

**International Association of Insurance Supervisors (IAIS)  
Public Consultation: Revision of ICPs 1 and 2**

Please note that the CIA did not respond to all questions in the consultation on the [revision of ICPs 1 and 2](#). The CIA's comments to questions to which it responded appear below.

**Q1 General Comment on ICP 1**

The Canadian Institute of Actuaries (CIA) is the national, bilingual organization and voice of the actuarial profession in Canada. Its 5,000+ members are dedicated to providing actuarial services and advice of the highest quality. The Institute puts the public interest ahead of the needs of the profession and those of its members.

Overall, we support the updated ICP 1 and ICP 2. We do not indicate our support in every case throughout this feedback form, but where there is no comment, you should infer that we agree with the contents. You will find we have only a few minor edits to suggest.

The Canadian Institute of Actuaries hopes that its comments provided herein will be of value to you.

**Q 15 Comment on Guidance 1.3.2**

We believe that the second half of paragraph 1.3.2 has been covered in paragraph 1.3.1. Please replace the paragraph with the following:

Legislation should clearly address insurance legal entity and group-wide supervision.

**Q 64 Comment on Guidance 2.9.3**

We have a concern that secondments to or from industry could compromise the supervisor's ability to protect confidential information and we recommend appending the following sentence to this paragraph:

When implementing such measures, the supervisor should take steps to avoid compromising confidentiality or operational independence.