

Prudential Regulation Authority
20 Moorgate
London
EC2R 6DA

London, 1 May 2018

Dear Sir/Madam,

Consultation Paper | CP6/18

The Berne Union (International Union of Credit and Investment Insurers) is the global association of the export credit and investment insurance industry. As providers of (inter alia) credit risk mitigation to banks, the members of the Berne Union have an interest in bank regulation for these CRM instruments. In this capacity, we would like to provide feedback to the proposals in the Consultation Paper.


Enclosed is a note which:

1. Describes the size and significance of credit insurance
2. Describes the relationship between export credit insurance and job creation
3. Describes how credit insurance to banks works
4. Provides evidence about the extremely low Expected Loss for bank loans supported by credit insurance
5. Comments on the concepts of Timeliness and Incontrovertibility and provides recommendations on both

Also enclosed are our 2017 statistics of members' business, published in our Bulletin.

If you require further clarification on the note or our statistics, or would like to discuss, then we would be happy to meet with you.

Yours faithfully,



Vinco David
Secretary General