



Deadline: 30 June 2018

Please use this template to comment on the [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 Exposure Draft, particularly on the questions set out below. Comments are most helpful if they:

- (a) Comment on the questions as stated;
- (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:	Organization
Name of organization		Institute of Actuaries of Japan
Disclosure of comments:	Please indicate if your comments should be treated as confidential, and if so why:	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"> ⇒ Do not write in the yellow shaded cells ⇒ Write in the white cells ⇒ When commenting on a specific paragraph: <ul style="list-style-type: none"> ○ Please use a separate row for each paragraph, sub paragraph, or bullet. ○ Please include the full reference in the first column such as “Introduction 3rd paragraph 2nd bullet” or “2.6.1.b.ii” ○ Please insert/append extra rows as needed. <p>Please send the completed template, renamed with the organization’s or individual’s name, attached in <u>Word Format</u>, to ISAP4.comments@actuaries.org</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 (except for the general/specific comments below)
Q2.	Is the guidance sufficient and appropriate? If not, how should it be changed?	Yes (except for the general/specific comments below)
Q3.	Is the guidance at the right level of detail? If not, what text should be omitted because it is too detailed? In what areas do actuaries need more detailed guidance?	Yes (except for the general/specific comments below)
Q4.	Are there other matters that should be included in this standard? Are there some included here that should not be?	No

	General Comments on the ISAP 4 Exposure Draft	
	We are concerned that some paragraphs (2.1, 2.6.12) may impose too extensive requirements. These paragraphs should be modified appropriately. (Please refer to “Comments on specific paragraphs”)	

Comments on specific paragraphs of the ISAP 4 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)
2.1.b	It may be more appropriate to add the word “relevant” as below. b. The entity’s appetite for any <u>relevant</u> risk that has an impact on the measurement under IFRS 17	We are concerned that “The entity’s appetite for <u>any</u> risk“ may impose too extensive requirements.



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2.6.12.b	<p>It may be more appropriate to add the word “relevant” as below.</p> <p>i. Take into account any <u>relevant</u> diversification benefit the entity includes in its compensation risk</p>	<p>We are concerned that “ <u>any</u> diversification“ may impose too extensive requirements.</p>
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Comments on specific definitions in the Exposure Draft of the updated Glossary

Note that only the proposed revisions are open for comment

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)
Nil		