



Comments Template on CEIOPS-CP 43 Consultation Paper on the Draft L2 Advice on TP – Standards for data quality		Deadline 11.09.2009 4 p.m. CET
Name of Company:		
Disclosure of comments:	CEIOPS will make all comments available on its website, except where respondents specifically request that their comments remain confidential. Please indicate if your comments should be treated as confidential:	No
The numbering of the paragraphs refers to Consultation Paper No. 43 (CEIOPS-CP-43/09).		
Reference	Comment	
General Comment	<p>Captives differ from commercial insurers in these important respects: -</p> <p>(1) They write a restricted number of lines of insurance business (property, liability, for example) and normally issue a small number of policies (e.g. global programmes with one policy per insurance class)</p> <p>(2) They insure or reinsure a restricted number of risk units (sites, vehicles, for example)</p> <p>(3) They have a restricted number of insureds, or clients</p> <p>(4) They insure or reinsure above deductibles that are high enough to reduce the relative number of claims they receive every year.</p>	



Comments Template on CEIOPS-CP 43 Consultation Paper on the Draft L2 Advice on TP – Standards for data quality		Deadline 11.09.2009 4 p.m. CET
	<p>Captives therefore do not need to have complex data collection systems in place as they can easily document and report their data. It is important that the principle of proportionality is applied to the data requirements for captives to reflect their relatively straightforward structure.</p> <p><i>Please note that where a comment has not been made on a particular paragraph, this does not indicate that we agree with the paragraph.</i></p>	
1.		
1.1.		
1.2.		
1.3.		
1.4.		
1.5.		
1.6.		
1.7.		
2.		
2.1.		
2.2.		
3.		
3.1.		



Comments Template on CEIOPS-CP 43 Consultation Paper on the Draft L2 Advice on TP – Standards for data quality		Deadline 11.09.2009 4 p.m. CET
3.2.		
3.3.		
3.4.		
3.5.		
3.6.		
3.7.		
3.8.		
3.9.		
3.10.		
3.11.		
3.12.		
3.13.		
3.14.		
3.15.		
3.16.		
3.17.		
3.18.	Captives normally have a very good knowledge of reported claims since their owner is also the policyholder. This close relationship between the (re)insurance company and the insured and the control function inherent in this system should be recognised when considering the quality of the available data versus the lack of a large portfolio and homogeneous risk.	



Comments Template on CEIOPS-CP 43 Consultation Paper on the Draft L2 Advice on TP – Standards for data quality		Deadline 11.09.2009 4 p.m. CET
3.19.		
3.20.		
3.21.		
3.22.		
3.23.		
3.24.		
3.25.		
3.26.		
3.27.		
3.28.		
3.29.		
3.30.		
3.31.		
3.32.	Requirements on internal processes and procedures should be adapted for captives. Resources and manpower are limited and bureaucratic procedures will significantly increase the workload and running expenses without providing additional security in view of the relatively small accounting data involved compared to a standard insurance company.	
3.33.		
3.34.		
3.35.		



Comments Template on CEIOPS-CP 43 Consultation Paper on the Draft L2 Advice on TP – Standards for data quality		Deadline 11.09.2009 4 p.m. CET
3.36.		
3.37.		
3.38.		
3.39.		
3.40.		
3.41.		
3.42.		
3.43.		
3.44.		
3.45.		
3.46.		
3.47.		
3.48.		
3.49.		
3.50.		
3.51.		
3.52.		
3.53.		
3.54.		



Comments Template on CEIOPS-CP 43 Consultation Paper on the Draft L2 Advice on TP – Standards for data quality		Deadline 11.09.2009 4 p.m. CET
3.55.		
3.56.		
3.57.		
3.58.		
3.59.		
3.60.		
3.61.		
3.62.		
3.63.		
3.64.		
3.65.		
3.66.		
3.67.		
3.68.		
3.69.		
3.70.		
3.71.		
3.72.		
3.73.		



Comments Template on CEIOPS-CP 43 Consultation Paper on the Draft L2 Advice on TP – Standards for data quality		Deadline 11.09.2009 4 p.m. CET
3.74.		
3.75.		
3.76.		
3.77.		
3.78.		
3.79.		
3.80.		
3.81.		