



<b>Comments Template on CEIOPS-CP 58</b> <b>Consultation Paper on the Draft L2 Advice on Supervisory reporting and disclosure</b>		<b>Deadline</b> <b>11.09.2009</b> <b>4 p.m. CET</b>
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. 58 (CEIOPS-CP-58/09).		
Reference	Comment	
General Comment	<p>ECIROA is in full agreement with providing a Report to Supervisors but consider that the SFCR is not appropriate for captives. The reasons for this are detailed in the document but in summary, there are issues of confidentiality for the parent company and the requirement for public disclosure does not apply as the captive is insuring the risks of its parent company.</p> <p>In the process of developing a proportionate reporting package for captives it is very important to consider how much information would be necessary to get a full picture of the company in question. A lot less data is needed for a supervisor to understand a captive.</p> <p>Besides the close identity between shareholders and insureds, 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>	

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	<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> <p><b><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></b></p>	
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2.1.	Captive insurance companies can provide relevant, reliable and comprehensible information to the supervisory authorities. The extent of the information should reflect the nature, scale and relatively straightforward nature of their business, subject to the principle of proportionality.	
2.2.	The majority of captives are insuring only the risks of their parent company and therefore should be exempted from public disclosure. Full information is available to the parent company and supervisory authorities. Captives are not in competition with other captives nor with other insurers or reinsurers. However, if captive information is made publicly available, this will be detrimental to the parent	

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	company as it will be accessible by the competitors of the parent company.	
2.3.	Captives hold information which is confidential. Where a captive is insuring only the risks of its parent company, disclosure of the risks underwritten will provide a clear picture of the parent company's insurance programme. Similarly, the captive may create loss reserves for outstanding claims which can be easily identified. It would be detrimental to their business if this information is publicly available e.g. it would have an impact upon the settlement negotiations between the parent company and the claimant. Captives should be exempted from public disclosure of this information.	
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3.2.	This paragraph makes it clear that the reporting requirements have to be designed in light of the principle of proportionality. Undertakings with more complicated risk profiles are likely to have more to report and disclose than companies with less complex risk profiles. We would like to emphasise that most captives have a relatively simple risk profile - making them eligible to less burdensome reporting and disclosure requirements.  ECIROA's position is to acknowledge the need to report to supervisors in general but to make it	



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	possible to national supervisors to adjust the reporting requirements.	
3.3.		
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3.5.	Article 3.53 makes it clear that the principle of proportionality applies to disclosure requirements. Therefore ECIROA is entitled to claim its full application to captives.	
3.6.		
3.7.	3.77 allows for non disclosure of information to the public in specific cases. Confidentiality from a competitive standpoint of view should also be taken into consideration. The use of a captive vehicle in the structuring of the major insurance program of an undertaking can generate significant competitive advantages to the captive's mother company. Appreciating the validity of the supervisory authority's control and considering the likely absence of public interest needs, ECIROA's recommendation is to opt for confidentiality.	
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3.17.	The majority of captives are small undertakings which do not employ any staff and outsource their	

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	administration to professional licensed captive managers. Disclosure requirements for captives should reflect their size and straightforward structure whilst ensuring that unnecessary administrative costs are avoided.	
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3.21.	Proportionate requirements for small undertakings must include captives.	
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3.28.	Captives should be exempted from SFCR (see comments above regarding the need for public disclosure). Captives should complete the RTS with information appropriate to the size and nature of the undertaking.	
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3.43.	The detail of information to be received by supervisors from captives should be considered as a separate topic due to the different nature of captives i.e. they mostly underwrite only the risks of their parent company. Captive information is confidential and proprietary and should not be publicly available. Captives should submit an RTS and the frequency of this should reflect their size and relatively straightforward structure.	
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3.51.	Captives should be exempt from the need to complete the SFCR.	
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3.58.	<p>The target audience of the SFCR of a captive would be supervisors, shareholders and policyholders only (shareholders and policyholders are the same). The others listed are not relevant for a captive which supports the argument that captives should be exempt from completing the SFCR but should complete the RTS.</p> <p>Other insurance and reinsurance undertakings and business partners of a captive are receiving the necessary information for security clearance directly from the captive upon request. Supervisors in other jurisdictions than the captive's home jurisdiction can obtain all necessary information from the home jurisdiction supervisor, obviating the need for public disclosure.</p>	
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3.91.	If the Executive Summary is aimed specifically at Policyholders, this further supports the argument that captives should not complete the SFCR.	
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3.281.	Captives can complete the RTS. The applicability of the various reporting categories should be considered for captives and only those which are relevant should be required. Principle of proportionality to apply.	
3.282.	As a general comment, (not only for captives) if the RTS is to include the elements of the SFCR it should be made certain that the wording of the requested information is the same.	
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3.284.	Captives can develop a written policy. Principle of proportionality to apply.	
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3.296.	ECIROA supports Option 3 as this is consistent with the principle of proportionality i.e. reporting can follow a standardised format but the content can be adapted to reflect the size and risk profile of captives.	
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3.300.	As stated in 2.3 above, captive information is confidential and proprietary. If the RTS is to be used for reporting confidential information to supervisors then captives should only complete the RTS and not the SFCR.	
3.301.		
3.302.	Captives can provide an executive summary. Captives can report on the business and external environment. Principle of proportionality to apply.	
3.303.	Captives can provide information on objectives and strategies. Principle of proportionality to apply.	
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3.305.	Captives can provide information on underwriting performance. Principle of proportionality to apply.	

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3.306.	Captives can provide information on investment activities. Principle of proportionality to apply.	
3.307.	Captives can provide information on operating/other expenses. Principle of proportionality to apply.	
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3.319.	Captives can provide information on General governance arrangements. Principle of proportionality to apply.	
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3.322.	Captives can provide information regarding fit and proper processes. Principle of proportionality to apply.	
3.323.	Captives either outsource risk management to professional licensed captive management companies or	

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	are subject to the risk management policies of their parent companies. Principle of proportionality to apply.	
3.324.		
3.325.	Captives can provide information on the ORSA. Principle of proportionality to apply.	
3.326.	Captives can provide information on Internal control. The majority of captives outsource their administration to professional licensed captive management companies. Captives can provide details of this outsourcing including details of the service agreement.	
3.327.		
3.328.	Captives are too small to have their own internal audit function. They are normally subject to the controls of the Internal Audit function of the parent company. Information regarding this function and findings of audits can be provided. Principle of proportionality to apply.	
3.329.	Captives are too small to have their own actuarial function. This function is normally outsourced to professional licensed captive management companies or to independent actuaries. Captives can provide information regarding the outsourcing of this function.	
3.330.	The majority of captives outsource all of their administrative activities to professional licensed captive management companies. These companies are licensed and controlled by the Regulator in their location. The acceptance by Regulators of the ability of the staff of these management companies and their systems and procedures is an important factor when considering the quantity of information required from captives. Principle of proportionality to apply.	
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3.344.	Captives can provide a description for each category of risk. Principle of proportionality to apply.	
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3.366.	Captives can provide information on their own funds. Principle of proportionality to apply.	
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3.429.	Consideration should be given to developing reporting templates appropriate to captives. This will ensure Supervisors will receive all relevant data whilst keeping the costs of reporting appropriate to the size and risk profile of these undertakings. These templates can be used on a European level, ensuring consistency of reporting in different countries.	
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3.513.	It is very important to distinguish the different duties of the Supervisor and the External Auditor. Captives employ actuaries where required by the business they write or the supervisor, and these actuaries are often independent from the management companies, thereby providing an additional independent opinion on the captive's business practices.	
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3.551.	ECIROA agrees that Option 2 is the best option provided the principle of proportionality is applied to the extent of the data required from captives.	
3.552.	ECIROA agrees that Option 2 is the best option as it follows the principle of proportionality, which will allow captives and small undertakings to submit a full RTS in the first year and report material changes thereafter (thereby reducing the cost impact on captives).	
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3.555.		
3.556.	<p>ECIROA suggest that Option 3 is appropriate for captives. It would be administratively burdensome and costly for captives and smaller undertakings to report on more than an annual basis. This frequency of reporting is appropriate to captives' size and risk profile.</p> <p>It is important that the MCR is adequately calibrated for captives in order to not let the majority (as in the QIS 4) fall outside the SCR corridor. Should this status remain a captive would be penalised and would be forced to conduct a quarterly calculation of the SCR in order to obtain the MCR.</p>	
3.557.		
3.558.		
3.559.	It is important that the frequency and extent of external audits are appropriate to captives so that there is not a high cost and administrative burden put upon them.	
3.560.		
3.561.		
3.562.		
3.563.	ECIROA agrees that Option 3 is the best option. The free format supports the principle of proportionality allowing captives to report only relevant information but in an agreed predefined order.	
3.564.		
3.565.	ECIROA suggests a new scenario appropriate for captives Scenario 6: Option 2; Option 2; Option 2; Option 3; Option 3	
3.566.		
3.567.		



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3.568.		
3.569.		
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3.571.		
Annex B		
3.572.		
3.573.		
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Annex C		
3.586.		
3.587.		
3.588.		
Annex D		
A1		
B1		
B2A		
B2B		
B3A		
B3B		
B3C		
B3D		
B3E		
B3F		
B4A		
B4Q		
C1		
C2		



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D1		
D2		
D3		
D4		
D5		
E1		
E2		
E3		
E4		
E5		
F1		
F2		
F3		
F4		
F5		
F6		
G1		
G2		
G3		



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G4		
H1		
H2		
H3		
H4		
H5		
J1		
J2		
J3		
J4		
J5		
Annex E		