

## Response for the Central Bank of Ireland (“CBI”)

23<sup>rd</sup> January 2015

Thank you for the opportunity to respond to the proposed National Specific Templates consultation.

AXA Insurance Limited (“AXA Ireland”) would like to make some high level comments:

1. The proposed templates will create a considerable additional workload for the company due to the difference in Line of Business versus the EIOPA templates. The company would appreciate the opportunity to discuss the practical issues that this would create with the CBI.
2. Again, the proposed templates will create a considerable additional workload for the company due to the quarterly requirement for claims triangles versus the EIOPA templates.
3. Solvency II does not require a full quarterly calculation of the Technical Provisions, simplifications are allowed according to the Consultation Paper on the proposal for draft Implementing Technical Standards on the templates for the submission of information to the supervisory authorities Article 7 "undertakings may apply simplified methods in the calculation of the technical provisions". Confirmation that this will also apply for the NST's would alleviate some of the potential increased workload for the company. While data and trends are interrogated and investigated on a monthly basis, full quarterly calculation of the Technical Provisions is not always completed.
4. Investment income and taxation are not split by line of business. The assets held by the company are not allocated to technical provisions or lines of business and so any such split would be arbitrary.
5. Risk Premium is generated within the capital modelling platform and so is at a different level of granularity to the technical provisions.
6. The company would like to request Excel submissions are allowed and that the CBI does not move to XBRL for NST's.
7. Cashflow information for NST05 relating to latent claims will include significant elements of expert judgement due to the characteristics of such claims. Motor business has not historically been exposed to such claims as would have been the case for other lines.
8. If the CBI request NST's under Solvency II, it would be beneficial for the company to have a time lag for the commencement of any NST's and not for both the EIOPA templates and the NST templates to commence concurrently. For example, the NST's could commence from Q3 2016 instead of Q1 2016.
9. As an alternative to the proposed NST's, the company would be willing to provide data to allow the CBI to complete a regular projection of reserves as required. Additionally, this could be provided in a format that is compatible with ResQ.