

Comments Template on EIOPA-CP-14-055 Draft proposal for ITS on the procedures, formats and templates of the solvency and financial condition report		Deadline
		02.Mar.2015 23:59 CET
Company name:	Financial Services User Group	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential. Please indicate if your comments on this CP should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.	Public/ Confidential
<p>Please follow the instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ <u>Do not change the numbering</u> in column “Reference”. ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph, keep the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below. <ul style="list-style-type: none"> o If your comment refers to multiple paragraphs, please insert your comment at the first paragraph and mention in your comment to which other paragraphs this also applies. o If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment itself. <p>Please send the completed template to Consultation_Set2@eiopa.europa.eu, in MSExcel Format, (our IT tool does not allow processing of any other formats).</p> <p>The paragraph numbers below correspond to Consultation Paper No. EIOPA-CP-14-055.</p>		
Reference	Comment	
General Comment	FSUG welcomes this raft on the procedures, formats and templates of the solvency and financial condition report. We are certain it will increase transparency of this industry.	
Recital 1		
Recital 2		
Recital 3		

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Recital 4	<p>We would like to raise the issue of information on premiums according to the country and business lines. FSUG members noticed increasing cross-border activity. Unfortunately there is no information on the range of such sale. It is becoming crucial for consumer organization, financial ombudsman and ADR schemes, as proper disclosure of information consumer rights and potential disputes with foreign financial institution are usually challenging. That is why we would like to propose no limitation concerning information on claims and expenses according to disclosed EU countries and business lines to make above mentioned institutions aware of potential new areas of activities. Small companies usually operates within one country and that is why it would be burdensome obligation. For a big insurance company activity in a small Member State is immaterial from the perspective of whole business but substantial from the country's perspective.</p>	
Recital 5	<p>We would like to raise the issue of information on premiums according to the country and business lines. FSUG members noticed increasing cross-border activity. Unfortunately there is no information on the range of such sale. It is becoming crucial for consumer organization, financial ombudsman and ADR schemes, as proper disclosure of information consumer rights and potential disputes with foreign financial institution are usually challenging. That is why we would like to propose no limitation concerning information on claims and expenses according to disclosed EU countries and business lines to make above mentioned institutions aware of potential new areas of activities. Small companies usually operates within one country and that is why it would be burdensome obligation. For a big insurance company activity in a small Member State is immaterial from the perspective of whole business but substantial from the country's perspective.</p>	
Recital 6		
Recital 7		
Article 1		
Article 2		
Article 3		
Article 4		
Article 5		
Article 6		
Article 7		
Article 8		
Article 9		
Article 10		
Article 11		
Article 12		
Article 13		

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Annex I - S.02.01 Individual entities		
Annex I - S.05.01 Individual entities		
Annex I - S.05.02 Individual entities		
Annex I - S.12.01 Individual entities		
Annex I - S.17.01 Individual entities		
Annex I - S.19.01 Individual entities		
Annex I - S.22.01 Individual entities		
Annex I - S.23.01 Individual entities		
Annex I - S.25.01 Individual entities		
Annex I - S.25.02 Individual entities		
Annex I - S.25.03 Individual entities		
Annex I - S.28.01 Individual entities		
Annex I - S.28.02 Individual entities		
Annex I - S.02.01 Groups		
Annex I - S.05.01 Groups		
Annex I - S.05.02 Groups		
Annex I - S.22.01 Groups		
Annex I - S.23.01 Groups		

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Annex I - S.25.01 Groups		
Annex I - S.25.02 Groups		
Annex I - S.25.03 Groups		
Annex I - S.32.01 Groups		
Annex II - S.02.01 Individual entities		
Annex II - S.05.01 Individual entities		
Annex II - S.05.02 Individual entities		
Annex II - S.12.01 Individual entities		
Annex II - S.17.01 Individual entities		
Annex II - S.19.01 Individual entities		
Annex II - S.22.01 Individual entities		
Annex II - S.23.01 Individual entities		
Annex II - S.25.01 Individual entities		
Annex II - S.25.02 Individual entities		
Annex II - S.25.03 Individual entities		
Annex II - S.28.01 Individual entities		
Annex II - S.28.02 Individual entities		
Annex II - S.02.01 Groups		

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Annex II - S.05.01 Groups		
Annex II - S.05.02 Groups		
Annex II - S.22.01 Groups		
Annex II - S.23.01 Groups		
Annex II - S.25.01 Groups		
Annex II - S.25.02 Groups		
Annex II - S.25.03 Groups		
Annex II - S.32.01 Groups		
Impact Assessment General Comment		
Impact Assessment 1.1		
Impact Assessment 1.2		
Impact Assessment 1.3		
Impact Assessment 1.4		
Impact Assessment 1.5		

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Impact Assessment 1.6		
Impact Assessment 1.7		
Impact Assessment 1.8		
Impact Assessment 1.9		
Impact Assessment 1.10		
Impact Assessment 1.11		
Impact Assessment 1.12		
Impact Assessment 1.13		
Impact Assessment 1.14		
Impact Assessment 1.15		
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Impact Assessment 1.17		

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Impact Assessment 1.18		
Impact Assessment 1.19		
Impact Assessment 1.20		
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Impact Assessment 1.34		
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Impact Assessment 1.45		
Impact Assessment 1.46		
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Impact Assessment 1.66		
Impact Assessment 1.67		