
SENATE ECONOMICS REFERENCES COMMITTEE INQUIRY INTO AUSTRALIA'S GENERAL INSURANCE INDUSTRY

Australia



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insurance



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IAG welcomes the opportunity to make a submission to the Senate Economics References Committee regarding the Inquiry into Australia's general insurance industry.

IAG's purpose is to make your world a safer place and as such we believe this Inquiry provides an opportunity to discuss the crucial role that general insurance plays in helping individuals protect the things they value, and the benefits that general insurance provides to the government, economy and communities, particularly when recovering from disasters, accidents and financial loss.

IAG believes that there is robust competition in the home, strata and car insurance industries, demonstrated by the number of insurers, the products and services they offer and digital innovation across the insurance value chain.

IAG recognises that the pace with which insurance premiums have risen in recent years has caused concern for a number of consumers. Much of the work IAG is undertaking aims to address and balance the broader objectives of insurance affordability, disclosure, transparency, accessibility and participation.

We note the Committee's focus is on the cost of home, strata and car insurance. We believe that these costs must be considered in the appropriate context and take into account broader economic forces and pressures, including the underlying risk cost, the increasing claims cost and the prevalence of natural perils. Though the cost of insurance is a primary concern for the Committee, IAG believes consumers need affordable insurance that provides the necessary inclusions to protect their interests.

IAG remains concerned that an independent comparison service for home, strata and car insurance would misdirect focus and resources from the drivers of premiums and further emphasise price, working against the objectives of transparency and disclosure. Our review of other jurisdictions and different models of comparative services in operation in the Australian market does not provide any observable evidence that implementation of such a service would achieve all the above stated objectives.

It is important to recognise that risk is the key driver of price, and IAG believes that solutions focusing on risk mitigation and access to information will keep significant pressure on pricing and continue to cause rapid innovation to the betterment of the consumer.

Our purpose is to make your world a safer place, which means we are working to create a safer, stronger and more confident tomorrow for our customers, partners, communities, shareholders and our people throughout Asia Pacific.

IAG is the parent company of a general insurance group, with operations in Australia, New Zealand, Thailand, Vietnam and Indonesia. Our businesses sell insurance under many leading brands, including: NRMA Insurance, CGU, SGIO, SGIC, Swann Insurance and WFI in Australia; NZI, State, AMI and Lumley Insurance in New Zealand; Safety and NZI in Thailand; AAA Assurance in Vietnam; and Asuransi Parolamas in Indonesia. IAG also has interests in general insurance joint ventures in Malaysia and India.

Below is a list of the brands and products relevant to this Inquiry:

- The NRMA Insurance brand in the Australian Capital Territory, Queensland and Tasmania offers home and car insurance. The NRMA Insurance brand in New South Wales offers home, strata and car insurance
- The SGIO brand in Western Australia offers home and car insurance
- The SGIC brand in South Australia offers home and car insurance
- The RACV brand in Victoria offers home and car insurance via a distribution agreement¹
- The Coles Insurance brand nationally offers home and car insurance, via a distribution agreement
- The CGU brand offers home, strata and car insurance for all states and territories in Australia through affinity and financial institution partnerships as well as direct and broker/agent channels
- The WFI brand nationally offers home, strata and car insurance via direct and authorised representative channels

IAG has built a strong reputation on understanding the unique needs of Australians and being a steadfast supporter of the community. We take pride in helping consumers understand insurance so they can make confident choices to protect the things they value.

The role of general insurance

General insurance does more than help protect the assets and financial wellbeing of individuals. It provides significant benefits to individuals, the government, economy and community. When consumers purchase insurance, they transfer certain risks to an insurer. Insurers identify and manage the costs of those risks to ensure there are sufficient funds to meet the cost of future claims as they arise. To do this, an insurance company has to put a price on the likelihood of someone making a claim, and the cost of that claim. Therefore, the most significant contributions of insurance to society is provision of risk sharing, risk transfer abilities and as a loss prevention mechanism.

Helping individuals protect what's important

The availability of home, strata and car insurance allows individuals to protect their most valuable assets and avoid the financial burden of repairing or replacing assets damaged as the result of an insurable event. For example, in the event of a natural disaster, many uninsured individuals would not have the savings necessary to rebuild their home while simultaneously paying off the mortgage on the original home.

Benefits to Government

In the absence of insurance, governments would have a financial responsibility to rebuild and restore communities should misfortune or disaster occur. The private insurance market remains the most effective and economically sustainable solution to ensuring the maximum number of Australians choose to cover themselves for risk.

Benefits to the economy

Insurance facilitates trade and commerce while supporting business and economic growth, as individuals who would otherwise require precautionary savings are able to spend those funds elsewhere². The Australian general insurance industry is well-placed to protect customers with home, strata and car policies. According to the Australian Prudential Regulation Authority (APRA) the industry is well capitalised and highly competitive³. This is against the backdrop of a low interest rate environment with unprecedented numbers of natural disasters in recent years.

Benefits to the community

Insurance plays an important role in identifying, assessing and communicating risk. The price of insurance premiums provides an important signal that can help individuals and communities understand their exposure to a range of risks and provide an incentive to implement preventative and protective measures to reduce vulnerability. IAG is a founding member of the Australian Business Roundtable for Disaster Resilience & Safer Communities (Roundtable) and shares the Roundtable's objective for a sustainable, coordinated national approach to making communities more resilient and people safer. They believe that national investment in disaster resilience and preventative activities is the most effective way to protect communities and reduce the impact of disasters.⁴ Additional information regarding the Roundtable is located in Annexure A.

The role played by IAG

As an organisation, IAG has a long history of working proactively to support the communities in which we operate. This role extends beyond providing insurance cover and paying claims, to raising awareness of insurance and risk, and helping communities prevent avoidable damage and mitigate loss. IAG has embedded a shared value strategy within our business by undertaking programs and projects that focus on building social and economic resilience.

We recognise that Australian home owners need transparent, easy-to-comprehend information about insurance to help them better protect their homes, valuables and loved ones. Our Safer Homes website publishes our claims and coverage data so that users can educate themselves on the right level of insurance for their needs and risk levels.

The general insurance industry

Continued.



Other work we are doing includes: partnering with the NSW State Emergency Service to assist the community to prepare for and recover from natural disasters; supporting safer vehicle technologies via the IAG Research Centre; the launch of a low cost insurance product to insure single items (Insurance 4 That); piloting virtual reality technology to educate on the risks of underinsurance; research to understand how we can better meet the insurance needs of Indigenous Australians; and launching the IAG Consumer Advisory Board.

IAG's major focus is to improve our customer experience, and everything we do is designed with our customers in mind. In 2016, we developed a new way to bring customers into our conversations and involve them in shaping our business. The IAG Consumer Advisory Board brings together a number of Australia's leading consumer representatives with IAG management to discuss key customer issues in the insurance industry, with the goal of improving customer service and consumer protection. This forum has helped crystallise important opportunities for IAG, including employee training and process improvement initiatives to help us better support customers who may be vulnerable, experiencing mental health issues or in a hardship or crisis situation.

As part of IAG's commitment to delivering outcomes that help communities: better prepare for and respond to damaging events; protect the environment; and sustain economies, we are a signatory to a number of industry working groups. For example, in 2012, IAG became a founding signatory to the Principles for Sustainable Insurance, a set of voluntary and aspirational global principles that are part of the United Nations Environment Programme Finance Initiative. In 2016 we engaged with over 2,500 people, internal and external to IAG, to better understand resilience and learn how to create more of it in a community. This included a tour of eight of Australia's urban, regional and rural areas to better understand community needs and the role of insurance. This local level research is intended to assist IAG in the continued development of accessible and affordable insurance options to give customers the certainty, peace of mind and confidence to prosper.⁵

The Committee is tasked with assessing the increase in the cost of home, strata and car insurance cover over the past decade in comparison to wage growth over the same period.

Gaining insight on the cost of home, strata and car insurance in comparison to wage growth provides an overview of how the cost of insurance is changing as a whole, and how much of the average weekly wage is being allocated to risk management. IAG believes an appreciation and understanding of the underlying drivers of cost is also required to better inform options for addressing affordability.

The starting point is to outline the components of a premium that a customer is charged. These components are listed in Table 1.

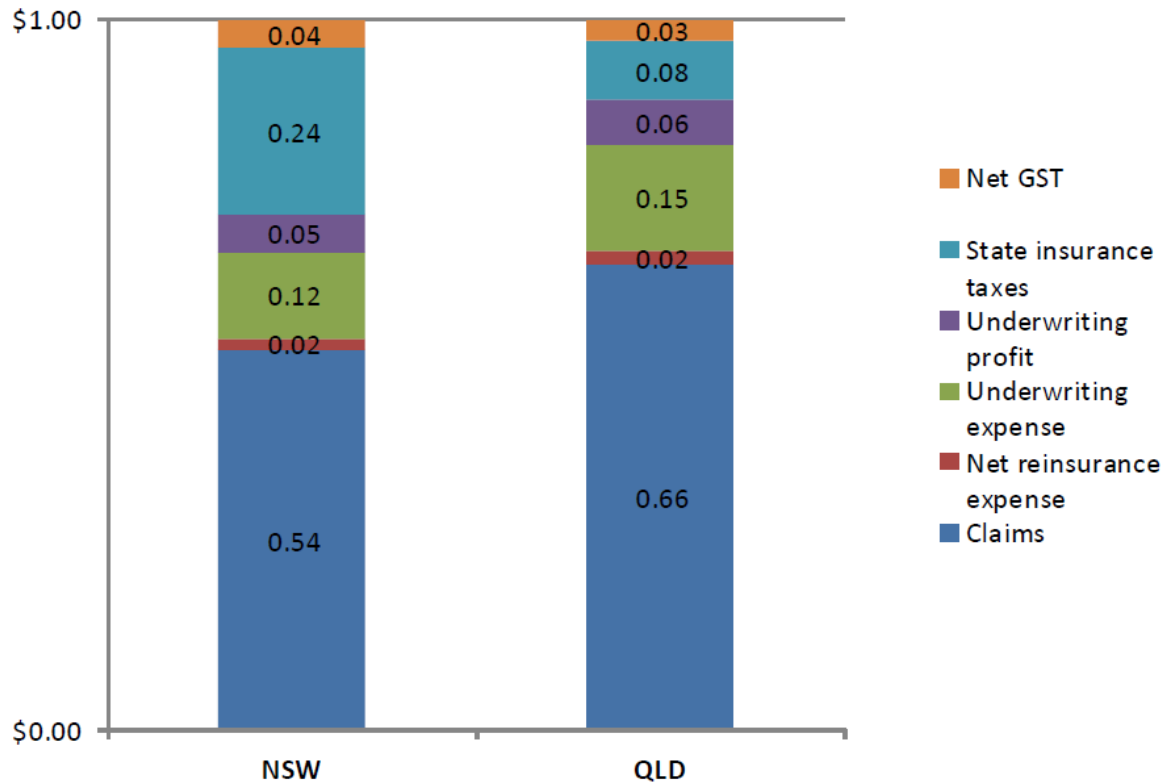
Table 1: Components of a premium

Charges	All applicable Government taxes and charges including stamp duty and GST.
Reinsurance costs	Reflecting the cost to purchase cover for catastrophic events and individual claims, as a cheaper alternative to raising the additional capital that would otherwise be required under prudential regulation.
Expected claims cost	The expected chance of a claim occurring and the expected cost of a claim if it does occur, which varies on the individual characteristics of each risk.
Expenses	Reflecting an appropriate share of fixed and variable expenses.
Profit margin / cost of capital	Reflecting an appropriate return to shareholders and sufficient funding for other sources of capital (e.g. debt and hybrid instruments).
Investment income	Insurers invest premium income prior to paying related claims, which for long tail classes may not occur for a significant length of time. Premiums make an allowance for this expected investment income, leading to premiums being lower than would otherwise be required to meet financial targets.

Charges

Not all of the components that make up an insurance premium are within an insurer's control. State taxes represent a significant portion of the cost of home, strata and car insurance premiums. A paper on the Affordability of Natural Disaster Insurance indicates that taxes "represent just over 10 per cent of the cost of household insurance premiums in Queensland and more than one quarter of premiums in NSW. All States currently apply insurance stamp duties.⁶" Details of the impact of taxes on home building insurance premiums in abovementioned states are provided in Figure 1.

Figure 1: Where does \$1 of home building insurance premium go?⁷



Source: J. Douglas, M. Bowditch, A. Ni, Affordability of Natural Disaster Insurance (2013)

The impact government taxes and charges have on the customer is illustrated in the following example⁸: A home owner in New South Wales who purchased a home contents policy with NRMA Insurance would be required to pay the Emergency Services Levy⁹ of 16% plus GST of 10% of that subtotal and Stamp Duty of 9% of the GST and Levy inclusive amount.

Example

As these charges are cumulative:

- If the customer's risk premium was \$500, the customer would be required to pay \$695.42 which includes charges of **\$195.42**; or
- If the customer's risk premium was \$1,000, the customer would be required to pay \$1,390.84, which includes charges of **\$390.84**.

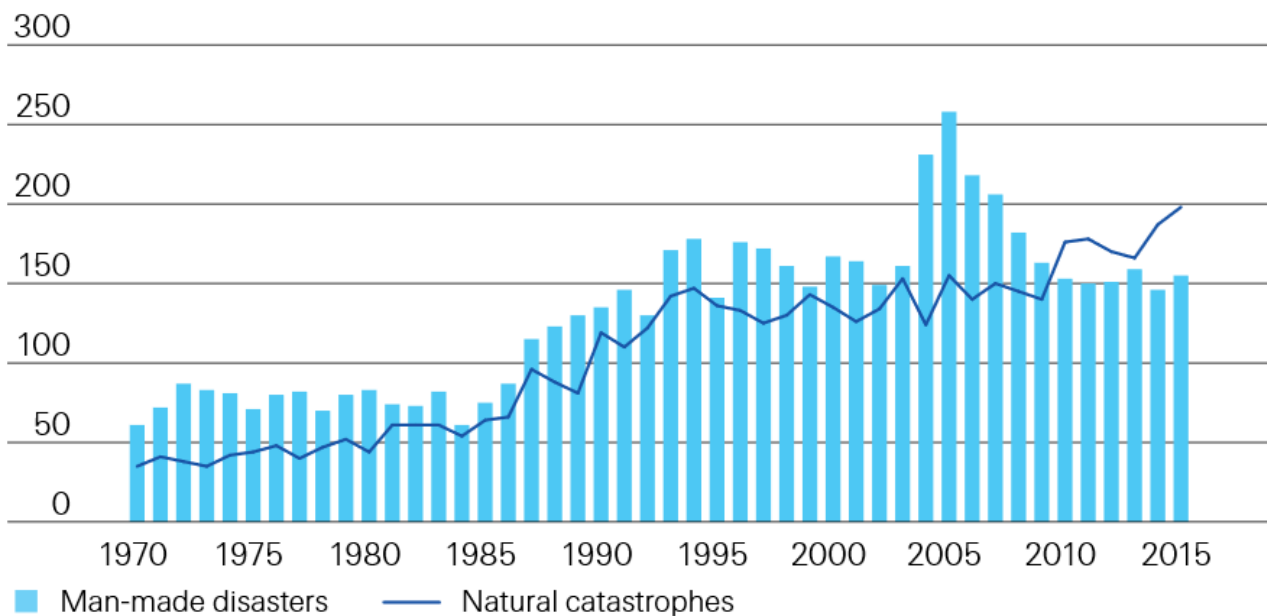
IAG believes the removal of all State government taxes and duties on general insurance products is an important first step in addressing insurance affordability, accessibility and participation.

Reinsurance costs

Reinsurance costs are another component of an insurance premium. Reinsurance is used to limit an insurer's exposure to large single claims and to the aggregation of claims that arise from the same event or a series of events. IAG's reinsurance program is an important part of the group's overall approach to capital management.

The reinsurance costs incorporated in Australian home, strata and car insurance premiums are not only the result of Australian natural perils and events but are affected by global catastrophic events. Figure 2 shows the rising number of incidences of global natural perils and the number of catastrophic events between 1970-2015. According to the annual SwissRe Sigma report criteria, there were 353 catastrophe events across the world in 2015, up from 339 in 2014. Of those, 198 were natural catastrophes, the highest ever recorded in one year, and up from 191 in 2014¹⁰.

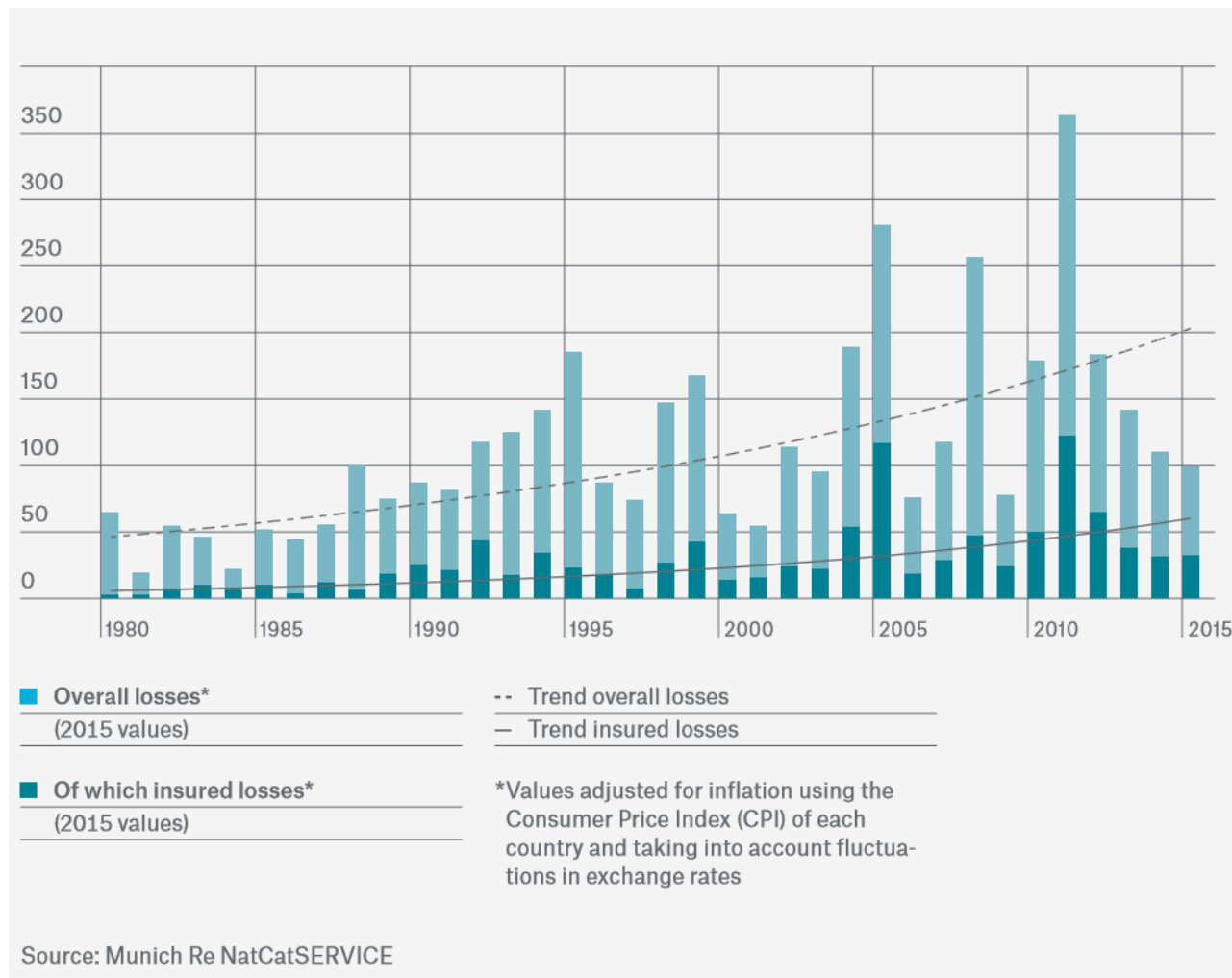
Figure 2: Number of catastrophic events 1970 - 2015



Source: Swiss Re Economic Research & Consulting and Cat Perils.

The impact natural perils have on claims costs is evidenced in Figure 3. Munich RE (in its 2015 global report on natural catastrophes) included the following graph showing the rise of insured losses between 1980-2015. This suggests that there needs to be an accompanying rise in premium to cater for the increase in loss severity and frequency¹¹.

Figure 3: Overall and insured losses 1980 to 2015 (in US \$billion)



Turning to Australia, the type of peril and likelihood of occurrence varies depending on the geographical location. For example, Queensland has been highly impacted by flood and tropical cyclones, while bushfire has greatly impacted Victoria. Table 2 illustrates the scale (as measured by insurance loss) of various natural perils in Australia between 1970-2013.

Table 2: Insurances losses (\$million) by natural perils (1970-2013)¹²

State	Bushfire	Tropical cyclone	Flood	Storm	Hail	Earthquake	Total
NSW	527	36	965	2,747	4,856	1,657	10,788
VIC	1,650		400	2,439	294		4,783
QLD		3,329	3,630	1,376	949		9,283
SA	189			47	92		327
WA	96	486	24	1,232		15	1,852
TAS	100		51	34	86		271
NT		1,529	123				1,652
ACT	440						440
Australia	3,002	5,380	5,193	7,875	6,277	1,672	29,396
Share of Total	10%	18%	18%	27%	21%	6%	100%

Source: Productivity Commission (2014)

Source: IAG and SGS Report- At what cost?

The impact natural perils have had on reinsurance costs in Australia was recently acknowledged by APRA, who reported that a "...decrease in industry net earned premium was driven by an increase in the level of reinsurance purchased by insurers. Outwards reinsurance expense for the industry in the year to 31 December 2016 was \$13.7 billion, an increase of 18.4 per cent on the previous year (\$11.6 billion).¹³"

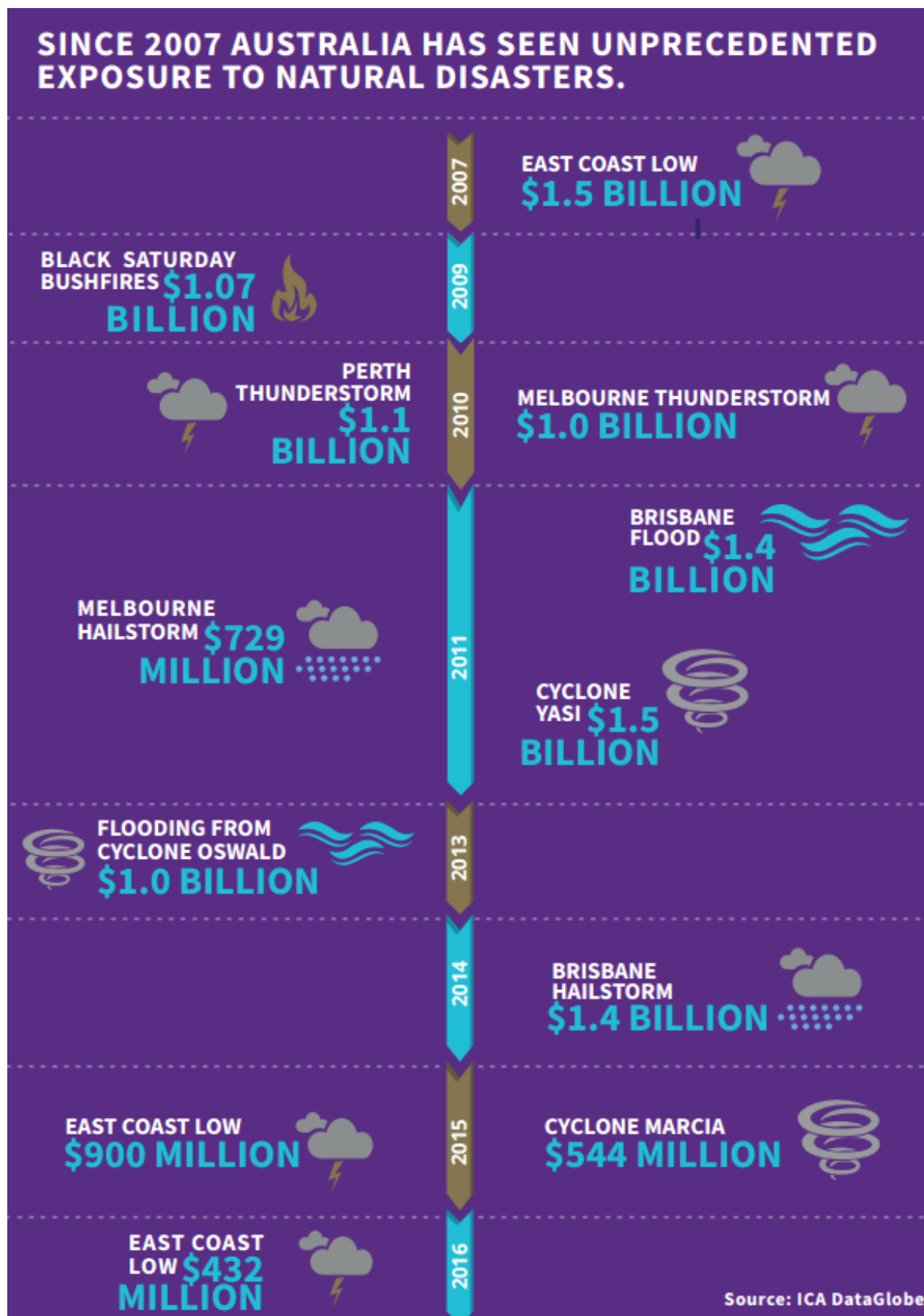
Expected claims cost

The incidences of natural perils affect both reinsurance costs and claims costs. This was the view held by the Productivity Commission in the Inquiry Report into Natural Disaster Funding Arrangements, with its projections indicating that, based on past trends, nominal insurance losses from natural disasters are likely to grow by around 5–6 per cent per annum over the next decade¹⁴.

In 2015, IAG responded to its largest volume of claims in more than 15 years. IAG¹⁵ managed more than 50,000 claims from the 2015 April East Coast Low. This number is equivalent to a year's worth of storm claims, and the majority of them were lodged in the first two weeks following the event. More recently, we received approximately 15,000 claims resulting from the low pressure weather system which impacted much of the east coast of Australia in June 2016¹⁶.

The expected cost of claims has increased in the past decade due to a number of factors, including: an increase in the cost of repairs; an increase in the speed with which water and fire damage spreads due to the open design of properties and the density of strata dwellings. As evidenced by Figure 4, the cost of claims has also been significantly influenced by the increasing prevalence and severity of natural perils in Australia. Over the past decade, Australia has had unprecedented exposure to natural perils. The estimated cost to insurers following some of the major events experienced since 2007 is displayed in Figure 4.

Figure 4: Estimated cost to insurers of some major events (2007-2016)¹⁷



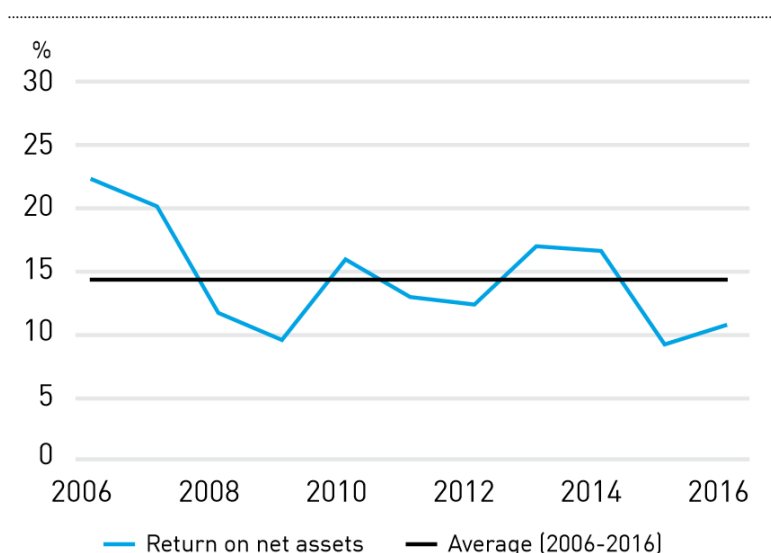
Expenses

Expenses can be fixed and/or variable, and can vary amongst the different general insurers that offer home, strata and car insurance, depending on their structure and operational model. For example, an insurer that provides branches for its customers will incur higher distribution costs than one that does not. Competition puts pressure on insurers to contain expenses but it should not be to the detriment of customer experience and service.

Profit margin

Profit margin is required for a sustainable and strong industry. As evidenced by Figure 1 and the confidential appendix, profit margin makes up a small component of a premium. Figure 5 from the 2016 annual report released by APRA reveals that the general insurance industry has achieved an average return on net assets of slightly more than 14 per cent per annum over the past decade¹⁸.

Figure 5: General Insurers' Return on Net Assets



Return on net assets is net profit (loss) for the year divided by average net assets over the year.

Source: APRA Annual Report 2016

Figure 5 must be considered in context. Increasing premiums does not automatically equate to increased profitability. The Treasury's submission to the Financial System Inquiry in 2014 found that despite rises in home building and home insurance policies since 2008, industry-wide profitability was lower than in the five years preceding 2008¹⁹, with the industry recording an increase in profitability in 2013 for the first time in three years²⁰. Four of the past six years have been below this average, driven in part by claims costs from significant natural catastrophe events. The decline in profitability in 2014-2015 was mostly due to a series of storm events in New South Wales and Queensland, which resulted in a 10 per cent increase in the industry's net loss ratio²¹.

APRA reported some improvement in 2015-2016 given the absence of major catastrophe events during the year, however profitability continued to be adversely impacted by falls in investment income as a result of the continued low interest rate environment and subdued premium growth.

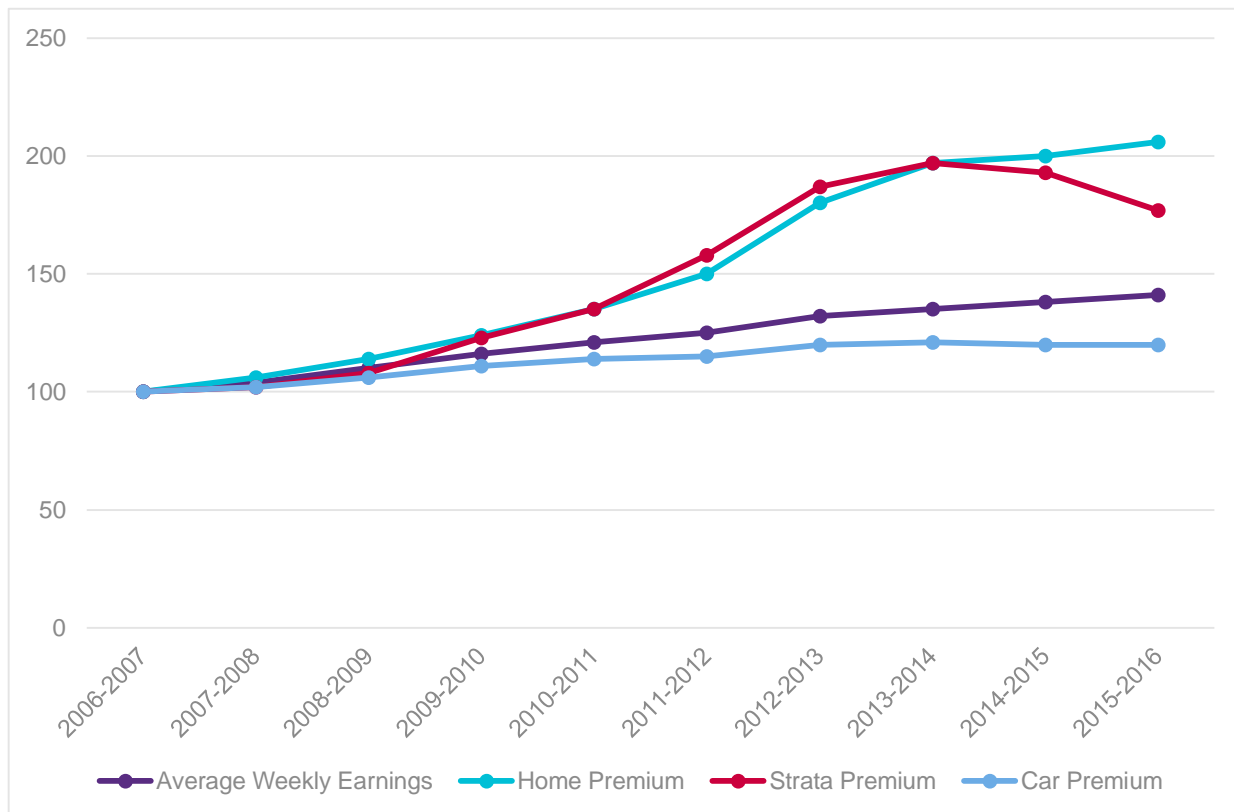
Investment income

In its submission to the Financial System Inquiry, APRA observed that “the performance of the general insurance industry in Australia has been strong over the past decade. Industry performance has been characterised in the main by both healthy underwriting returns and investment income, though the global financial crisis and various natural catastrophe events negatively impacted on insurers' returns in some years.²²”

As requested by the Committee, Figure 6 compares average weekly earnings with the average premium growth of home, strata and car insurance for IAG brands.

Figure 6 shows that the average rate of growth of car insurance premiums has remained below the growth of average weekly earnings. The same cannot be said for the average growth rate of home insurance premiums, which have increased at above the rate of average weekly earnings, more since 2011. The average growth rate of strata insurance premiums initially remained on par with the rise of average weekly earnings, rising higher in the 2009-2010 financial year before spiking in 2013-2014 and declining since then.

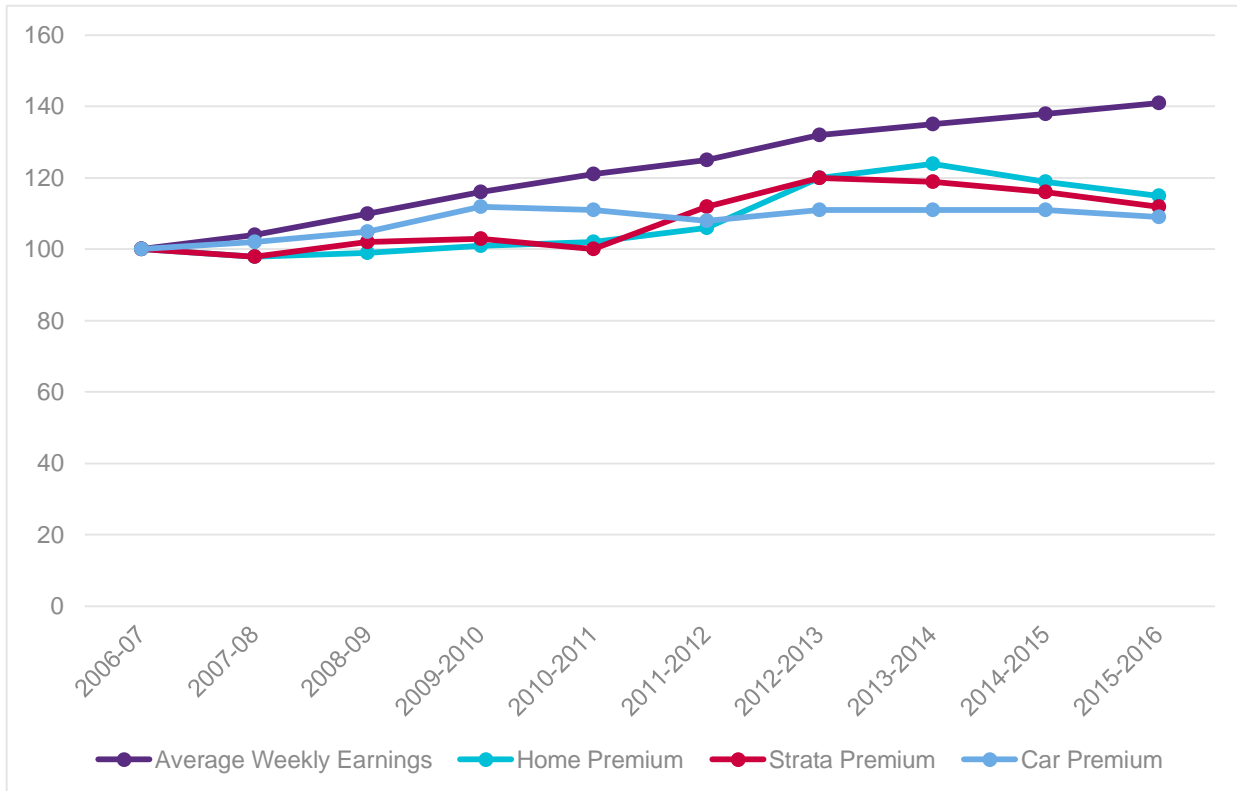
Figure 6: Average weekly earnings compared to average premium



Source: ABS & IAG

The cost of a home insurance premium must be viewed in the economic context that the value of the asset²³ has increased over the past decade²⁴. Significant work has been undertaken by the industry to improve transparency and address underinsurance. Costs to rebuild a home continue to increase not only from inflation on wages, but also factors such as changes to building standards. A more accurate indication of the movement of insurance premiums in comparison to earnings over time takes into account the sum insured of the asset being covered. This is shown in Figure 7.

Figure 7: Average weekly earnings compared to average premium per \$1,000 sum insured

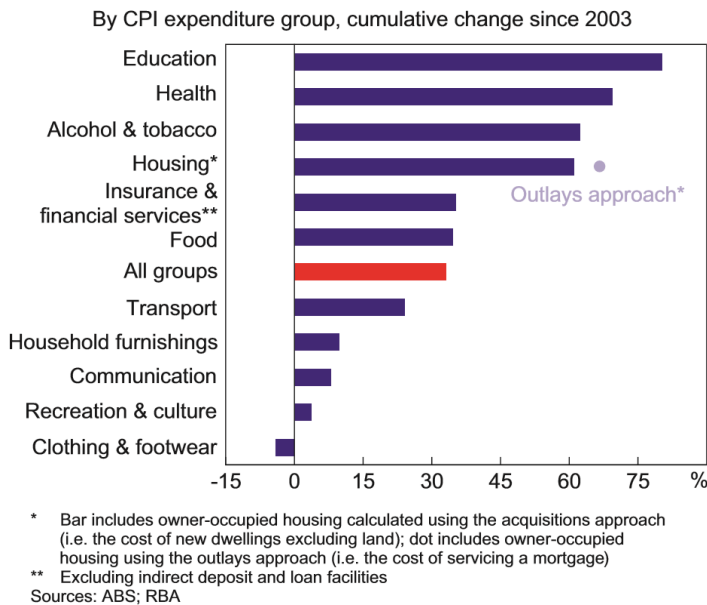


Source: ABS & IAG

Comparison of insurance

The Reserve Bank of Australia²⁵ compared the cost of insurance relative to other household expenditure for the period 2003-2014. Insurances and financial services were not segregated, but nevertheless these costs had not increased more than education, health, alcohol and tobacco over the past decade as seen in Figure 8.

Figure 8: Relative Price Movements



Home Insurance

Analysis of average weekly earnings against average premiums reveals that the annual premium for home insurance increased at a slightly higher rate than average weekly earnings between 2006-2009. Since then the cost of home insurance has further surpassed average weekly earnings.

A combination of factors has contributed to the justifiable rise in home insurance. A key premium driver includes building and repair costs. Factored into home insurance premiums is the cost of repairing or rebuilding a home or replacing its contents. An economic insight release by CommSec in August 2016 highlights that building costs have increased at the fastest pace in 7.5 years²⁶.

Of relevance to the assessment of the cost of home insurance is the fact that we are now covering more risks in our policies. For example, from 2012 we expanded our cover to offer flood insurance as a standard inclusion in most home and contents policies.

Strata Insurance

Several of the factors that go towards explaining the increase in home insurance have also contributed to the increase in strata insurance premiums across Australia. In addition, other factors include: the location; concentration; and risk attributes of strata dwellings.

Location

Many strata buildings are situated in areas of high risk, such as next to the coast. This places these dwellings at higher risk of cyclone damage than inland properties. For example, there has been extensive strata development along the coast of Queensland and New South Wales in the last 10 years, particularly northern areas within the region that are more prone to cyclonic and storm related damage.

Concentration

As opposed to insuring 100 homes dispersed over a large area, a residential strata building may comprise 100 homes on a smaller square footage. If a storm hits that area it could lead to a higher number of claims than if the risk was spread across a broader geographical area. This level of concentration is further exacerbated by the number of strata buildings concentrated within medium density corridors throughout our major centres. High levels of concentration directly impact higher reinsurance costs.

In recognition of the pressures on strata premiums IAG launched the Strata Resilience project, which implemented pre-disaster mitigation measures. In 2015 the project delivered \$1.3 million of savings to CGU strata property customers in North Queensland²⁷.

Risk attributes

The style and nature of strata building construction has changed in recent years with homeowners demanding higher-end finishings (for example, the inclusion of stone benchtops rather than laminate and timber flooring rather than carpets). Additionally, individuals who own older properties are undertaking rejuvenation and renovation projects to include such finishings. These factors are contributing to the cost of repairs when these items are damaged or destroyed, directly impacting premiums.

The increased demand for medium and high density living resulting in high-rise developments drives the need to include facilities such as lifts, sprinkler systems, cooling towers for central air conditioning, underground car parking and shared recreational facilities such as pools, gyms and tennis courts. This high-value infrastructure adds to the sum insured, resulting in increased average premiums.

Car Insurance

Analysis of average car premiums indicates that increases in annual premiums have been lower than increases in average weekly earnings for the period 2006- 2016. IAG has contributed to this by working to improve car safety. We are the only insurer in Australia to invest in its own Research Centre, where we conduct and share research on a range of vehicles, focusing on safety, security and repair costs. A research initiative that has led to a premium reduction is our work on Autonomous Emergency Braking (AEB). We recognise vehicles featuring AEB as a positive rating factor in a customer's car insurance premium. Depending on the system, vehicles fitted with AEB as standard equipment will have a saving of up to 15 per cent applied to their car insurance premium²⁸.

Several factors contribute to the premium that car insurance customers pay. These include: car design; the cost of specialised tools and equipment; higher repair costs and fluctuations in currency exchange rates.

Car design is rapidly evolving and cars now have more components in vulnerable locations. The amount of standard equipment in cars is gradually increasing to improve safety, comfort and convenience, but this adds to the complexity of vehicles and therefore the time and labour required to undertake repairs.

Almost all cars now feature at least six air bags with various crash sensors, while many newer cars now have supplementary cameras, radar and even lasers for range-finding and hazard detection. All these parts are physically vulnerable to destruction in collisions²⁹.

Additionally, a greater proportion of the front and rear components of vehicles are made of thermoplastics, such as the entire front and rear bumper fascias, upper and lower grilles, front and rear lampware, boot lid mouldings and tailgate finishing panels. Most of these components are quite expensive and they shatter on impact and are generally unrepairable.

Specialised tools and equipment are more often required to address specific engineering requirements that differ according to the car manufacturers' technical requirements. Car safety has improved in the past decade, but higher safety standards have brought higher repair costs because newer cars have proportionally greater structural complexity, with more frequent use of unrepairable high-strength steels, aluminium and composite materials including carbon fibre. Improved automotive safety technology has been made possible because component parts are now much more complex. This has increased the prices of parts commonly damaged in collisions.

One example of this price increase is demonstrated in the case study below.

Case Study

The headlamp for a ten-year-old vehicle uses Quartz-Halogen technology and costs \$300 + GST to replace. The headlamp for the equivalent 2017 model uses Light-Emitting Diode technology and costs \$1,248 + GST to replace.

Additional information in respect of the increase in cost of car parts in the past decade is contained in IAG's confidential appendix.

Fluctuations in currency exchange rates affect the prices of imported replacement parts. More than 80 per cent of replacement parts utilised in car body repairs are now imported from overseas, up from around 70 per cent a few years ago due to the rapid decline in local car manufacturing. IAG measured the rate of price inflation in the last financial year to be 3.73 per cent. This is well above other rates of domestic inflation measured by the ABS Consumer Price Indices. For instance, 'All Groups' was only 1.3 per cent annualised, while the result for 'Insurance and Financial Services' was 2.3 per cent in the same period³⁰.

Vehicle crash testing and evaluations at the IAG Research Centre uncover poor design features and expensive repair methods. In each case, the matter is raised with the relevant car manufacturer for rectification via re-engineering or component re-specification, leading to future cost reductions for all car owners.

IAG's focus has always been on delivering high quality standards for our customers by providing a seamless experience before, during, and after a motor vehicle incident. IAG's objective is to improve our customers' experiences and everything we do is designed with them in mind. For this reason, we do not compromise on safety and quality of repairs and believe that some cost trade-offs need to be made when it comes to saving people from road collisions and serious injury.

IAG has undertaken the following initiatives to ensure quality and safety outcomes are achieved for customers at the most reasonable cost possible.

1. A national network of partner repairers to ensure that vehicles are returned to owners with quality repairs quickly and cost-effectively³¹. It is our view that the quality and safety of repairs is the foremost priority. To achieve this, we believe a car must be repaired to manufacturer's standards. It is critical that we get our customer's cars to a repairer who has the equipment, knowledge and skills to repair modern vehicles. IAG has made the conscious decision to assess repairers via a Request for Proposal (RFP) process, ensuring repairers in our network have the capability to deliver high quality repairs consistent with manufacturer's standards, and a demonstrated commitment to excellence in customer service.
2. A Quality Repair Program to ensure all repairs of cars, homes and buildings are completed in accordance with manufacturer/building standards. This framework sets out how we manage repair quality nationally and ensures we deliver on our promise to get vehicle repairs completed to the highest quality and safest standard. IAG has a dedicated team undertaking thousands of quality inspections each year to ensure repairs are completed to industry standards. We are in the fourth year of publically releasing our annual quality findings and statistics, and IAG remains the only insurer in Australia to provide our customers with this level of accountability and assurance³².
3. A lifetime guarantee on the workmanship of authorised repairs on cars and homes. IAG's Motor Vehicle parts criteria predominately recommends new genuine Original Equipment Manufacturer parts for vehicles less than three years old, with the ability to fit used Original Equipment Manufacturer parts for vehicles over three years old where available and cost effective. This policy is based on our commitment to quality and safety.

The Committee is also tasked with assessing competition in the general insurance market.

IAG asserts that the level of competition and prudential regulation is strong enough to provide consumers with confidence that their home, strata and car insurance will be available if they need to make a claim. We believe that within the general insurance industry there are three layers of competition: across the various insurers; within insurers themselves through their different brands and coverage; and as a consequence of digital disruption.

Across insurers

APRA statistics reveal that there were 109 insurers licensed to conduct general insurance business as at 31 December 2016, of which 99 were general insurers and 10 were reinsurers³³.

In its submission to the Financial System Inquiry (2014), the Treasury highlighted that the Australian general insurance industry is largely open to the entry of new insurers, including foreign insurers. The Treasury noted that there has been an intensification of competition and contestability broadly across the general insurance sector in recent years, with new entrants offering a range of general insurance products and capturing market share by advertising aggressively and offering cheaper premiums and/or enhanced product features. The Treasury also highlighted that contestability in the general insurance market is reflected in trends in profitability, notwithstanding a popular perception that a lack of competition is driving rising premiums³⁴.

Within insurers

The home, strata and car insurance market in Australia is relatively mature and sophisticated in terms of product offering and risk assessment and management. It is serviced by a large number of insurers and consumers have access to a healthy range of products, many of which include optional cover enhancements that they can elect to purchase. Consumers are able to take advantage of special features such as loyalty and multi-policy discounts.

Core products

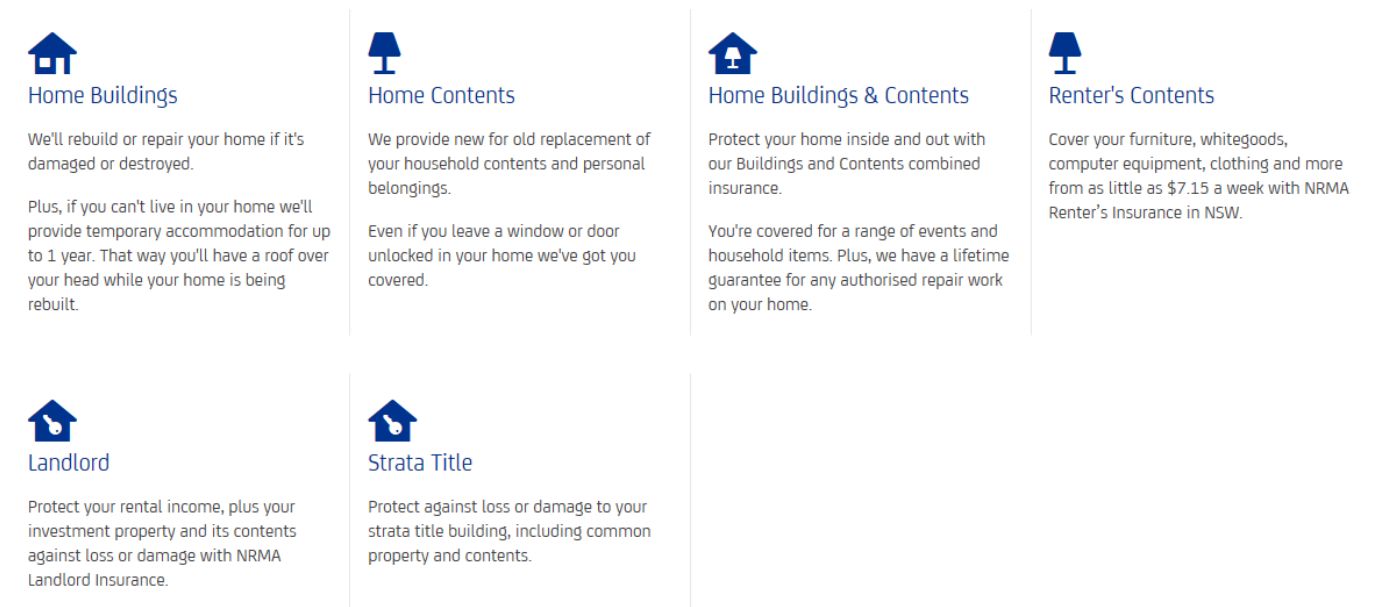
Across home, strata and car insurance, insurers often offer consumers a base coverage as well as optional additional coverage at various price points.

For example, a NRMA Insurance home customer has numerous choices available through different policies at different prices. As demonstrated in Figure 9³⁵, NRMA Insurance customers can obtain: Home Buildings, Home Contents, Home Buildings & Contents, and Strata Title products, amongst others.

Individual policies vary depending on a variety of factors including:

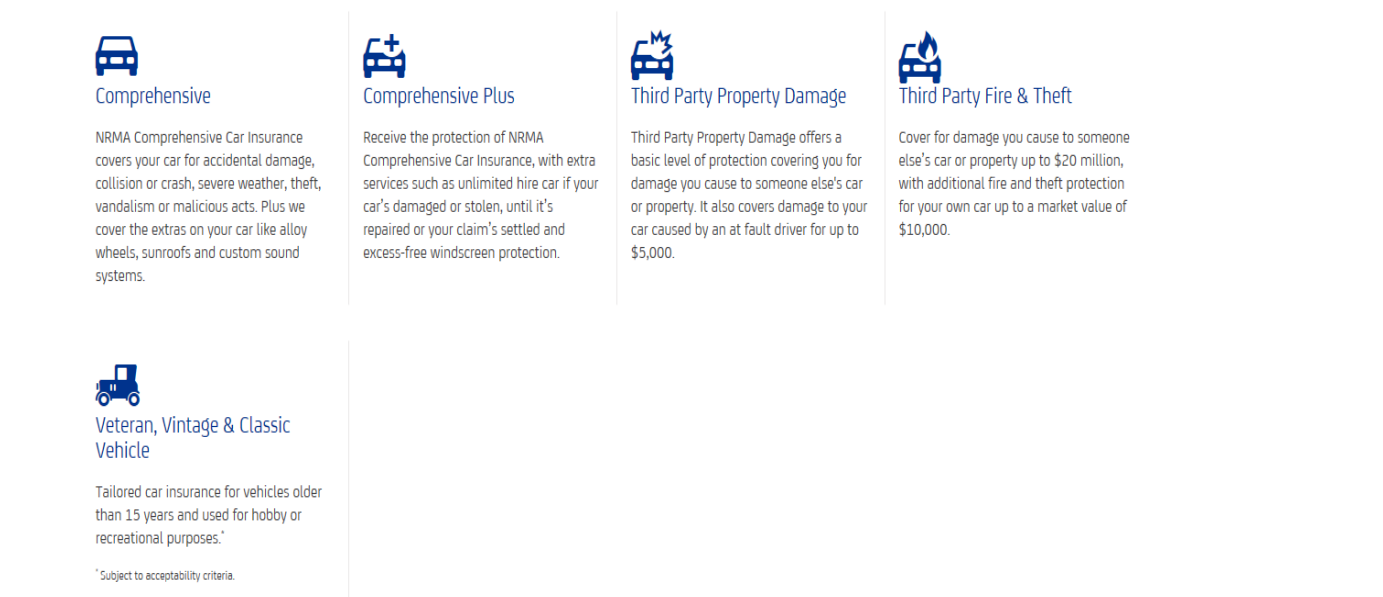
- Type of insurance (i.e. home buildings, home contents or combined home building and contents)
- Level of cover (i.e. standard home insurance or premium home insurance cover, which provides a higher level of cover)
- Amount of insurance (i.e. sum insured value of home buildings or contents)
- Amount of excess chosen by consumers
- Listed events covered (i.e. fire, theft, storm, flood and earthquake, vandalism, broken glass, animal damage, water and oil leaks)
- Optional cover (i.e. accidental damage, burn out of electric motors-fusion and pet cover, valuable contents and portable contents)

Figure 9



NRMA Insurance customers can also select from four different car insurance products, each of which provide a different level of cover: Comprehensive, Comprehensive Plus, Third Party Property Damage and Third Party Fire & Theft, as shown in Figure 10³⁶.

Figure 10

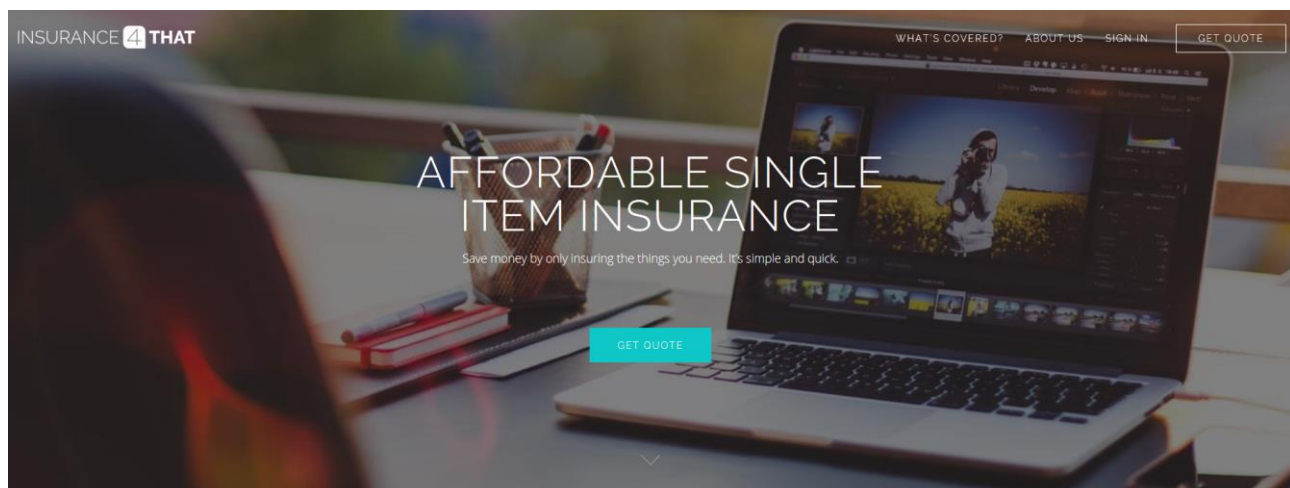


Digital disruption

Technology and changing customer behaviour is also driving additional competition in the general insurance industry, both within traditional products and across components of the insurance value chain.

Strong competition and technological advances support innovation. IAG is committed to educating our customers and broader community on the risks they face so they can be adequately covered. For example, in 2016 IAG developed and piloted First Place, a virtual reality experience designed to educate millennials about insurance risks around the home. This focused on engaging with millennials to ensure they have adequate understanding of how to protect themselves when they move out of home for the first time.

Another initiative is Insurance 4 That³⁷, a simple insurance solution that provides an alternative to traditional contents insurance by enabling people to insure individual items at an affordable price.



FOR LESS THAN YOU THINK

Electronics, cameras, musical instruments and more.

In addition to the core product suite available to customers, new innovative and tailored products have introduced additional competition to the market. Existing insurers are motivated to continually improve their offerings to better address customers' needs as technology becomes more advanced. An example of how innovation will continue to drive competition is the presence of disruptors. These companies are disrupting components of the traditional insurance value chain. For example, niche players, such as specialised claims management firms, are offering the same services that have traditionally been provided by insurers, forcing general insurers to be more innovative and competitive. At IAG the emergence of disruptors and the changing need of our customer base has driven us to reconsider the ways we have traditionally offered our insurance products, and become more digitised. IAG is committed to becoming a customer-led and data driven organisation that can adapt quickly to the rapidly changing environment.

The Committee is also examining the level of transparency in Australia's home, strata and car insurance industries.

The sector is competitive and dynamic, with ever increasing transparency of pricing and policy features. IAG believes that as the insurance industry evolves there is a continuing obligation to review how to provide greater transparency to consumers.

General insurers face unique challenges in making home, strata and car insurance underwriting data available due to the inherently commercially sensitive nature of the data. Significant intellectual property is associated with the actuarial modelling that underpins insurance data sets, together with proprietary and license restrictions on some of the data used. As the Committee would appreciate, underwriting data also forms the basis for competition between insurers.

Increasing the transparency of insurance enables consumers to understand the purchase of insurance, their risk and coverage. In this respect, a co-ordinated, strategic response is required to increase the community understanding of insurance. This strategic response should encompass community insurance education programs, promoting the value of insurance and making it easier for customers to read and understand their policies.

Community insurance education programs

Community insurance education programs are necessary to support and complement risk awareness and risk reduction. A key part of these programs is to help consumers understand that price is a reflection of risk. IAG has taken steps to increase access to information through various initiatives, such as the report we commissioned with SGS "At what cost? Mapping where natural perils impact on economic growth." The report analysed Insurance Council of Australia (ICA) data as well as IAG flood data and includes interactive maps and data files that are publicly available³⁸.

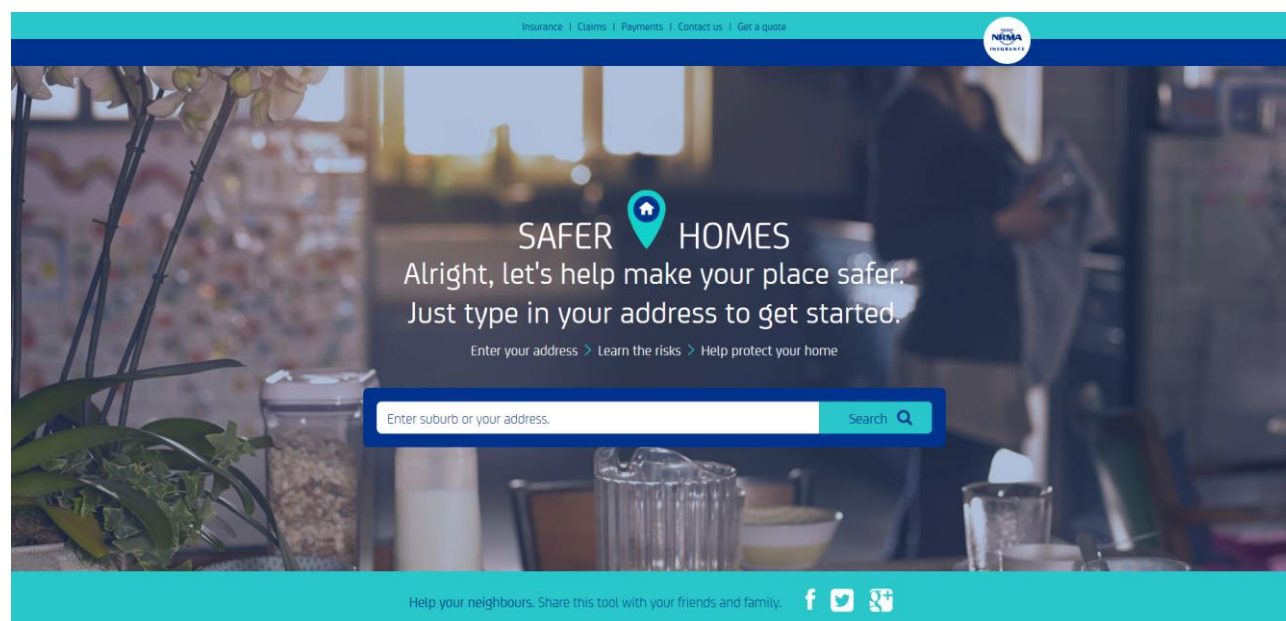


IAG commissioned a report titled, "At what cost? Mapping where natural perils impact economic growth and communities."

It is the first report to examine the impact that floods, storms, tropical cyclones, bushfires and earthquakes have on economic activity. This report will help all levels of government, businesses and the wider community understand the impact ever-increasing natural disasters are having on our economic activity. It can also help inform decisions on where future communities should live and work.

Explaining the value of insurance

Explaining the value of insurance is important. Insurance protects the individual and promotes financial stability by alleviating the welfare burden on governments. It stabilises the economy as a whole by allowing for quicker reconstruction and reestablishment following natural disasters.

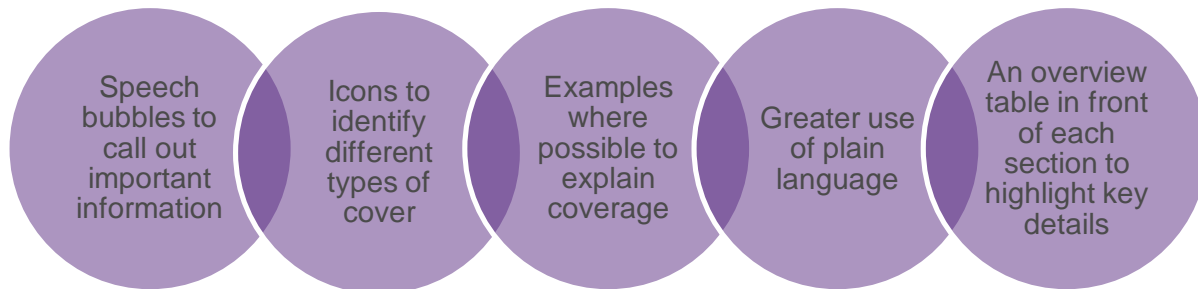


Our commitment to helping customers and the broader community understand the value of insurance led to the launch of the SaferHomes website in 2015³⁹. This website helps individuals to learn about their homes, insurance, risks and surrounding communities and to assess whether they have adequate protection.

This initiative is seeking to educate by building an individual's awareness of the real value of their home and contents and the most common risks in their neighbourhood. Lack of knowledge in these areas can lead to underinsurance and increased vulnerability. Since the website launched we have had more than 200,000 visitors to the site. More information available in Annexure B.

Making it easier for customers

IAG is committed to its role in ensuring customers not only receive adequate information about their insurance policies, but also understand them. With this in mind, NRMA Insurance, SGIO and SGIC⁴⁰ undertook a program in 2014 to rewrite their respective motor insurance Product Disclosure Statements after a review featuring in-depth customer research and surveys. The changes implemented were to ensure the PDSs were more transparent in terms of being easier to read, clearer and calling out relevant information to customers. The changes made were:



Further reviews have taken place to improve customer understanding and to ensure compliance with legal and regulatory changes.

In 2016, IAG implemented a number of changes to the NRMA Insurance Comprehensive Motor Renewal Certificate of Insurance, as seen below. A complete copy of the new and old versions is included at Annexure C, together with the previous renewal notices for comparison. The revised Renewal Certificate improves transparency, enables increased awareness of the insurance cover and provides customers with easy to understand information so that they can make informed decisions.

NRMA INSURANCE

2013 Toyota Aurion
Mr E McIgyocasyuppu
MOT 019 068 193

Mr E McIgyocasyuppu
98207778 Fake Street
SYDNEY NSW 2000

Your 2016-2017 Comprehensive Motor Renewal

Dear Mr E McIgyocasyuppu,

Thank you for being an NRMA Insurance customer. We look forward to providing you with everything you need for the next year and beyond. If you have any questions about your policy, please contact us and we'll be only too happy to help.

What's covered	Policy type	Renewal due
2013 Toyota Aurion	Comprehensive	27 Sep 16

To view all your policy details visit nrma.com.au/myaccount
Combined Home Bldg/Landlords and Contents counts as 2 policies

Make the switch and go paperless
Receive your policy documents anywhere, anytime, straight to your inbox.
Visit nrma.com.au/paperless

Changes to ESL (Emergency Services Levy)
We're happy to let you know from the 1st July 2017 NSW will be making the funding for Emergency Services and SES fairer by including the levy alongside council rates.
The ESL which accounted for 1% of your premium, has previously been collected with your insurance. Please visit nrma.com.au/eslexplained for further details.

Your policy summary	
Policy holders	Mr E McIgyocasyuppu
Vehicle	2013 Toyota Aurion
Registration	MCINNL
Start date	27 Sep 2016 (11:59pm)
End date	27 Sep 2017 (11:59pm)
Sum insured	Market value
Basic Excess	\$695
Last year's premium	\$977.27 <small>This includes any amendments made during the last policy period</small>

This year's premium **\$950.33**
Due date **27 Sep 2016**

65% No Claim Bonus
This year you will save **\$1,528.06**

5% Loyalty Discount
will be applied if you take out 1 more policy, or after two years.

CHECK IT Check ALL your policy details
CHANGE IT Update any changes
COVER IT Pay the premium by 27 September 2016
Visit nrma.com.au/myaccount

132 132 Visit your local NRMA branch Make a claim 131 144 nrma.com.au 1 of 5
NRMA Insurance Australia Limited ABN 11 000 016 722 trading as NRMA Insurance
NRMA Insurance Australia Limited ABN 11 000 016 722 trading as NRMA Insurance

Transparency

Continued.



The industry is also working together to increase the level of transparency. IAG was represented on the ICA's Effective Disclosure Taskforce which developed a report titled "Too long, didn't read"⁴¹, released in 2015. The Taskforce found a notable absence of empirical research around how consumers actually use disclosure documents to inform their decision-making. Rather than focusing on any radical immediate change to the mandated disclosure regime, the goal was to first thoroughly research consumer needs to provide a resource to help members improve their customers' decision making processes. The ICA will release the 'Consumer Research on Insurance Product Disclosures' report on 17 February 2017. The ICA will work with members, and consult with key stakeholders, to develop effective disclosure principles that are informed by the findings of the research. These principles will be considered for adoption by the forthcoming review of the General Insurance Code of Practice. In the interim, IAG will continue to enhance efforts to engage customers on product information and facilitate informed decision making with customer-tested, evidenced-based solutions.

The Committee has enquired about the effect in other jurisdictions of an independent home, strata and car insurance comparison service on insurance cover costs.

IAG's concern is that a comparison service would only emphasise price rather than educate consumers on the insurance they require, the coverage provided by the various products compared and the steps they can take to mitigate their risks.

Other industries

Unlike other industries (such as travel, where the commodity being compared such as a flight or hotel room is the same), the risk profile and therefore premium for one person's home, strata property or car can vary significantly from another person's. For that reason, websites that provide a range of prices for an identical commodity such as Hotels Combined or Trivago⁴² should not be considered as relevant comparative services.

With respect to home, strata and car insurance and to avoid misleading consumers on the actual premium they will be required to pay, any comparative service would require a level of granularity that would defeat the intended purpose. This is attributable to the fact that the ultimate quote or premium for an individual can be influenced by several factors such as years of loyalty, level of excess, level of coverage, geographical location and other pricing factors such as claims history.

This view is shared by both the UK Regulators Network and European Insurance and Occupational Pensions Authority who noted that, while Price Comparison Websites (PCW's) compare price well they are not as good at comparing the value of products. Over-simplification can result in consumers purchasing products that are not suitable for their needs⁴³.

Domestic experience

An independent comparative service that provides consumers with a national overview is privatehealth.gov.au. This website was established by the Private Health Insurance Ombudsman (PHIO) for the purpose of allowing consumers to access standard product information for their health insurance product and compare it with other products offered by their own and other health insurers. However even this government run website has limitations. The disclaimer provided by the PHIO recognises that the website may not take into account detail that could be significant in your particular context, or to particular persons. Another section of the disclaimer reads, "While PHIO endeavours to ensure the accuracy of the information set out on this website, the information may not be accurate, complete or up to date, for a wide range of reasons. You should not make any decision or take any action, based on the information in this web site, or otherwise rely on it for any purpose."⁴⁴ It is questionable whether comparative websites (private and government run) have led to a reduction in premiums in the private health sector, given the rate at which private health insurance premiums have risen since 2009⁴⁵.

Home, strata and car insurance premiums are calculated based on an individual's risk profile, unlike private health insurance where as long as two separate individuals purchase the same type of cover they would pay the same price.

Existing insurance comparison websites in Australia have attracted the scrutiny and concern of regulators, indicating that a proliferation of these sites could lead to issues similar to those faced in the UK.

Continued.

Australian regulators have previously expressed concern about comparison websites. In their response to the Financial System Inquiry in 2014, APRA noted that,

- “... comparison categories may aid comparison but do not solve the underlying problem of comparing differences in terms and conditions that can exist even where policies are targeted, for example at particular consumer categories; and
- In principle, it would be possible to design a comparator site that enabled consumers to compare both price and key policy terms and conditions. However, there is a balance between simplicity and complexity, and meaningful comparisons may not always be feasible.⁴⁶

Australian Securities and Investment Commission Deputy Chair, Peter Kell has expressed concern about comparator websites failure to disclose which insurers are being compared for quotes, how rankings are compiled and the use of special offers and “featured products”⁴⁷

International experience

United Kingdom

IGC cautions against the introduction of a comparative service as it would not have the desired effect of lowering prices or increasing competition and transparency. This view is shared in several independent reviews of price comparison websites⁴⁸. The UK Regulators Network report revealed that the listing of products by price is not sufficiently personalised to reflect the level of cover needed. Consumers are much more likely to pick the cheapest product when presented this way irrespective of product suitability⁴⁹.

In July 2014, the UK Financial Conduct Authority (FCA) released the ‘Review of price comparison websites in the general insurance sector’ - its second review of general insurance PCW in three years due to concerns that customers were being treated unfairly. The Review focused on motor, home and travel insurance because they are the general insurance products most commonly purchased through a PCW. The review found that PCWs did not always ensure that consumers were given the appropriate information to help them make informed decisions. This should be of particular concern to the Committee given part of the focus of this Inquiry relates to transparency⁵⁰.

Furthermore, the apparent success of comparator websites in the UK is questionable given the financial investment that is required to advertise those services. The Competition & Markets Authority, when investigating the UK private motor insurance market, found that they invested heavily in advertising and marketing. The example referred to in Moneysupermarket’s 2011 Annual report which revealed that its marketing investment amounted to \$78 million in that year, corresponding to around 43% of its revenue⁵¹.

The experience in the UK highlighted a number of issues for consumers and Government that must be overcome before the Committee should consider the introduction of an independent comparative service⁵². These issues include:

- Does not facilitate effective and informed decision making;
- Focus on price may exacerbate underinsurance;
- Danger of over emphasising price over other considerations such as coverage; and
- May be misleading due to discrepancy between actual and comparison price.

Effectiveness of comparative services



Continued.

Comparative websites provide simplistic and often an inaccurate overview of insurance policies. They reduce the purchasing decision to one based on price alone. In our view, this leads to a 'lowest common denominator' approach where consumers make purchasing decisions without due regard for differences in policy cover, product options and claims service capabilities, ultimately to their detriment.

The lessons learned both within Australia and internationally should cause the Committee to question the effectiveness of an independent comparative service.

The Committee also seeks to understand the costs and benefits associated with the establishment of an independent home, strata and car insurance comparison service.

Costs

Complexity in assessing individual risk

Importantly, underwriting and pricing questions are not consistent across the Australian insurance industry. Each insurer has its own underwriting appetite of acceptable risks and relies on a unique set of underwriting and pricing questions that enable it to confirm the availability and the terms of the cover it provides. This is particularly relevant for home buildings insurance. Even if a set of questions could be provided to capture some of this information, insurers could not rely solely on the responses to obtain a comprehensive view of the building's risk attributes because:

- The list of questions that would need to be asked would be extremely lengthy and cumbersome (due to it having to incorporate all participating insurer's varying question sets) for consumers; and
- Many questions that are intended to act as an indicator of potential risk issues would then require further analysis by an underwriter.

Due to variations in business models, cover and pricing, it is difficult for comparative websites to accurately and fairly make 'like with like' product comparisons.

Providing simplistic comparisons means consumers are less inclined to research the different products available to them that suit their personal circumstances. As a consequence, consumers can miss out on coverage options that suit their personal needs. Consumers also risk missing out on relevant discounts available to them, along with the ability to choose the level of excess suitable to their personal circumstances which could reduce premiums.

Implementation

In order to be transparent and accurate, a comparative service would require not only the capability to receive specified data from every home, strata and car insurer in Australia, but for that information to be updated on a regular basis so as not to mislead consumers. It is not known the extent that each general insurer offering the insurance subject to this Inquiry would have to upgrade or change their IT systems to have this level of functionality. IAG would speculate that it would be of significant cost to all insurers to build functionality and maintain the data provision required. This should be a significant consideration for the Committee.

Benefit

The overall benefits of an independent comparative service to consumers is highly debatable. Consumer groups have previously expressed their concern about privately run comparison websites. In the article "Where do you go for independent advice?"⁵⁴ Choice reviewed four of Australia's largest online comparison sites to see how they work, and just how much of the market they allowed consumers to compare. In summary, Choice found there were hidden catches to comparison websites which included:

- Free comparison sites can earn exorbitant fees per sale from the insurers
- Fees can make up a sizeable chunk of the total insurance premium
- Some comparison sites are misleading about how much of the market they compare
- Some sites are actually owned by insurance companies they're supposedly comparing

Operational hurdles

Continued.



A further consideration is that strata insurance is predominately an intermediated product that is not available to individual consumers via online or telesales channels. If a comparative website were to be relied on by bodies corporate in place of an appropriately qualified insurance broker or other intermediary, they would miss out on the expert advice and services to ensure they obtain the most appropriate cover for the strata property at the most competitive price.

The final Term of Reference requires the Committee to ascertain legislative and other changes necessary to facilitate an independent home, strata and car insurance comparison service in Australia.

Australian Governments recognise that efficient and effective regulation is necessary and desirable to facilitate the smooth functioning of the economy and to ensure that social, economic and environmental aims are achieved. Governments should not act to address “problems” through regulation unless a case for action has been clearly established. Moreover, any regulatory or legislative response should be proportional to the issue or “problem” being addressed.

The type of comparison site will determine whether any confidentiality or privacy implications arise. For example, a static product features/sample pricing site would not pose any privacy implications as consumers would not be inputting personal information. However, a ‘live-quote’ comparison service may require consumers to provide their personal information to generate quotes, posing potential privacy concerns.

Moreover, in the case of a ‘live-quote’ comparison service, there is a risk for misleading, inaccurate and or obsolete pricing information being displayed. Presumably, responsibility and ultimately liability for any damage incurred rests with the site administrator. Insurers who participate in the comparison website would expect to be indemnified for any potential action taken against them for the accuracy of information provided.

Again, IAG submits that any regulatory or legislative response should be proportional to the issue or “problem” being addressed and only the option that generates the greatest net benefit for the community, taking into account all the impacts, should be adopted.

IAG data

Historical and aggregated data was utilised in this submission given the commercial sensitivity of pricing and underwriting information. Individuals are likely to have different premium rates from the averages that are provided.

As the Inquiry is charged with assessing whether the cost of home, strata and car is affordable in comparison to wage growth, data was utilised from the following brands; CGU, RACV, NRMA Insurance, SGIC and SGIO, WFI and Coles Insurance. Home insurance data incorporated landlord's insurance.

The Committee is referred to IAG's confidential appendix which outlines how home, strata and car insurance premiums have changed for the financial years 2006-2016.

IAG also offers CTP Insurance in the following states and territory:

- The NRMA Insurance brand in Australian Capital Territory, New South Wales and Queensland (in run-off); and
- The SGIC brand in South Australia.

These products and any associated data have been excluded based on the Terms of Reference for the Inquiry.

Statistical information

In addressing the Terms of Reference, statistical information has been used from several sources including the ICA, Insurance Statistics Australia, Australian Bureau of Statistics and the Australian Government Actuary Second Report on Strata Title Insurance Price Rises in North Queensland.

ANNEXURE A – Australian Business Roundtable for Disaster Resilience & Safer Communities

Building a more resilient Australia

The first economic analysis of the social impact of natural disasters and benefits of infrastructure resilience.

Many Australians know only too well the devastating consequences of natural disasters. The Australian Business Roundtable for Disaster Resilience & Safer Communities has released two new reports by Deloitte Access Economics exploring the areas most impacted by natural disasters, social wellbeing and critical infrastructure.

The Economic Costs of the Social Impact of Natural Disasters

THE COST OF RECOVERY

The true cost of natural disasters is at least **50% greater** than previous estimates.

It is estimated that the total cost of natural disasters in Australia in 2015 exceeded **\$9 billion**

This is expected to double by 2030 and to reach an average of **\$33 billion annually by 2050**

INTANGIBLE LOSS

More than **1 in every 10** people exposed to natural disasters are reported to develop psychological distress.

Social costs tend to persist over a person's lifetime - while most tangible costs are one-off.

<p>Black Saturday bushfires</p> <div style="border: 2px solid white; border-radius: 50%; width: 60px; height: 60px; display: flex; align-items: center; justify-content: center; margin: 0 auto;"> \$7.0 billion </div> <p>Tangible 44% Intangible 56%</p>	<p>Queensland floods</p> <div style="border: 2px solid white; border-radius: 50%; width: 60px; height: 60px; display: flex; align-items: center; justify-content: center; margin: 0 auto;"> \$14.1 billion </div> <p>Tangible 47% Intangible 53%</p>	<p>Newcastle earthquakes</p> <div style="border: 2px solid white; border-radius: 50%; width: 60px; height: 60px; display: flex; align-items: center; justify-content: center; margin: 0 auto;"> \$18.7 billion </div> <p>Tangible 45% Intangible 55%</p>
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BUSINESS ROUNDTABLE RECOMMENDATIONS

- 1

Pre and post disaster funding should better reflect long term social impacts.
- 2

Greater collaboration between government, business and community to address the medium and long term economic costs of social impacts.
- 3

Government, business and community need to further invest in community resilience programs that drive behavioural change.
- 4

New research needed into how to quantify the medium and long term costs of social outcomes.

Building Resilient Infrastructure

<h3 style="margin: 0;">THE ECONOMIC CASE FOR CHANGE</h3> <p>\$1.1 trillion will be spent on new infrastructure between now and 2050.</p> <p>Yet just 3 / 12 Australian cost-benefit analysis guidelines recognise resilience to natural disasters.</p> <p>\$17.0 billion will need to be spent on rebuilding critical infrastructure after natural disasters occur between now and 2050.</p>	<h3 style="margin: 0;">WIDESPREAD IMPACT</h3> <p>Bushfires in Victoria: a single loss of electricity supply cost around \$234 million.</p> <p>Repeated bridge flooding in Dubbo, NSW resulted in bridge closure costs of \$91.8 million.</p> <p>Flooding in Brisbane, Queensland cost \$1 million a day in lost mobile service.</p>	<h3 style="margin: 0;">BUSINESS ROUNDTABLE RECOMMENDATIONS</h3> <ol style="list-style-type: none"> 1. Integrate resilience into infrastructure planning processes. 2. Prioritise policy and funding to ensure disaster resilience is incorporated. 3. Invest in resilience education to strengthen technical capacity.
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Who we are

The Business Roundtable was formed in December 2012 by six of Australia's leading CEOs, who believe that it is of national importance to have resilient communities that can adapt to extreme weather events and natural perils.

Australian Red Cross
THE POWER OF RESILIENCE

To find out more about the Business Roundtable or to view the two reports in full visit australianbusinessroundtable.com.au
Together, we can build a more resilient Australia.

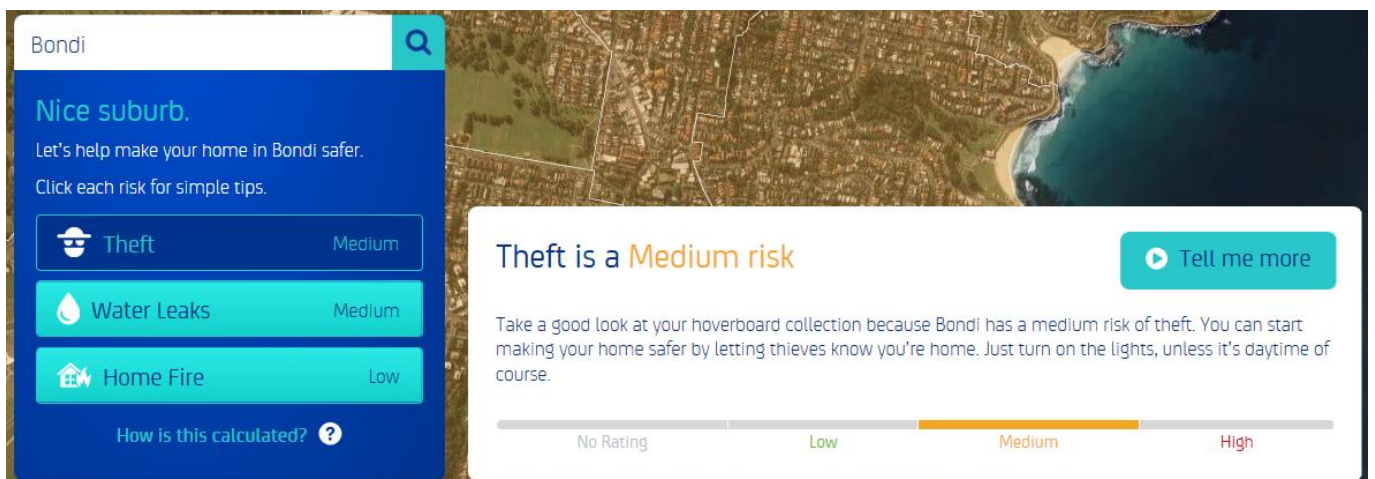
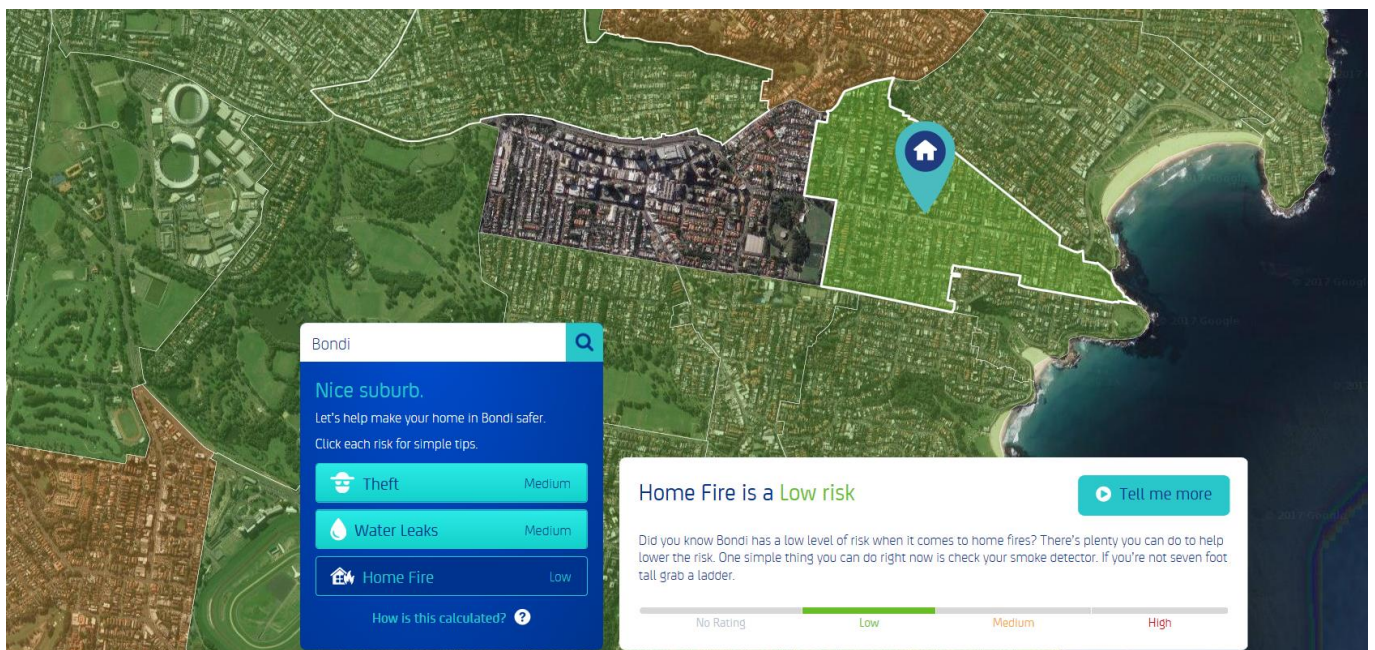
Join the social conversation with [#resilientAUS](https://twitter.com/resilientAUS)

ANNEXURE B-SaferHomes.com.au

Usage

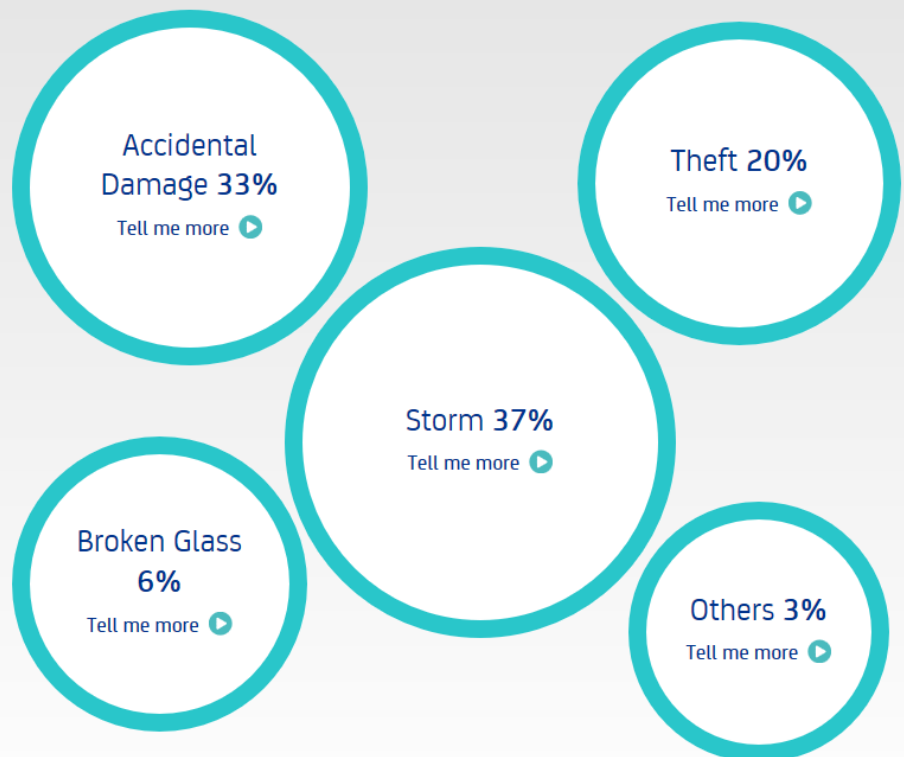
Users are spending an average of 5.34 minutes perusing the website, eclipsing global dwell time benchmarks by an average of 2+ minutes. Visitors have been identified from across Australia including all states and territories.

Snapshot of website tools



Common claims in Bondi^{*}

[How is this calculated?](#)



^{*} Figure calculated from data taken from the suburb searched plus suburbs with the same state.

ANNEXURE C- NRMA Insurance Comprehensive Motor Renewal Certificate of Insurance

NEW VERSION



2013 Toyota Aurion
Mr E Mclgyocasyuppu
MOT 019 068 193

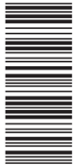


Mr E Mclgyocasyuppu
98207778 Fake Street
SYDNEY NSW 2000

Your 2016-2017 Comprehensive Motor Renewal

Dear Mr E Mclgyocasyuppu,

Thank you for being an NRMA Insurance customer. We look forward to providing you with everything you need for the next year and beyond. If you have any questions about your policy, please contact us and we'll be only too happy to help.



Your portfolio



What's covered	Policy type	Renewal due
2013 Toyota Aurion	Comprehensive	27 Sep 16

To view all your policy details visit nrma.com.au/myaccount
Combined Home Bdgs/Landlords and Contents counts as 2 policies

Make the switch and go paperless



Receive your policy documents anywhere, anytime, straight to your inbox.

Visit nrma.com.au/paperless

Changes to ESL (Emergency Services Levy)

We're happy to let you know from the 1st July 2017 NSW will be making the funding for Emergency Services and SES fairer by including the levy alongside council rates.

The ESL which accounted for 1% of your premium, has previously been collected with your insurance. Please visit nrma.com.au/eslexplained for further details.

Your policy summary



Policy holders	Mr E Mclgyocasyuppu
Vehicle	2013 Toyota Aurion
Registration	MCINNL
Start date	27 Sep 2016 (11:59pm)
End date	27 Sep 2017 (11:59pm)
Sum insured	Market value
Basic Excess	\$695
Last year's premium	\$977.27 <small>This includes any amendments made during the last policy period</small>



This year's premium
\$950.33



Due date
27 Sep 2016

65% No Claim Bonus

This year you will save **\$1,528.06**



5% Loyalty Discount

will be applied if you take out 1 more policy, or after two years.

- CHECK IT** Check ALL your policy details
 - CHANGE IT** Update any changes
 - COVER IT** Pay the premium by 27 September 2016
- Visit nrma.com.au/myaccount

MOT01906819300003

132 132
Insurance Australia Limited ABN 11 000 016 722 trading as NRMA Insurance

Visit your local NRMA branch

Make a claim 131 144

nrma.com.au

1 of 5

MOTRNL Issued at 8:37am on 18/10/2016

NEW VERSION



2013 Toyota Aurion
Mr E Mclgyocasyuppu
MOT 019 068 193



This document is your **Certificate of Insurance (COI)** for policy number **MOT 019 068 193**. Please keep this certificate, along with your Motor Insurance Product Disclosure Statement and Policy Booklet (PDS), and any applicable Supplementary PDS, in a safe place. On full payment these documents become your Tax Invoice and Comprehensive Motor Insurance Contract. Let us know if any of these details have changed or are incorrect.

Policy holders

Mr E Mclgyocasyuppu

Policy number	MOT 019 068 193	Premium (including 65% No Claim Bonus)	\$822.80
Start date	27 September 2016 (11:59pm)	Plus Government charges	\$45.25
End date	27 September 2017 (11:59pm)	Stamp Duty	\$82.28
		GST	
Sum insured	Market value	Total premium	\$950.33
Basic Excess	\$695		

Your vehicle

2013 Toyota Aurion

GSV50R AT-X Sedan, 3500cc fuel injection

These details affect your premium [Check it](#)

Vehicle address	98207778 Fake Street, Sydney NSW 2000	VIN/chassis number	ABCDEFABCDEFABCDEF
Parking type	Garaged overnight	Credit provider	No finance
Registration	MCINNL	Vehicle use	Private or business purposes and you are not entitled to claim any GST input tax credits in respect of this policy
Expected travel	10,001 - 15,000 kilometres per year		

Understanding your sum insured

These details affect your premium [Check it](#)

Your **sum insured** should represent the **replacement price** of your vehicle, including the values of any **legal modifications** + **on-road costs**. (Registration and CTP). You can choose **Agreed** or **Market** value to insure your vehicle.



AGREED value

is the amount that we agree to insure your vehicle for. You can select an agreed value within a price range set by NRMA Insurance based on an independent valuation guide.

Not Selected



MARKET value

is the value of your vehicle determined by us based on an independent valuation guide at the time of a claim. It is based on local market prices, the age, kilometres and pre-claim condition of your vehicle.

Selected

Visit nrma.com.au/myaccount to update your policy and pay

How to pay

NRMA INSURANCE Mr E Mclgyocasyuppu
Policy number: **MOT 019 068 193**

\$950.33 **27th September 2016**
Premium Amount Due Date

[ONLINE nrma.com.au/payments](http://nrma.com.au/payments) [PHONE 131 144](tel:131144)

[VISIT A BRANCH](#)
Make an appointment or find a branch nrma.com.au/branches

BPAY



Make a **BPAY®** payment online or by phone banking

Billers code: **90001**
Ref: **6680 1906 8193**

POST OFFICE

Make a **Post BillPay®** at any Australia Post Office.



*782 MOT019068193 111016

NEW VERSION



2013 Toyota Aurion
Mr E Mclgycasyuppu
MOT 019 068 193



Who pays the excess?



The excess is usually paid by the driver who is considered at-fault. You must provide the at-fault driver's name and home address.



If 1, 2 and 3 are there, you don't pay an excess. If **ANY** are missing, you will pay an excess.

Your drivers

This information affects your excess and premium [Check it](#)

LISTED DRIVERS	AGE	DRIVING YRS	LICENCE HISTORY	INSURANCE HISTORY
Your drivers, history and any additional excess			Licence cancelled or suspended in the last 2 years	Insurance refused, cancelled, renewal not offered, special conditions imposed or claim refused in the last 5 years
Mr E Mclgycasyuppu	29	11 yrs	-	-

Your excess



A **basic excess** applies to all claims, see below to understand how **age excess** may apply. A **special excess** may also apply. You can choose how high or low to set your **basic excess**, the higher your **basic excess** the lower your premium.

AGE	DRIVERS	BASIC EXCESS		AGE EXCESS		
Over 25	Over 2 yrs driving experience	\$695	+	\$0	=	\$695
Over 25	Less than 2 yrs driving experience	\$695	+	\$400	=	\$1,095
Under 25	Listed driver on your policy	\$695	+	\$400	=	\$1,095
Under 25	Unlisted driver on your policy	\$695	+	\$1,600	=	\$2,295
Any special excess listed in 'Your drivers' above will also apply						

See the Premium, Excess & Discounts Guide (PED) or visit nrma.com.au/car-ped for more information.



Maximise your Loyalty Discount

Your **Loyalty Discount** rewards you for your entire relationship with us. The longer you stay and the more policies you have, the greater your **Loyalty Discount**. Now is a great time to take out other eligible policies as you could receive an even bigger discount. To view the list of policies that make up your Loyalty Discount, please see 'Your Portfolio' on page 1.

MOT019068193000003

132 132
Insurance Australia Limited ABN 11 000 016 722 trading as NRMA Insurance

Visit your local NRMA branch

Make a claim **131 144**

nrma.com.au

3 of 5

MOTRNL Issued at 8.37am on 18/10/2016

NEW VERSION



2013 Toyota Aurion
Mr E Mclgyocasyuppu
MOT 019 068 193



Your policy covers

Property

- Your vehicle**
- Someone else's vehicle or property** damaged by your
- Personal Items** up to \$500
- Baby capsules** or child seats up to \$500
- Trailer or caravan** you are towing up to \$1,000

Incidents

- Crash, collision** or **accidental damage**
- Theft** or **attempted theft**
- Explosion** or **Fire**
- Flood** or **Storm**
- Vandalism** or a malicious act

Other benefits

- Towing** to a repairer or a safe place
- Windscreen repair** or replace
- Emergency repairs** up to \$800 to get back on the road safely
- Hire car after theft** up to \$65 per day for 21 days
- Liability cover** for up to \$20,000,000
- Lifetime guarantee** on workmanship for authorised repairs

For full details on your cover please see your PDS, and any applicable Supplementary PDS, or visit nrma.com.au/car-policy

Optional extras

You can select the following optional extra to add to your standard policy cover.

Hire Car after an Incident

Up to \$65 a day for 14 days car hire.

Not selected X

Windscreen cover

Windscreen, sunroof, or window glass damage with no excess.

Not selected X

No Claim Bonus protection

Protect your No Claim Bonus status in the event of an accident.

Not selected X

You can update your optional extras by visiting nrma.com.au/myaccount

Important changes

The following changes have been made to your Comprehensive Motor policy:

Excess changes

We have changed the amount of the basic excess. Your Certificate of Insurance details your basic excess.

visit nrma.com.au/car-policy to view your PDS and any applicable Supplementary PDS.

NEW VERSION



2013 Toyota Aurion
Mr E Mclgyocasyuppu
MOT 019 068 193



Representatives of NRMA Insurance

In addition to our employees, NRMA Insurance has a network of agents that are authorised to arrange our insurance products ('distributors'). The individuals who work for our distributors are also authorised distributors of NRMA Insurance. When our distributors provide insurance they act on our behalf, not yours.

We pay our distributors certain fees for providing insurance which may include an operating fee, new business fees, renewal fees and bonus fees paid for achieving volume targets, exceeding volume targets and achieving premium targets.

If you have a complaint about us or one of our distributors, please speak with one of our consultants by calling **132 132**. If your complaint remains unresolved, you may ask for it to be referred to our **Customer Relations** area. If you are unhappy with their decision, they can provide you with information on external review options.

We know privacy is important to our customers: Any personal information you provide to us will be collected, held, used and disclosed in accordance with our Privacy Policy. Please refer to nrma.com.au to review the Privacy Policy.



OLD VERSION



2016-2017 Certificate of Insurance Comprehensive Motor Renewal



22766-0000001-00001

Mr E McIgyocasyuppu
98207778 Fake Street
SYDNEY NSW 2000

Dear Mr E McIgyocasyuppu,

Thank you for choosing NRMA Insurance. You will find a summary of your policy opposite, including how to renew and when the payment is due.

Next steps:

1. Review the information on the following pages and if you need to make changes call 132 132 or +61 2 8661 7307, access Self Service Centre at nrma.com.au/selfservice or visit an NRMA Office at your convenience, see nrma.com.au/branches-finder for details. Please check our website for the latest operating hours.
2. Please pay by 27 September 2016. If paying in person, take your payment slip on page 3 with you.
3. On full payment, this document becomes your Certificate of Insurance. Please keep this document in a safe place.

**Go Paperless. Switch to email
for your insurance documents.
Visit nrma.com.au/paperless to
switch.**

YOUR POLICY SUMMARY

Policy number:	MOT 019 068 193
Annual premium:	\$950.33
Due date:	27 September 2016
Current policy expires:	11:59pm on 27 September 2016

Vehicle:	2013 Toyota Aurion Sedan
Registration:	MCINNL
The insured:	Mr E McIgyocasyuppu
Address where vehicle is kept:	98207778 Fake Street, Sydney NSW 2000
Insured for:	Market value
Basic excess:	\$695 See over for all excesses that apply.

YOUR PREMIUM (Includes 65% No Claim Bonus, your chosen Options and government charges - see over for full details)

Pay annually:	\$950.33
You currently pay this way	
OR	
Pay monthly:	\$90.55
You can nominate to pay your premium in monthly instalments. This will incur an extra \$136.24 p.a. To pay this way, please contact us before 27 September 2016.	
Please pay by 27 September 2016 For how to pay, see page 4.	

YOUR LOYALTY DISCOUNT

Loyalty Discount 0%	Nil
Loyalty Years	0
Number of policies	1

See page 2 for a list of the policies used to determine your Loyalty Discount

Enquiries 132 132
Payments 131 144

Claims 131 123
Visit nrma.com.au



MOTO19068193000003

OLD VERSION



2016-2017 Certificate of Insurance Comprehensive Motor Renewal

Policy number: **MOT 019 068 193**

Enquiries **132 132**
 Payments **131 144**
 Claims **131 123**
 Visit **nrma.com.au**
 an NRMA office

YOUR POLICY LIST

This is a list of policies used to determine this policy's Loyalty Discount. It is based on the policyholder who has the most eligible policies and longest relationship with us. Please contact us if you have any policies that are not listed here.

Policy type	Description	Reference number
Comprehensive Motor	2013 TOYOTA AURION	MOT019068193

Note:

A combined Home Buildings and Contents policy counts as 2 policies

A combined Landlord Buildings and Contents policy counts as 2 policies

YOUR POLICY DETAILS

The following pages list your Policy details. Please keep this certificate, along with your Motor Insurance Product Disclosure Statement and Policy Booklet (PDS), and any applicable Supplementary PDS, in a safe place. On full payment these documents will form your Motor Insurance Contract.

Policy number	MOT 019 068 193
Your contract	Valid from 11:59pm, 27 September 2016 to 11:59pm, 27 September 2017
Annual premium	\$950.33
The insured	Mr E McIgyocasyuppu
Vehicle insured	2013 Toyota Aurion GSV50RAT-X Sedan, 3500cc fuel injection
Registration	MCINNL
VIN/chassis number	ABCDEFABCDEFABCDE
Insured for	<ul style="list-style-type: none"> Your vehicle is insured for market value. The market value includes all modifications, options and accessories attached to your vehicle at the date of an incident.
Credit provider	There is no finance on this vehicle.
The vehicle is	<ul style="list-style-type: none"> kept at 98207778 Fake Street, Sydney NSW 2000

- usually parked in a garage overnight
- used for private or business purposes and you are not entitled to claim any GST input tax credits in respect of this policy
- expected to travel approximately 10,001 - 15,000 kilometres per year

Key policy features

- standard hire car cover up to \$65 a day for a maximum of 21 days, if your vehicle has been stolen or damaged as a result of theft or attempted theft
- cover for accidental damage, flood, storm, theft or attempted theft, fire, vandalism or malicious acts
- \$20 million liability cover for damage caused to someone else's vehicle or property by your vehicle
- lifetime guarantee on the workmanship of repairs authorised by us for the life of your vehicle

Government charges

The following amounts are included in your premium.

GST	\$82.28
Stamp duty	\$45.25

Important changes to your policy

There are some changes to your Policy. See the 'Important Changes' section of this renewal and the Supplementary PDS.

EXCESSES

The following excesses apply to your policy:

- A basic excess of \$695 for each claim
- Add an age excess of \$1,600 for drivers under 25 years of age

- Add an age excess of \$400 for drivers 25 years of age or over with no more than 2 years driving experience

You can reduce the under 25 age excess from \$1,600 to \$400 by telling us that a person under 25 might drive the vehicle. This may affect the premium you pay.

OLD VERSION



2016-2017 Certificate of Insurance
Comprehensive Motor Renewal

Policy number: MOT 019 068 193

Enquiries 132 132
Payments 131 144
Claims 131 123
Visit nrma.com.au
an NRMA office

OPTIONS

Options you may add

You may be eligible to add these options to your policy. Contact us for an estimate or refer to the PDS, and any applicable Supplementary PDS for more information.

• Hire car option

If an incident we cover, other than theft or attempted theft, causes loss or damage to your vehicle and you need a hire car, we will pay up to \$65.00 a day for a maximum of 14 days for a hire car.

• Windscreen option

Allows you to make a claim if only your windscreen, sunroof or window glass is damaged, without paying any excess.

• No Claim Bonus Protection

YOUR PREMIUM

Please refer to the Premium Excess and Discounts guide for further information about how we determine your premium and excesses that may be payable at claim time. The following provides a breakdown of how your premium is calculated.

Premium including 65% No Claim Bonus	\$822.80
Plus Government charges	\$127.53
Total premium	\$950.33

BENEFITS

You've been awarded Claim Free Privilege giving you our maximum **65% No Claim Bonus**. Claim Free Privilege status is your reward for a good claims history.

OWNER AND DRIVER HISTORY

Details of insurance and driving history for each insured and driver are listed here.

Mr E Mclgyocasyuppu, age 29, years driving 11

In the last 5 years

- had no insurance refused, cancelled, avoided or renewal not offered, no claim refused and no special conditions imposed

Page 3 of 4

PAYMENT SLIP



*782 MOT019068193 111016

Important! Take this payment slip with you when paying in person.

Name: Mr E Mclgyocasyuppu
 Policy number: MOT 019 068 193
 Payment amount: **\$950.33**
 Due date: **27 September 2016**



MOT019068193000003

Receipt ID 03

MOTRNL Issued at 8.37am on 18/10/2016

OLD VERSION



2016-2017 Certificate of Insurance Comprehensive Motor Renewal

Policy number: **MOT 019 068 193**

Enquiries **132 132**
Payments **131 144**
Claims **131 123**
Visit **nrma.com.au**
an NRMA office

In the last 2 years

- has not had a licence cancelled or suspended due to a driving offence(s)

IMPORTANT CHANGES

The following changes have been made to your Comprehensive Motor policy:

Excess changes

- We have changed the amount of the basic excess. Your Certificate of Insurance details your basic excess.

ADDITIONAL INFORMATION

Insurance Australia Limited ABN 11 000 016 722 AFS Licence No. 227681 trading as NRMA Insurance in New South Wales, the Australian Capital Territory, Queensland and Tasmania, SGIO in Western Australia and SGIC in South Australia.

Making a claim

If you need to make a claim, please call our dedicated Claims Team on 131 123. It's available 24 hours a day, 7 days a week, and it may help to have this document with you when you call.

Transaction confirmation

If you would like confirmation of any transaction made on your policy, please contact us.

Privacy of your information

Any personal information you provide to us will be collected, held, used and disclosed in accordance with our Privacy Policy. Please refer to nrma.com.au to review the Privacy Policy. You can also ask us to send you a copy by calling 132 132.

Representatives of NRMA Insurance

In addition to our employees, NRMA Insurance has a network of agents that are authorised to arrange our insurance products ('distributors'). The individuals who work for our distributors are also authorised distributors of NRMA Insurance. When our distributors provide insurance they act on our behalf, not yours.

We pay our distributors certain fees for providing insurance which may include an operating fee, new business fees, renewal fees and bonus fees paid for achieving volume targets, exceeding volume targets and achieving premium targets.

If you have a complaint about us or one of our distributors, please speak with one of our consultants by calling 132 132. If your complaint remains unresolved, you may ask for it to be referred to our Customer Relations area. If you are unhappy with their decision, they can provide you with information on external review options.

HOW TO PAY



In person - Take this document and pay at an NRMA Office at your convenience, see nrma.com.au/branches-finder for details, or pay at any Australia Post Office.



By mail - Detach this payslip and send it with your cheque or credit card details to: NRMA Insurance, Customer Correspondence, Reply Paid 9871, In Your Capital City



By phone - Call 131 144 and have your credit card ready.



Online - Go to nrma.com.au/payments and have your credit card ready.



By BPAY® - Contact your financial institution to arrange payment from your account.

Bill code:	90001
Reference:	6680 1906 8193

Credit card details Mastercard VISA

_____ / _____ / _____

Expiry _____ / _____ Signature _____

- 1 IAG's short tail personal insurance products are distributed in Victoria under the RACV brand, via a distribution relationship and underwriting joint venture with RACV. These products are distributed by RACV and manufactured by Insurance Manufacturers of Australia Pty Limited (IMA), which is 70% owned by IAG and 30% by RACV.
- 2 Geneva Association, The Social and Economic Value of Insurance, September 2012
- 3 APRA, Insight Issue 3, 2013. Available at <http://www.apra.gov.au/Insight/Pages/Insight-Issue-Three-2013-HTML.aspx>
- 4 Further information available at <http://australianbusinessroundtable.com.au/>
- 5 Further information available at <https://www.iag.com.au/shared-value/creating-shared-value/confident-communities>
- 6 Justin Douglas, Matt Bowditch, Adam Ni, Affordability of Natural Disaster Insurance, 2013
- 7 Justin Douglas, Matt Bowditch, Adam Ni, Affordability of Natural Disaster Insurance, 2013.
- 8 The premium quote used in this example was valid as at 2 February 2017.
- 9 From 1 July 2017, the NSW Government has proposed to make the funding for fire & emergency services fairer by including the levy alongside council rates.
- 10 SwissRe, Sigma No 1, 2016, page 2
- 11 Munich RE, TOPICS GEO, Natural catastrophes 2015, Analyses, assessments, positions 2016 issue, page 56
- 12 Data based on 2011 dollars, Productivity Commission 2014, reproduced in IAG and SGS Economics & planning report, At What Cost? Mapping where natural perils impact on economic growth and communities, November 2016, page 8
- 13 APRA, Statistics, Quarterly General Insurance Performance Statistics, December 2016 (released 16 February 2017). Available at <http://www.apra.gov.au/GI/Publications/Documents/0217-QGIPS-Dec16.pdf>
- 14 Productivity Commission Inquiry Report, Natural Disaster Funding Arrangements, Volume 1, Number 74, 17 December 2014.
- 15 Claims were received under NRMA Insurance, RACV and SGI brands
- 16 IAG estimates \$60-80 million net claim cost from East Coast Low, 9 June 2016. Available at <http://www.iag.com.au/iag-estimates-60-80-million-net-claim-cost-east-coast-low>
- 17 ICA DataGlobe is available at <http://www.icadataglobe.com/>
- 18 APRA, 2015/2016 Annual Report, page 25, Figure 2c. Available at <http://www.apra.gov.au/AboutAPRA/Publications/Documents/AR-2015-16-WHOLE-FINAL-WEB.pdf>
- 19 The Treasury's submission to the Financial System Inquiry, 3 April 2014, page 64
- 20 APRA, Insight Issue 3, 2013. Available at <http://www.apra.gov.au/Insight/Pages/Insight-Issue-Three-2013-HTML.aspx>
- 21 APRA, 2015/2016 Annual Report, page 27, Available at: <http://www.apra.gov.au/AboutAPRA/Publications/Documents/AR-2015-16-WHOLE-FINAL-WEB.pdf>
- 22 APRA, Financial System Inquiry Submission, 31 March 2014, page 99
- 23 Reference to home only rather than home and land.
- 24 Available at <http://www.macrobusiness.com.au/2013/02/the-history-of-australian-property-values/>
- 25 David Jacobs Dilhan Perera and Thomas Williams, Inflation and the Cost of Living, Reserve Bank of Australia Bulletin, March Quarter 2014, Available at <http://www.rba.gov.au/publications/bulletin/2014/mar/4.html>
- 26 Economic Insights, CommSec, Economics, August 24, 2016, "Building costs rise at the fastest pace in 7 ½ years" (Available at https://www.commssec.com.au/content/dam/EN/ResearchNews/ECO_Insights_240816-construction-work-done.pdf)
- 27 IAG welcomes Northern Australia insurance affordability taskforce, 30 March 2015. Available at <https://www.iag.com.au/iag-welcomes-northern-australia-insurance-affordability-taskforce>
- 28 NRMA Insurance counts collision avoidance technology, 6 August 2014. Available at <https://www.nrma.com.au/nrma-insurance-counts-collision-avoidance-technology>
- 29 Available at <https://www.iagresearch.com.au/>
- 30 Available at <http://www.abs.gov.au/ausstats/abs@.nsf/mf/6401.0> and Available at <https://www.partsresearch.com.au/>
- 31 Available at <http://www.repairernetwork.com.au/nrma/>
- 32 Available at <https://www.iag.com.au/shared-value/iag-quality-report-2015-2016>
- 33 APRA, Quarterly General Insurance Performance Statistics, December 2016, page 6. Available at: <http://www.apra.gov.au/GI/Publications/Documents/0217-QGIPS-Dec16.pdf>
- 34 The Treasury's submission to the Financial System Inquiry, 3 April 2014
- 35 Figure 9 is relevant to NSW customers. Available at <https://www.nrma.com.au/home-insurance>
- 36 Figure 10 is relevant to NSW customers. Available at <https://www.nrma.com.au/car-insurance>
- 37 Available at <https://insurance4that.com.au/>
- 38 Available at: <https://www.sgsep.com.au/about/latest-news/what-cost-mapping-where-natural-perils-impact-economic-growth-and-communities>
- 39 Available at <https://saferhomes.nrma.com.au/>
- 40 Motor PDS were reviewed for New South Wales, Australian Capital Territory, Tasmania and Queensland for NRMA Insurance, Western Australia for SGIO and South Australia for SGIC
- 41 Insurance Council of Australia, 'Too Long; Didn't Read. Enhancing General Insurance Disclosure', October 2015, available at <http://www.insurancecouncil.com.au/assets/Effective%20Disclosure%20Report.pdf>
- 42 Examples include: Hotels Combined. Available at HotelsCombined.com.au and Trivago. Available at trivago.com.au/Hotels-Cheap
- 43 Price comparison websites final report, UK Regulators Network, prepared by UK FCA, UK, 2016 pages 21 and 23 as well as European Insurance and Occupational Pensions Authority, Report on Good Practices on Comparison Websites, 2014, page 7
- 44 PrivateHealth.gov.au, Disclaimer section. Available at <http://www.privatehealth.gov.au/footer/about/disclaimer.htm>
- 45 Choice, Health insurance premium hikes on the horizon, 17 January 2017. Available at <https://www.choice.com.au/money/insurance/health/articles/health-premium-hikes-on-the-horizon-131115>
- 46 APRA, Financial System Inquiry, Response to the Interim Report, page 18 (Available at: <http://www.apra.gov.au/Submissions/Documents/140829-APRA-FSI-Response.pdf>)
- 47 Available at <http://www.insurancenews.com.au/regulatory-government/watchdog-sends-warning-to-aggregators>
- 48 Price comparison websites final report, UK Regulators Network, prepared by UK FCA, UK, 2016 page 21, Price comparison website: Consumer market research, UK FCA, Prepared by Atticus Market research, UK, 2014, pages 8 and 10, Report on Good Practices on Comparison Websites, European Insurance and Occupational, EU, 2014 page 7
- 49 Price comparison websites final report, UK Regulator, Available at <http://www.privatehealth.gov.au/footer/about/disclaimer.htm> mors Network, prepared by UK FCA, UK, 2016 pages 22 and 23.

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- 50 Financial Conduct Authority, Thematic Review, Price comparison websites in the general insurance sector, July 2014. Available at <https://www.fca.org.uk/publication/thematic-reviews/tr14-11.pdf>
- 51 Competition & Markets Authority, Private motor insurance market investigation, Final Report, 24 September 2014, pages 8-7 and 8-8.
- 52 UK Regulators Network (Prepared by the UK FCA) Price Comparison Websites Final Report 2016
- 53 Price comparison websites final report, UK Regulators Network, prepared by UK FCA, UK, 2016 page 26
- 54 Jodi Bird, Last updated 19 August 2014, Available at <https://www.choice.com.au/money/insurance/insurance-advice/articles/insurance-comparison-sites>