

**Comments Template on
Consultation Paper on draft Implementing Technical Standards (ITS)
on a standardized presentation format of the Insurance Product
Information Document (IPID)**

**Deadline
24 October 2016
18:00 CET**

| | | |
|--|---|--------|
| Name of Company: | FG2A France | |
| Disclosure of comments: | <p>EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential.</p> <p>Please indicate if your comments on this CP should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.</p> | Public |
| <p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ <u>Do not change the numbering</u> 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 paragraph or a cell, keep 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-16-007@eiopa.europa.eu.</p> <p>Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the questions refers to the Consultation Paper on draft Implementing Technical Standards (ITS) on a standardized presentation format of the Insurance Product Information Document (IPID).</p> | | |

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| General Comment | <p>The FG2A (“Fédération des garanties et assurances affinitaires”) is a federation bringing together industry players operating on the affinity and add-on insurance market in France. Our federation comprises leading French and international market participants manufacturing and/or selling affinity insurance and add-on insurance products throughout the EU. Insurance products distributed by our members include, but are not limited to, mobile phone insurance, travel insurance, motor insurance and services and payment insurance.</p> <p>As a general comment, we encourage the Delegated Acts to confirm that the IPID will not be considered as precontractual or contractual information, and therefore cannot create legally binding obligations between the distributor and the customer.</p> |
| Question 1: What barriers, if any, do you see to utilizing a single standardized presentation format for all non-life insurance products? If you believe barriers to a standardized presentation format exist, please describe how they could be overcome. | <p>FG2A France supports the idea of having a standardized presentation for non-life insurance products which would facilitate comparability between different insurance products (ex: household insurance or motor insurance). However, we note that comparability can only be achieved within a single class of relatively homogeneous products (ex: motor or household insurance) and is less relevant across different lines of products (health insurance versus motor insurance).</p> <p>Within the affinity and add-on insurance market, where products are ancillary to goods or services, the level of warranties and extent of coverage provided to consumers is key to allow proper products comparison. We believe that the format proposed by EIPOA goes well beyond what would be necessary to meet IDD’s objectives in terms of customer information. In particular, by adopting a full standardization, by imposing the size and sequencing of the different sub-sections, the IPID may prevent the distributor from underlining the key information relevant to a customer. We believe that in its current proposed format the IPID as an information document, brings very limited added-value to the customer.</p> |

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| <p>Question 2(a) Q2. (a) Do you agree that visual aids such as icons and symbols used to distinguish different information requirements in the IPID should be highly standardized at a European level?</p> | <p>Usually icons and symbols are used to facilitate the understanding of complex matters. They are used as an alternative way to communicate a complex message (for example, in the case of a mobile phone insurance, the attention of the customer can be drawn to the information that theft is not covered under the insurance contract by using a "theft" icon).</p> <p>In the proposed template the icons are only used to visualize the titles of the various sections of the IPID. This is of limited interest, because at that level any customer is capable of understanding what the titles mean.</p> <p>On the contrary, using icons for the different sections makes it impossible to use them again to distinguish the information within each section, which may again reduce the added-value of the document for the customer.</p> <p>More generally, imposing the type of icons will reduce the possibility for market participants to further rely on different icons and symbols in their other communication with customers, whether on their website or in the terms and conditions documents.</p> <p>FG2A France encourages EIOPA to keep the icons only for the exclusions section of IPID, but to remove the use of icons from the rest of the document. This will allow each manufacturer to choose with care which icons are the most relevant for specific information.</p> <p>FG2A France also would like to have full clarity regarding the property rights attached to the IPID template, signs and icons to avoid any legal uncertainty in using the template in practice.</p> <p>In accordance with the principle of proportionality we believe the design,</p> | |
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| | <p>color and type of icons and symbols should be left to the insurance manufacturer (as long as objectives sought in the directive are met).</p> <p>We would also recommend to merge to two sections "exclusions" and "restrictions" of the IPID as this will allow more flexibility to communicate on these topics to the customer.</p> | |
| <p>Question 2(b) (b) Are there any circumstances in which it is necessary to allow for differences in any such icons between Member States? If so please explain the circumstances.</p> | <p>Please refer to question 2(a).</p> | |
| <p>Question 3(a) Q3. (a) In what circumstances do you consider that it will not be possible to include the information required under the IPID on two sides of an A4 page?</p> | <p>If it is confirmed that the IPID is not part of the precontractual information, it should be possible to include only the main features of the insurance product on the IPID and then meet the two sides of an A4 page.</p> <p>We underline the fact that IPID will not be used as sale medium by the distributors, because all relevant information may not be included in the document due to its reduced format.</p> | |
| <p>Question 3(b) (b) Do you foresee any difficulties with prescribing a font type and font size?</p> | <p>We find it intrusive to prescribe a font type and size. We further note that digital format in the current proposal would not need to use identical font type and would only need to "preserve the relative size and weighting as set out in the default printed version". Imposing a font type and size for paper communication but loosening standards for digital format would also create a two-tier regime increasing detrimental risks for consumers when purchasing online insurance policies.</p> | |

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Question 4(a)
What challenges do you think a manufacturer would face, and how would these be overcome, in adapting the IPID to be compatible with provision via digital media such as websites, tablets or smartphones, including with preserving the fundamental aspects of the standardized presentation format?

An insurance manufacturer would face difficulties in ensuring all format remain compliant with the RTS requirements, particularly when the product is distributed through the website or other digital media of a distributing partner. **To be more compatible with digital display (mobile and tablets), the various sections of the IPID should be organized in lines and not in rows.**

Question 4(b)
What benefits do you see for the manufacturer in making the IPID compatible with the provision via digital media?

Please refer to question 4(a).

Question 5
What do you consider are the main cost drivers for the standardized presentation format (not including the efforts associated with the collection, identification and assimilation of the information itself) and at what point will they occur?

We have identified different types of costs:

- Costs directly associated with the amendment, printing and sending of a new information document, particularly in the case of existing products (already distributed to customers);
- Costs associated with controls and checks to be performed on the information document;

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Question 6
Q6. Do you agree with
EIOPA's approach to focus
primarily on consumers
(i.e. retail customers) in
developing the IPID?

Agreed: the IPID should be customer-based.