

IAIS 市中協議文書「監督カレッジに関する適用文書（改訂版）」に関する協会意見

該当箇所	意見(和文)	意見(英文)
<p>パラグラフ 13-15</p>	<ul style="list-style-type: none"> <li>・ ICP 25.0.3 およびパラグラフ 8 では、グループワイド監督における有効性・効率性の確保が重要であることに言及されている。</li> <li>・ パラグラフ 13～15 では、グローバル監督カレッジ、リージョナルカレッジ、コアカレッジなど監督対象の事業や目的に応じた階層的構造に関する複数の例が示されているが、上述のとおり有効性・効率性の確保が重要である点を踏まえ、それらの階層的取組が作業の重複等によって監督カレッジに参加する保険グループの過度な実務負担につながることはないよう留意いただきたい。</li> <li>・ 上述の趣旨は改訂前の適用文書のパラグラフ 12 に「Colleges should be manageable as well as effective and efficient in their work, thereby reducing potential duplication of work and avoiding the creation of any unnecessary additional burden on supervisory authorities and firms.」と明記されていたため、当該記載を改訂後の適用文書にも存置いただきたい。</li> </ul>	<ul style="list-style-type: none"> <li>• The Life Insurance Association of Japan (hereafter "LIAJ") appreciates the opportunity to submit public comments to the International Association of Insurance Supervisors (or the "IAIS") regarding the Draft Revised Application Paper on Supervisory Colleges.</li> <li>• ICP 25.0.3 and Paragraph 8 mention the importance of ensuring effectiveness and efficiency in group-wide supervision.</li> <li>• Paragraphs 13-15 provide several examples of the tiered structure of the supervisory college, such as a global supervisory college, regional colleges, and core colleges, depending on the business to be supervised and its objectives.</li> <li>• In light of the importance of ensuring effectiveness and efficiency as mentioned above, we would like to ask the IAIS to consider that the tiered approaches do not lead to an excessive amount of administrative burden due to the duplication of work for insurance groups participating in the supervisory colleges.</li> <li>• The purpose of the above-mentioned was clearly stated as "Colleges should be manageable as well as effective and efficient in their work, thereby</li> </ul>

		reducing potential duplication of work and avoiding the creation of any unnecessary additional burden on supervisory authorities and firms" in Paragraph 12 of the previous version of the Application Paper, and we would like to ask the IAIS to retain this statement in the Revised Application Paper.
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