



Supplementary
Statutory Declaration
of
James Bruce Merchant
Regarding CGU Insurance
General Claims Handling
1 of 2

QFCI

Date:

6/10/11

JM

Exhibit Number:

743

Oaths Act 1867

Statutory Declaration

QUEENSLAND
TO WIT

I James Bruce Merchant, care of CGU, 181 William Street Melbourne in the State of Victoria do solemnly and sincerely declare that:

- 1 I am employed by Insurance Australia Group Limited (IAG) as National Claims Manager for CGU Insurance.
- 2 I provide this declaration in relation to the request by Commissioner Justice C E Holmes to Insurance Australia Group Limited dated 2 September 2011 in relation to the Queensland Floods Commission of Inquiry (Commissioner's request). Exhibited to this statement and marked "Annexure 1" is a copy of the letter from Commissioner Justice C E Holmes to Insurance Australia Group Limited dated 2 September 2011.
- 3 My response to the Commissioner's request is also made having regard to the further correspondence from Jayne Moynihan, executive director of Queensland Floods Commission of Inquiry to DLA Piper Australia dated 5 September 2011 and 12 September 2011 (further correspondence). Attached to this Statutory Declaration and marked "Annexure 2" are copies of the further correspondence from Ms Moynihan to DLA Piper Australia dated 5 September 2011.

Background

- 4 I have been employed by Insurance Australia Group Limited for approximately 16 months since May 2010.
- 5 Prior to commencing employment for Insurance Australia Group Limited I have been employed in the following:
 - 5.1 July 2010 – current: National Manager, Claims (CGU);
 - 5.2 May 2010 – June 2010: Claims Manager, Personal Lines (CGU);
 - 5.3 September 2009 – March 2010: Executive Manager, Personal Insurance Home Claims Project (Suncorp);
 - 5.4 January 2008 – August 2009: Executive Manager, Operational Services (AAMI);
 - 5.5 August 2004 – December 2007: Home Product Manager, Victoria (AAMI);
 - 5.6 January 2004 – July 2004: General Manager, Queensland (AAMI);
 - 5.7 December 2002 – January 2004: Motor Claims Services Manager, Victoria (AAMI);
 - 5.8 January 2000 – November 2002: General Manager, All States Auto (AAMI); and
 - 5.9 June 1995 – December 2000: State Manager, Tasmania (AAMI).
- 6 CGU, through IAG, has made submissions in relation to the following inquiries concerning the Queensland Floods which we seek for this Commission to have regard to:
 - 6.1 Submission dated 31 March 2011 to the Commission of Inquiry into the Queensland Floods;



- 6.2 Supplementary submission dated 10 June 2011 to the Commission of Inquiry into the Queensland Floods;
- 6.3 Submission to the Natural Disaster Insurance Review dated 14 July 2011¹;
- 6.4 Submission to the 2011 House of Representatives' Inquiry into the Operation of the Insurance Industry during Disaster Events².

Response to Commissioner's Requests

- 7 Exhibited to this statement and marked "Annexure 3" is my response to the specific questions raised in the Commissioner's requests.
- 8 Exhibited to this statement and marked "Annexure 4" to "Annexure 14" are the documents relevant to my response to the Commissioner's requests.

and I make this solemn declaration conscientiously believing the same to be true and by virtue of the provisions of the *Oaths Act 1867* (Qld).

Signature of declarant

Taken and declared before me at Melbourne this day of September 2011

Justice of the Peace/Commissioner for Declarations/Solicitor

ELANA O'REILLY
DLA Piper Australia
140 William Street, Melbourne
An Australian Legal Practitioner within the
meaning of the Legal Profession Act 2004

¹ This submission can be viewed at [http://www.ndir.gov.au/content/submissions/issues_paper_submissions/Insurance_Australia_Group_\(IAG\).pdf](http://www.ndir.gov.au/content/submissions/issues_paper_submissions/Insurance_Australia_Group_(IAG).pdf)

² This submission can be viewed at <http://www.aph.gov.au/house/committee/spla/insurance/submissions.htm> (see submission 38)