Online questionnaire for PCAF's Insurance-Associated Emissions Progress Report

Part I. Contact information
Part II. General questions
Part III. Feedback on attribution factors
Part IV. Feedback on recommendations and requirements for disclosure

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PART I)   Contact Information

- First name
- Last name
- Job title
- Organization name
- Type of organization (choices: Academia / Accountant / Broker / Consultant and service provider / Data provider / Re/insurer / Net-Zero Initiative / NGO / Regulator / Other / Prefer to stay anonymous)
- Country (HQ of organization)
- Email address

PART II) General questions (Chapters 1-4)

Introduction

1. Do you think the consultation document appropriately characterizes the role of insurers in facilitating climate change?
   a. Scale of 1 to 10 (extremely inappropriate – extremely appropriate)
   b. What would you like to see changed, added, or removed? [Text box]

2. How clearly do you think the consultation document characterizes the differences between the Insurance Sector and the Investment Industry (i.e., that the different relationships with the clients necessitate a different approach for attribution of greenhouse gas emissions)?
   a. Scale of 1 to 10 (extremely unclear – extremely clear)
   b. Please comment. [Text box]

3. Do you agree it is acceptable to have different approaches for the attribution of insurance-associated Emissions (IAE) for commercial lines and personal lines?
   a. Yes
   b. No, please explain. [Text box]

4. Should the methodology cover all industry sectors within a line of business?
   a. Yes, the methodology should cover all industry sectors
   b. No, different methodologies should be developed
      i. Select the most important sectors (choose from list below, multiple options):
         Aluminium
         Apparel and footwear
         Aviation
         Buildings
         Chemicals
         Cement
         Financial Institutions
         Forest, Land and Agriculture
         Information and Communication Technology
         Oil and Gas
         Power
         Steel
         Transport
         [Others], please specify

5. Do you foresee substantial regulatory, legal, or compliance challenges **with measuring** IAE of commercial lines or personal lines, including compulsory product lines?
   a. No
   b. Yes
      i. Please explain the challenges you see with reference to specific laws and jurisdiction. [Text box]

6. Do you believe your jurisdictional consumer protection or other insurance laws may be in conflict with the use of the standard to measure IAE?
   a. No
   b. Yes
      i. Please explain with specific references to jurisdiction and laws. [Text box]

GHG accounting in reinsurance

7. Do you agree that the progress report should not provide guidance on how to measure avoided emissions and emission removals?
   a. Yes
   b. No
      i. Please explain why guidance needs to be provided [Text box]

8. The Progress report also proposes three intensity metrics which could be published next to the absolute metric (see Table 2-1).
   a. What do you think of the proposed emissions intensity metrics (e.g., usefulness, applicability, feasibility)? [Text box]
   b. Do you have alternative or additional suggestions for the proposed intensity metric list? [Text box]

GHG accounting can be used as a basis to achieve business goals

9. Do you believe your jurisdictional consumer protection or other insurance laws may be in conflict with insurers' efforts to reduce their IAE from commercial and/or personal motor lines of business?
   a. No
   b. Yes
      i. Please explain. [Text box]

10. How much control does an insurance company have over reducing emissions associated with their commercial lines of business and personal motor line of business?
    a. Scale of 1 to 10 (no control at all – full control)

11. Do you think the proposed methodologies incentivize re/insurers to reduce IAE?
    a. No
    b. Yes
       i. Please explain why. [Text box]
    c. If yes, can you suggest an alternative method that fits for purpose? [Text box]

12. Do you think there will be substantial unintended impacts of insurers' efforts to reduce their IAEs from commercial and/or personal motor lines of business?
    a. No
    b. Yes,
       i. Please explain the unintended impact you foresee. [Text box]

Principles and requirements of GHG accounting for reinsurers

13. Is the concept of insurers as "facilitators" of economic activities well enough explained?
    a. Yes
    a. No
       i. Please explain what is missing. [Text box]

14. Does the progress report sufficiently address the issues of double counting? Does it sufficiently minimize its impact in the proposed attribution method and in how it is disclosed?
    a. Yes
    b. No
       i. Please explain the issues of double counting. [Text box]

15. Do you think the "follow the risk" principle is the correct methodological philosophy for calculating insurance-associated emissions?
    a. Yes
    b. No
       i. Please explain why "follow the risk" is not the correct methodology. [Text box]

16. Do you agree that the "treaty reinsurance business" is excluded from the first methodologies?
    a. Yes
    b. No, but I don't know how an attribution factor could be calculated.
    c. No, but I have a suggestion of how to calculate an attribution factor.
       i. Please explain your approach. [Text box]

PART III) Questions on Methodology to measure IAE
Commercial lines portfolios

Attribution factors

17. Do you agree with the line of business scope as set out in the progress report (See Table 5.1)?
    a. Yes
    b. No
        i. Please explain which lines of business you think should be covered. [Text box]

18. Which one of the presented commercial lines attribution factors is your preferred option and what do you see as the main benefits of using that option?
    a. Proposal A1 (GWP/Revenue)
    b. Proposal A2 (GWP/Revenue*[EM%])
    c. Proposal B (GWP/Limit)

19. Are the presented commercial lines attribution factors fit for purpose (attributing the emissions from the commercial client properly), if not, what needs to be changed?

	Fit for purpose	Not fit for purpose	Rationale (text)
Proposal A1 (GWP/Revenue)			[Text box]
Proposal A2 GWP/revenu*[EM%])			[Text box]
Proposal B (GWP/Limit)			[Text box]

20. Are the metric definitions clear or is further clarification needed?

	Yes, definition is clear	No, needs clarification	Explain what should be clarified
Gross Written Premium			[Text box]
Revenue			[Text box]
Earnings Margin [EM%]			[Text box]
Contract limit			[Text box]

21. Do you have specific concerns related to any of the metrics in terms of implementation or unintended consequences for the attribution?

	No concerns	Yes, we have concerns	Explain your specific concerns
Gross Written Premium			[Text box]
Revenue			[Text box]
Earnings Margin [EM%]			[Text box]
Contract limit			[Text box]

22. How well does each attribution factor reflect the guiding design principles (see Section 4.2 and Box 2)?
    a. Proposal A1 (GWP/Revenue)

	Rating scale 1 to 10 (not well at all – very well)
Follow the risk	
Proportionality	
Comparability	
Feasibility and reasonableness	
Materiality	

    b. Proposal A2 (GWP/Revenue*[EM%])

	Rating scale 1 to 10 (not well at all – very well)
Follow the risk	
Proportionality	
Comparability	
Feasibility and reasonableness	
Materiality	

    c. Option B (GWP/Limit)

	Rating scale 1 to 10 (not well at all – very well)
Follow the risk	
Proportionality	
Comparability	
Feasibility and reasonableness	
Materiality	

23. Do you agree the attribution factors should also be applicable to:

	Yes	No	Rationale
a) credit insurance			[Text box]
b) fronting and captives			[Text box]
c) project-specific insurance (e.g., engineering lines)?			[Text box]

PCAF data quality score

24. How clear is the data quality score table 5.3? Scale 1 to 10 (not clear at all – very clear)
    a. What would you change to make the data quality score clearer? [Text box]

25. Are there limitations of the data quality scoring table?
    a. Yes
    b. No,
        i. Please explain your specific limitations. [Text box]

26. How do you rate the clarity of the guidance for calculating emissions on asset or activity level and company level?
   a. Scale from 1 to 10 (very dissatisfied – very satisfied)?
      i. Please provide suggestions to improve clarity or highlight areas where you would like to see additional guidance. [Text box]

27. Given the current state of data availability, do the benefits of attributing emissions on asset or activity level (accuracy), outweigh the additional complexity of data gathering exercise?
   a. Yes
   b. No
      i. Please explain why. [Text box]

28. Which emission scopes (if any) are currently required to be reported in your jurisdiction?
   a. Public companies (Please name jurisdiction and emissions) [Text box]
   b. Private companies (Please name jurisdiction and emissions) [Text box]

29. Insurer-specific question: How well-prepared are your internal systems to meet the data needs to calculate the proposed attributions?
   a. Rating Scale 1 to 10 (requires very significant work – fully prepared)

30. Insurer-specific question: Based on the proposed data quality scoring tables and the current data available to your organization, what do you expect your score to be in your initial reporting?
   a. Scale: 5 options, only one to be selected (Score 1, Score 2, Score 3, Score 4, Score 5)

31. Do you have concerns about the calculation and/or usage of the attribution factors?
   a. No
   b. Yes
      i. Please explain your specific concerns. [Text box]

Personal motor portfolios

Attribution factors

32. Do you agree with the asset classes described for the motor attribution factor?
   a. Yes
   b. No
      i. Please explain why. [Text box]

33. Which of the presented personal motor attribution factors is your preferred option and what do you see as the main benefits of using that option? Explain rationale.
    a. Proposal A (Insurance Expense within the Total Cost of Vehicle Ownership) [Text box]
    b. Proposal B [portfolio GWP/(portfolio annualized asset value of a vehicle + GWP) [Text box]
    c. Proposal C [portfolio GWP/portfolio Coverage Limits) [Text box]

34. Are the presented personal motor attribution factors fit for purpose? If not, what needs to be changed?

	Fit for purpose	Not fit for purpose	Rationale
Proposal A (Insurance Expense within the Total Cost of Vehicle Ownership)			[Text box]
Proposal B (portfolio GWP/(portfolio annualized asset value of a vehicle + GWP)			[Text box]
Proposal C (portfolio GWP/portfolio Coverage Limits)			[Text box]

35. Are the metric definitions clear or are there any that require further clarification?

	Yes, definition is clear	No, needs clarification	Explain what should be clarified
Total Cost of Ownership			[Text box]
Gross Written Premium/Portfolio Insurance Premium			[Text box]
Annualized Asset Value			[Text box]
Residual Life			[Text box]
Contract limit			[Text box]

36. Do you have specific concerns related to the metrics in terms of implementation or unintended consequences for the attribution?

	Yes	No	Explain what issues you foresee
Total Cost of Ownership			[Text box]
Gross Written Premium/Portfolio Insurance Premium			[Text box]
Annualized Asset Value			[Text box]
Residual Life			[Text box]
Contract limit			[Text box]

37. How well does each attribution factor reflect the guiding design principles (see Section 4.2 and Box 2)?
    a. Proposal A (Insurance Expense within the Total Cost of Vehicle Ownership)

	Rating scale 1 to 10 (not well at all – very well)
Follow the risk	
Proportionality	
Comparability	
Feasibility and reasonableness	
Materiality	

    b. Proposal B (portfolio GWP/(portfolio annualized asset value of a vehicle + GWP)

	Rating scale 1 to 10 (not well at all – very well)
Follow the risk	
Proportionality	
Comparability	
Feasibility and reasonableness	
Materiality	

    c. Proposal C (portfolio GWP/portfolio Coverage Limits)

	Rating scale 1 to 10 (not well at all – very well)
Follow the risk	
Proportionality	
Comparability	
Feasibility and reasonableness	
Materiality	

38. Each attribution factor proposal can be calculated at different levels of granularity. What level of granularity do you recommend?
    a. Global
    b. Regional
    c. Country portfolio
    d. Company portfolio
    e. Insured vehicle

39. Questions to specific motor attribution proposals:
    a. Proposal A: Is it appropriate for PCAF to calculate the attribution factor?
        i. Yes,
        ii. No
            1. Please explain why. [Text box]

    b. Proposal B: Should the average life of the vehicle be decided by the re/insurer?
        i. Yes
        ii. No
            1. Who should decide, and should it be the same globally or vary by region or country? [Text box]

       c. Proposal C: is the suggestion of a proxy limit for those policies with unlimited cover appropriate?
            i. Yes
            ii. No
                    1. Please explain why. [Text box]

PCAF data quality score:

40. How clear is the data quality score table? Rating scale 1 to 10 (Not clear at all – Very clear)
       a. What would you change to make the data quality score clearer? [Text box]
       b. What do you think are the limitations of the data quality scoring guideline? [Text box]

41. Insurer-specific question: How well prepared are your internal systems to meet the data needs to calculate the proposed attributions?
       a. Rating Scale 1-10: Requires very significant work – Fully prepared

42. Do you have any concerns about the calculation and/or usage of the attribution factors?
       a. No
       b. Yes,
            i. Please explain your specific concerns. [Text box]

PART IV) Questions on Metrics + reporting recommendations (chapter 6)

43. Overall, how satisfied are you with the recommendations and requirements for metrics and reporting? Please rate the following attributions against the core principles using a scale from 1 to 10 (Extremely dissatisfied – Extremely satisfied):

	Rating scale 1 to 10
Relevance: Ensure the GHG inventory appropriately reflects the GHG emissions of the company and serves the decision-making needs of users — both internal and external to the company.	
Completeness: Account for and report on all GHG emission sources and activities within the inventory boundary. Disclose and justify any specific exclusions.	
Consistency: Transparently document any changes to the data, inventory boundary, methods, or any other relevant factors in the time series.	
Transparency: Disclose any relevant assumptions and make appropriate references to the accounting and calculation methodologies and data sources used.	
Accuracy: Achieve sufficient accuracy to enable users to make decisions with reasonable confidence as to the integrity of the reported information.	

   a. What would you change to make the recommendations and requirements for metrics and reporting more relevant, complete, consistent, transparent, or accurate? [Text box]

44. Do you agree with the recommendation to report the IAE of mandatory lines of coverage and government-based insurance schemes separately? [Text box]

45. Do you agree with the recommendation to include insureds' scope 3 emissions, which would be reported separately from insureds' Scope 1 and 2 emissions? [Text box]

46. Are the sample table templates displaying reported emissions for a given reporting (fiscal) period sufficiently clear and detailed?
   a. Yes
   b. No
      i. Please explain why. [Text box]

47. Do you foresee issues in implementing the recommendations and requirements for metrics and reporting?
   a. Yes
   b. No
      i. Please explain why. [Text box]

48. Should statutory LoBs be included in the scope?
    a. Yes
    b. Yes, but reported separately
    c. No
        i. Please explain why. [Text box]

49. Do you agree that the sample reporting table should be separated for commercial and personal lines?
    a. Yes
    b. No
        i. Please explain why. [Text box]

50. Does the separate reporting of an insured's scope 3 emissions address the issue of double counting?
    a. Yes
    b. No
        i. Please explain why [Text box]

51. The proposed method requires the accounting of customers' scope 1 and 2 emissions. Inclusion of scope 3 emissions is recommended to the extent that such numbers are available, material, and represent reasonable and verifiable estimates. Do you support the approach for scope 3 emissions? Rating scale 1-10 (Very dissatisfied – Very satisfied)
    a. Please explain your concerns [Text box]

52. Do you agree that the reporting requirements for the re/insurance sector should be different than the ones for banks, asset managers and asset owners?
    a. Yes
    b. No
        i. Please explain why. [Text box]

PART V) Additional feedback
53. Would you like to share any other feedback with us? [Text box]

PART VI) Specific questions for brokers
54. Would you like to share any other feedback with us? [Text box]

55. With the proposed commercial lines attribution factor in mind, how applicable is the methodology for brokers with the use of placement fee instead of gross premium? [Text box]