

# IAIS Consultations

Print view of your comments on "ICP 8 and ComFrame material integrated with ICP 8 " - Date: 15.01.2018, Time: 18:18

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<b>Treat my comments as confidential</b>	No

Question	
	Q1 General Comment on revisions made in ICP 8
<b>Answer</b>	<p>ICMIF welcomes the opportunity to comment on ICP 8 Risk Management and Internal control. We agree that for risk management to be sound and internal control systems to be effective they should be integrated into the insurer's overall system of governance. Risk management should also be embedded in the business model of the insurer, as we believe is already the requirement in most jurisdictions. From the outset, we would like to make the general point that good governance in an enterprise relies strongly on the motivation, involvement and ethics of the individuals concerned. For mutual insurers, this is complemented by an intrinsic focus on the long-term development of the company for the benefit of its member-policyholders. A multitude of strategies, policies, rules and controls alone can and will not suffice.</p>
	Q2 Comment on the additional ComFrame material integrated with ICP 8
<b>Answer</b>	
	Q3 Comment on revised Standard ICP 8.1
<b>Answer</b>	<p>We would like to suggest this wording for the 3rd bullet point: 'the ability to respond to material changes in the insurer's risk profile in an appropriate manner.'</p>
	Q4 Comment on revised Guidance ICP 8.1.2
<b>Answer</b>	<p>We agree with the changes proposed but would like to note that, as part of the ORSA, the format of the risk appetite statement should be up to the insurance undertaking.</p> <p>Q5 Comment on new Guidance ICP 8.1.3 We believe that, among the elements that should be part of a sound risk management system, the notion of conduct of business cannot be placed on an equal footing with the rest, which all derive from prudential calculations. Like the European Banking Authority's Guidelines on Internal Governance (Title V, 15, 129) we would suggest considering that 'the internal control framework of an institution should ensure prudent conduct of business, alongside effective and efficient operations; adequate identification, measurement and mitigation of risks; the reliability of financial and non-financial information reported both internally and externally; sound administrative and accounting procedures; and compliance with laws, regulations, supervisory requirements and the institution's internal policies, processes, rules and decisions.'</p>

Q5 Comment on new Guidance ICP 8.1.8

**Answer**

Q6 Comment on new ComFrame Standard CF8.1a

**Answer**

We think the current wording is far too strong and would suggest toning it down with the addition of 'major' before 'differences in risk management that may apply to different legal entities within the IAIG'.

Q7 Comment on new ComFrame Guidance CF8.1a.1

**Answer**

Q8 Comment on new ComFrame Guidance CF8.1a.2

**Answer**

Q9 Comment on revised Guidance ICP 8.1.9

**Answer**

Q10 Comment on new Guidance ICP 8.1.13

**Answer**

Q11 Comment on new Guidance ICP 8.1.14

**Answer**

We agree that all employees should be made aware of risk management policies.

Q12 Comment on new Guidance ICP 8.1.15

**Answer**

Q13 Comment on revised ComFrame Standard CF8.1b

**Answer**

Q14 Comment on revised Guidance ICP 8.1.16

**Answer**

Q15 Comment on revised ComFrame Standard CF8.1c

**Answer**

With regard to the changes affecting the IAIG's structure we would like to insert the concept of materiality concerning the assessment of changes in one or more entities of the group, as well as deleting the last sentence of CF8.1c.1, which seems odd in an ICP.

Q16 Comment on new ComFrame Guidance CF8.1c.1

**Answer**

Q17 Comment on new ComFrame Guidance CF8.1c.2

**Answer**

Q18 Comment on new ComFrame Guidance CF8.1d.2

<b>Answer</b>	
	Q19 Comment on new Guidance ICP 8.1.18
<b>Answer</b>	
	Q20 Comment on new Guidance ICP 8.1.19
<b>Answer</b>	
	Q21 Comment on revised Standard ICP 8.2
<b>Answer</b>	
	Q22 Comment on revised ComFrame Standard CF8.2a
<b>Answer</b>	
	Q23 Comment on revised ComFrame Standard CF8.6a
<b>Answer</b>	We believe most of the tasks that this paragraph lists as expected from the actuarial function are too broad. The actuarial function should principally assess and validate the methods and calculations used for the establishment and the maintenance of the IAIG's solvency position.