

Comments Template for Joint Consultation Paper concerning amendments to the PRIIPs KID (JC 2018 60)

**Deadline
6 December 2018
23:55 CET**

Name of Company:	Insurance Sweden (Industry Association) (Sweden)	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ Do not change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool ⇒ Leave the last column <u>empty</u>. ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a question or a cell, leave the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <p>Please send the completed template, in Word Format, to CP-18-005@eiopa.europa.eu</p> <p>Our IT tool does not allow processing of any other formats.</p>		
Reference	Comment	
General Comments	<p>Insurance Sweden (henceforth we) welcome the opportunity to comment on the Joint Consultation Paper concerning amendments to the PRIIPs KID.</p> <p>As a member of Insurance Europe, we overall share the views expressed in the consultation response submitted by that association. We would however wish to both highlight and elaborate a bit further on one particular issue in relation to Q2.</p>	
Q1		
Q2	We wish to highlight that including past performance for the traditional life insurance product on the Swedish insurance market (<i>Sw. traditionell livförsäkring</i>), a Category 4-PRIIPs, would not	

**Comments Template for Joint Consultation Paper concerning amendments
to the PRIIPs KID (JC 2018 60)**

**Deadline
6 December 2018
23:55 CET**

	increase the understanding of the performance scenarios. As regards such products there is a correlation between past performance and bonus rates, the latter of which is used to allocate bonus to the insurance policies. However, only informing on past performance would be misleading as that is not what the policy holder gets. Informing on past bonus rates would also be confusing, as past bonus rates are not fully used to calculate the performance scenarios in the KID.	
Q3		
Q4		
Q5		
Q6		
Q7		
Q8		
Q9		
Q10		
Q11		
Q12		
Q13		