



## APCIAResponses to NAIC Questions to Determine Objectives of NAIC Climate Disclosures

The American Property Casualty Insurance Association (APCIA) represents nearly 1200 insurers and reinsurers with a wide range of business models and sizes that play a key role in America's financially strong, competitive, and innovative insurance markets that protect and serve consumers and enterprises. Our responses to the questions posed by the NAIC regarding the climate risk disclosure framework are outlined below.

- 1) Who is/are the audience(s) and what do they wish to glean from the results (solvency regulation, risk evaluation, etc.)? Public climate disclosures are for the company to discuss its policies and should reflect an insurer's unique business model and risk profile which is driven by materiality and the other factors that govern public reporting. In contrast, the objectives of regulatory reporting are providing policyholder protection while concurrently preserving the solvency condition of the insurer. Therefore, for regulator mandated reporting, the audience should be solely state regulators with respect to their responsibility to oversee insurer solvency and consumer protection with confidentiality protection particularly for forward looking disclosures.
  - a) What qualitative and quantitative metrics do they need?

c)

c) Combination of public and regulator-