

## **ED 5 Insurance Contracts (2003)**

10th Dec 2003

### **Comment Letters**

- CL 1** Financial Reporting Standards Board (FRSB) (New Zealand)
- CL 1A** -- *Additional comments*
- CL 2** Holcim Group Ltd (Switzerland)
- CL 3** Organismo Italiano di Contabilità (OIC) (Italy)
- CL 4** Skandia (Sweden)
- CL 5** Life Insurance Actuarial Standards Board (Australia) [*comments on AASB ED122*]
- CL 6** Swiss Insurance Association (Switzerland)
- CL 7** Malaysian Accounting Standards Board (Malaysia)
- CL 8** Aviva Plc (UK)
- CL 9** Holiday, Susan (UK)
- CL 10** Syngenta International (Switzerland)
- CL 11** Accounting Standards Board of Japan (Japan)
- CL 12** Forum of European Insurers
- CL 13** F Hoffmann-La Roche (Switzerland)
- CL 14** Abbott, William (UK)
- CL 15** Groupe Consultatif Européen
- CL 16** Verband der Versicherungsunternehmen Österreichs (Austria)
- CL 17** Santam Ltd (South Africa)
- CL 18** Institute of Chartered Accountants in Ireland (Ireland)
- CL 19** Littlejohn Frazer Chartered Accountants (UK)
- CL 20** Association of European Cooperative and Mutual Insurers (ACME) (Belgium)
- CL 21** Actuarial Profession, The (UK)
- CL 22** Insurance Council of Australia (Australia)
- CL 23** Fédération Française des Sociétés d'Assurances (FFSA) (France)
- CL 24** van Rees, Herman (The Netherlands)
- CL 25** Federal Financial Supervisory Authority - BaFin (Germany)
- CL 27** Swedish Insurance Federation (Sweden)
- CL 28** Danish Insurance Association (Denmark)
- CL 29** Foreningen af Statsautoriserede Revisorer (FSR) (Denmark)
- CL 30** Swedish Financial Accounting Standards Council (Sweden)
- CL 31** British Bankers' Association (BBA) (UK)
- CL 32** Nationwide Building Society (UK)
- CL 33** Accounting Standards Board (ASB) (UK)
- CL 34** Royal Association of Belgian Actuaries (Belgium)
- CL 35** Conseil National de la Comptabilité CNC (France)
- CL 36** Association of Financial Guaranty Insurers (USA)
- CL 37** Industrie-Holding (Switzerland)
- CL 38** International Accounting Standards Working Group (IASWG) of the National Association of Insurance Commissioners (NAIC) (USA)
- CL 39** Taiyo Life Insurance Company (Japan)

- CL 40** Federation of Finnish Insurance Companies (Finland)
- CL 41** General Insurance Association of Japan (Japan)
- CL 42** Institute of Actuaries of Japan (IAJ) (Japan)
- CL 43** BHP Billiton (Australia)
- CL 44** Nippon Life Insurance Company (Japan)
- CL 45** Asahi Mutual Life Insurance Company (Japan)
- CL 46** Dai-ichi Mutual Life Insurance Company (Japan)
- CL 47** Fukuoku Mutual Life Insurance Company (Japan)
- CL 48** Marillion (Russia)
- CL 49** Life Insurance Association of Japan (Japan)
- CL 50** Swedish Society of Actuaries (Sweden)
- CL 51** Council on Corporate Disclosure and Governance (CCDG) (Singapore)
- CL 52** Treuhand-Kammer (Switzerland)
- CL 53** UK 100 Group (UK)
- CL 54** Actuarial Association of Austria (Austria)
- CL 55** Masahiro Hoshino (Japan)
- CL 56** German Actuarial Society (Germany)
- CL 57** Meiji Life Insurance Company (Japan)
- CL 58** Sumitomo Life Insurance Company (Japan)
- CL 59** Raad voor de Jaarverslaggeving (Council for Annual Reporting) (Netherlands)
- CL 60** Deloitte (International)
- CL 61** Chamber of Auditors of the Czech Republic
- CL 62** Mitsui Mutual Life Insurance Association (Japan)
- CL 63** Istituto per la Vigilanza sulle Assicurazioni private e di Interesse Collettivo (ISVAP) (Italian Supervisory Authority) (Italy)
- CL 64** Comité Européen des Assurances
- CL 65** Australian Accounting Standards Board (AASB) (Australia)
- CL 66** Yasuda Life Insurance Company (Japan)
- CL 67** Danish Bankers Association (Denmark)
- CL 68** Instituto de Contabilidad y Auditoria de Cuentas (Spain)
- CL 69** German Insurance Association (Germany)
- CL 70** Time & Tide Shipping (UK)
- CL 71** Association of British Insurers (UK)
- CL 72** American Council of Life Insurers (US)
- Additional information provided by the American Council of Life Insurers and the International Actuarial Association (CL 107)*
- ACLI/ IAA – first report on joint project (10 March 2003)
- ACLI/ IAA – second report on joint project (3 June 2003)
- ACLI/ IAA – final supplement to second report on joint project (Revised - August 2003)
- Memorandum from Paul McCrossan concerning the supplement [CL 72C] (August 2003)
- CL 73** South African Institute of Chartered Accountants (South Africa)
- CL 74** *[Joint Response]*  
 American Council of Life Insurers  
 Austrian Insurance Association  
 German Insurance Association  
 Life Insurance Association of Japan

National Association of Independent Insurers (USA)  
National Association of Mutual Insurance Companies (USA)  
Reinsurance Association of America

- CL 75** Lloyd's (UK)
- CL 76** Allianz AG (Germany)
- CL 77** Estonian Financial Supervisory Authority (Estonia)
- CL 78** Standard Life Assurance Company (UK)
- CL 79** European Financial Reporting Advisory Group (EFRAG)
- CL 80** Financial Services Authority (Finansinspektionen) (Sweden)
- CL 80A** -- *Additional comments*
- CL 81** Co-operative Insurance Society Limited (CIS) (UK)
- CL 82** Norsk RegnskapsStiftelse - Norwegian Accounting Standards Board (Norway)
- CL 83** Institute of Chartered Accountants in & Wales (UK)
- CL 84** Royal & Sun Alliance (UK)
- CL 85** RAC Plc (UK)
- CL 86** Danish Financial Supervisory Authority (Denmark)
- CL 87** Kredittilsynet (Norway)
- CL 88** UBS (Switzerland)
- CL 89** London Investment Banking Association (LIBA) (UK)
- CL 90** Society of Actuaries in Ireland (Ireland)
- CL 91** Swiss Re (Switzerland)
- CL 92** American Academy of Actuaries (US)
- CL 93** Hepp, John, University of Wisconsin at Madison (US)
- CL 94** Novartis International AG (Switzerland)
- CL 95** New Zealand Securities Commission (New Zealand)
- CL 96** Australian Accountants & Actuaries Liaison Committee (Australia)
- CL 97** Institute of Certified Public Accountants in Israel (ICPAI) (Israel)
- CL 98** Basel Committee on Banking Supervision
- CL 99** Institute of Actuaries of Australia (IAAust) (Australia)
- CL 100** Japanese Institute of Certified Public Accountants (JICPA) (Japan)
- CL 101** Gecalux Group (Luxembourg)
- CL 102** Föreningen Auktoriserade Revisorer FAR (Sweden)
- CL 103** PricewaterhouseCoopers (International)
- CL 104** KPMG International
- CL 105** South African Insurance Association (South Africa)  
*(NB – the attachment to this letter was also submitted as an appendix to CL 73)*
- CL 106** WestLB AG (Germany)
- CL 107** *[Draft]*International Actuarial Association (IAA)
- CL 108** Association for Investment Management and Research (AIMR)
- CL 109** *[Joint Response]*  
Association pour la participation des entreprises françaises à l'harmonisation comptable internationale (ACTEO)  
Mouvement des Entreprises de France (France)
- CL 110** Institut der Wirtschaftsprüfer (IDW) (Germany)
- CL 111** Hong Kong Society of Accountants (Hong Kong)
- CL 112** International Association of Insurance Supervisors (IAIS)
- CL 113** *[Joint Response]*  
Canadian Institute of Actuaries (CIA)

Canadian Life and Health Insurance Association (CLHIA)  
Canadian Life and Health Insurance Compensation Corporation (CompCorp)  
Insurance Accounting Task Force of the Canadian Accounting Standards Board  
Insurance Bureau of Canada (IBC)  
Office of the Superintendent of Financial Institutions (OSFI)

- CL 114** International Organization of Securities Commissions (IOSCO)
- CL 115** Legal & General Group plc (UK)
- CL 116** New York State Society of Certified Public Accountants (NYSSCPA) (USA)
- CL 117** European Banking Federation (EBF) & the European Savings Banks Group (ESBG)
- CL 118** Prudential (UK)
- CL 119** Zurich Financial Services (Switzerland)
- CL 120** Société Générale (France)
- CL 121** Swiss Life (Switzerland)
- CL 122** Old Mutual (UK)
- CL 123** Amlin (UK)
- CL 124** Ernst & Young (International)
- CL 125** Association of Dutch Insurers (Netherlands)
- CL 126** Swiss Association of Actuaries (Switzerland)
- CL 127** Abbey (UK)
- CL 128** Dutch Health Insurers (Netherlands)
- CL 129** Arias Actuarios S.L.
- CL 130** German Accounting Standards Committee (DRSC) (Germany)
- CL 131** London Society of Chartered Accountants (LSCA) (UK)
- CL 132** Fédération des Experts Comptables Européens (FEE)
- CL 133** Accounting Standards Executive Committee (AcSEC) of the American Institute of Certified Public Accountants (USA)