

IAIS「気候リスクの監督ガイダンスに関する市中協議（Part1）」への生命保険協会意見

該当箇所	意見（和文）	意見（英文）
Q1. Do you have any comments on the proposed text referencing climate-related risk within the ICP Introduction?	<ul style="list-style-type: none"> 「気候リスクの監督ガイダンスに関する市中協議（Part 1）」にコメントを提供する機会をいただき感謝する。 気候変動が金融安定や保険会社のレジリエンスに影響を与えるリスクであるという認識のもと、重要戦略テーマとして I A I S が各種取組を行うことは有意義なものと認識している。こうした認識のもと以下のコメントを提出したい。 Climate-related risk の定義は、Application paper には示されているが（Risk posed by the exposure of an insurer to physical, transition and/or liability risks caused by or related to climate change.）、I C P でも記述し、かつ Climate risk という言葉と interchangeably に用いるのであれば、その旨も記述する方がよい。 	<ul style="list-style-type: none"> The Life Insurance Association of Japan (hereafter the “LIAJ”) appreciates the opportunity to submit public comments to the International Association of Insurance Supervisors (or the “IAIS”) regarding the Climate risk supervisory guidance – Part one (or the “Consultation Document”). Based on the acknowledgement that the possible risk of climate change impacts financial stability and resilience of insurers, we perceive each initiative taken by the IAIS as a strategic theme is beneficial for the insurance sector. With this in mind, we would like to submit our comments as follows. The ICP should include the definition of “climate-related risk,” as stated in the 2021 Application paper, which defined it as “risk posed by the exposure of an insurer to physical, transition and/or liability risks caused by or related to climate change.” If the terms “climate-related risk” and “climate risk” are used interchangeably that should be noted as well.
Q2. Do you have any comments on the location of the proposed text?	<ul style="list-style-type: none"> Proportionalityとrisksを同じ節の中で述べるのは適当でないのではないか。ここでのrisksは、proportionalityの文脈とは関わりのない話である。Risksについてのパラ11と12は「risks」という節を新たに設け、その後に現状通り 	<ul style="list-style-type: none"> It is not appropriate to place the terms “proportionality” and “risk” in the same section, as risks referred here is not relevant to the context of proportionality. It would be better to point this out more clearly by establishing a new section on Risks”

	Proportionality and risk-based supervisionを記述する方が論旨がより明確になるのではないかと。	mentioned in paragraphs 11 and 12, leaving the sections on “Proportionality and risk-based supervision” the same.
Q4. Do you have suggestions on issues or themes to explore in the forthcoming consultations to improve the usability of the climate risk related Application Papers?	<ul style="list-style-type: none"> ● 気候リスクは全ての主体にとって比較的新たなリスク分野であり、保険会社にとっても、より詳細に気候リスクを認識し対応をより一層推し進める上では、監督当局をはじめとした様々なステークホルダーとの情報共有や密接な意見交換が不可欠である。保険会社から監督当局への一方向の報告だけではなく、双方向の情報提供やコミュニケーションの重要性を認識し、それを勧奨するような形で今後の監督支援文書を策定頂ければ幸いである。 ● 現在、NZDPUにて、気候変動関連データのグローバルかつオープンなデータプラットフォームの構築を進めていただいているものの、気候変動リスクの評価や気候シナリオ分析の分野は、各社が創意工夫を凝らしながら進めている領域であり、スタンダードとなるような分析手法等はまだ存在しないと認識している。今後、ORSAや気候シナリオ分析に関する監督支援文書を開発する際には、様々な気候変動リスクの評価手法や気候シナリオ分析のベストプラクティスを例示するなど、各社が自社の規模やビジネスモデル等に応じた最適な手法を採用し、リソースを効果的に使うことが可能にな 	<ul style="list-style-type: none"> ● Climate risk is a relatively new category of risk for all standard setting bodies as well as for insurers, so information-sharing and close exchange of views between various stakeholders and supervisors are necessary as to understand climate risk in more detail and to further address the issue of climate risk. We would appreciate if the IAIS could develop additional supporting material in a manner that recognizes the importance of sharing information based on a two-way communication channel, and encourages to do so, rather than requiring insurers to share information to supervisors in a one-way manner. ● While the Net-Zero Data Public Utility(NZDPU) is currently developing a global and open data platform related to climate change, climate-related risk assessment and climate scenario analysis are areas in which insurers are working on figuring out how best to proceed, as there is not any standard for analytical methods being established yet. As the IAIS develops supporting material on ORSA and climate scenario analysis, we would like the IAIS to consider providing information such as best practices on various climate-related risk assessment and climate scenario analysis so that insurers

	<p>るような配慮をしていただきたい。</p> <ul style="list-style-type: none"> ● 社会の Net-Zero 移行を広く推し進める上で、現状 NZAOA など気候変動にかかる様々なイニシアティブが存在している。また、TCFD 提言をベースとした ISSB による国際的なサステナビリティ開示基準の策定も進んでいる。このような国際的な動向を踏まえながら、各種イニシアティブに参加してネットゼロに向けた取組みを進めている保険会社も多く存在するため、IAIS は ICP の改訂や新たな監督支援文書の開発に係る検討にあたっては、上記のような保険会社の主体的な取組みを尊重しつつ、TCFD 提言や ISSB 基準等の国際的な基準との整合性の確保も考慮しながら対応すべきである。また、こうした取組みに対し、監督当局としてはどう受け止め、気候リスクとの関係をどう捉えているのか、イニシアティブを通じて保険会社が経済のネットゼロ移行を支援する際に、監督者として留意する論点はあるのか、等についても今後の市中協議で取り上げ、IAIS の考え方を示して頂きたい。 ● また、IAIS としての規制監督方針を定める上では、保険セクター以外の金融セクター監督当局との連携も不可欠である。金融業態ごとに規制や監督の方向性（direction）が異なることは避け、プロポーショナリティ原則の尊重を前提と 	<p>can adopt the most appropriate method that accounts for the scale and business models of theirs and fully utilize their resources effectively.</p> <ul style="list-style-type: none"> ● Various financial sector initiatives related to climate change exist that broadly encourage society's transition to net-zero, such as the UN-convened Net Zero Asset Owner Alliance (NZAOA). Moreover, the development of international sustainability disclosure standard built upon the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) recommendations which is led by The International Sustainability Standards Board (ISSB). Taking into account these international developments, as many insurers already participate in initiatives that promote net-zero exist, the IAIS should respect the proactive initiatives of individual insurers, as well as consider to ensure consistency with other international disclosure standards such as the TCFD recommendations and ISSB standard when revising the ICP or developing new supporting material. ● In addition, coordination with supervisors other than insurance supervisors is essential when the IAIS decides on regulatory and supervisory policy. It would be appreciated if the IAIS could respect the principle of proportionality when considering
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	<p>しながら、他の金融セクターにおける取組内容も考慮しながら今後の取組を検討いただきたい。</p>	<p>future climate-related work and communicate with other financial sectors to avoid adopting different regulatory and supervisory approaches as to keep them consistent with different financial sectors.</p>
<p>Q5. Should the IAIS' work and upcoming consultations on climate risk also cover considerations related to transition planning by insurers?</p>	<ul style="list-style-type: none"> 移行計画策定上の考慮事項については、すでにTCFDやGFANZの取組みの中でそれぞれガイダンスが策定済である。このようなガイダンスを踏まえて、多くの保険会社が移行計画の策定等の対応を進めている状況と理解している。IAISは保険会社に対する過度な規制対応要求は避けるとともに国際的な基準との整合性の確保に留意いただきたい。 	<ul style="list-style-type: none"> With regard to considerations for transition planning, guidance has already been developed based on initiatives such as the TCFD and the Glasgow Financial Alliance for Net Zero(GFANZ). Based on these types of guidance, we understand that many insurers are working on their own transition planning. We would like to ask the IAIS to avoid superfluous regulation, as well as to ensure consistency of insurance regulatory material with these types of guidance.

以 上