

30 January 2026

General Manager, Policy Development  
Australian Prudential Regulatory Authority  
Level 12, 1 Martin Place  
Sydney NSW 2000  
By email: PolicyDevelopment@apra.gov.au

Dear General Manager

## Targeted adjustments to the general insurance reinsurance framework

Finity Consulting welcomes the opportunity to comment on APRA's consultation *Targeted adjustments to the general insurance reinsurance framework*.

Finity is a leading independent actuarial and analytics consultancy in Australia and New Zealand, advising general insurers, reinsurers, regulators, and government entities. Our work spans capital management, reinsurance strategy, reserving, pricing, and risk management, giving us practical insight into how prudential settings influence insurer behaviour and market outcomes. Finity provides Appointed Actuary services to 27 authorised general insurers, and engages with many of the larger general insurers who have internal Appointed Actuaries.

Finity is **supportive** of APRA's proposed changes. We have reviewed and **endorse the submission made by the Actuaries Institute**.

As APRA monitors the industry implementation of these proposed changes, we suggest that a future review of the natural perils horizontal requirement (out of scope for this consultation) would be worthwhile. We think there is merit in considering whether refinements to the horizontal requirement could further improve the efficiency of reinsurance arrangements in the industry.

Yours sincerely

