

**Insurance Ireland response to CP 92 - Consultation on Domestic
Actuarial Regime and Related Governance Requirements under Solvency II**

1. When previous changes were made to the Fitness and Probity regime, companies were required to satisfy due diligence requirements in respect of employees then in situ and holding these roles but CBI approval was not required. We would suggest that similar principles should apply here and that current PCF chief actuaries and signing actuaries should have their appointment as HoAF for the same firm accepted on application by letter to the CBI for a transfer of this designation.
2. For composite life and non-life reinsurers how does the CBI see the HoAF operating?
3. It is our understanding that other countries will not require an actuarial opinion on the ORSA processes and we would query whether this goes beyond the requirements of the Directive for the actuarial function contrary to the principles of maximum harmonisation. (If this requirement is to apply then it should not be for more than one opinion a year.)
4. What exactly will the Actuary have to certify each year? The actuarial function “co-ordinates” the calculation of the technical provisions rather than is responsible for them under Solvency I. This weakens the scope of what the HoAF can certify without having to redo work that has been done elsewhere.
5. The Signing Actuary for a reinsurance company only certifies that the adequacy of technical provisions. Under the CP, it appears that the CBI wants to extend the actuarial sign off to the valuation of assets and the level of solvency. This is quite a lot of additional work to take on.
6. Signing and chief actuary roles are ceasing on 1 January 2016. What implications does this have for the Solvency I submissions with respect to the year ending 31 December 2015?
7. Will the Corporate Governance Code be amended to reflect the final requirements of the CP?
8. It would be helpful to include clarification to the effect that the requirements apply to solo or group insurance undertakings only and not to holding companies.
9. Does the CBI see the reserving committee comprising board directors and in particular non-executive directors?
10. With respect to 3.6 (viii) can the CBI confirm that the periods referred to commence with effect from 1 January 2016?

11. Provision 4.1(I)(b) refers to the transfer of the allocation of surplus for, amongst other matters, the old basis tax regime. Is this allocation to be included, for life companies, on the NST 2 template as proposed in the Insurance Ireland response to the NST consultation?
12. Provision 4.1 (II)(b) refers to discretionary powers of 'The Actuary'. Is this to be an annual report or only on occasions where it is used?
13. Is the CBI going to give any guidance on the form and structure of the opinion to be provided on the AO TPs to the CBI?
14. Given the small number of organisations who can do the peer review in Ireland, is there a risk of "group think" and the likelihood that over time market norms will be applied to every company?