

<b>Comments Template on Consultation Paper on draft Implementing Technical Standards (ITS) on a standardised presentation format of the Insurance Product Information Document (IPID)</b>		<b>Deadline 24 October 2016 18:00 CET</b>
Name of Company:	Insurance Europe	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential.  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.	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> <li>⇒ <u>Do <b>not</b> change the numbering</u> in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool</li> <li>⇒ Leave the last column <u>empty</u>.</li> <li>⇒ 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>.</li> <li>⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below.</li> </ul> <p><b>Please send the completed template, <u>in Word Format</u>, to <a href="mailto:CP-16-007@eiopa.europa.eu">CP-16-007@eiopa.europa.eu</a>.</b></p> <p><b>Our IT tool does not allow processing of any other formats.</b></p> <p>The numbering of the questions refers to the Consultation Paper on draft</p>		

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Implementing Technical Standards (ITS) on a standardised presentation format of the Insurance Product Information Document (IPID)		
<b>Reference</b>	<b>Comment</b>	
General Comment	<p>Insurance Europe welcomes the opportunity to comment on EIOPA's draft implementing technical standards regarding a standardised presentation format of the Insurance Product Information Document (IPID) under the Insurance Distribution Directive (IDD).</p> <p>Insurance Europe fully supports the objective of the IPID under the IDD, to help provide consumers with information on insurance products and enable them to make an informed decision (recital 48 and Article 20, 4 IDD). Insurance Europe supports EIOPA's approach to have a single standardised presentation format for all non-life products and its aim to help consumers to choose insurance contracts both online and offline.</p> <p>As part of the industry's commitment to make a success of the IPID, Insurance Europe has developed a consumer and digital-friendly mock up, available <a href="#">here</a> and at the end of the general comments section.</p> <p>The Insurance Europe IPID is built using the requirements under Article 20(8) of the IDD, but also with a view to making sure the document can properly and clearly present all the different kinds of products across Europe in an engaging way for all consumers. The Insurance Europe response to this consultation should be read</p>	

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	<p>together with its mock-up IPID.</p> <p><b><u>Appropriate level of standardisation</u></b></p> <p>EIOPA should ensure that the level of standardisation introduced in the final IPID leaves manufacturers the necessary flexibility to make the IPID as meaningful as possible for consumers.</p> <p>The objective of the IPID is to increase understanding and comparability of product information. A way to do this and help consumers to keep track of the different manufacturers of the products that they will compare is to make sure that the IPID can reflect their corporate identity.</p> <p>The right balance also needs to be struck between standardising the information in the IPID and making sure that it can really work for the wide range of different products that it will cover.</p> <p><b><u>A digital-friendly IPID</u></b></p> <p>In Europe consumers increasingly buy and compare financial products online. It is a trend that is only expected to increase and develop. For the IPID to be useful now and continue to be relevant in the future it must be designed to work not only in paper, but also in a digital format.</p> <p>The EIOPA format for the IPID is designed to first and foremost be used as a paper document and is not adapted to enable consumers to take full advantage of using the IPID online. EIOPA must ensure that consumers have equal access to both digital and</p>	

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	<p>paper IPIDs that work now and in the future.</p> <p><b><u>Focus on consumers</u></b></p> <p>EIOPA rightly puts the focus of the IPID on consumers. A pre-contractual IPID is not suitable or useful for professional customers, who are generally offered a commercial contract that is specifically made for them and to meet their particular needs.</p> <p>Additionally, this approach is in line with the IDD level 1 text, where references to consumers (and not retail customers) are explicitly made, such as in Article 20(7) (d) but also Article 20(9), Recitals 43 and 51.</p> <p>Further explicit clarification of the aim of the IPID would help to ensure that it is provided to consumers and not professional customers.</p> <p><b><u>Issues for implementation</u></b></p> <p>Sufficient time must be left for the insurance industry to properly prepare IPIDs for the wide scope of non-life insurance products covered and ensure that they are available to consumers by 23 February 2018, the deadline for the IDD transposition. This is because the introduction of a standardised format requires significant modifications, particularly to IT-systems.</p> <p>The industry will need 12 months following the adoption of the final implementing technical standards (ITS) by the European Commission. However, given that EIOPA is expected to submit the final draft ITS to the Commission on 23 February 2017 — and that it could then take several months for the ITS to be adopted by the Commission —</p>	

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insurers could have less than 12 months to implement the IPID.



**Insurance Product Information Document**



**Home Contents Insurance**

[Name of company] [Name of specific product]

**What is and what is not covered by this home contents insurance policy?**

This Insurance Product Information Document is only intended to provide a summary of the main coverage and exclusions, and is not personalised to your specific individual needs in any way. Complete pre-contractual and contractual information on the product is provided in your policy documentation.



**What is this home contents insurance?**

This home contents insurance policy provides cover against damage to, or loss of, the contents of your home and garage. ⓘ



**What is insured?**

The policy covers damage or loss caused by fire, theft, water leakage, floods, storms and lightning. It covers your household items and personal belongings such as furniture, electrical items, clothes, money and jewellery, up to a maximum of €3000 per single item.

You may also optionally insure additional items, such as higher value jewellery items. ⓘ



**What is not insured?**

We will not reimburse you in relation to any damage or loss resulting from criminal acts, wear and tear, poor maintenance, negligence or fraud. ⓘ



**Please note**

Text of note: most common question, complaint or misunderstanding, or additional information to highlight. ⓘ



**How and when to pay?**

You can pay your premium as a one-off payment, annually or in monthly instalments. Payment can be made by bank transfer, direct debit or debit/credit card. ⓘ



**What are your obligations?**

You must provide us with honest, accurate and complete information, and inform us without delay of any changes in your situation. In the event of a claim, you must notify us as soon as possible and within 72 hours. ⓘ



**When does the cover start and end?**

Your cover will take effect on the date stated in your policy. After the first year, you can cancel your insurance by notifying us in writing. ⓘ

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

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### Insurance Product Information Document

#### Home Contents Insurance

[Name of company] [Name of specific product]

#### What is and what is not covered by this home contents insurance policy?

This Insurance Product Information Document is only intended to provide a summary of the main coverage and exclusions, and is not personalised to your specific individual needs in any way. Complete pre-contractual and contractual information on the product is provided in your policy documentation.



#### What is this home contents insurance?

This home contents insurance policy provides cover against damage to, or loss of, the contents of your home and garage. <sup>ⓐ</sup>



#### What is insured?

The policy covers damage or loss caused by fire, theft, water leakage, floods, storms and lightning. It covers your household items and personal belongings such as furniture, electrical items, clothes, money and jewellery, up to a maximum of €3000 per single item.

You may also optionally insure additional items, such as higher value jewellery items. <sup>ⓑ</sup>



#### What is not insured?

We will not reimburse you in relation to any damage or loss resulting from criminal acts, wear and tear, poor maintenance, negligence or fraud. <sup>Ⓒ</sup>



#### Please note

Text of note: most common question, complaint or misunderstanding, or additional information to highlight. <sup>Ⓓ</sup>



#### How and when to pay?

You can pay your premium as a one-off payment, annually or in monthly instalments. Payment can be made by bank transfer, direct debit or debit/credit card. <sup>Ⓔ</sup>



#### What are your obligations?

You must provide us with honest, accurate and complete information, and inform us without delay of any changes in your situation. In the event of a claim, you must notify us as soon as possible and within 72 hours. <sup>Ⓕ</sup>



#### When does the cover start and end?

Your cover will take effect on the date stated in your policy. After the first year, you can cancel your insurance by notifying us in writing. <sup>Ⓖ</sup>

Commented [IE1]: Company logo

Commented [IE2]: This is required under Article 20(7)(f) of IDD.

Commented [IE3]: This is based on the requirement under Article 20(7)(g) of IDD.

Commented [IE4]: Certain flexibility should be left to the design and colour of icons at national level. For example, the euro symbol may be replaced with other currency symbols appropriate to the national market.

Commented [IE5]: This covers Article 20(8)(a) (information about the type of insurance)

Commented [IE6]: The content within each of the different sections of this document is included for illustrative purposes only.

Commented [IE7]: The information icon allows for a layered approach where more detailed explanations can be provided for the different sections.

Commented [IE8]: This covers Article 20(8)(b) (main risks insured and the insured sum).

This section should remain flexible both in terms of the length of the section and how the information regarding the contents is best presented to consumers, depending on national requirements and preferences. This may also include the use of icons for the different types of coverage.

Commented [IE9]: This covers Article 20(8)(b) (summary of the excluded risks) and (d) (main exclusions where claims cannot be made)

This section should remain flexible both in terms of the length of the section and how the information regarding the contents is best presented to consumers, depending on national requirements and preferences. This may also include the use of icons for the different types of coverage.

Commented [IE10]: This optional section offers the flexibility to include any additional relevant information about the product that may be useful or helpful to draw consumers' attention to.

Commented [IE11]: This covers Article 20(8)(c) (means and duration of payments)

Commented [IE12]: This covers Article 20(8)(e)(f) and (g) (obligations at the start of the contract, during the contract and in the event of a claim)

Commented [IE13]: This covers Article 20(8)(h) (term of the contract) and (i) (means of terminating the contract). As this is intended as a pre-contractual and non-personalised document it is not possible to include specific start and ends. It may, however, state that the contract will be of 12 months duration and will begin on the date stated in the consumer's policy.

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**Insurance Product Information Document**



## Motor Insurance

[Name of company] [Name of specific product]

### What is and what is not covered by this motor insurance policy?

This Insurance Product Information Document is only intended to provide a summary of the main coverage and exclusions, and is not personalised to your specific individual needs in any way. Complete pre-contractual and contractual information on the product is provided in your policy documentation.



#### What is this motor insurance?

This motor insurance policy provides cover against damage to your car or damage caused by your car. ①



#### What is insured?

The policy covers the following types of damage or risk: third party liability for damage caused to another vehicle or person, damage caused by theft or total loss, damage due to attempted theft or break-in, damage due to fire and nature, window damage, and assistance after an accident, such as towing, replacement transport or emergency repairs.

You may also optionally include additional items, such as roadside assistance. ①



#### What is not insured?

You will not be insured where damage is caused intentionally, while driving without a licence or while driving under the influence of drugs or alcohol. You will also not be insured in the case of damage caused while the car is rented or used to transport people for payment. ①



#### Please note

Text of note: most common question, complaint or misunderstanding, or additional information to highlight. ①



#### How and when to pay?

You can pay your premium as a one-off payment, annually or in monthly instalments. Payment can be made by bank transfer, direct debit or debit/credit card. ①



#### What are your obligations?

You must provide us with honest, accurate and complete information, and inform us without delay of any changes in your situation. In the event of a claim, you must notify us as soon as possible and within 72 hours. ①



#### When does the cover start and end?

Your cover will take effect on the date stated in your policy. After the first year, you can cancel your insurance by notifying us in writing. ①



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Company logo

### Insurance Product Information Document

## Motor Insurance

[Name of company] [Name of specific product]

### What is and what is not covered by this motor insurance policy?

This Insurance Product Information Document is only intended to provide a summary of the main coverage and exclusions, and is not personalised to your specific individual needs in any way. Complete pre-contractual and contractual information on the product is provided in your policy documentation.

?

**What is this motor insurance?**  
This motor insurance policy provides cover against damage to your car or damage caused by your car. <sup>(1)</sup>

✓

**What is insured?**  
The policy covers the following types of damage or risk: third party liability for damage caused to another vehicle or person, damage caused by theft or total loss, damage due to attempted theft or break-in, damage due to fire and nature, window damage, and assistance after an accident, such as towing, replacement transport or emergency repairs.  
You may also optionally include additional items, such as roadside assistance. <sup>(2)</sup>

X

**What is not insured?**  
You will not be insured where damage is caused intentionally, while driving without a licence or while driving under the influence of drugs or alcohol. You will also not be insured in the case of damage caused while the car is rented or used to transport people for payment. <sup>(3)</sup>

!

**Please note**  
Text of note: most common question, complaint or misunderstanding, or additional information to highlight. <sup>(4)</sup>

€

**How and when to pay?**  
You can pay your premium as a one-off payment, annually or in monthly instalments. Payment can be made by bank transfer, direct debit or debit/credit card. <sup>(5)</sup>

👤

**What are your obligations?**  
You must provide us with honest, accurate and complete information, and inform us without delay of any changes in your situation. In the event of a claim, you must notify us as soon as possible and within 72 hours. <sup>(6)</sup>

📅

**When does the cover start and end?**  
Your cover will take effect on the date stated in your policy. After the first year, you can cancel your insurance by notifying us in writing. <sup>(7)</sup>

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This section should remain flexible both in terms of the length of the section and how the information regarding the contents is best presented to consumers, depending on national requirements and preferences. This may, for example, also include the use of icons for the different types of coverage.

**Commented [IE9]:** This covers Article 20(8)(b) (summary of the excluded risks) and (d) (main exclusions where claims cannot be made).  
  
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**Commented [IE13]:** This covers Article 20(8)(h) (term of the contract) and (i) (means of terminating the contract). As this is intended as a pre-contractual and non-personalised document it is not possible to include specific start and end dates. It may, for example, state that the contract will be of 12 months duration and will begin on the date stated in the consumer's policy.



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Question 1	<p>Insurance Europe supports EIOPA's approach to have a single standardised presentation format for all non-life products. The fundamental aims of a standardised presentation format of creating familiarity and recognition on the side of the consumer and the possibility to easily compare the IPIDs of different insurers with each other, can be achieved by standardising core elements of the IPID, whilst providing necessary flexibility for others.</p> <p>In particular, the spaces for the company logo and the disclaimer should be standardised in the IPID and explicitly mentioned in the implementing regulation. The text of the disclaimer, the headings, the order of information, the icons and the minimum font dimensions should also all be standardised. The standardisation of the order of the headings and the wording of the titles would significantly enhance the product comparability to the benefit of consumers.</p> <p>At the same time the regulation should allow appropriate room for flexibility in the presentation of information to consumers to ensure an effective, consumer-friendly and future-proof IPID format.</p> <p>Therefore, Insurance Europe calls for EIOPA to take into consideration the following suggestions:</p> <ul style="list-style-type: none"> <li>■ <u>Company logo</u>: there should be a space at the top of the IPID for the logo of the manufacturer. This will help consumers to quickly identify which company is behind the product. Similarly, insurers should be able to place the logo of their company on either side - depending on the design of the logo used - at</li> </ul>	

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	<p>the top of the first page of the IPID.</p> <ul style="list-style-type: none"> <li>■ <b>Disclaimer:</b> EIOPA is right to include the disclaimer at the beginning of the IPID, right underneath the blue box. The text of the disclaimer must, however, avoid duplication of information and not refer to the type of product and thus, the reference to “household insurance” should be deleted in the proposed format. A generic disclaimer would allow insurers to use the same text for all their IPIDs without making further adjustments.</li> </ul> <p>The following text is proposed in the Insurance Europe IPID to achieve this:  <i>"This Insurance Product Information Document is only intended to provide a summary of the main coverage and exclusions, and is not personalised to your specific individual needs in any way. Complete pre-contractual and contractual information on the product is provided in your policy documentation."</i></p> <ul style="list-style-type: none"> <li>■ <b>Length:</b> Insurance Europe agrees that the IPID should be short and not result in a de facto duplication of the policy terms and conditions, whilst at the same time being accurate and not misleading.</li> </ul> <p>As a result, the EIOPA proposal to limit the IPID format to two pages is positive in principle. However, in certain cases, a strict two pages limit would not enable the IPID to meet its objective of properly informing consumers about the main characteristics of the product. For example, multi-risk products can include basic cover (not optional for the consumer), optional cover and other optional elements (for example the level of the insured sum or the extent of the</p>	

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	<p>geographical scope for some travel insurance contracts).</p> <p>This requires more than two pages to enable consumers to properly compare products and make informed decisions. Moreover, certain EU languages require more characters than others to write the same words and therefore need a longer format to deliver the same information to consumers. For these reasons, EIOPA must ensure that the delegated regulation for the ITS leaves the possibility to have a maximum of three pages where necessary in consumer's interests.</p> <p>Insurance Europe also believes that the sections describing what is insured and what is not insured should remain flexible both in terms of the length of the sections and how the information regarding the contents is best presented to consumers, depending on national requirements and preferences.</p> <p>■ <u>Headings and order of information</u>: The order and the wording of the headings should also be standardised in the IPID.</p> <p>However, the text of the headings should be made simpler and more understandable for consumers. The wording of some of the headings currently proposed by EIOPA is too complicated and may confuse consumers, who, for instance, may not be able to grasp what "geographical scope" really means, or the difference between "main risks not covered" and "main restrictions and exclusions".</p> <p>The use of questions instead of descriptive headings as titles for each section,</p>	

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	<p>would increase consumer engagement as well as the document's readability and adaptability to different products.</p> <p>Moreover, products offered on individual non-life markets differ significantly even from one branch to the next. It is, therefore, important to ensure that the headings in the IPID remain meaningful to consumers in all circumstances and that they are adapted to all of the different kinds of products available. Some of the headings proposed by EIOPA would not work for all non-life products and should therefore be reworked or removed.</p> <p>For example, the heading "insured sum" would not be appropriate for products that provide more than one sum. Some products do not even provide a sum but provide services or assistance, eg. by insuring the vitrification of a building. In order to enhance the readability and comparability of the document, the two sections "Insured sum" and "Main risks" as in Article 20(8)(b) should be merged under the single heading "What is insured?".</p> <ul style="list-style-type: none"> <li>■ <u>Corporate identity</u>: the IPID should be able to reflect the corporate identity of the manufacturer, in particular concerning the specific design of the contents and frame of the icons, the colours used (including the background colours of the sections), the font type and size, and the choice between bullet points and/or text.</li> <li>■ <u>Icons</u>: Insurance Europe agrees with EIOPA's findings under paragraphs 2.2.3 and 2.2.4 of the consultation that <i>"icons can help the reader to quickly identify</i></li> </ul>	

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	<p><i>and easily find particular parts of a set of information”.</i></p> <p>The use of an icon for each of the sections increases consumer engagement and helps them to navigate through the IPID, whilst also ensuring an appropriate level of consistency across markets and operators. These benefits would be achieved by standardising what the icon should represent (such as a question mark or an exclamation mark).</p> <p>A reference in the implementing regulation stating that the “<i>information indicated in Article x of IDD shall be headed by an icon representing the form of an umbrella (or of a question mark, etc)</i>” would achieve this.</p> <p>By contrast, there would be no benefit for consumers or insurers to standardising the design of the image for icon and the colours used. These should therefore be left up to the individual insurer to ensure that the document is consistent with their corporate identity.</p> <ul style="list-style-type: none"> <li>■ <u>Minimum font height</u>: EIOPA could set a minimum font height to ensure that the IPID text is readable instead of a compulsory font type and size. In this way, standardisation can be achieved to the benefit of consumers, while insurers would have sufficient flexibility to use a font that is compatible with their different IT systems, which have a licence for.</li> </ul> <p>This approach was adopted in <a href="#">Regulation 1169/2011</a> on the provision of food information to consumers, where it states that when mandatory information is printed on the label, it should be in characters using a font size where the x-</p>	

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	<p>height is equal to or greater than 1,2 mm.</p> <ul style="list-style-type: none"> <li>■ <u>One-column:</u> EIOPA should adopt a one-column approach for the entire IPID. A single column would make it easier for consumers to view the IPID in a consistent way in both paper and digital formats, including smart phones and similar devices with smaller screens. By contrast, a two-column format would not be appropriately readable on a standard smart phone screen.</li> </ul> <p>If EIOPA does maintain a two-column format (even for only a part of the IPID), there should be the possibility to adapt to a full one-column format to allow consumers to read the IPID on smaller screens. In this a case, for the sake of legal clarity, EIOPA should specify explicitly in the regulation i) the order of the sections when switched from two to one columns or ii) that the insurer has the discretion to decide on the order of the sections.</p> <ul style="list-style-type: none"> <li>■ <u>Digital format and layered approach:</u> Insurance Europe strongly supports EIOPA's aim to develop a digital-friendly IPID format. Consumers who wish to should be able to take full advantage of all the benefits that digital access to an IPID could offer now and in the future.</li> </ul> <p>For example, digital IPIDs offer the possibility to layer information and thus to enable consumers to access further information if they wish to by clicking on a specific icon, while keeping the IPID format simple and short.</p> <p>The regulation should allow insurers to add, for instance, a ⓘ symbol at the end of any relevant sections. By clicking on the symbol, the consumer would</p>	

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	<p>then access further information in a pop-up, look through, or another webpage or site.</p> <p>Moreover, the regulation should also explicitly allow insurers to add icons for printing, downloading or sharing the IPID – when in a digital format – by email or via social media.</p> <p>■ <u>Additional elements</u>: It should be possible to include additional elements in the IPID under a “please note” section if necessary or appropriate as proposed in the Insurance Europe mock-up. This could be used for instance to enable the insurer to highlight the responses to the most common questions that consumers may have about the product.</p> <p>This section could also be used to disclose pre-contractual information stemming from legislative texts other than the IDD (both at EU and national level), such as the law applicable to the insurance contract and arrangement for complaints handling under Article 184 of the Solvency II Directive. This would benefit consumers by allowing the inclusion of this pre-contractual information in one single document.</p> <p>There should be space at the bottom of the document to insert the date when the IPID was developed by the manufacturer. This would ensure that consumers are able to identify which out of two IPID formats for the same product is the most recent one.</p>	



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Question 2(a)	<p>Insurance Europe recognises the added value of standardised visual aids such as icons at European level to help consumers compare and navigate through different products. Insurance Europe agrees with EIOPA's findings under paragraphs 2.2.3 and 2.2.4 of the consultation that <i>"icons can help the reader to quickly identify and easily find particular parts of a set of information"</i>.</p> <p>The use of an icon for each of the sections increases consumer engagement and facilitates navigation through the IPID, while ensuring an appropriate level of consistency across markets and operators.</p> <p>These benefits would be achieved by standardising what the icon should represent (such as a question mark or an exclamation mark).</p> <p>A reference in the implementing regulation stating that the <i>"information indicated in Article x of IDD shall be headed by an icon representing the form of an umbrella (or of a question mark, etc)"</i> would achieve this.</p> <p>By contrast, there would be no benefit for consumers or insurers to standardising the design of the image for icon and the colours used. This should therefore be left up to the individual insurer, to ensure that the document is consistent with their corporate identity.</p> <p>Similarly, insurers should be able to use for digital IPIDs icons or symbols such as the ⓘ symbol at the end of a section for accessing further information in a pop-up, look through, or another webpage or site. Insurers should also have the possibility to</p>	

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	<p>include icons for printing, downloading or sharing the IPID by email or social medias. These visual aids should be optional and tailored to each insurer's corporate design framework, enabling consumers to use a variety of tools and gain easier access to the information.</p>	
Question 2(b)	<p>Insurance Europe agrees that an IPID with an appropriate level of standardisation across the EU would benefit consumers when comparing different non-life insurance products.</p> <p>However, three icons in the IPID proposed by EIOPA are of concern:</p> <ul style="list-style-type: none"> <li>i) the <i>currency</i> icon for the "Insured sum" section, given that member states outside the Eurozone have different currencies and would need corresponding currency symbols; and</li> <li>ii) the <i>coint</i> icon icon for the "Payment" section, which looks like two watches may not be not easily identifiable for consumers.</li> </ul> <p>EIOPA rightly clarifies (paragraph 2.2.5 page 11 of the consultation paper) that member states outside the Eurozone should be able to use their own currency symbol instead of the Euro symbol. We suggest using the local currency symbol for the section "How and when to pay?" which would correspond to the "Payment" section of EIOPA proposed format.</p> <p>These solutions comply with the IDD level 1 requirements and facilitate a standardised approach. This will benefit consumers, when adapting the IPID</p>	

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	<p>to different markets in member states with different currency symbols.</p> <p>iii) the <i>geographical scope</i> icon can be easily misinterpreted by consumers and would not be compliant with Article 20(7) (e) of IDD that requires the information to be accurate and not misleading.</p> <p>For instance, an icon representing a flag could be understood to mean that coverage is limited to a single country while in reality it is often worldwide coverage or coverage within Europe.</p> <p>Moreover, consumers would not be allowed to distinguish between the flags of some countries when the IPID is printed in black and white (and consumers may print in black and white more often than in colour given the printing cost).</p> <p>An example would be that the German flag icon in IPID format proposed by EIOPA could be mixed-up with the Dutch or Luxembourgish flags when printed in black and white. The flag icon would therefore not meet the IDD requirement under Article 20(7)(c) that the IPID shall "be no less comprehensible if, having been originally produced in colour, it is printed or photocopied in black and white". It should, therefore, not be retained in the final IPID format.</p> <p>An icon representing a globe, a map of Europe or of the EU would be equally misleading, as it would again not be obvious to the consumers what</p>	

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	<p>the coverage is.</p> <p>This is why Insurance Europe believes that instead of having a separate section and icon about the geographical scope, the relevant information should fall under the "What is insured?" heading. This solution will increase the readability of the document by excluding different interpretations and shortening the number of sections. It would also overcome issues related to printing the IPID in black and white.</p>	
Question 3(a)	<p>Insurance Europe supports EIOPA's proposal for a short IPID and acknowledges that long information documents discourage consumers from reading product information, as outlined in paragraph 2.3.2. of the consultation paper.</p> <p>The font type and size are not, however, the determining factors when it comes to the length of the document. The most important elements that need to be taken into consideration are:</p> <ul style="list-style-type: none"> <li>■ <u>The type of policies</u>: Insurance Europe agrees with EIOPA that the IPID should not be too elaborate and should not result in a de facto duplication of the policy terms and conditions, whilst being accurate and not misleading (IDD, art. 20, 7 (e)).</li> </ul> <p>However, a two-page IPID is often too limited to properly inform the consumer about the main characteristics and possible options of a multi-risk product, which can include basic covers (not optional for the consumer) and optional</p>	

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	<p>covers together with other elements of choice (for example the height of the insured sum, the extent of the geographical scope for some travel insurance contracts).</p> <p>If these issues are not tackled properly the principal goals of IPID of ensuring comparability and readability would not be adequately achieved, to the detriment of consumers.</p> <ul style="list-style-type: none"> <li>■ <u>Different languages</u>: The nature and complexity of the different languages that the IPID will be used in could influence the length of the document. There are languages that use short sentences, being more succinct than others that use long phrases or words to express the same information.</li> <li>■ <u>IPID headings and sections</u>: As mentioned under question 1, the use of the heading proposed by EIOPA for each of the IPID sections could be further developed to the benefit of the consumer, to improve comparability and restrict the length of the IPID by merging some of the sections in the proposed format.</li> </ul> <p>Therefore, Insurance Europe suggests merging some of the sections in the proposed presentation format. This would also contribute to keeping the IPID format engaging and straight-forward for consumers, and ensure a more efficient use of space, while respecting the IDD requirements. It should be noted that Article 20 (8) of IDD does not impose any obligations to use separate headings for the information that needs to be included in the IPID.</p>	

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	<p>Insurance Europe calls for EIOPA to merge the following sections:</p> <ul style="list-style-type: none"> <li>■ <u>"duration of the contract"</u> and <u>"termination of the contract"</u>: these two sections should be merged into one with the heading "When does the cover start and end?". This unique section would cover Article 20(8) (h) regarding the information about the terms of contract and means of terminating the contract.</li> </ul> <p>As the IPID is intended to be a pre-contractual and non-personalised document it is not possible to include specific start and end dates in this section. However, it may for example state that the contract will be of 12-month duration and will begin on the date stated in the consumers' policy.</p> <ul style="list-style-type: none"> <li>■ <u>"main risks not covered"</u> and <u>"main restrictions and exclusions"</u>: these two sections can be merge into one with the heading "What is not insured?". This section would cover the summary of the excluded risks in Article 20(8)(b) and main exclusions where claims cannot be made in Article 20(8)(d) not included in the proposed format on page 24 of the consultation paper.</li> </ul> <p>For these reasons, the maximum appropriate overall length of the IPID should be no more than 3 pages when necessary and in the interest of the consumer. Restricting the space and length more that this would be to the detriment of the consumer as it decreases the clarity and comprehensiveness of the IPID.</p>	

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	<p><u>Inconsistencies in EIOPA's consultation paper and proposed template</u></p> <p>Article 7 on page 21 of the consultation paper states that the information about the obligations at the start of the contract in Article 20(8) (e) of IDD and regarding the obligations during the term of the contract in Article 20(8)(f) of IDD need to be included under the heading "main obligations".</p> <p>According to the consultation paper, information concerning the obligations in case of a claim in Article 20(8)(g) of IDD should be presented in a separate section called "obligations in case of a claim". However, this section is not included in the proposed format on page 24 of the consultation paper.</p> <p>Therefore, Insurance Europe proposes presenting the information on obligations at the start of the contract, during the term of the contract and in the event that a claim is made in Article 20(8)(e-g) of IDD into one single section titled "What are your obligations?". This would allow for a more efficient use of space and would be easier for consumers to understand.</p>	
Question 3(b)	<p>Insurance Europe supports EIOPA's approach to have a single standardised presentation format for all non-life products. The fundamental aims of a standardised presentation format of creating familiarity and recognition on the side of the consumer and the possibility to easily compare the IPIDs of different insurers with each other, can be achieved by standardising core elements of the IPID, whilst providing necessary flexibility for others.</p>	



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	<p>At the same time the regulation should allow appropriate room for flexibility in the presentation of information to consumers to ensure an effective, consumer-friendly and future-proof IPID format. EIOPA should also take into account the importance of individual insurers' corporate identity and design, to which the font type and size is significant.</p> <p>On the contrary, neither the font type nor the font size were amongst the design features highlighted as important by the consumer testing focus groups (page iv of the final report on the IPID consumer testing and design work). Consumers prefer the use of a single font size throughout the document, but do not express any opinion or preference when it comes to the font type and size. Additionally, Article 20 (7) (b) of IDD indicates that insurers should use characters of a readable size in IPID, without adding any further requirements.</p> <p>Taking these two important factors into account, there does not appear to be any added value to consumers of having a pre-determined font type and size. These two elements are, however, essential for compatibility with manufacturers IT systems to produce the IPID.</p> <p>Introducing a new standardised specific font type would mean that insurers need to acquire and integrate it into the respective systems. Even in the case of an 'open format' font type this involves substantial costs (acquisition, integration, testing, maintenance), without bringing any added value to consumers. Additionally, consumers may find it difficult to read the document when the format changes and is different from the rest of the documents that consumers will be provided with as part</p>	

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	<p>of the information disclosure process with the insurance company.</p> <p>Therefore, EIOPA should set a minimum font height to ensure that the IPID text is readable instead of a compulsory font type and size. In this way, standardisation can be achieved to the benefits of consumers, while insurers would have sufficient flexibility to use a font that is compatible with their different IT systems and not under license.</p> <p>This approach was adopted in <a href="#">Regulation 1169/2011</a> on the provision of food information to consumers, where it states that when mandatory information is printed on the label, it should be in characters using a font size where the x-height is equal to or greater than 1,2 mm.</p>	
Question 4(a)	<p>In the Europe of 2016, where 63% of individuals aged between 16 to 74 are seeking information about goods and services on line (<a href="#">Eurostat 2015</a>), Insurance Europe strongly supports EIOPA aim to develop a digital IPID as a durable medium to provide pre-contractual information for non-life insurance products to consumers online.</p> <p>The biggest challenge manufacturers would be facing is directly linked to how far EIOPA facilitates the development of digital IPIDs.</p> <p>Insurance Europe supports EIOPA's approach to have a single standardised presentation format for all non-life products. The fundamental aims of a standardised presentation format of creating familiarity and recognition on the side of the consumer and the possibility to easily compare the IPIDs of different insurers with each other,</p>	

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	<p>can be achieved by standardising core elements of the IPID, whilst providing necessary flexibility for others.</p> <p>At the same time the regulation should allow appropriate room for flexibility in the presentation of information to consumers to ensure an effective, consumer-friendly and future-proof IPID format. EIOPA should also take into account the importance of individual insurers' corporate identity and design.</p> <p>Similarly, in a digital IPID, consumers should be able to click on links that will take them to the insurance companies' website and provide them with additional information about the product. Moreover, as part of a layered approach, clicking on an information symbol ⓘ, could provide supplementary information for those who are interested in finding out more about the product than the information that is on the IPID.</p> <p>This layered information could be visible throughout a pull-down menu instead of pop-up (which will be blocked most of the time on the device of the consumer) and could also be printed.</p> <p>Insurance Europe strongly supports EIOPA's aim to develop a digital-friendly IPID format. Consumers who wish to should be able to take full advantage of all the benefits that digital access to an IPID could offer now and in the future.</p> <p>For example, digital IPID offer the possibility to layer information and thus to enable consumers to access further information if they wish to by clicking on a specific icon,</p>	

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	<p>while keeping the IPID format simple and short.</p> <p>Moreover, the regulation should also explicitly allow insurers to add icons for printing, downloading or sharing the IPID – when in a digital format – by email or via social media.</p> <p>Finally, EIOPA’s analysis in paragraphs 3.9 and 3.10, page 15 of the consultation rightly states that it is up to the manufacturer to decide on the approach taken. It is, therefore, important that the format remains flexible, so that more innovative manufacturers can develop a central online application and others can opt for a PDF file or email attachment.</p> <p>The format proposed by EIOPA needs further improvements to ensure its continued use in a changing digital environment. For instance, the use of two-columns is not at all compatible with designs for smartphones and similar devices.</p>	
Question 4(b)	<p>Digital IPIDs would mainly have only beneficial outcomes for consumers. In most markets, consumers operate on digital platforms and now expect digital interaction with their providers and to be able to access all available information online.</p> <p>The presentation of the IPID in a digital-friendly format would allow consumers to click-through relevant sections of the IPID. Most importantly, it will also mean that consumers can use a single medium throughout the whole distribution process (pre-contractual information, purchase of the product, etc). In this way insurers would meet consumers’ increasing expectations of being provided with insurance cover</p>	

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	<p>through a digital medium.</p> <p>It is crucial to ensure that the IPID is workable both as a paper and a digital document so that it remains future-proof in light of the increasing digital trend in financial services and to cater to all consumers' needs.</p>	
Question 5	<p>In general, it can be said that the highly prescribed provisions that do not take into account the different internal and IT systems of different insurers and markets will result in substantial costs.</p> <p>In particular, the presentation format costs depend on finding the appropriate level of standardisation when it comes to length, fonts, colours, outline of information, etc in the IPID. A highly standardised template risks being difficult to implement and ultimately not ensuring a workable and successful IPID for consumers.</p> <p><u>Presentation format costs</u></p> <ul style="list-style-type: none"> <li>■ Most of the costs outlined here are considered one off costs at this point. However, there will be costs related to updates and others. The main cost-drivers for the IPID in general are as follows:</li> <li>■ one-off costs related to the development of information documents for the extremely broad range of products;</li> <li>■ ongoing costs for keeping all the IPIDs up to date and maintaining archives;</li> <li>■ the costs related to the setting-up and adapting of IT-systems (one-off) for the</li> </ul>	

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	<p>manufacturing of the IPIDs and the maintenance of such systems (on-going);</p> <ul style="list-style-type: none"> <li>■ the ongoing costs for the provision of the IPIDs to the consumer (printing costs, postal charges, adaptation of websites).</li> </ul> <p>Here it is important to stress once again that it is essential that the IPID can be printed / photocopied in black and white. The IPID will not mainly be used in colour, as many insurance distributors work with black and white copies and many consumers are also likely to print or photocopy in black and white.</p> <p>Furthermore, a digital-friendly approach to the IPID will also help to reduce unnecessary printing costs. As EIOPA suggests the provision of the IPID in a digital format can be either as simple (pdf) or more complex. The provision of the IPID in a simple pdf format should in any case remain possible.</p> <p><b><u>Issues for implementation</u></b></p> <p>Sufficient time must be left for the insurance industry to properly prepare IPIDs for the wide scope of non-life insurance products covered and ensure that they are available to consumers when the IDD transposition will take place on 23 February 2018. This is because the introduction of a standardised format requires significant modifications, particularly to IT-systems.</p> <p>The industry will need 12 months following the adoption of the final implementing technical standards (ITS) by the European Commission. However, given that EIOPA is expected to submit the final draft ITS to the Commission on 23 February 2017 — and</p>	

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	that it could then take several months for the ITS to be adopted by the Commission — insurers could have less than 12 months to implement the IPID.	
Question 6	<p>EIOPA rightly puts the focus of the IPID on consumers. A pre-contractual IPID is not suitable or useful for professional customers, who are generally offered a commercial contract that is specifically made for them and to meet their particular needs.</p> <p>Additionally, this approach is in line with the IDD level 1 text, where references to consumers (and not retail costumers) are explicitly made, such as in Article 20(7) (d) but also Article 20(9), Recitals 43 and 51. Further explicit clarification of the aim of the IPID would help to ensure that it is provided to consumers and not professional customers.</p>	