

General statement of response to the public comments on Exposure draft of Insurance Regulatory and Development Authority of India (Insurance Surveyors and Loss Assessors) (Third Amendment) Regulations, 2026

Public comments have been received from various stakeholders, including insurers, individuals and professional firms. Provided below is the gist of public comments along with the response of Insurance Regulatory and Development Authority of India (IRDAI).

S. No.	Public Comments	IRDAI Response
1.	Processing Fee and Annual Fee Stakeholders suggested various levels of processing and annual fee to be charged.	The suggestions received from stakeholders regarding the processing and annual fees have been duly considered. As registrations will be granted on a perpetual basis, continued regulatory scrutiny, oversight, and off-site monitoring will be required, involving deployment of the Authority's resources and time. Accordingly, the proposed fee structure is considered appropriate.
2.	License conversion to registration and pending surveys Stakeholders have suggested to prescribe a defined time window to apply for conversion of license to registration and also to allow lapsed license cases. It was further suggested that while conversion of license or revocation of suspension is under process, pending survey assignments be allowed to be completed even after expiry/suspension of license/registration.	The suggestions have been examined. An application for conversion of a licence into registration may be submitted within 90 days before its expiry or within six months after the date of expiry. Hence, the licence holders are provided sufficient time (9 months) to apply for conversion. Survey activities cannot be undertaken or continued after the expiry or during the suspension of a licence or registration, as the person concerned does not hold a valid authorisation during such period. Accordingly, pending survey assignments cannot be completed while an application for conversion of an expired license is under consideration or a registration is under suspension. The suggestion has, therefore, not been accepted.

S. No.	Public Comments	IRDAI Response
3.	Timeline for annual fee payment, suspension and cancellation Stakeholders suggested that a longer annual fee payment window should be given along with a reminder/grace period/warning/notice for suspension followed by an opportunity to rectify non-payment of annual fee in the given time period before effecting suspension. The suspension should also continue indefinitely without cancellation of registration; or if cancelled, it should be allowed to be restored upon payment of additional fee.	The suggestions have been examined. A period of two months has been provided for rectification of the default in payment of the annual fee, subject to payment of the applicable additional fee. Accordingly, the provision for immediate suspension has been omitted, and suspension will take effect from 1st April if the default is not rectified within the prescribed period. Such suspension may be revoked within three months upon payment of the applicable additional fee. If the suspension is not revoked within this period, the registration will stand cancelled. A Surveyor and Loss Assessor whose registration is cancelled may follow the prescribed process for obtaining fresh registration without any waiting period.
4.	Document submission before annual fee payment Stakeholders have suggested to remove the requirement of furnishing documents before payment of annual fee. Instead, the same may be collected separately.	The suggestion has been examined. The specified documents relate to the preceding completed financial year and are already required to be maintained or furnished under the existing Regulations. Requiring their submission at the time of payment of the annual fee facilitates verification of continued compliance and does not introduce any additional documentation requirement. Accordingly, the suggestion has not been accepted.
5.	Prior approval of IRDAI for IIISLA's trainings Stakeholders have suggested to continue with the prior approval mechanism while enhancing regulatory oversight on IIISLA's activities.	The suggestion has been examined. Approval of training programmes is an operational matter that may be addressed through appropriate administrative arrangements and, therefore, need not be prescribed in the Regulations. Accordingly, the provision has been omitted.

S. No.	Public Comments	IRDAI Response
6.	Issue of registrations through appeal mechanism Stakeholders have commented on the proposed amendment to the appeal provisions.	The proposed changes have been omitted, since the current provisions suffice.

The above comments/ suggestions received within the prescribed timeline (19th June, 2026 – 10th July, 2026) were considered and placed before the Competent Authority. Necessary modifications / changes have been carried out on the Draft Insurance Regulatory and Development Authority of India (Insurance Surveyors and Loss Assessors) (Third Amendment) Regulations, 2026.

Several comments were also received which were neither related to the provisions of the Exposure Draft nor to the amendments introduced by the SBSR Act, 2025. Hence, such comments have not been considered.