

**Comments Template on the  
Consultation Paper  
on  
the methodology to derive the UFR and its implementation**

**Deadline  
18 July 2016  
23:59 CET**

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| Name of Company: | The Swedish Society of Actuaries |  |
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| Disclosure of comments: | Please indicate if your comments should be treated as confidential: Public | Confidential/Public |
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The numbering of the paragraphs refers to on the Consultation Paper on the methodology to derive the UFR and its implementation.

| Reference | Comment |
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| General Comment | <ul style="list-style-type: none"> <li>• We welcome that the proposed methodology to derive the UFR is transparent and that it provides the calculation of a stable and predictable UFR.</li> <li>• We believe that the current UFR of 4.2% should be kept until the Solvency II standard formula has been reviewed. In particular, it must be ensured that the methodology and assumptions underpinning the discount rate is not changed elsewhere.</li> <li>• It is in our view inappropriate to round the inflation target. The reason for this is that the inflation target is normally an important assumption for modelling inflation rates in cash flow projections used in the calculation of technical provisions. From a valuation point of view, it is inconsistent to round or adjust the inflation target in the UFR but allowing for it elsewhere in the calculation of technical provisions. Therefore, the expected inflation in UFR should be based on unadjusted currency specific</li> </ul> |
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|              | inflation. The same argument can be used against limiting the annual change in UFR, which is likely to be driven by a change in the inflation target. However, we believe that a stabilized UFR is a more important objective and agree with the proposed limit to the annual change of the UFR of 20 bps in this regard.   |  |
| Q1. (pg. 56) | <ul style="list-style-type: none"> <li>We believe there is a risk that a general European UFR will not be proper for small countries. We find it important that not only expected inflation but also the real interest rates can be country specific. This could be achieved by letting the national FSA decide whether the default UFR from EIOPA is suitable in their country and else calculate an UFR by the same method (i.e. using a similar time period and type of averaging), but based on national data.</li> </ul>   |  |
| Q2. (pg. 56) | <ul style="list-style-type: none"> <li>We believe that the widening window approach, i.e. to fix the start date and using weights for averaging real rates, is unnecessarily complicated as there are no evidences that the inclusion of past economic cycles from 1960 is most appropriate for calculating an UFR. We think that a rolling window approach using 50 years' worth of data and equal weights would take both of the desired goals, i.e. stability in the UFR and the representativeness of the time period used, into account in a more simple and transparent way.</li> </ul>                                   |  |
| Q3. (pg. 56) | <ul style="list-style-type: none"> <li>We believe that a rolling window approach using 50 years' worth of data and equal weights should be used (see Q2).</li> </ul>  |  |
| Q4. (pg. 56) | <ul style="list-style-type: none"> <li>It is in our view inappropriate to use inflation buckets for the expected inflation rate. The reason for this is that the inflation target is normally an important assumption for modelling inflation rates in cash flow projections used in the calculation of technical provisions. From a valuation point of view, it is inconsistent to adjust the inflation target in the UFR but allowing for it elsewhere in the calculation of technical provisions. Therefore, the expected inflation in the UFR should be based on unadjusted currency specific inflation targets.</li> </ul> |  |
| Q5. (pg. 56) | <ul style="list-style-type: none"> <li>Although this may imply the inconsistent use of economic assumptions in the cash flow projection and the discount rate, we believe that a stabilized UFR is a more important objective and agree therefore with the proposed approach.</li> </ul>  |  |
| Q6. (pg. 56) | <ul style="list-style-type: none"> <li>We agree with the proposed approach, although we do not believe rounding is particular needed due to the small volatility in expected real rates.</li> </ul>   |  |
| Q7. (pg. 56) | <ul style="list-style-type: none"> <li>Firstly, we believe that a revised methodology for UFR should be implemented first after it can be ensured that the discount rate will not be changed otherwise in the near future. We believe therefore that the current UFR of 4.2% should be kept until the Solvency II standard formula has been reviewed.</li> <li>Secondly, provided that the timing of introducing a new UFR is right, we agree that the proposed implementation of the methodology according to option 2 is appropriate.</li> </ul>  |  |
| Paragraph 1. |   |  |

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|               |  |  |
|---------------|--|--|
| Paragraph 2.  |  |  |
| Paragraph 3.  |  |  |
| Paragraph 4.  |  |  |
| Paragraph 5.  |  |  |
| Paragraph 6.  |  |  |
| Paragraph 7.  |  |  |
| Paragraph 8.  |  |  |
| Paragraph 9.  |  |  |
| Paragraph 10. |  |  |
| Paragraph 11. |  |  |
| Paragraph 12. |  |  |
| Paragraph 13. |  |  |
| Paragraph 14. |  |  |
| Paragraph 15. |  |  |
| Paragraph 16. |  |  |
| Paragraph 17. |  |  |
| Paragraph 18. |  |  |
| Paragraph 19. |  |  |
| Paragraph 20. |  |  |
| Paragraph 21. |  |  |
| Paragraph 22. |  |  |
| Paragraph 23. |  |  |
| Paragraph 24. |  |  |
| Paragraph 25. |  |  |

**Comments Template on the  
Consultation Paper  
on**

**Deadline  
18 July 2016  
23:59 CET**

**the methodology to derive the UFR and its implementation**

|               |  |  |
|---------------|--|--|
| Paragraph 26. |  |  |
| Paragraph 27. |  |  |
| Paragraph 28. |  |  |
| Paragraph 29. |  |  |
| Paragraph 30. |  |  |
| Paragraph 31. |  |  |
| Paragraph 32. |  |  |
| Paragraph 33. |  |  |
| Paragraph 34. |  |  |
| Paragraph 35. |  |  |
| Paragraph 36. |  |  |
| Paragraph 37. |  |  |
| Paragraph 38. |  |  |
| Paragraph 39. |  |  |
| Paragraph 40. |  |  |
| Paragraph 41. |  |  |
| Paragraph 42. |  |  |
| Paragraph 43. |  |  |
| Paragraph 44. |  |  |
| Paragraph 45. |  |  |
| Paragraph 46. |  |  |
| Paragraph 47. |  |  |
| Paragraph 48. |  |  |
| Paragraph 49. |  |  |

**Comments Template on the  
Consultation Paper  
on**

**Deadline  
18 July 2016  
23:59 CET**

**the methodology to derive the UFR and its implementation**

|               |  |  |
|---------------|--|--|
| Paragraph 50. |  |  |
| Paragraph 51. |  |  |
| Paragraph 52. |  |  |
| Paragraph 53. |  |  |
| Paragraph 54. |  |  |
| Paragraph 55. |  |  |
| Paragraph 56. |  |  |
| Paragraph 57. |  |  |
| Paragraph 58. |  |  |
| Paragraph 59. |  |  |
| Paragraph 60. |  |  |
| Paragraph 61. |  |  |
| Paragraph 62. |  |  |
| Paragraph 63. |  |  |
| Paragraph 64. |  |  |
| Paragraph 65. |  |  |
| Paragraph 66. |  |  |
| Paragraph 67. |  |  |
| Paragraph 68. |  |  |
| Paragraph 69. |  |  |
| Paragraph 70. |  |  |
| Paragraph 71. |  |  |
| Paragraph 72. |  |  |
| Paragraph 73. |  |  |

**Comments Template on the  
Consultation Paper  
on**

**Deadline  
18 July 2016  
23:59 CET**

**the methodology to derive the UFR and its implementation**

|               |  |  |
|---------------|--|--|
| Paragraph 74. |  |  |
| Paragraph 75. |  |  |
| Paragraph 76. |  |  |
| Paragraph 77. |  |  |
| Paragraph 78. |  |  |
| Paragraph 79. |  |  |
| Paragraph 80. |  |  |
| Paragraph 81. |  |  |
| Paragraph 82. |  |  |
| Paragraph 83. |  |  |
| Paragraph 84. |  |  |
| Paragraph 85. |  |  |
| Paragraph 86. |  |  |
| Paragraph 87. |  |  |
| Paragraph 88. |  |  |
| Paragraph 89. |  |  |
| Paragraph 90. |  |  |
| Paragraph 91. |  |  |
| Paragraph 92. |  |  |
| Paragraph 93. |  |  |
| Paragraph 94. |  |  |
| Paragraph 95. |  |  |
| Paragraph 96. |  |  |
| Paragraph 97. |  |  |

**Comments Template on the  
Consultation Paper  
on**

**Deadline  
18 July 2016  
23:59 CET**

**the methodology to derive the UFR and its implementation**

|                |  |  |
|----------------|--|--|
| Paragraph 98.  |  |  |
| Paragraph 99.  |  |  |
| Paragraph 100. |  |  |
| Paragraph 101. |  |  |
| Paragraph 102. |  |  |
| Paragraph 103. |  |  |
| Paragraph 104. |  |  |
| Paragraph 105. |  |  |
| Paragraph 106. |  |  |
| Paragraph 107. |  |  |
| Paragraph 108. |  |  |
| Paragraph 109. |  |  |
| Paragraph 110. |  |  |
| Paragraph 111. |  |  |
| Paragraph 112. |  |  |
| Paragraph 113. |  |  |
| Paragraph 114. |  |  |
| Paragraph 115. |  |  |
| Paragraph 116. |  |  |
| Paragraph 117. |  |  |
| Paragraph 118. |  |  |
| Paragraph 119. |  |  |
| Paragraph 120. |  |  |
| Paragraph 121. |  |  |

**Comments Template on the  
Consultation Paper  
on**

**Deadline  
18 July 2016  
23:59 CET**

**the methodology to derive the UFR and its implementation**

|                |  |  |
|----------------|--|--|
| Paragraph 122. |  |  |
| Paragraph 123. |  |  |
| Paragraph 124. |  |  |
| Paragraph 125. |  |  |
| Paragraph 126. |  |  |
| Paragraph 127. |  |  |
| Paragraph 128. |  |  |
| Paragraph 129. |  |  |
| Paragraph 130. |  |  |
| Paragraph 131. |  |  |
| Paragraph 132. |  |  |
| Paragraph 133. |  |  |
| Paragraph 134. |  |  |
| Paragraph 135. |  |  |
| Paragraph 136. |  |  |
| Paragraph 137. |  |  |
| Paragraph 138. |  |  |
| Paragraph 139. |  |  |
| Paragraph 140. |  |  |
| Paragraph 141. |  |  |
| Paragraph 142. |  |  |
| Paragraph 143. |  |  |
| Paragraph 144. |  |  |
| Paragraph 145. |  |  |



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on**

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|                |  |  |
|----------------|--|--|
| Paragraph 146. |  |  |
| Paragraph 147. |  |  |
| Paragraph 148. |  |  |
| Paragraph 149. |  |  |
| Paragraph 150. |  |  |
| Paragraph 151. |  |  |
| Paragraph 152. |  |  |
| Paragraph 153. |  |  |
| Paragraph 154. |  |  |
| Paragraph 155. |  |  |
| Paragraph 156. |  |  |
| Paragraph 157. |  |  |
| Paragraph 158. |  |  |
| Paragraph 159. |  |  |
| Paragraph 160. |  |  |
| Paragraph 161. |  |  |
| Paragraph 162. |  |  |
| Paragraph 163. |  |  |
| Paragraph 164. |  |  |
| Paragraph 165. |  |  |
| Paragraph 166. |  |  |
| Paragraph 167. |  |  |
| Paragraph 168. |  |  |
| Paragraph 169. |  |  |

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on**

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|                |  |  |
|----------------|--|--|
| Paragraph 170. |  |  |
| Paragraph 171. |  |  |
| Paragraph 172. |  |  |
| Paragraph 173. |  |  |
| Paragraph 174. |  |  |
| Paragraph 175. |  |  |
| Paragraph 176. |  |  |
| Paragraph 177. |  |  |
| Paragraph 178. |  |  |
| Paragraph 179. |  |  |
| Paragraph 180. |  |  |
| Paragraph 181. |  |  |
| Paragraph 182. |  |  |
| Paragraph 183. |  |  |
| Paragraph 184. |  |  |
| Paragraph 185. |  |  |
| Paragraph 186. |  |  |
| Paragraph 187. |  |  |
| Paragraph 188. |  |  |
| Paragraph 189. |  |  |
| Paragraph 190. |  |  |
| Paragraph 191. |  |  |
| Paragraph 192. |  |  |
| Paragraph 193. |  |  |

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on**

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|                |  |  |
|----------------|--|--|
| Paragraph 194. |  |  |
| Paragraph 195. |  |  |
| Paragraph 196. |  |  |
| Paragraph 197. |  |  |
| Paragraph 198. |  |  |
| Paragraph 199. |  |  |
| Paragraph 200. |  |  |
| Paragraph 201. |  |  |
| Paragraph 202. |  |  |
| Paragraph 203. |  |  |
| Paragraph 204. |  |  |
| Paragraph 205. |  |  |
| Paragraph 206. |  |  |
| Paragraph 207. |  |  |
| Paragraph 208. |  |  |
| Paragraph 209. |  |  |
| Paragraph 210. |  |  |
| Paragraph 211. |  |  |
| Paragraph 212. |  |  |
| Paragraph 213. |  |  |
| Paragraph 214. |  |  |
| Paragraph 215. |  |  |
| Paragraph 216. |  |  |
| Paragraph 217. |  |  |

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on**

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|                |  |  |
|----------------|--|--|
| Paragraph 218. |  |  |
| Paragraph 219. |  |  |
| Paragraph 220. |  |  |
| Paragraph 221. |  |  |
| Paragraph 222. |  |  |
| Paragraph 223. |  |  |
| Paragraph 224. |  |  |
| Paragraph 225. |  |  |
| Paragraph 226. |  |  |
| Paragraph 227. |  |  |
| Paragraph 228. |  |  |
| Paragraph 229. |  |  |
| Paragraph 230. |  |  |
| Paragraph 231. |  |  |