

25 September 2019

Mr Hans Hoogervorst
Chairman
International Accounting Standards Board

Email: hhoogervorst@ifrs.org

Dear Mr Hoogervorst

COMMENTS ON ED/2019/4: AMENDMENTS TO IFRS 17 INSURANCE CONTRACTS

I am writing on behalf of the Insurance Council of Australia¹ (the Insurance Council) in response to ED/2019/4, the proposed changes to IFRS 17 Insurance Contracts.

The Insurance Council has had a Working Group following and contributing to the development of IFRS 17 ever since it was first discussed and our membership has a keen interest in the effective implementation of the new standard. A number of the members of the Insurance Council's Working Group also participate in the AASB's Transition Resource Group and were involved in preparation of the AASB submission in response to ED/2019/4.

The Insurance Council fully supports the AASB submission. In particular, we strongly endorse the comments made about remaining areas of concern and the suggestions made by the AASB to address those issues. We also support the AASB proposals for improved clarity in various aspects of the proposed changes.

If you have any questions or comments in relation to our feedback, please contact John Anning, the Insurance Council's General Manager Policy, Regulation Directorate, on (02) 9253 5121 or janning@insurancecouncil.com.au.

Yours sincerely



Robert Whelan
Executive Director and CEO

¹ The Insurance Council of Australia is the representative body of the general insurance industry in Australia. Our members represent approximately 95 percent of total premium income written by private sector general insurers. Insurance Council members, both insurers and reinsurers, are a significant part of the financial services system. June 2019 Australian Prudential Regulation Authority statistics show that the general insurance industry generates gross written premium of \$48.4 billion per annum and has total assets of \$128.4 billion. The industry employs approximately 60,000 people and on average pays out about \$151.4 million in claims each working day.

Insurance Council members provide insurance products ranging from those usually purchased by individuals (such as home and contents insurance, travel insurance, motor vehicle insurance) to those purchased by small businesses and larger organisations (such as product and public liability insurance, professional indemnity insurance, commercial property, and directors and officers insurance).