



December 4, 2023  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
Executive Office of the President

**RE: Federal Insurance Office Climate-Related Financial Risk Data Collection for U.S. Homeowners Multi-Peril Underwriting Data**  
ICR Reference Number: 202311-1505-001

E3G writes to express our strong support for the Office of Management and Budget's (OMB) approval, without delay, of the U.S. Treasury Department's Federal Insurance Office (FIO) final proposed "Climate-Related Financial Risk Data Collection for U.S. Homeowners Multi-Peril Underwriting Data" ("data collection" or "data call") from top nationwide homeowners insurers.

E3G is an independent climate change think tank with a global outlook. We work on the frontier of the climate landscape, tackling the barriers and advancing the solutions to a safe climate. Our goal is to translate climate politics, economics, and policies into action. E3G builds broad-based coalitions to deliver a safe climate, working closely with like-minded partners in government, politics, civil society, science, the media, public interest foundations and elsewhere to leverage change. E3G joined other U.S. civil society members in commenting on the FIO data call last year. See [Treasury FIO Climate Risk Data Coalition Comment - Public Citizen](#)

The International Association of Insurance Supervisors (IAIS), including the National Association of Insurance Commissioners (NAIC), *recently underscored the importance of the insurance market to financial stability, as well as how important data collections are to assess, and mitigate, climate related financial stability risks.* We highlight the following from the IAIS November 2023 report on actions for insurance supervisors to address natural catastrophe protection gaps:

**Insurance is integral to financial stability:** "Insurance plays a key role in the financial system as a risk management and transfer tool that can provide protection against unexpected damages and losses. Insurance also supports the distribution of financial risk, mitigates the economic impact of catastrophic events, and supports recovery and future preparedness by strengthening resilience against a variety of risks, including NatCat [natural catastrophe] events. Insurers are also large-scale institutional investors. Thereby the insurance business model inherently contributes to financial stability. Including by providing sources of funding to other institutions and supporting risk management through the pooling and diversification of risk management."

**Closing natural catastrophe protection gaps can support financial stability...and assessment of protection gaps requires access to data.** "It is important to have different types of data and models for each of the different types of perils...that can result in NatCat protection gaps...Separate data and models by geography and risk type (peril) are also key..."



**There are distinct benefits to centralized data collections:** While the IAIS report acknowledges the benefits of “joint” efforts on data collection such as the NAIC’s data call, it also points to the benefits of having a central organization responsible for driving data collection – “...both quantitative and qualitative – as such organizations can define data elements, establish procedures for data collection, and develop routines for data aggregate and analysis. For example, EIOPA released a dashboard for NatCat protection gaps in December 2022. The dashboard was developed using data on economic and insured losses, risk estimates, and insurance coverage from 30 European countries.”

We thank OMB for its thoughtful review of FIO’s data collection request and urge its swift approval.

Sincerely,

E3G