

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

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

Name of Company:	AAS "BTA Baltic Insurance Company"	
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"> <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, in Word Format, 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 Implementing Technical Standards (ITS) on a standardised presentation format of the Insurance Product Information Document (IPID)</p>		

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Reference	Comment	
General Comment		
Question 1		
Question 2(a)		
Question 2(b)		
Question 3(a)	Article 20 (8) of Directive (EU) 2016/97 on insurance distribution states that IPID must contain information on <i>main</i> risks insured and <i>main</i> exclusions. As there are no criteria to identify, which risks and exclusions are <i>main</i> , then, to avoid any potential consumer objections and claims with respect to any deception, the insurance company will want to publish in the IPID <i>all</i> the risks insured and <i>all</i> exclusions. With respect to the abovementioned, the information to be included in the IPID will not fit in two A4 size pages.	Public
Question 3(b)		
Question 4(a)		
Question 4(b)		
Question 5		
Question 6		