## **IAIS** Consultations

## Print view of your comments on "Revised Insurance Core Principles 13 Reinsurance and Other Forms of Risk Transfer" - Date: 31.07.2017, Time: 15:50

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Treat my comments as confidential	No

	Question	
	Q1 General Comment on ICP 13	
Answer	The draft of ICP 13 appears to us to be appropriate, and rightly sets a high standard of knowledge and understanding for supervisors. However, as drafted, it is possible that supervisors may feel that they are expected to engage with levels of detail to a point that is not justified against tests of materiality or proportionality. We believe it would be helpful if the ICPs included provisions that guarded against this. In particular, we believe the ICPs should emphasise the importance of supervisors exercising judgement, to determine the point at which they have sufficient information and understanding, given the circumstances of the case.	
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	Q3 Comment on Guidance ICP 13.0.2	
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	Q4 Comment on Guidance ICP 13.0.3	
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	Q5 Comment on Guidance ICP 13.0.4	
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