



Deadline: 16 August 2019

Please use this template to comment on the [Final Exposure Draft of ISAP 4 on IFRS 17 Insurance Contracts](#), and the proposed revisions to the [Glossary for ISAP 4](#).

The IAA invites comments on this Final Exposure Draft, particularly on the questions set out below. Comments are most helpful if they:

- (a) Are comments on the questions as stated;
- (b) Take full account of what is already addressed in the [consultation report on the 2nd exposure draft](#).
- (b) Indicate the specific paragraph or group of paragraphs to which they relate;
- (c) Contain a clear rationale; and
- (d) Include any alternative that the IAA should consider, if applicable within the scope of the [Statement of Intent for ISAP 4](#).

Identification and instructions		
Name of Individual:	Please indicate if your comments are personal, or represent your organization:	Comments represent those of the Australian Actuaries Institute
Name of organization		Australian Actuaries Institute
Disclosure of comments:	Please indicate if your comments should be treated as confidential, and if so why:	Comments are not confidential
Instructions for filling in and sending the template	<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> <li>⇒ Do <b>not</b> write in the yellow shaded cells</li> <li>⇒ Write in the white cells</li> <li>⇒ When commenting on a specific paragraph: <ul style="list-style-type: none"> <li>○ Please use a separate row for each paragraph, sub paragraph, or bullet.</li> <li>○ Please include the full reference in the first column such as “Introduction 3<sup>rd</sup> paragraph 2<sup>nd</sup> bullet” or “2.6.1.b.ii”</li> <li>○ Please insert/append extra rows as needed.</li> </ul> </li> </ul> <p><b>Please send the completed template, renamed with the organization’s or individual’s name, attached in <u>Word Format</u>, to <a href="mailto:ISAP4.comments@actuaries.org">ISAP4.comments@actuaries.org</a></b></p>	



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	Specific Questions asked by the ASC	Response
Q1.	Is the guidance clear and unambiguous? If not, how should it be changed?	Yes
Q2.	Is the guidance sufficient and appropriate? If not, how should it be changed?	Yes

	General Comments on the ISAP 4 – Final Exposure Draft
	N/A

Comments on specific paragraphs of the ISAP 4 - Final Exposure Draft		
Full paragraph reference	Change proposed to the paragraph (markup preferred)	Reason the change is needed (can be kept very brief or left blank if obvious from the change)
2.7.2	Is just advising the principal of the existence of a significant financing component sufficient, or should the actuary act accordingly in the performance of calculations (i.e. calculate the liability in the knowledge that a significant financing component exists)?	This is a new paragraph which has not previously been reviewed.
2.9.1(b)	The processes to be followed where the actuary's recommendations or results are included inappropriately in the IFRS 17 financial statements or disclosures needs to be consistent with the requirements of ISAP 1 (e.g. discussion with the principal, disclosure of concerns in reports).	This guidance is potentially inadequate and inconsistent with other guidance given by the IAA. .

**Comments on specific definitions in the Exposure Draft of the updated Glossary**

**Note that only the proposed revisions are open for comment**



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Defined Term	Change proposed to the definition (markup preferred)	Reason the change is needed (can be kept very brief or left blank if obvious from the change)