

# IAIS Consultation

Print view of your comments on "Revisions to the IAIS Glossary, Introduction to ICPs and ICP 7 and development of ComFrame assessment methodology" - Date: 15.08.2019, Time: 08:26

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	Question
<b>Answer</b>	Q1 General Comment on Glossary terms
<b>Answer</b>	Q2 Comment on definition of Alternative risk transfer (ART)
<b>Answer</b>	Q3 Comment on definition of Asset-liability management (ALM)
<b>Answer</b>	Q4 Comment on definition of Back-testing
<b>Answer</b>	Q5 Comment on definition of Basis risk
<b>Answer</b>	Q6 Comment on definition of Captive insurer
<b>Answer</b>	Q7 Comment on definition of Claims provision
<b>Answer</b>	Q8 Comment on definition of Collateral
<b>Answer</b>	Q9 Comment on definition of Contagion risk
<b>Answer</b>	Q10 Comment on definition of Consumers

Q11 Comment on definition of Control Function

**Answer**

Q12 Comment on definition of Control level

**Answer**

Q13 Comment on definition of Corporate Governance framework

**Answer**

Q14 Comment on definition of Counterparty risk

**Answer**

Q15 Comment on definition of Credit rating

**Answer**

Q16 Comment on definition of Derivative

**Answer**

Q17 Comment on definition of Direct powers

**Answer**

Q18 Comment on definition of Duration

**Answer**

Q19 Comment on definition of Economic capital

**Answer**

Q20 Comment on definition of Enterprise Risk Management (ERM)

**Answer**

Q21 Comment on definition of Facultative reinsurance

**Answer**

Q22 Comment on definition of Financial conglomerate

**Answer**

Q23 Comment on definition of Finite reinsurance

**Answer**

Q24 Comment on definition of Going-concern basis

**Answer**

Q25 Comment on definition of Group-wide supervisor

**Answer**

Q26 Comment on definition of Head of the group (or parent)

**Answer**

Q27 Comment on definition of Head of the IAIG

**Answer**

Q28 Comment on definition of Home jurisdiction

**Answer**

Q29 Comment on definition of Host jurisdiction

**Answer**

Q30 Comment on definition of IAIS MMoU

**Answer**

Q31 Comment on definition of Indirect powers

**Answer**

Q32 Comment on definition of Insurance group

**Answer**

Q33 Comment on definition of Insurer

**Answer**

Q34 Comment on definition of Involved supervisors

**Answer**

Q35 Comment on definition of License

**Answer**

Q36 Comment on definition of Macroeconomic exposure

**Answer**

Q37 Comment on definition of Mismatching risk

**Answer**

Q38 Comment on definition of Multiple gearing

**Answer**

Q39 Comment on definition of Provision for unearned premiums

**Answer**

Q40 Comment on definition of Provision for unexpired risks

**Answer**

Q41 Comment on definition of Credit rating agency

<b>Answer</b>	
	Q42 Comment on definition of Reinsurance
<b>Answer</b>	
	Q43 Comment on definition of Reinsurer
<b>Answer</b>	
	Q44 Comment on definition of Retrocession
<b>Answer</b>	
	Q45 Comment on paragraph 18
<b>Answer</b>	GFIA appreciates that the IAIS took on board its recommendation in the consultation to include the addition of this paragraph in the overarching comments section of the ICPs. This now means that much of the detail language in the individual ICPs including in the applicable ComFrame text can be read in an appropriate context in respect of the appropriate focus of governance and materiality concerning the IAIG as a whole.
	Q46 Comment on paragraph 19
<b>Answer</b>	GFIA appreciates the addition of this paragraph in the overarching comments section of the ICPs. This now means that much of the detail language in the individual ICPs including in the applicable ComFrame text can be read in an appropriate context recognizing the distinction between the focus of the IAIG's Board on the IAIG as a whole, and that of the Boards of individual underlying legal entities on those respective entities.
	Q47 General Comment on draft ComFrame Assessment Methodology
<b>Answer</b>	
	Q48 Comment on paragraph 57
<b>Answer</b>	
	Q49 Comment on paragraph 58
<b>Answer</b>	
	Q50 Comment on paragraph 59
<b>Answer</b>	
	Q51 Comment on paragraph 60
<b>Answer</b>	
	Q52 Comment on paragraph 61
<b>Answer</b>	This paragraph seems unnecessary as it does not provide anything that is not already contemplated by ICP 25, which also would apply to IAIGs. Moreover, a simple aspirational statement in ComFrame encouraging supervisors to share information, but taken outside the broader context of ICP 25 which also considers safeguards such as MoUs, is too open-ended. GFIA recommends this paragraph be deleted.

Q53 Comment on paragraph 62

**Answer**

Q54 Comment on paragraph 63

**Answer**

The text in this paragraph seems self-contradictory. On the one hand, it states that “[an] observance of the ICPs is a necessary foundation for observance of ComFrame, an assessment of ComFrame Standards cannot be done in isolation.” Yet it appears to conclude with the possibility that the scope of an assessment may result in the level of observance of ComFrame Standards being treated separately from that of the underlying ICPs. That conclusion seems to be contradictory, and it is not readily apparent to us how it would be reasonably possible for such a separate assessment to be made without an understanding as well of the “necessary foundation.”

Q55 General comment on revisions to ICP 7

**Answer**

Q56 Comment on revisions to ICP 7.0.7

**Answer**

Q57 Comment on revisions to ICP 7.0.8

**Answer**

Q58 Comment on revisions to ICP 7.1.3

**Answer**