

Stakeholder responses to EIOPA's Discussion Paper on the SCR review

- Overview on the responses to cat risk related questions

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- This presentation aims at providing a short overview of the responses to the discussion paper
- These responses were used to draft the CAT WS mandate
- This mandate focuses on simplifications. It will be completed with a list of perils to recalibrate
- There are other “CAT risks” topics that are being reviewed by the SCR review project group

- Q7.1 and Q7.2 on granularity
→ cf. CAT WS mandate
- Q7.3 to Q7.7: difficulties for each sub-module
 - o Difficulties often linked with granularity (e.g. allocating sum insured to risk-zone)
 - o Some stakeholders mentioned inappropriate results for some countries → will be addressed in the recalibration part
 - o Lack of documentation → effort to better document the new calibration
 - o No other significant difficulty: formula is simple enough to apply once mapping to risk zone is done

- Q7.8 on risk-sensitivity
 - o Standard formula has its limits and the current design for Nat Cat is already granular
 - o ORSA was seen as the right tool to go further than the standard formula
 - o Risk-sensitivity for non-EEA exposures could be improved
 - It was not seen as a priority work

- Q7.9 on contractual limits
 - o No evidence that contractual limits have changed since 2010
 - o Several requests for clarification on the application of sum insured and contractual limits
 - Practices are being collected and if necessary, the point will be included in the CAT WS mandate in the future

- Q7.10 to Q7.13 on windstorm clustering
 - o Clustering component observed in 1990 and 1999 → already somehow included in the calibration
 - o Doubt whether that would improve the risk sensitivity
 - o Not a risk in all jurisdictions
 - o Rather an issue of level of calibration
 - o 2 events are enough for the standard formula
 - o Model vendors are considering this risk
 - Not a priority to be addressed, not part of the mandate for the time being

- Q8.1 to 8.6 on simplifications
 - Most of the difficulties relate to the fire risk sub-module
 - Motor-vehicle liability and marine risk sub-modules mentioned by several stakeholders as well
→ cf. mandate
- Q8.7 on issue with calibration
 - Most of the comments relate to fire risk sub-module
→ cf. mandate

- Q8.8 on risk sensitivity of marine, aviation and fire risks: should it be based on the sum insured net of reinsurance?
 - Vast majority of stakeholders agree
 - Some point out that it increases complexity, but not necessarily to a degree that it prohibits the proposal
 - Data has been collected and is being analysed to draw pros and cons
- Q8.9 to Q8.12 on fire risk:
 - cf. mandate

- Q9.1 and Q9.2 on mass accident and terror risks
 - Only 2 stakeholders in favour of reviewing terror risk
 - Others believe the current design is appropriate
 - And that ORSA should complete the assessment, which depends on the exposure
 - No further work on this topic
- Q9.3 to Q9.5 on simplifications
 - cf. mandate



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Thank you

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