Questions for public consultation on draft application paper on climate scenario analysis in the insurance sector

Thank you for your interest in the public consultation on draft application paper on climate scenario analysis in the insurance sector. The Consultation Tool is available on the IAIS website.

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| **Please do not submit this document to the IAIS. All responses to the Consultation Document must be made via the** [**Consultation Tool**](https://survey.iaisweb.org/125583?lang=en) **to enable those responses to be considered.** |

Consultation questions

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| 1 | General comments on the draft application paper on climate scenario analysis in the insurance sector |
| 2 | General comments on section 1 Introduction |
| 3 | Comments on section 2 Scenario analysis versus stress testing |
| 4 | Comments on section 2.1 Identifying and applying climate change risk drivers |
| 5 | Comments on section 3 Scenario analysis objectives and scenario design (ICP 24 and 16) |
| 6 | Comments on section 3.1 Objectives of climate-related scenario analysis exercise |
| 7 | Comments on section 3.2 Scenario design |
| 8 | Comments on section 4 Macroprudential considerations for supervisors (ICP 24) |
| 9 | Comments on section 4.1 Assessing systemic importance (ICP 24.3) |
| 10 | Comments on section 4.2 Supervisory response (ICP 24.4) |
| 11 | Comments on section 4.3 Transparency (ICP 24.5) |
| 12 | Comments on section 5 Scenario analysis to inform assessment of insurers’ risk management and governance (ICP 16) |
| 13 | Comments on section 5.1 ERM framework review (ICP 16.16) |
| 14 | Comments on section 5.2 Investment policies (ICP 16.6) |
| 15 | Comments on section 5.3 Underwriting policies (ICP 16.7) |
| 16 | Comments on section 5.4 Insurer ORSAs (16.12) (16.14) |
| 17 | Comments on section 5.5 Integrating scenario analysis into risk policies (ICP 16.5, 16.6 & 16.7) |
| 18 | Comments on section 5.6 Risk appetite statement (ICP 16.4) |
| 19 | Comments on section 5.7 Board accountability (ICP 16.11) |
| 20 | Does the draft application paper provide sufficient detail to be a useful tool for supervisors and insurers?  |
| 21 | Are the different dimensions of climate risk for insurers namely (i) transition (ii) physical and (iii) climate-related litigation risks effectively covered in the application paper to both sides of insurer balance sheets?  |
| 22 | Are there concepts or approaches which should be added to the application paper?  |
| 23 | Does the application paper cover all relevant issues for scenario analysis from a macroprudential perspective (see section 4)?  |
| 24 | Does the application paper cover all relevant issues for scenario analysis related to Enterprise Risk Management and governance (see section 5)?  |
| 25 | Is there any additional work the IAIS should be undertaking in the area of climate-related scenario analysis?  |