

19 September 2025

Andy Robertson
Chief Data Officer
Australian Prudential Regulation Authority
Level 12, 1 Martin Place
SYDNEY NSW 2000

By email: dataconsultations@apra.gov.au

Dear Mr Robertson

Consultation on general insurance and life insurance non-confidentiality determination and statistical publications

The Council of Australian Life Insurers ('CALI') welcomes the opportunity to respond to the Australian Prudential Regulation Authority's ('APRA') consultation on statistical publications and non-confidentiality determination for general insurance and life insurance ('the publications').

Recommendations

1. CALI endorses APRA's proposal to not extend the granularity of data included in the publications, consistent with the previous capital and reporting framework.
2. To support a level playing field, and to ensure market integrity, contestability and innovation, CALI strongly endorses APRA's proposal to not publish or otherwise disclose class of business or product group data at individual insurer-level.
3. CALI recommends that publication of a 'flat file' data set is accompanied by guidance notes, clear metadata and definitions, and update and version history to ensure consistency and clarity in the use of such data sets.

Detailed response

Publication content

CALI notes that APRA's public reporting regime seeks to align with its prudential objectives, and strives to support competition, contestability and efficiency in the financial system. We recognise that the updates proposed to the publications are intended to reflect changes following the implementation of accounting standard Australian Accounting Standards Board 17 *Insurance Contracts* ('AASB 17'), and a revised capital framework for private health insurers.

Consistent with APRA's focus on "getting the balance right"¹, CALI endorses APRA's proposal to not extend the granularity of data included in the publications, consistent with the previous capital and reporting framework. We also strongly endorse APRA's proposal to not publish or otherwise disclose class of business or product group data at insurer-level.

We consider the publications, as historically published and as now proposed, to strike an appropriate balance between meeting APRA's prudential objectives and supporting transparency and accountability, with the need to safeguard commercial confidentiality, contestability and market integrity.

Data files

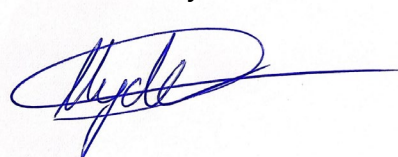
CALI notes APRA's proposal to publish a 'flat file' data set in support of greater customisation. Acknowledging the potential benefits of such a proposal, CALI notes such a data set may introduce risks to interpretation, consistency and commercial sensitivity.

Without clear guidance, definitions and version control of raw data, it's foreseeable that loss of context or misrepresentation of data could occur. In turn, this could undermine consumer and public trust of both the life insurance industry and APRA. We recommend that the publication of the 'flat file' data set is accompanied by guidance notes, clear metadata and definitions, and version control/history protocols to support data quality and integrity.

Further information

This submission is made on a non-confidential basis. CALI and our members welcome the opportunity to discuss this consultation further at any time.

Yours sincerely



Luke Hyde
General Manager, Policy
Council of Australian Life Insurers

¹ [APRA Corporate Plan 2025-2026](#)

About the Council of Australian Life Insurers (CALI)

CALI is the leading voice of life insurance in Australia. We support Australians to make informed choices about their future and help them live in a healthy, confident and secure way over their lifetime.

CALI represents all life insurers and reinsurers in Australia. The Australian life insurance industry is today a \$26.4 billion industry, employing thousands of Australians and paying billions of dollars of benefits each year.

For more information, visit www.cali.org.au.