

Manager, General Insurance Statistics
Australian Prudential Regulation Authority

Thank you for consulting with NIBA in relation to the APRA Discussion Paper on proposed changes to general insurance statistical publications.

I have reviewed the proposed changes, and only have very brief comments to offer.

We note that all data submitted by general insurers will be treated as non-confidential. We believe it is a matter for each authorised general insurer to determine the commercial sensitivity of this information, and to make representations to APRA in that regard. NIBA does not wish to comment in detail, although any information which indicates the strength and security of the insurer providing cover is always appreciated by brokers.

We also note the proposed changes to general insurance statistical publications. These changes will provide additional information, which will enable NIBA and our Members to better understand market trends over time. We do note, however, that risks and policies can and do differ quite markedly within classes of business, so the data will be broadly indicative only.

Please do not hesitate to contact me if I can be of further assistance in relation to these comments.

Yours sincerely,

Dallas Booth
Chief Executive Officer
NIBA
National Insurance Brokers Association of Australia
Level 11, 20 Berry Street
North Sydney, NSW, 2060
AUSTRALIA
Phone: +61 2 9964 9400
Fax: +61 2 9964 9332
www.niba.com.au