

**Comments Template on  
CP9 – GR - Reporting**

**Deadline  
20 January 2012  
12:00 CET**

Name of Company:		
Disclosure of comments:	Danish Insurance Association	Public
<b>Reference</b>	<b>Comment</b>	
General Comment	<p>We appreciate the opportunity to comment on the Consultation Paper on the draft proposal for Guidelines on Narrative Public Disclosure etc.</p> <p>We find that the guidelines on the SFCR and RSR seem much less problematic than the Quantitative Reporting Templates. We do however have a few examples of requirements that seem excessive, especially when the volume of information of the QRTs are taken into account.</p>	
3.38.	Reinsurance is already reported on QRTs J1 and J2. The reporting requirements regarding reinsurance in total is duplicative reporting and we ask EIOPA to consider eliminating or simplifying these requirements.	
3.63.	We believe "guarantee" actually creates an unrealistic requirement, especially where estimates are employed. "Provide proportionately reasonable comfort" might be a more suitable alternative.	
4.110.	See above regarding "guarantee". Furthermore although the Guideline no longer refers to "accuracy", 4.110 still does – this needs to be changed.	