clear on which basis the amount of guarantees and contingent liabilities needs to be included i.e. the Solvency II value or the maximum value? Furthermore, the thresholds of 1% of total Assets and 1.5% are rather low, and therefore it is highly likely that the thresholds will be met. As a result, the thresholds proposed do not limit the amount of work to be performed on reporting the guarantees and contingent liabilities. We propose an increase to the thresholds.	
QRTs Review	S.03.02 & S.03.03 - Off - balance sheet items - EIOPA Advice (Blue Box)	We agree with the amendments proposed by EIOPA.	
QRTs Review	S.04.01 – cross border business – EIOPA Advice (Blue Box)	EIOPA proposes to delete the existing templates for cross-border business (S.04.01, S.05.02, S.12.02, S.17.02) from the reporting package and replace these with a new approach of reporting templates that would consolidate the information requirement.	

		We do not agree with this proposal; the new cross-border template simply consolidates information requested in previous templates to a new one; however, some additional information is also requested. Some of the new information requested in the number of insureds and number of contracts by line of business and location is very difficult to produce. The proposed EIOPA template can be simplified as follows: • Thresholds should be introduced to avoid burdensome processes for insignificant cross-border activities should be introduced. This is key for smaller insurers, especially those doing business on the borders of different countries, otherwise filling in the template would be very burdensome as the information would not be directly available from the systems since it is not part of the core business, and costly as additional queries would be needed which would not be proportionate to the actual business volume. An example would further describe the issue; an entity insures horses on both sides of the border between two jurisdictions. Another example could be a policyholder who has a second home in another Member State but wants to remain insured with his/her local mutual. The cross-border business may not be material but it will be required to fill in the new cross-border template • The existing S.04.01 report has already been the subject of several questions which have been sent to EIOPA but that have not yet been answered; This has led to options being taken by insurers to feed the reporting. Please find below some of the questions: ○ Can EIOPA provide some clarity as to how the acceptances should be broken down?	

		○ Further guidance is needed as to the notion of country of location according to the different scenarios (i.e ceding or accepting company, FPS) • The integration of new data such as the "number of contracts" and the "number of insured persons" presents complexity and requires detailed and explicit instructions as to the very definition of these concepts; We request that this information be removed. • The new proposed QRTs should not be part of the public disclosure.	
QRTs Review	S.05.01 – Premiums, claims and expenses – EIOPA Advice (Blue Box)	EIOPA proposes to split the Gross written premiums by different distribution channels (i.e Direct business, Written via credit institutions, Written via other distributors). We query why such a split is needed when the risk is not related to excessive commissions on the gross premiums written by different distribution channels. As long as it is included in the Solvency II calculations, no unaddressed risks are foreseen.	
QRTs Review	S.05.01 – Premiums, claims and expenses – number of contracts and number of insured	Number of contracts and number of insured**:** We query the added value of requiring information on the items "Number of contracts", "Number of insured" in S.05.01, S.04.03 and S.14.01. We request the removal of these templates.	
QRTs Review	S.05.02 - Premiums, claims and expenses – by country –	See our comments to S.04.01.	

	EIOPA Advice (Blue Box)		
QRTs Review	S.06.01 – Summary of Assets – EIOPA Advice (Blue Box)	We agree with EIOPA’s proposal to delete this template.	
QRTs Review	S.06.02 – List of assets – Comment on proportionality	Submitting information on the list of assets on a quarterly basis is very burdensome, particularly for SMEs. Article 35 of the Solvency II Directive allows Member States to exempt up to 20% of the national market, however that exemption is only applied in a few jurisdictions; We therefore propose a threshold that exempts SMEs from submitting this template in the quarterly reporting when the insurer can justify that its portfolio does not contain complex products. The threshold would only apply to insurers not benefiting from the exemption in Article 35 of the Solvency II Directive.	
QRTs Review	S.06.02 – List of Assets – EIOPA Advice (Blue Box) – ECB add-on items	EIOPA proposes to include new ECB add-on items to the S.06.02 QRT. This appears to be in contradiction with the planned reduction of the ECB add-ons as mentioned in paragraph 23 of this consultation paper. Can EIOPA provide further clarification as to which ECB add-ons it plans to reduce?	
QRTs Review	S.06.02 – List of Assets – EIOPA Advice (Blue Box) – ECB add-on items	We welcome the aim to reduce the ECB add-ons. In case add-ons remain, please align the definitions with the Solvency II-reporting as much as possible. For example, in the current Q&A on the log files regarding ECB-reporting (S.06.02), it is stated "(“For the ECB reporting, Issuer Sector according to ESA 2010 should be reported also for loans and mortgages to individuals, as they are reported with CIC category 8. It can be reported always with the	

		option 11 – households and non-profit institutions serving households (ESA sector S.14 + ESA sector S.15)”. This implies that for ECB-reporting a revised S.06.02 needs to be generated.	
QRTs Review	S.06.02 – List of Assets – EIOPA Advice (Blue Box) - Additional data item on applicability of bail-in rules	EIOPA defines an additional data item on the applicability of bail-in rules following the implementation of the Bank Recovery and Resolution Directive. Further guidance is needed as to whether this item would have to be fulfilled not only when the entity subject to bail-in rules is the issuer but also when the entity is the custodian.	
QRTs Review	S.06.02 – List of Assets – EIOPA Advice (Blue Box) - RGLA	EIOPA proposes to add an additional item on RGLA. Adding this item to the CIC table should suffice.	
QRTs Review – Annex II	S.06.02 – List of Assets – Instructions - Annex II- Write-offs/write-downs (C0141)	EIOPA defines this new cell as the reduction in the “par amount” (C0140) of a loan due to its impairment. This refers to the reduction which occurred since the last reporting, i.e. the previous quarterly report in the case of quarterly reporting and the previous annual report in the case of annual reporting. The reduction should be expressed as a positive value. A reverse write-off (write-up) should be expressed as a negative value. Write-offs should be reported net of reverse write-offs (write-ups). The loan should be reported in this template for the period when the write-off occurs, even if the undertaking no longer records the loan as an asset.	

		Further guidance is needed as to when this cell C0141 should be implemented for the first time. Should this cell be applied for any new investments or is this to be applied retrospectively?	
QRTs Review	S.06.02 – List of Assets – EIOPA Advice (Blue Box) – Write-offs & Write downs	The ECB add-on regarding write-offs/write-downs does not give any additional information on the economic value as per reporting date. Therefore, including this info in the QRTs is not considered necessary.	
QRTs Review	S.06.02 – List of Assets – EIOPA Advice (Blue Box) – Write-offs & Write downs	The ECB add-on regarding write-offs/write-downs is not clear since it is not in line with the economic value principle (write-offs/write-downs are calculated only in case of an 'amortised cost' valuation). As long as the financial instrument still reflects any economic value as per reporting date the decrease in value in comparison to a prior period is a 'common' decrease in value. Therefore, we suggest deleting this cell from the QRT.	
QRTs Review	S.06.02 – List of Assets – EIOPA Advice (Blue Box) - Cryptocurrencies	EIOPA proposes to add a new field in the list of assets, something like "Investment linked to cryptocurrencies" (Yes/No/…). This field requires a narrow definition. The phrase 'linked to cryptocurrencies' is too broad. Are only (in)direct investments in cryptocurrencies to be included, or for example, also investments in brokers which trade in cryptocurrencies? We would prefer including this information as part of the CIC table rather than through the addition of new columns.	
QRTs Review	S.06.02 – List of Assets – EIOPA Advice (Blue Box) – LEI code	Submitting information on the LEI for each and every asset is very burdensome. Requiring an additional item regarding the LEI code of the Custodian would be very demanding for small and medium sized undertakings.	

QRTs Review	S.06.02 – List of Assets – EIOPA Advice (Blue Box) – CIC definitions	EIOPA proposes to clarify the CIC definitions of Government bonds by including "bonds that are fully, unconditionally and irrevocably guaranteed by the European Central Bank, Member States' central government and central banks"; We welcome this clarification.	
QRTs Review	S.06.02 – List of Assets – EIOPA Advice (Blue Box) – CIC definitions	Identify government bonds and corporate bonds with government guarantees issued in a different currency by adding a new CIC ##18 and amending the definitions of other CIC ##1# accordingly. We welcome this clarification.	
QRTs Review	S.06.02 – List of Assets – EIOPA Question to Stakeholders	**EIOPA would also like to collect stakeholders' views on the possibility of having a mandatory report of the item "Fund number", which is already applicable to assets held in ring fenced funds, and that should be widely used in the case of other internal funds, defined according to national markets, especially regarding funds (portfolios) supporting life products. A unique number (or code) assigned to each fund, used consistently over time, would allow a link between the information on assets, derivatives, look-through and the fund number reported in S.14.01.** Usually insurance undertakings do not categorise their assets by way of fund numbers. Therefore, the inclusion of a fund number in the QRT is artificial and does not provide any additional insights for the NCAs. While for RFF(s) there is a rationale to use a fund number, for other internal funds there is no such rationale. Assigning a fund number to individual investments would create a tremendous administrative burden and it would	

		not reflect the manner in which investments are managed. The proper matching of the insurance liabilities with the assets can be reviewed by other means, such as analysing how an insurance undertaking complies with the prudent person principle and how it performs its ALM.	
QRTs Review	S.06.03&S.06.04 – Look-through – EIOPA Advice (Blue Box)	We do not see the need for a reduced scope or for the inclusion of a new template for CIU which are under control of the reporting entity. We believe that few companies would fall in the scope of this template in any case; We query the usefulness of developing an additional template be for very few insurers. Nevertheless, further guidance is needed as to what "*having an influence on the investment strategy of the fund*" means in practice; We believe that in the case of an asset manager whose independence is safeguarded by financial market regulation, there cannot be a significant influence exercised by the insurance company over the investment strategy (for instance, dedicated CIU).	
QRTs Review	S.06.03 – Look-through template – General Comments	We appreciate that EIOPA proposes to increase the quarterly threshold from 30% to 50% however we believe that this template could be further simplified: • Additional proportionality considerations for the annual calculations should be introduced; • Moreover, Article 84 (3) of the Solvency II Delegated Acts allows firms to use data groupings for up to 20% of the total value of the assets. The template S.06.03 should be aligned with the Delegated Acts so that the same level of granularity is required.	

		• Further guidance is needed as to what “*having an influence on the investment strategy of the fund*” means in practice. ;(see previous answer)	
QRTs Review	S.06.04 – Look-through – EIOPA Advice (Blue Box)	EIOPA defines a new template S.06.04 where the undertaking has influence on the investment strategy or when the undertaking performs a full look-through of the collective investment undertaking or investments packaged as funds. We query whether developing a new regular template would be needed when only a limited amount of insurers would be impacted by this template. Further guidance is also needed as to what “*having an influence on the investment strategy of the fund*” means in practice (see previous answers);	
QRTs Review	S.06.03 & S.06.04 – EIOPA Advice (Blue Box) – General Comments	We welcome EIOPA’s formalisation of a process that was already accepted by some NSAs, i.e accepting asset look-through data that is up to a month out of date for quarterly reporting given the difficulty in obtaining look-through data within the timelines. However, a one month delay for CIU or other funds is not enough. Insurers may be obliged to request monthly information from the asset managers in order to fulfil this request. We propose extending the delay to three months with the inclusion of the requirement to qualitatively assess the need for an adjustment if circumstances so require. Moreover, it is unclear whether the allowance for one month out of date data would apply to S 06.03 only or whether it applies to both S 06.03 and S.06.04.	

QRTs Review	S.07 – Structured Products – EIOPA Advice (Blue Box) – General Comments	We agree with EIOPA's advice, however more clarity has to be provided regarding the instructions so that the template can be completed more easily.	
QRTs Review	S.08.01 - pen derivatives - – EIOPA Advice (Blue Box) – General Comments	We agree with EIOPA's advice.	
QRTs Review	S.09.01 - Income/gains and losses in the period- – EIOPA Advice (Blue Box) – General Comments	Solvency II is a prudential regime and it does not have a "profit or loss account". The requested information duplicates information already provided in the financial statements. We propose deleting this template.	
QRTs Review	S.11.01 – Assets held as collateral	We question the need to provide very detailed information regarding collaterals. The most relevant information is the economic value of the collateral, the type of the asset held as collateral, the counterparty and where the collateral is localised.	
QRTs Review	S.12.02 – EIOPA Advice (Blue Box) – General Comments	See our comments to S.04.01.	
QRTs Review	S.13 - Projection of future gross cash flows - EIOPA Advice (Blue Box)	EIOPA proposes to add a cell on "Total recoverables by LOB". Guidance is needed as to how reinsurance recoverables covering multiple LoBs would have to be treated.	

QRTs Review	S.13 - Projection of future gross cash flows – EIOPA Advice (Blue Box)	EIOPA proposes to split the "future benefits" into two components, “future guaranteed benefits” and “future discretionary benefits”. We query the added value of requesting further granularity. In any case a threshold should be introduced for when the item is not material.	
QRTs Review	S.14.01 - Life obligations analysis – cell C0040 - Number of contracts at the end of the year – EIOPA Advice (Blue Box)	EIOPA indicates that in case of inactive policyholders (no premium paid) the contract shall be reported anyway unless the contract is cancelled. Further guidance is needed as to whether the inactive policyholders have to be added with premium equal to zero or the last premium paid.	
QRTs Review	S.14.01 - Life obligations analysis – cell C0051 - number of contracts surrendered during the year – EIOPA Advice (Blue Box)	In Cell C0051 the “*number of contracts surrendered during year*” is required. However further clarification is needed as to whether contracts which have been partially surrendered would have also to be taken into account in this cell.	
QRTs Review	S.14.01 - Life obligations analysis – C0073 - administrative expenses –	The allocation of administrative expenses per product level is not currently available in companies and it would be very difficult to estimate. The allocation of administrative expenses at any level – either by product or by HRG or at any other level - is always challenging.	

	EIOPA Advice (Blue Box)		
QRTs Review	S.14.01 - Life obligations analysis – fiscal treatment – EIOPA Advice (Blue Box)	EIOPA proposes to include a new cell on the fiscal treatment (i.e Cell C0210) and apply a closed list. We query why this cell needs to be included. Even if it is, it is not clear, based on the collected information, how a change in fiscal treatment would have an impact on the insurance undertaking. Furthermore, an insurance undertaking would not be able to complete the requested information for all its policyholders. The cells can only be based on certain assumptions (e.g 'all policyholders are residents of the home country and have a taxable income'). Finally, we question whether EIOPA has concluded that this is an exhaustive list of all relevant fiscal treatments. For example, in one jurisdiction there is no fiscal impact at surrender when the policyholder has found a similar insurer willing to accept the contract. Under which heading is such an impact to be included?	
QRTs Review	S.14.01 - Life obligations analysis – C0074 - expected future premiums – EIOPA Advice (Blue Box)	EIOPA introduces two new cells C0074 and C0075 on Expected future premiums. Insurers do not calculate the Best Estimate by product but by Homogenous Risk Groups (HRG). The requested calculation would be extremely difficult if not impossible for most insurance companies.	
QRTs Review	S.14.01 - Life obligations analysis – C0075 - expected future premiums on new business –	EIOPA requests that this cell be populated with the effect of expected future premiums in the Best Estimate at product level. As indicated in the previous cell, insurers do not calculate the Best Estimate by product but by Homogenous Risk Groups (HRG). Companies assess the impact of new business in the Variation Analysis template, but the calculation is computed at HRG and not at product level.	

	EIOPA Advice (Blue Box)		
QRTs Review	**Question to Stakeholders:** Do you support the overall aim to streamline the different granularities of reporting within the templates in S.14.? (explanation: in its current version the first three templates are to be reported by product and the forth one by HRG, the question intends to reflect the preference for aligning the granularity across these templates, but acknowledging the challenges – see also above)	Version 2 seems to request insurers to recalculate the Best Estimate by product whereas version 1 of the same template (i.e S.14) requests the Best Estimate calculated as a whole, capital-at-risk, surrender value, annualized guarantee rate and exit conditions by Homogeneous Risk Group. We would prefer EIOPA keeps the HRG-related tables as it would be very difficult to calculate the Best Estimate at product level.	

New Non-life template			
QRTs Review	New NL template similar to S.14 – General Comments	The Solvency II reporting package contains a significant number of QRTs which collect non-life information. We query the added value of the new proposed information on non-life products. when the risk management and even the tarification process are not conducted at this level ? Further guidance is needed as to what is meant by product. For example, in Motor insurance there can be loads of cohorts of products or old products which are not sold anymore but which still exist because of the renewals. It will therefore be extremely difficult to produce the information at the requested granularity level.	
QRTs Review	New NL template similar to S.14 – Annex XXVI	The instructions indicate that columns C0170 to C0210 shall be reported by homogenous risk group, however those columns cannot be found in EIOPA´s Proposal for Instructions nor in the proposed QRTs.	
QRTs Review	New NL template similar to S.14 Characteristics of product - Columns C0010 to C0080	EIOPA indicates that the columns C0010 to C0080 shall be reported by product but it is not clearly defined what it is meant by "product"; If EIOPA wishes to obtain the information by "commercial product" (*EIOPA is defining C0120 "Product denomination" as the commercial name of product - undertaking-specific*) this would require an enormous amount of work for undertakings. Insurers generally have a significant number of non-life products and reporting all of these would be very burdensome and costly for undertakings.	
QRTs Review	New NL template similar to S.14 Characteristics of product - Columns C0030 – Line of Business	Non-life products are normally unbundled across different lines of business (LoBs). The requirements to insert a line for each of the LoB where the different components of the product have been allocated, would be extremely burdensome and demanding for companies.	

QRTs Review	S.15.01 - Description of the guarantees of variable annuities EIOPA – EIOPA Advice (Blue Box)	EIOPA proposes to delete this template. We agree with EIOPA's proposal.	
QRTs Review	S.15.02 - Hedging of guarantees of variable annuities – EIOPA Advice (Blue Box)	EIOPA proposes to delete this template. We agree with EIOPA's proposal.	
QRTs Review	S.16.01 - Information on annuities stemming from Non-Life Insurance obligations - Question to Stakeholders	**Regarding the threshold, concrete views from stakeholders are welcomed on how to revise it in order not to create a more complex system than the one in place today unless it really reduces the burden of reporting** We propose that this template not be reported when the best estimate on the annuities stemming from non-life insurance obligations is less than 10% of the total amount of best estimate. This threshold would be in line with the one proposed for S.19.01, S.20.01 and S.21.01	
QRTs Review	S.17.01 - Non-Life Technical Provisions - – EIOPA Advice (Blue Box)	EIOPA proposes to simplify the quarterly template S.17.01 by deleting the information on the transitional measures. We agree with this proposal.	
QRTs Review	S.17.02 – Non-life technical	see our comments to S.04.01	

	provisions by country – EIOPA Advice (Blue Box)		
QRTs Review	S.19.01 - Non-life insurance claims – EIOPA Advice (Blue Box)	The lines of business which are less material are those which are generally not integrated in the systems and to retrieve the information requested for these non-material lines of business is very time consuming. We therefore welcome EIOPA's proposal to introduce a threshold for this template but the proposed threshold is still very high and it would not exempt the reporting of non-material LoBs; Moreover, as EIOPA deems this template to be a Non-Core QRT, there is no need for such a high threshold. We suggest lowering this threshold so that it represents 80% of the Total Best Estimate; EIOPA could align this threshold with the one from the public QRTs in the SFCR which allows only major LoBs to be reported.	
QRTs Review	S.20.01 - Development of the distribution of the claims incurred – EIOPA Advice (Blue Box)	As for S.19, we welcome EIOPA's proposal to introduce a threshold for this template but the proposed threshold is still very high and it would not exempt the reporting of non-material LoBs; Since EIOPA deems this template to be a Non-Core QRT,there is no need for such a high threshold.We suggest lowering this threshold so that it represents 80% of the total best estimate.	
QRTs Review	S.21.01- Development of the distribution of the claims incurred – EIOPA Advice (Blue Box)	We welcome EIOPA's proposal to introduce a threshold for this template but the proposed threshold is still vey high and it would not exempt the reporting of non-material LoBs; since EIOPA deems this template to be a Non-Core QRT, there is no need for such a high threshold. We suggest lowering this threshold so that it represents 80% of the total best estimate.	

QRTs Review	S.23.02 - Detailed information by tiers on own funds – General Comments	EIOPA proposes replacing the existing table on the reconciliation between local GAAP and Solvency II by a "simpler" table. However, the proposed changes allow two major subgroups to be separated: • A part relating to the statutory accounts ; • A part relating to the differences in revaluation between statutory accounts and Solvency II. The changes to the template and instructions would have to be provided before being able to give an educated and final opinion on the proposed amendments. In any case, and based on the information provided, we disagree with the proposal made by EIOPA. In our opinion the requested information does not provide any additional insights on the own funds which are not already submitted either as part of the RSR or in the other templates. Moreover, EIOPA's proposal would require insurers to derive the own funds from their financial statements rather than from the movement in own funds based on economic principles. EIOPA could obtain this information (i.e. movements in own funds based on accounting principles) from the insurers' financial statements. Finally, EIOPA introduces a sequential process to complete this template; insurers would have to fill in the financial statements first and only then could the Solvency II information be inserted. This process would very burdensome for small and medium sized companies as they are not always able to prepare the financial statements within the timelines required for submitting the Solvency II QRTs.	
QRTs Review	S.23.02 - Detailed information by	The suggested table for the reconciliation between the own funds from the financial statements and the own funds from the Solvency II balance sheet gives rise to the following questions:	

	tiers on own fund – EIOPA Advice (Blue Box)	- The first subtotal includes the retained earnings, whereas in the second subtotal deferred tax assets are included. However, the deferred tax assets are already part of the retained earnings; Including them again in the second subtotal would result in a double counting of DTAs. - The proposed change aims to have an overall breakdown of own funds from the financial statements adjusted for Solvency II valuation differences. Therefore, we would have to assume that cell 'R0640/C0120 Other' cannot be used anymore and a cell reflecting the change in value of the own shares would have to be added; When the own shares are not part of the own funds from the financial statements (which is the case for the financial statements prepared under IFRS principles) this cell will then represent the total economic value of the own shares. - The other valuation differences only describe the effect of the Solvency II financial statement difference on the deferred tax assets and subordinated liabilities. We assume that the cell 'R0620 Excess of assets over liabilities – attribution of valuation differences –Difference in the valuation of other liabilities' would remain. In the current proposal the change in a deferred tax liability should be then recorded in R0620. It seems preferable to include it in the cell reflecting the change in the deferred tax asset, in order to combine the total effect in the change of the deferred tax position in one cell. - In order to prevent any misunderstanding, please include in the final guidance on 'R0600/C0110 Excess of assets over liabilities – attribution of valuation differences –Difference in the valuation of assets' the comment that these assets do not include deferred tax assets.	

QRTs Review	S.23.03 - Annual movements on own funds - EIOPA Advice (Blue Box)	EIOPA proposes not to change template S.23.03 and introduce a risk-based threshold as follows: "*Template is due only when sum of notional movements is higher than 10% of the own funds amount at the beginning of the year";* We support the introduction of a threshold which would exempt a significant amount of companies, however, we query the intended use of this template for prudential supervision. We believe that this template is in any case of limited use and it should be deleted.	
QRTs Review	S.23.04 - List of items on own funds - EIOPA Advice (Blue Box)	See our comments to the previous template. We believe that this template is of limited use and it should be deleted.	
QRTs Review	S.23.04 - List of items on own funds - EIOPA Advice (Blue Box)	We agree with EIOPA's proposal.	
QRTs Review	S.24.01 – Participations held - EIOPA Advice (Blue Box)	We agree with EIOPA's proposal.	
QRTs Review	Own Funds – Subordinated liabilities	The information on subordinated liabilities has to be reported in different own funds templates. We request that EIOPA consolidates all the related information in one single template.	
New template on Internal Models			

QRTs Review	S.25 – Internal Model – General Comments	We understand the need for comparability across the various markets and therefore the urge to obtain standard formula outcomes for all risks. However, an insurance company would optimise their ALM based on the risk/return following the models used. If a (partial) internal model is used, a different optimisation exists compared to when the standard formula is used. A comparison would always fail because of this. Some supervisors ask for the so called "drift ratio". This ratio aims at capturing the differences in the outcomes between the standard formula and (partial) internal models. The "drift ratio" also captures the movement of exposures which are treated differently in the internal model and the standard formula. Although the standard formula is considered to be the fall-back scenario as soon as an internal model is not "fit for use" a mandatory requirement embedded in the Solvency II Directive is not needed (See comment below). Supervisors are generally concerned that internal models generate less and less capital requirements. However, internal models are designed to capture the risk profile of the insurer in an appropriate manner.	
QRTs Review	S.25 – Internal Model – General Comments – EIOPA Advice (Blue Box)	EIOPA proposes that templates S.26 and S.27 be completed with standard formula data by undertakings using an internal model. EIOPA explains that this data will facilitate comparison between the standard formula and internal model solvency capital requirements (SCR). EIOPA notes that several NCAs already request such data. Any proposal to extend the requirement to submit both the standard formula and internal model calculation would require first a change to Article 112(7) of the Solvency II Directive as indicated in EIOPA's Advice.	

QRTs Review	S.25 – Internal Model – Paragraph 318	In paragraph 318 of this consultation paper, EIOPA states that the interest assumptions in the internal model would have an impact on EPIFP; However, the Best Estimate is required to be calculated based on the relevant risk-free interest rate curve published by EIOPA and endorsed by the European Commission irrespectively of the use of an internal model or the standard formula.	
QRTs Review	S.25 – Internal Model – General Comments	The additional information requested by EIOPA would be very burdensome to collect. Moreover, it has already been requested in the application phase of the internal model. Internal model users are already required to have a PLAT on a yearly basis, which can be submitted at the request of the supervisory authorities. EIOPA also publishes benchmark studies for market risk on a yearly basis which capture very similar information. We do not see the need to report further information on internal models.	
QRTs Review	Internal Models – Annex XIII to Annex XVIII	EIOPA asks for a split (this is also done for other risk types) between interest rate risk and interest rate volatility risk. However, not all internal models are modelled in such a manner that these risks can be isolated. EIOPA’s request should not lead to changes being required in internal models. Therefore there should be a possibility to disregard those cells provided the internal model does not accommodate such a split. The same comments apply to the split requested within credit spread and equity risk. EIOPA seems to be using Black and Scholes volatility shocks in the sensitivity analysis. However, not all internal model users apply this type of shock. Others could use “normal vols” which	

		would generate divergencies. EIOPA should acknowledge this and allow for this difference. Furthermore, EIOPA should explain all its requests in a more explicit manner and apply clearer definitions as to what is expected and how the terminology and methodology is defined. The proposed templates should encompass more flexibility to allow for the differences in the methodological components of the various internal models.	
QRTs Review	S.28.01 MCR – EIOPA Advice (Blue Box)	We agree with EIOPA's advice.	
QRTs Review	S.28.02 MCR – EIOPA Advice (Blue Box)	We agree with EIOPA's advice.	
Variation analysis General			
QRTs Review	Variation analysis - General Comments EIOPA Advice (Blue Box)	We welcome the deletion of S.29.01 and S.29.02. We agree that the current proposals better reflect the actuarial practice in the analysis of Best Estimate movements. We welcome the separation of the variation between life and non-life business. However, EIOPA's Proposal for VA is more granular than the current template and it should be significantly simplified.	
Variation analysis Life			
QRTs Review	Variation analysis– Life S.29.05 Templates – Proposals for simplification	We would like to put forward several ways to simplify the proposed variation analysis for the life business S.29.05: ▪ S.29.05.01 & 02 - Deviation between actual and expected benefits: There is no need to split by type of benefits (ie survival, mortality, disability, reactivation benefits, health cost and unconditional benefits); a single line of actual and expected benefits would suffice.	

		▪ S.29.05.03: There is no need to split the impact by type of technical assumptions. A single line for all technical assumptions would suffice.
		▪ Information about total cashflows could be simplified as follows:
		    ▪ S.29.05.04: Table "influence of reinsurance" could be simplified (i.e expected and actual incoming and outgoing cashflows with no further split)
		    ▪ S.29.05.05: Table "influence of lapses" could be removed
		    ▪ S.29.05.06: Table "new business" could be simplified
		▪ S.29.05.07: Last table could be removed. This table does not provide any useful information.	

QRTs Review	Variation analysis S.29.05 Non/Life and S.29.06 Life – General Comments	The proposed changed VA templates are the answer to "*enhanced monitoring against market-wide under-reserving*" according to paragraph 7 and 8. However, we question whether this would be achieved with the too-granular data request as put forward in the proposal for the S.29.05 and S.29 06. Under-reserving can only be seen if the actual premiums, which are requested, are reconciled with the claims and benefits payable from a specific contract or cohort of contracts. This analysis has to be followed for several years in order to experience a trend and be able to provide any good conclusions. In a template like the one proposed by EIOPA, this would be very burdensome to do. A thematic data call could be done if needed (see also the response to EIOPA´s Discussion Paper on Macroprudential tools). Furthermore, a market-wide under-reserving analysis can only apply at Member State level. And the costs of completing these templates will outweigh the	

		possible benefits that it could bring; Macro-wide under-reserving, if it exists at all, is an issue to be dealt with by the local supervisor. They would have a view as to whether premiums are too low and/or best estimates are too low and would act accordingly (react to remediate the situation).	
QRTs Review	Variation analysis templates – S.29.05 – Life – General Comments	We welcome the separation of the variation analysis templates between life and non-life business and the development of a specific template for life business. We would like to reiterate that the current proposal better reflects the actuarial practice in the analysis of Best Estimate movements for the life business. However, EIOPA is proposing more tables than in the current version, more specifically seven different tables to be filled in and the requested information is in more granular form: • The expected benefits are currently being reported on an aggregated form but EIOPA proposes that this new template include a split between living, mortality, disability, reactivation benefits, health costs and unconditional benefits. • On the impact of non-economic assumptions (i.e third table -S.29.05.03 change of the assumptions at closing date) EIOPA is requesting the impact of each technical assumption. In the current Variation Analysis QRT all changes are being analysed together. For non-economic assumptions there is one line only whereas in EIOPA´s proposal there is one line for each assumption (e.g. changes mortality tables covering longevity risk, changes mortality tables covering mortality risk, changes of the biometric tables covering health cost).	

		We believe that the proposed variation analysis template for life business should either be removed or significantly simplified.
		The template could be simplified as follows:
		▪ Third table - S.29.05.03: There is no need to split the impact by type of technical assumptions; One line with the impact of all technical assumptions would suffice.
		▪ Information about total cashflows:
		    ▪ S.29.05.04: Table "influence of reinsurance" could be simplified (i.e. expected and actual incoming and outgoing cashflows with no further split)
		    ▪ S.29.05.05: Table "influence of lapses" could be removed. We do not see the added value of this template.
		    ▪ S.29.05.06: Table "new business" could be simplified
		▪ S.29.05.07: Last table could be removed. This table does not provide any useful information	

QRTs Review	Variation analysis templates – S.29.05 – Life - Cell C0010-C0020/R0020	Cell C0010-C0020/R0020 is not consistent with the text presented in S.29.05.01 C0010/R0030. The same applies to C0010-C0020/R0030 with cell C0010/R0040 of S.29.05.01.	
QRTs Review	Variation analysis templates – S.29.05 –Life – First Table – Business in force at opening date – Comparison of actual and expected	EIOPA introduces a new cell "Interest according to the RFR and its components (for example MA/VA) at opening date on the BECE +/- expected benefits/premiums in advance (according to calculation of BE of surrendered contracts as well as remaining business)" Further clarity is needed as to the information required in this cell. The reference to the opening date seems to indicate that the unwinding of the discount rate is not required here.	

	development - New Cell Interest according to the RFR and its components (for example MA/VA) at opening date on the BECE +/- expected benefits/premiums in advance		
QRTs Review	Variation analysis templates – S.29.05 –Life – First Table – Business in force at opening date – Comparison of actual and expected development – - Expected costs	EIOPA indicated that firms would have to provide all types of costs (excluding investment expenses) which are expected to be paid during the period; Further guidance is needed as to whether EIOPA is referring to all costs as from the opening (i.e the insurer is at t=0 and will calculate the costs incurred until t=1).	
QRTs Review	Variation analysis templates – S.29.05 – Life - Actual Costs (including all type of costs from both: existing and new business except investment	Our interpretation is that the information requested in this cell is the same as the one required in the previous cell (i.e. Expected Costs) but based on a present value. Can EIOPA confirm this interpretation?	

	expenses)		
QRTs Review	Variation analysis templates – S.29.05 – Life - Expected living benefits current year / Actual living benefits	The terminology "living" is not currently used. Further guidance is needed as to what is meant by "living". We understand that EIOPA could be referring here to the benefits on survival or any benefits which are paid on survival. If this assumption is correct, we would suggest that the term "living" is replaced by "survival".	
QRTs Review	Variation analysis templates – S.29.05 – Life - Expected Health costs (SLT health)	Further clarification is needed as to what it is meant by expected health costs; Are the expected health costs the best estimate of health benefits? If yes, are the health benefits with or without expenses? Regarding the expenses, EIOPA should be aware that it would be very difficult to split expenses between current year and prior years;	
QRTs Review	Variation analysis templates – S.29.05 – Life - Actual Health costs (SLT health) of the current year	The explanatory text of this cell is identical to the previous cell "expected health costs". The text would have to be amended.	
QRTs Review	Variation analysis templates – S.29.05 – Life - Expected Unconditional benefits (e.g. from products without biometric assumptions)	EIOPA proposes to split between contracts with biometric assumptions and contracts without biometric assumptions. These contracts are classified as with-profit contracts LoB and are not split into different LoBs. The "with-profit" category comprises contracts with conditional benefits and contracts with unconditional benefits. There is no reason for this split.	

QRTs Review	Variation analysis templates – S.29.05 – Life - Actual Unconditional benefits	No definition is provided for this cell. Please add	
QRTs Review	Variation analysis templates – S.29.05.03 – Life - Variation of the BECE due to changes of the cost charges based on the closing date	Further guidance is needed as to what it is meant by "cost charges based on the closing date". Would this mean that the insurer would have to recalculate the BECE with the previous cost charge assumption and the current cost charge assumption and to assess the impact?	
QRTs Review	Variation analysis templates – S.29.05.01.03 – Life -Variation of the BECE due to reinsurance contracts underwritten during the year (C0070/R0270)	No definition is provided for this cell. We query why the impact of the reinsurance underwritten during the year is relevant here when the other cells in the table are requested gross of reinsurance. The reinsurance contracts underwritten during the year should not affect the gross figure.	
QRTs Review	Variation analysis templates –	No explanatory text is provided: please add	

	S.29.05.03 – Life -Third table – change of the assumptions at closing date (C0070/R0260)		
QRTs Review	Variation analysis templates – S.29.05.03 – Life -Third table – change of the assumptions at closing date (C0070/R0270)	No explanatory text is provided: please add	
QRTs Review	Variation analysis templates – S.29.05.03 – Life -Third table – change of the assumptions at closing date (C0070/R0300)	No explanatory text is being provided: please add	
QRTs Review	Variation analysis templates – S.29.05.03 – Life -Third table – change of the assumptions at	No explanatory text is being provided: please add	

	closing date (C0070/R0310)		
QRTs Review	Variation analysis templates – S.29.05.01.04 – Life -Fourth table - influence of reinsurance	We understand that this template is about cashflows. We query why such level of detail is necessary. This template could be easily simplified by keeping the split between actual and expected but aggregating the cashflows for incoming and outcoming cashflows.	
QRTs Review	Variation analysis templates – S.29.05.01.04 – Life -Fourth table - influence of reinsurance Cell C0090/R340	No explanatory text is provided: please add	
QRTs Review	Variation analysis templates – S.29.05.01.04 – Life -Fourth table - influence of reinsurance Cell C0090/R350	No explanatory text is provided: please add	
QRTs Review	Variation analysis templates – S.29.05.01.04 – Life -Fourth table - influence of reinsurance Cell C0090/R370	No explanatory text is provided: please add	

QRTs Review	Variation analysis templates – S.29.05.01.04 – Life -Fourth table - influence of reinsurance Cell C0090/R380	No explanatory text is provided: please add	
Variation Analysis Non-Life			
QRTs Review	Variation analysis templates – S.29.06 – Non life - General Comments (second part)	We suggest that EIOPA makes a clearer link between the items in table 1 of S.29.06 and those that are detailed in table 2, table 3 and table 4. In some cases, there is not a one to one relation; it would therefore be extremely useful if EIOPA could indicate how to reconcile the first table with the other tables.	
QRTs Review	Variation analysis templates – S.29.06 – Non life - Instructions – Analysis of undiscounted movements – Removal of future premium on past business at the opening date	In the table "<u>Analysis of undiscounted movements - analysis per AY/UWY if applicable</u>" EIOPA introduces a new cell "Removal of future premium on past business at the opening date". Guidance is needed as to the intended purpose of such removal. Moreover, the instructions define this cell as the *Amount of future premiums as reported in S.18.01 C0070 and S.13.01 on annuities stemming from Non-life at year N-1 on an aggregated level for the corresponding LoB.* We believe there is a typo and it should be read as follows: "*Amount of future premiums as reported in S.13.01 and S.18.01 on annuities stemming from Non-life at year N-1*".	
QRTs Review	Variation analysis templates – S.29.06 – Non life - Instructions	<u>Undiscounted annuity claims provision set up during the period prior AY</u> For non-life contracts that pay the benefits as an annuity, a provision is not set up. There is no provision if there is no claim;	

	– Analysis of undiscounted movements – Undiscounted annuity claims provision set up during the period prior AY/	EIOPA is requesting here to set aside a claims provision as if it was a life annuity. In non-life business, when a claim occurs, the amount is passed onto the life business but if the claim does not occur, the insurer does not set aside any claim provision. The exception would be for the Worker´s Compensation LoB. Clarification is needed as to whether this cell would have to be filled in for WC LoB only.	
QRTs Review	S.30s – Reinsurance templates – EIOPA Advice (Blue Box)	EIOPA proposes to reduce the scope of the templates to the overall 20 largest facultative reinsurance exposures plus the largest two in each line of business if not covered by the largest 20 (in line with template S.21.02); We understand that the proposed approach would simplify the process. Further guidance is needed as to whether EIOPA is referring to a completed facultative treaty or also to tranches of a facultative treaty.	
Reinsurance			
QRTs Review	S.30s – Reinsurance templates – General Comments – EIOPA Advice (Blue Box)	The set of reinsurance templates are very granular and it is difficult to understand why such level of detail is really needed. The rationale for such granularity is not provided in EIOPA´s consultation paper. We reiterate that more clarity is needed as to the purpose of these templates for prudential supervision. The reinsurance templates together with the variation analysis templates are the ones which are most burdensome for our small and medium sized membership. We therefore very much welcome the introduction of a threshold for reinsurance templates; However the defined threshold of 1% ratio of recoverables over best estimate is too low. We would suggest an increase in the threshold to 10%.	

		EIOPA defines the risk-based threshold as the ratio of recoverables over best estimate that is, for any line of business, higher than 1% and the Total Non-life catastrophe risk after diversification after risk mitigation is lower than 70% of the amount after risk mitigation. We believe that there is a typo in the definition; we believe the risk-based threshold should be read as follows: The ratio of recoverables over best estimate is, for any line of business, higher than 1% and the Total Non-life catastrophe risk after diversification after risk mitigation is lower than 70% of the amount ~~after~~ before risk mitigation. We understand that the two conditions would have to be fulfilled in order to be exempted. However, the proposed threshold would not work for proportional covers.	
QRTs Review	S.30.01 - Reinsurance templates	We welcome EIOPA´s proposal to delete cells C0180 and C0330 related to commissions.	
QRTs Review	S.30.01 - Reinsurance templates	EIOPA is proposing a replacement of cell C0040 by a cell with the description of operation of the facultative reinsurance item (e.g. how to apply this cover). Further guidance is needed as to whether EIOPA would propose a free text or a closed list. We would prefer a closed list.	
QRTs Review	S.30.02 - Reinsurance templates - Facultative covers - Shares	We welcome the proposal for the deletion of the broker info (i.e. cells C0370/C0380/C0390).	
QRTs Review	S.30.03 - Reinsurance	EIOPA proposes to add a field to address the coverage of a layer; EIOPA adds that it might not always be fully (100%)	

	templates - Outgoing Reinsurance Program in the next reporting year – Basic – EIOPA's Proposal coverage of a layer	covered by reinsurance; Such information might be difficult to extract.	
QRTs Review	S.30.03 - Reinsurance templates – Outgoing Reinsurance Program in the next reporting year – Basic – EIOPA's Proposal order of claims	EIOPA proposes to add a field to address the order of claims within the reinsurance program. Further guidance is needed on the information to be reported in this cell.	
QRTs Review	S.30.03 - Reinsurance templates - Outgoing Reinsurance Program in the next reporting year – Basic – EIOPA's Proposal	EIOPA proposes to add a field to report the minimum and maximum and the expected commission (i.e "Add field to report the minimum and maximum and the expected commission") - and it also proposes to delete the fields C0270 to C0350 (i.e details on reinsurance commissions). EIOPA seems to be proposing to delete all cells from C0270 to C0350 and to add C0270&C0280&C0290 when it proposes to add the field on the minimum reinsurance commission (C0270), minimum reinsurance commission (C0280) and the expected commission (C0290); Further clarification is therefore needed.	
QRTs Review	S.30.04 – Reinsurance templates -	We welcome EIOPA´s proposal to delete the broker info (C0070/C0090/C0270/C0290) in S.30.04. However the cell C0080 does not seem to be deleted; Keeping C0080 "Type of	

	Outgoing Reinsurance Program in the next reporting year – Shares – EIOPA's Proposal	code broker" and deleting C0070 and C0090 would not make sense. We propose that EIOPA also delete cell C0080.	
New template on Cyber risk			
QRTs Review	New template – Cyber risk – General Comments	Establishing a common terminology for cyber risk is imperative for firms in quantifying and managing their cyber risk exposures. One common problem is the use of the term 'cyber risk' to refer to what in fact is a threat, rather than a risk. The risks caused by cyber threats are of types that are already known – for example, reputational damage, business interruption, theft and fraud. We believe that the impact of cyber risk on insurance will vary a lot across the industry; We do not think that cyber risk constitutes a new line of business. It will represent either property, surety or liability risk and can be handled in a conventional matter. It is just a new nature of risk exposure; this should be covered in the ORSA. We do not see the public benefit of a specific and detailed supervisory reporting on this topic. We believe that cyber risk could be part of a thematic review similar to the one launched by EIOPA aimed at better understanding travel insurance products, Reporting on cyber risk may be justified for companies which develop a significant exposure. An overall threshold on premium income and / or MPL should apply for the mandatory reporting of the template (as already proposed by EIOPA for several existing QRTs in the consultation paper on supervisory reporting). • Detailed reporting should be limited to affirmative cyber exposure within industrial or commercial lines. It may be sufficient to report on the top risks in detail and the	

		overall risk in aggregate. The restriction on top risks and aggregated reporting of overall risk is already good practice in the existing QRTs S.21.02 and S.21.03 and sufficient for cyber risk. • Non-affirmative cyber risk on commercial and industrial lines should be reported on an aggregated basis if it exceeds a certain MPL threshold. The MPL could be demonstrated in the ORSA or RSR. • Non-affirmative cyber risk on private line business should not be reported at all; it should be sufficient to cover the risk in the ORSA • Affirmative cyber risk on private line business should be reported on an aggregated basis only, provided it exceeds a certain MPL threshold. There is a huge number of relatively small risks so that the risk is more of a cumulative nature which is completely captured by aggregated reporting. If the threshold is not met, it should be handled in the ORSA only"	
QRTs Review	New template – Cyber risk – Question to Stakeholders	**Stakeholders are invited to comment on the proposal, in particular on the level of granularity they see as feasible to report good quality data on cyber underwriting or on defining a specific LoB in Solvency II.** The proposed template is too granular and too detailed in order to be able to report good quality data (see our comments below).	
QRTs Review	New template – Cyber risk – Cell C0050	In cell C0050 the insurer would have to choose one LoB in which to report cyber risk; however, there should be an allowance for multiple LoBs where deemed appropriate or alternatively EIOPA	

		should provide guidance as to how a single LoB should be chosen.	
QRTs Review	New template – Cyber risk – Cells C0070 and C0080	Cells C0070 "Validity period (start date)" and C0080 "Validity period (end date)" are too burdensome to be filled in. We query how an insurer would implement those cells when contracts can start at any calendar day; this could result in 260 or more rows to be inserted. And if EIOPA refers to "start cover" instead, this would also result in many entries. We suggest that EIOPA delete these two cells, i.e C0070 and C0080 or alternatively indicate that the Validity period (start date) should be 01/01/N for 31/12/N closing date and the Validity period (end date) should be 31/12/N for 31/12/N closing date.	
QRTs Review	New template – Cyber risk – Net retention of insurer – C0150	Further guidance is needed as to what it is meant by "Net retention of insurer" Does it mean after reinsurance or is it a contractual limit of guarantee ?	
New template on Internal Models			
QRTs Review	New template – Internal Model change – General Comments	The new proposed template on internal model change requests too granular information. In our opinion, cells C0020-C0040, C0140, C0160, C0180 and an aggregation of C0230 &C0240 should be sufficient. Major and minor model changes follow a distinct and endorsed process for obtaining the approval of the supervisory authorities concerned. For each minor change, EIOPA is requesting that insurers recompute the impact. During the year there are minor changes but if these become a major change or if there is an approval during the year of the accumulation of minor changes, there is a reset date and there is no need to recalculate the impact of these minor changes. But for EIOPA that approval	

		never happened as the company would have to report the impact of minor changes occurred during the year, no matter whether there have been a major change due to the accumulation of minor changes during the year, or not. The process proposed by EIOPA would be very complex as insurers would have to recalculate the impact of minor changes. It is therefore key that the period considered for the accumulation of minor changes is not different from the one determined by the insurer’s internal model change policy. We reiterate that this QRT should not duplicate the information already provided to the individual supervisory authorities on internal models. Otherwise, the required information would double the administrative burden.	
QRTs Review	New template – Internal Model change – Cells C0110	In cell C0110 EIOPA introduces a new risk type named "pension risk". We query why this is not in line with the Solvency II standard formula taxonomy. Although pension risk may be recognised by some insurers, it should not be introduced as a general feature.	
QRTs Review	New template – Internal Model change – Cells C0060 and C0070	The is no clear rationale for the information requested in cells C0060 and C0070. Basically, we see no rationale for EIOPA's statement *"Also the template breaks down each major change to its subcomponents and the risk areas impacted. Minor changes are reported as an aggregate and also changes to the MCP are listed."* We query how this would be consistent with the whole process of obtaining approval and the supervisory review process already in place. Moreover, the split into the sub components is arbitrary.	
SFCR and Narrative Reporting			

SFCR Disclosure	One report two addressees – EIOPA Advice (Blue Box)	EIOPA's proposal to keep the SFCR as one report and two audiences is an improvement compared to the current situation and we welcome this proposal; however we would encourage EIOPA to be more ambitious and allow SMEs/mutuals to publish the SFCR addressed to policyholders only; An SME or mutual insurer which has no "*rating*" and no "*listed debt instrument*" and operates locally or nationally, has different stakeholders to a large financial conglomerate with listed equities and multiple ratings. The former's main stakeholder is its policyholders only while the latter would have multiple stakeholders. The content of EIOPA's proposal for the policyholder part contains information on the undertaking's business and performance, the undertaking's system of governance and quantitative information about the solvency position of the insurer. This information is already comprehensive and sufficient for most policyholders.; For the general policyholder the information required in the professional users report is too detailed. Policyholders would be interested in learning whether the insurer would be able to pay out his/her claims when due or would be able to pay out the benefits when agreed in the future and this information would be provided in EIOPA´s proposal for the policyholder part.	
SFCR Disclosures	General Comments – EIOPA Advice (Blue Box)	We welcome EIOPA´s proposal to streamline the professional users´part of the SFCR and to merge the Risk Profile and Capital Management sections. We also welcome the removal of certain elements of the SFCR which are duplicated in the RSR. We have, however, concerns with the proposed standardisation on the	

		analysis of the sensitivities, the proposed analysis of own funds and the request to disclose on ESG factors.	
SFCR Disclosure	EIOPA Advice (Blue Box) – ESG Factors	EIOPA indicates that insurers should include a statement regarding the consideration of ESG factors in the investment policy of the insurance or reinsurance undertaking. The Commission is carrying out an ongoing legislative process on sustainable finance. This includes a regulation on disclosure requirements and the development of non-binding guidance on non-financial reporting. The Regulation on disclosures relating to sustainable investments and sustainability risks amending Directive (EU)2016/2341 covers all financial market participants and advisers with respect to the integration of sustainability risks (i.e. SRs), the consideration of principal adverse sustainability impacts (i.e. ASIs) and specific sustainability-related information for products with environmental/social characteristics and sustainable investment products; We believe there is no need to provide further information on the ESG factors in the Solvency and Financial Condition Report (SFCR). Additionally, many insurers produce specific CSR reports that contain information on ESG factors.	
SFCR Disclosure	EIOPA Advice (Blue Box) – Standard sensitivities	EIOPA proposes to have a standardised set of sensitivities. In our opinion this is neither appropriate nor proportionate; Considering the undertaking´s risk profile and taking into account proportionality is key to assessing whether the proposed sensitivities are adequate or not. Appropriateness should direct the disclosure requirements and not a required	

		standard set of sensitivities. Otherwise, the administrative burden would increase without any added value. Additionally, EIOPA proposes to have a standardised set of sensitivities, but these do not cover all the sub-risk drivers; EIOPA advises considering three sets of non-economic parameters only; We do not know what the rationale behind these proposals and the proposed parameters is but the underwriting risks (i.e life, non-life and health) will not be addressed. EIOPA could also provide a more comprehensive standardised set of sensitivities which could be considered if, and only if, the undertaking´s risk profile would indicate so. A sensitivity analysis as proposed in EIOPA´s advice could be then used. Disclosing sensitivities should remain a decision of the insurer. Further, the number of standardised sensitivities included should be reduced and made less severe.	

SFCR Disclosure	EIOPA Advice (Blue Box) – Variation analysis own funds	EIOPA proposes that firms include a standardised table with the analysis of the movements to justify to the stakeholders the changes related to own funds (i.e a standardised variation analysis for the own funds) in the SFCR. In the proposed table, EIOPA proposes to add the line "Changes due to valuation of technical provisions of existing business"; We understand that this is due to the fact that the changes as a result of new business have to be reported in a separate line (i.e "Changes due to new business"). However, new business would have an impact both on the assets and liabilities. The item "Changes due to valuation of the assets" would consider the difference between the assets at the beginning of the year and the assets at the closing date but insurers would have to remove the impact from the assets which have been bought or sold during the period and this is going to be a difficult calculation. In order to simplify the calculation, we propose that the item "Changes due to new business" be removed and the item "Changes due to valuation of technical provisions of existing business" include both the impact of existing and new business. EIOPA also requests that information be reported based on the triggers for changes in the amount of Own Funds during the period as a % of the OF and in million euros. When the changes due to other items represent more than 20% of the variation, detailed information on the trigger of the changes included in the item would have to be reported. The 20% trigger should be accompanied by a materiality consideration. Additionally, we wonder whether the proposed table is useful information for policyholders or other stakeholders in the SFCR.	

		These building blocks are very piecemeal and do not refer to particular events or combined effects. For example, if a cat event affecting the insurer takes place, which would have meaning/be of interest to the stakeholders, the impact would not be seen directly in the proposed variation analysis of own funds table. Another example would be a change in the discount rate that would have an impact on both the assets and liabilities; We would prefer to disclose them together and the impact could then be related to the policy on interest rate risk.	
SFCR Disclosure	EIOPA Advice (Blue Box) – Variation analysis own funds	In the variation analysis as presented by EIOPA, it is unclear whether the analysis of change related to AOF (Available Own Funds) or EOF (Eligible Own Funds). If the latter, EIOPA should also consider the impact of the tiering limits and any relegation of tier as relevant information to be disclosed.	
SFCR Disclosure	EIOPA Advice - Variation analysis own funds – General Comments	The proposed analysis of the variation of own funds to be included in the SFCR should be based on a free format, based on the management view and how the management is being informed; Disclosing the analysis of variation of own funds should be voluntary and materiality considerations should apply.	

SFCR Disclosure	4.5.3 Gaps identified in the SCFR information – Question to Stakeholders – Still open if it should be a template or a table in the correct part of the SFCR, e.g in the new section on Risk profile and Capital Management. EIOPA welcomes views on how (template / table) should be included.	We favour a table in the correct part of the SFCR instead of a template. A table can be appropriately accompanied by narrative information; This would enable insurers to provide a comprehensive disclosure regarding the sensitivities including any proxies or simplifications used. The inclusion of the table in the section of the SFCR regarding the Risk profile and Capital management would be appropriate. The insurer could also then make reference to the policy regarding the specific risk and whether this is seen in the outcome of the sensitivity analysis.	
SFCR Disclosure	4.5.4 Availability of the SFCR – EIOPA Advice – Blue Box – Page 13	EIOPA points out that the format of the SFCR should be machine-readable but that the details will be put forward by EIOPA as part of the second wave of consultation under "Technical issues". We will provide our opinion on a "machine readable" SFCR once a definition is provided in the second wave.	
SFCR Disclosure	4.5.5 Audit of the SFCR Information	AMICE members have strong concerns regarding EIOPA´s proposal to request an external audit of some of the Solvency II information. The Solvency II Directive does not require any form	

	– General Comment	of external scrutiny or audit of Solvency II. The implementation of audit requirements in some Member States in recent years has proven that the role of external auditor overlaps with the duties of the supervisory authorities when conducting the Supervisory Review Process (SRP). The requirement to audit the undertaking´s balance sheet (as a minimum) requires a discussion with auditors about actuarial methods, actuarial assumptions, etc. which in reality should only concern the supervisory authority. Moreover, auditors need time to conduct a review; communicating, providing feedback on the comments, preparing their opinion and asking firms to resubmit data if the materiality of findings oblige companies to do so. The external audit reduces preparation time for the annual submission of data and reporting within the Solvency II deadlines by more than two weeks; EIOPA's proposed extension of the annual reporting deadlines is therefore not enough. In addition, a mandatory audit is extremely costly for undertakings, particularly for small and medium-sized undertakings. The cost of the audit can be significant, but often a lot more when actuarial work has to be taken into account; The audit has extended the amount of reporting work significantly; this is often because of questions that regularly fly between the actuary and auditor and this puts excessive pressure on the finance function when they are also preparing statutory accounts during the same period. From a content point of view, one can also question the ability of the auditors to provide a meaningful contribution with respect to the quality of the report. The Solvency II position and related information depends on (future) assumptions, (actuarial)	

		calculations regarding pre-agreed models and the use of already approved data (IFRS/GAAP information). In most public financial information (annual accounts), risk information is already included (see for example IFRS 7 and IAS 1). This information is already signed off by auditors. We question the added value of any additional external audit requirement. We would like to reiterate that any sort of external scrutiny and audit should be a choice for the undertakings and not an obligation. We therefore reject any proposal to impose a mandatory audit on any type of Solvency II information submitted by undertakings.	
SFCR Disclosure	4.5.5 Audit of the SFCR Information – Extension of the deadlines – EIOPA Advice (Blue Box)	EIOPA proposes an extension by two weeks of the annual reporting deadlines to accommodate the external audit. We believe that such an extension would not be not enough (see our comments above and below). This can be confirmed by insurers in those jurisdictions where an external audit is conducted.	
SFCR Disclosure	4.5.5 Audit of the SFCR Information – Paragraph 38	EIOPA writes that NSAs believe that the external audit requirement has materially improved the quality of the information within the SFCRs as they routinely see material corrections/reclassifications between the quarterly return (unaudited) and the final public disclosure which have been explicitly attributed (by the reporting undertaking) to the audit process. As we indicated in our comments to the Q4 reporting, the shortening of the deadlines obliges insurers to resort more and more to proxies and simplifications.We therefore have some remarks on that statement: Firstly, EIOPA should give more details as to the “material corrections/reclassifications” mentioned in the previous	

		paragraph; Some of the data quality issues found may be due to a different interpretation of the Solvency II Regulation. It would also be useful if EIOPA could provide further information about the number of companies per country which publish information with material errors. If as a result only few undertakings are concerned or they are located in one specific country, there is no need to harmonise the external audit requirement at European level. Secondly, we would like to reiterate that the reporting deadlines are very challenging in the Solvency II framework. The shortening of the deadlines is obliging companies to resort more and more to proxies and simplifications. Imposing an external audit would not solve this issue and would shorten even more the necessary period to prepare both the quantitative and qualitative information. Thirdly, Solvency II only came into effect in 2016; The quality of data and information published has improved significantly and continues to improve due to the further exchanges between the supervisory authorities and the undertakings, and also due to the great efforts made by insurers to implement the Solvency II regime. Furthermore, we believe that regulatory stability also helps achieve this goal. It is therefore key that EIOPA does not add any additional data requirements and only focus on simplifications for the QRTs review.	

		Comments Template on Consultation Paper on EIOPA's proposals for Solvency II 2020 review Package on Supervisory Reporting and Public Disclosure	Deadline 18 October 2019 23:59 CET
SFCR Disclosure	Audit of the SFCR Information – Section 4.5.5 – Paragraph 41	EIOPA indicates that the SFCRs are disclosed to the market and sent to the NSAs at the same time, therefore the review from supervisors can only take place after the undertakings publish their SFCR. EIOPA adds that in the supervisory review process NCAs will check the information provided by undertakings on their solvency and financial position in the SFCR. EIOPA adds that "*However, as much as possible undertakings should not publish deficient data in the first place*". The current SII framework requires several lines of defence in addition to those of the supervisory authority; we believe that the system ensures the quality of information published, especially for undertakings with only national activities and a low risk profile. In our opinion, the added value of an external auditor is very low for insurers subject to Solvency II and it is also very costly in terms of financial and human resources. In any case, if any important error is detected, the undertaking should publish an updated version of the SFCR together with an explanation in accordance with the Solvency II regulation. Finally, we question the benefit of disclosing the report to the market and sending to the NSA at the same time; Insurers could be requested to disclose their SFCR only once it has been reviewed by the NCAs. A maximum period of 2 months between the submission to the NCA and the publication could be defined.	
SFCR Disclosure	Audit of the SFCR Information – Section 4.5.5 – Paragraph 45	EIOPA states in paragraph 45 that the feedback received from the industry clearly shows that Members States' discretion should be avoided as it can affect the fairness of approaches across jurisdictions and "*might create entry barriers to cross-border activity or complicate matters for large multinational insurance groups with subsidiaries subject to different audit requirements*";	

		EIOPA also points out that the lack of audit might lead to higher supervisory costs. Before requiring an external audit for all undertakings, EIOPA should further assess the benefits and costs, and provide more statistical information about it as indicated previously. We believe there are few entities concerned by cross-border activities or the issues raised for large multinational insurance groups. A better coordination/communication between NSAs would be more efficient rather than an extension of the external audit requirements. In most jurisdictions, the NCAs are financed by the contributions of the undertakings subject to its supervision and the external auditor's role would therefore overlap with the duties of the supervisory authorities. If an external audit of the SFCR is required, additional costs should be borne by the NCAs and not by the undertakings.	
SFCR Disclosure	Question to Stakeholders	**EIOPA invites all stakeholders that already audit the Solvency II Balance-sheet to provide EIOPA with information on the costs, preferably as a percentage of the written premiums, using amounts referring to end of 2018. If more than the Solvency II Balance-sheet is audited additional information on the costs of audit is welcomed. Information regarding specific types of undertakings such as captives or run-off undertakings for example is also welcomed. If no adequate information is received during the consultation, EIOPA will perform a data request to ensure that appropriate information also by size of undertakings is received as an input for the Impact Assessment.**	

		The auditing requirement would also have implications on a company's human resources; Insurers would have to spend a lot of time answering the questions and requests from the external auditors and this in turn would increase the costs. We recommend that EIOPA also consider this aspect when assessing the impact of introducing external audit.	
SFCR Disclosure	4.5.8 Templates used in the SFCR – Paragraph 73	We agree with EIOPA´s proposal to keep unchanged the templates that are currently disclosed.	
SFCR Disclosure	Annex I	We agree with the removal of the proposed elements of the Business and performance (i.e Article 293 of the Delegated Regulation), System of governance (i.e Article 294 of the Delegated Regulation), Risk Profile (i.e Article 295 of the Delegated Regulation), Valuation for Solvency II purposes (i.e Article 296 of the Delegated Regulation) and Structure and Contents (i.e Article 359 of the Delegated Regulation) from the SFCR to the RSR in order to avoid duplications. These changes, which are expected to be part of the second wave of the consultation, may impact industry's views on the first wave of proposals.	
Financial Stability Reporting			
Financial Stability	EIOPA Advice (Blue Box) – General Comments	We welcome the proposed deletion of some templates, however the new additions and increase in frequency of some of the QRTs would increase the burden for undertakings.	
Financial Stability	S.39.01 Profit and loss – EIOPA Advice (Blue Box)	In S.39 (Profit and loss) EIOPA proposes to add the figures of the technical and non-technical account result, other income and other expenses, taxes, dividends and others (semi-annually frequency) to the Profit and Loss figure; The components being	

		requested by EIOPA are not similar to the current reporting of the semi-annual figures and would require a clearer definition and a new mapping. Additionally, Profit and Loss statements are based either on IFRS or national gaap; We wonder how comparability could be ensured. And if the Profit and Loss statements are further elaborated, S.05 would have to be deleted otherwise there would be a duplication of information.	
Financial Stability	S.38.01 - Duration of technical provisions- EIOPA Advice (Blue Box)	We query why S.38 would have to be submitted on a quarterly basis. The duration of the insurance liabilities does not change overnight. What purpose will this serve? Will the benefit outweigh the additional burden?	
Financial Stability	S.23.02 - Detailed information by tiers on own funds - EIOPA Advice (Blue Box)	EIOPA proposes a new table in S.23.02 (semi-annual frequency) and to replace S.23.01 to capture the transition from financial statement own funds to SII own funds (semi-annual frequency); We query the relevance of such an information request. Insurers have to report based on their economic perspective and on the movements according to this approach. We query what the added benefit of such disclosure would be in the Solvency II context. In the last section, EIOPA refers only to deferred tax assets. The reference to deferred tax liabilities should also be added.	
Financial Stability	Open Question to stakeholders: Would requesting the effective duration (as set out in Annex I) of	We share EIOPA's view that the duration concepts used for assets and liabilities could be aligned, and we support the proposal to use the modified duration for both assets and liabilities. The effective duration, however, is particularly challenging to calculate for liabilities, especially in life guarantee business. We do not see an added value in providing the	

	both assets and liabilities in addition to modified duration be feasible for groups/undertakings?	effective duration that would justify the significant additional effort.	