

■ICP 14、17 の改訂案に関する協会意見

(1) ICP14（評価）

該当箇所	規定内容	意見（和文）	意見（英文）
ICP14.0.2	Differences between technical provisions for general purpose financial reports and regulatory reports should be explained in terms of differences in data, discount rate, methodology and assumptions used together with the rationale for why any different approach is appropriate for solvency purposes.	<ul style="list-style-type: none">一般目的の財務諸表と規制目的の財務諸表に違いがある場合、保険会社はその差を関係者に説明する責任がある点について同意する。一方、日本では規制目的の財務諸表のみが経済価値ベースとなる見通しである。その様な前提において、我々は「合理的なコストと時間で作成および検証可能であり、かつ競争上の不利益を保険会社が被ることのない範囲での説明責任を全うすること」が重要と考えている。特に技術的準備金に関する詳細なデータ、割引率、計算前提等に関する差異の説明に関しては、理解困難となる場合も多く、理解可能性にも留意が必要である。ついては、以下の記載に変更頂きたい。 (修正前) 一般目的の財務諸表と、監督目的の財務諸表における技術的準備金の相違については、・・・説明されるべきである。 (修正後) 理解可能性が担保される程度まで、一般目的の財務諸表と、監督目的の財務諸表における技術的準備金の相違については、・・・説明されるべきである。 加えて、合理的なコストと時間で作成および検証可能であり、かつ競争上の不利益を保険会社が被ることのない範囲での説明責任を全うすることが重要である。	<ul style="list-style-type: none">We agree that any differences between technical provisions for general purpose financial reports and regulatory reports should be explained by an insurer.Since only the regulatory reports are expected to be based on market value in Japan, we believe that it is important for insurers to ‘fulfill their responsibility to explain the difference as long as it does not leave them at a competitive disadvantage and the preparation and assessment are possible within a reasonable cost and timeframe.In terms of the explanation for the detailed data on technical provisions, discount rates and differences in assumptions, there could often be cases where it is especially difficult to understand and the need for proper comprehension should be noted.Therefore, we suggest revising the paragraph 14.0.2 by adding the following sentence: ‘To the extent that intelligibility is ensured, differences between technical provisions should be explained (...) appropriate for solvency purposes. In addition, it is important to ensure that the explanation can be prepared and verified at a reasonable cost and time, and that it does not suffer a competitive disadvantage.’

(2) ICP17（資本充分性）

該当箇所	規定内容	意見（和文）	意見（英文）
ICP17.13.6	It may be appropriate for a supervisor to consider transitional measures when permitting insurers to use internal models for regulatory capital requirements purposes for the first time. Such measures will permit the necessary time for both insurers and the supervisor to become familiar with the internal models and their uses.	<ul style="list-style-type: none">既に内部モデルを導入・当局承認を得ている法域の保険会社グループ以外が、「承認プロセス」および「承認要件」を満たすことは、監督および業界双方にとって負担が大きく、移行措置について賛同する。	<ul style="list-style-type: none">We support the proposed introduction of transitional measures as the burden for both insurers and supervisor to meet the process and requirement of approval for the use of an internal model is significant except for insurers that are part of an insurance group from a jurisdiction where its use of an internal model has already been implemented and approved by the supervisory.
	For example, during a transition period, the supervisor could include the use of a partial internal model, to allow the insurer to transition gradually to use a full internal model or the supervisor could require parallel reporting of regulatory capital requirements determined by both the internal model and standardised approach. The supervisor may also consider applying a temporary minimum level of the regulatory capital requirements during the transition period.	<ul style="list-style-type: none">一方、移行措置の例示として挙げられている部分内部モデルは、意図的に保険会社にとって有利な部分のみに内部モデルを用いようとする行動（一種のチェリーピッキング）が生じる可能性があり、留意が必要である。	<ul style="list-style-type: none">However, an insurer could potentially apply the internal model partially to its advantage (i.e. some sort of cherry-picking). The use of a partial internal model, proposed as a transitional measure in the revised paragraph 17.13.6, should therefore be noted.

以上