

Climate Risk Disclosure Survey Guidance Reporting Year 2019

This document offers guidance to insurers responding to the annual mandatory Insurer Climate Risk Disclosure Survey (hereafter referred to as the “Survey”). Those questions contained in this guidance document which are not part of the official set of Survey questions are intended only to guide respondents as they craft their responses to the Survey and are not compulsory.

Guidance Notes

Survey Application and Instructions

i. Response Submissions

Mandatory disclosure will depend on the premium amounts reported for the most immediate prior financial reporting year. If an insurer reports over **\$100,000,000** on its Annual Schedule T filing with the NAIC, it must complete the survey. However, if an insurer reports less than that, it will not be required to complete and file the survey, but it may do so voluntarily. ***Please note beginning this year if you would like to submit a TCFD (Task Force on Climate-related Financial Disclosures; <https://www.fsb-tcf.org/>) report in lieu of submitting a survey you may do so.**

ii. Quantitative and Forward-Looking Information

Insurers are not required to submit quantitative information but may do so without implying materiality. Insurers are encouraged to provide quantitative information where it offers additional clarity on trends in the intensity or attenuation of natural hazards, insured losses, investment portfolio composition, policyholder risk reduction or improvements in computer modeling. As climate science improves (i.e., when there is greater agreement between observed data and models or when there is integration of catastrophe and climate models), insurers should be able to provide quantitative information with less uncertainty.

Insurers are required to answer all questions in good faith and with meaningful responses. However, there is no requirement to provide information that is immaterial to an assessment of financial soundness (insurers may choose to disclose such information voluntarily, with no implication that such information is in fact material).

Insurers are encouraged but not required to provide forward-looking information that will indicate the risks and opportunities insurers may face in the future; when provided, insurers may disclaim any responsibility for the accuracy of such forward-looking information. Forward-looking information is assumed to have some degree of uncertainty; if provided, insurers should offer explanation on the degree and sources of uncertainty as well as assumptions employed.

iii. Response Required

Insurers in all segments of the industry are required to respond to all eight questions. An insurer may state that a question is not relevant to its business practice, operations or investments. However, if it does so, it must also explain why the question is not relevant. ***Please note if you submit a TCFD report you will not be required to submit a survey.**

Narrative responses are acceptable. Where an insurer’s response to other disclosure

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mechanisms, such as the Carbon Disclosure Project (CDP) or Global Reporting Initiative, explicitly addresses the subject matter of a question in this survey, the insurer may use their most recent response to that external mechanism.

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Survey Questions

Question One: Does the company have a plan to assess, reduce or mitigate its emissions in its operations or organizations?

Yes - The company has a plan to assess and reduce or mitigate emissions in our operations or organizations - Please summarize.

No - The company does not have a plan to assess and reduce or mitigate emissions in our operations or organizations - Please describe why not.

Insurers who are unfamiliar with frameworks for greenhouse gas emission measurement and management are encouraged to review the principles of “The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)” developed by the World Resources Institute and the World Business Council for Sustainable Development (“the GHG Protocol”).

Each insurer is encouraged to clarify whether its plan for measuring and management of its emissions in operations and/or its subsidiary organizations’ operations includes emissions related to energy use for data storage or other computing-intensive processes.¹

Question Two: Does the company have a climate change policy with respect to risk management and investment management? If yes, please summarize. If no, how do you account for climate change in your risk management?

Yes - The company has a climate change policy with respect to risk management and investment management - Please summarize.

No - The company does not have a climate change policy with respect to risk management and investment management - Please describe how you account for climate change in your risk management, or why you do not account for climate change in your risk management.

Questions to consider include:

- Where in the structure of the company is climate risk addressed?
- Does the company approach climate change as an Enterprise Risk Management (ERM) issue?
- Does the company have a dedicated point-person or team within the company that is responsible for managing its climate change strategy?
- What is the role of the board of directors in governing climate risk management?
- Does the company consider potentially correlated risks affecting asset management and underwriting?
- Has the company issued a public statement on its climate policy

¹ Data centers consume more energy than any other area of an organization because they contain both IT equipment and the infrastructure that is needed to cool that equipment. The Environmental Protection Agency found that data centers consumed about 60 billion kilowatt- hours (kWh) in 2006, roughly 1.5 percent of total U.S. electricity consumption. Nancy Feig, Insurance & Technology “The Greening of Data Centers” Mar 07, 2008. URL: <https://www.insurancetech.com/data-and-analytics/the-greening-of-data-centers/d/d-id/1310251.html>

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Question Three: Describe your company's process for identifying climate change-related risks and assessing the degree that they could affect your business, including financial implications.

Yes - The company has a process for identifying climate change-related risks and assessing the degree that it could affect our business including financial implications - Please summarize.

No - The company does not have a process for identifying climate change-related risks and assessing the degree that it could affect our business including financial implications - Please describe why not.

Questions to consider include:

- How may climate change shift customer demand for products?
- What implications may climate change have on liquidity and capital needs?
- How might climate change affect limits, cost and terms of catastrophe reinsurance, including reinstatement provisions?
- Has the insurer considered creative methods of risk distribution such as contingency plans to reduce financial leverage and resolve any liquidity issues in the event of a sudden loss in surplus and cash outflows as a result of a catastrophic event?
- How are these impacts likely to evolve over time? Does the company have plans to regularly reassess climate change related risks and its responses to those risks?

Question Four: Summarize the current or anticipated risks that climate change poses to your company. Explain the ways that these risks could affect your business. Include identification of the geographical areas affected by these risks.

Yes - The company has identified current or anticipated risks that climate change poses to our company - Explain the ways that these risks could affect your business - Include identification of the geographical areas affected by these risks.

No - The company has not identified current or anticipated risks that climate change will pose to our company - Please describe why not.

Questions to consider include:

- Which business segments or products are most exposed to climate-related risks?
- Has the company considered its potential exposure to climate liability through its D&O or CGL policies?
- Are there geographic locations, perils or coverages for which the company has increased rates, limited sales, or limited or eliminated coverages because of catastrophic events? How do those actions relate to assessments of climate change impacts made by the company?
- Has the company examined the geographic spread of property exposures relative to the expected impacts of climate change, including a review of the controls in place to assure that the insurer is adequately addressing its net exposure to catastrophic risk?

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Question Five: Has the company considered the impact of climate change on its investment portfolio? Has it altered its investment strategy in response to these considerations? If so, please summarize steps you have taken.

Yes - The company has considered the impact of climate change on its investment portfolio - Please summarize.

No - The company has not considered the impact of climate change on its investment portfolio - Please describe why not.

Yes - The company has altered its investment strategy in response to these considerations - Please summarize steps you have taken.

No - The company has not altered its investment strategy in response to these considerations - Please describe why not.

Questions to consider include:

- Does the company consider regulatory, physical, litigation, and competitiveness-related climate risks, among others, when assessing investments?
- Has the company considered the implications of climate change for all of its investment classes, e.g. equities, fixed income, infrastructure, real estate?
- Does the insurer use a shadow price for carbon when considering investments in heavy emitting industries in markets where carbon is either currently regulated or is likely to be regulated in the future?
- Does the insurer factor the physical risks of climate change (water scarcity, extreme events, weather variability) into security analysis or portfolio construction? If so, for what asset classes and issuers (corporate, sovereign, municipal)?
- How does climate change rank compared to other risk drivers, given the insurer's asset liability matching strategy and investment duration?
- Does the insurer have a system in place to manage correlated climate risks between its underwriting and investments?

Question Six: Summarize steps the company has taken to encourage policyholders to reduce the losses caused by climate change-influenced events.

Yes - The company has taken steps to encourage policyholders to reduce the losses caused by climate change-influenced events - Please summarize.

No - The company has not taken steps to encourage policyholders to reduce the losses caused by climate change-influenced events - Please describe why not.

Questions to consider include:

- How has the company employed price incentives, new products or financial assistance to promote policyholder loss mitigation? In what lines have these efforts been attempted, and can the outcome of such efforts be quantified in terms of properties retrofitted, losses avoided, etc.?
- For insurers underwriting D&O, CGL and professional liability policies, what steps has the company taken to educate clients on climate liability risks or to screen potential policyholders based on climate liability risk? How does the company define climate risk for these lines?

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Question Seven: Discuss steps, if any, the company has taken to engage key constituencies on the topic of climate change.

Yes - The company has taken steps to engage key constituencies on the topic of climate change - Please summarize.

No - The company has not taken steps to engage key constituencies on the topic of climate change - Please describe why not.

Questions to consider include:

- How has the company supported improved research and/or risk analysis on the impacts of climate change?
- What resources has it invested to improve climate awareness among its customers in regulated and unregulated lines?
- What steps has it taken to educate shareholders on potential climate change risks the company faces?

Question Eight: Describe actions the company is taking to manage the risks climate change poses to your business including, in general terms, the use of computer modeling.

Yes - The company is taking actions to manage the risks climate change poses to the business - Please summarize what actions the company is taking and in general terms the use if any of computer modeling.

No - The company is not taking actions to manage the risks climate change poses to the business - Please describe why.

Questions to consider include:

- For what perils does the company believe that future trends may deviate substantially from historical trends due to changes in the hazard? Similarly, for what perils, if any, does the company believe that a catastrophe model extrapolating observed trends would be insufficient to plan for maximum possible loss or yearly average loss? What steps has the company taken to model or analyze perils associated with non-stationary hazards?
- Has the company used catastrophe models to conduct hypothetical “stress tests” to determine the implications of a wide range of plausible climate change scenarios? If so, over what timescale, in what geographies and for what perils?
- Has the company conducted, commissioned or participated in scenario modeling for climate trends beyond the 1-5 year timescale? If so, what conclusions did the company reach on the potential implications for insurability under these scenarios?

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Climate Change Resources for Insurers

There are many publications and websites that can provide insurers with a useful overview of the potential impacts of climate change on the insurance sector. The following resource list is not comprehensive but offers a good starting point for insurers seeking more information on the scientific basis of climate change, risks to insurers, catastrophe modeling, public policy, liability, risk management and impacts on insurer investments.

Impacts of Climate Change on the Insurance Sector

Mills, E. 2012. "The Greening of Insurance," *Science* 338, 1424."

URL: <http://science.sciencemag.org/content/338/6113/1424>

NAIC Climate Change and Global Warming (EX) Task Force. 2008. "The Potential Impact of Climate Change on Insurance Regulation."

URL: http://www.naic.org/documents/cipr_potential_impact_climate_change.pdf

Hecht, Sean. 2008. "Climate Change and the Transformation of Risk: Insurance Matters," *UCLA Law Review*, Vol. 55: 1559-1620. URL: <http://ssrn.com/abstract=1159853>

Life and Health Insurers and Climate Change

Harvard Medical School, Center for Health and the Global Environment, "Climate Change Futures: Health, Ecological, and Economic Dimensions."

URL: <https://www.eldis.org/document/A20972>

McGeehin, M. A. and M. Mirabelli. 2001. "The potential impacts of climate variability and change on temperature-related morbidity and mortality in the United States," *Environmental Health Perspectives*. May, Vol. 109, Suppl. 2: 185–189.

URL: <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1240665/pdf/ehp109s-000185.pdf>

Ebi, Kristie L. and Glenn McGregor. 2008. "Climate Change, Tropospheric Ozone and Particulate Matter, and Health Impacts," *Environmental Health Perspectives*. November, Vol. 116, Suppl. 11: 1449–1455. URL: <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2592262/>

Climate Change Disclosure

Ceres, *Insurer Climate Risk Disclosure Survey: 2016 Findings and Recommendations*.

URL: <https://www.ceres.org/resources/reports/insurer-climate-risk-disclosure-survey-report-scorecard>

Carbon Disclosure Project ("CDP") URL: <https://www.cdp.net/en>

Global Reporting Initiative ("GRI") URL: <https://www.globalreporting.org>.

Climate Change Science

Intergovernmental Panel on Climate Change (IPCC). 2012. "Managing the Risks of Extreme Events and Disasters to Advance Climate Change Adaptation."

URL: https://wg1.ipcc.ch/srex/downloads/SREX-FrontMatter_FINAL.pdf