

**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:	Bund der Versicherten e.V. (BdV – German Association of the Insured)	
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 standardised presentation format of the Insurance Product Information Document (IPID)</p>		

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Reference	Comment	
General Comment	<p>As Germany's most important NGO of consumer protection related to private insurances (with more than 50.000 members) we would like to thank EIOPA for the opportunity to publish comments on this consultation.</p> <p>We fully support the proclaimed objectives of this draft Implementing Technical Standards (ITS) aiming at standardising in a precise and unambiguous way the non-life Insurance Product Information Document (IPID). This represents a necessary and indispensable step for enhanced consumer protection, which in Germany is already implemented on the national level since 2008 (in addition to the EU Member States mentioned in CP, page 28, footnote 15). Our comments below are - of course - based upon these experiences.</p>	
Question 1	<p>We do not see any barriers to utilizing a single standardised presentation format for all non-life insurance products. In Germany this is already implemented since 2008 by the amended private insurance contract law (VVG), because the provision of information duties introduced the mandatory product information sheet (Produktinformationsblatt). The content of the EU IPID, determined by IDD article 20 (8), is exactly equivalent to the German provision of information duties (VVG- Informationspflichtenverordnung §4 Absatz 2).</p> <p>That is the reason why we fully agree upon the choice of policy options made by EIOPA in section 6 of the Impact Assessment (CP, p. 33-34). Consumer testings have additionally shown that customers benefit from the use of icons in order to distinguish the different section of the IPID (policy option 1.2) and there must be a requirement to present information in a specified order (policy option 2.1). For all classes of non-life insurance there must be a standardized presentation format, because it will minimize confusion for customers while having minimal effect on industry (policy option 3.1). Additional cover offered with the primary cover (multi-risk cover) shall be included in the IPID of the primary product, because for customers there would be increased levels of confusion and distraction with redundant repetitious information (policy option 4.1). The results of consumer testings are unequivocal on these issues (CP, page 8).</p>	

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Question 2(a)	<p>We fully agree upon EIOPA’s opinion that the use of icons in the IPID represents best practice for customers. The expected impact of a requirement to include icons to identify different product characteristics is expected to be very positive and continuing for costumers, particularly in terms of familiarity and comparability. The presence of icons and symbols in the IPID will assist the users in locating and understanding different parts of an IPID.</p> <p>These uniform icons and symbols do not exist in the German “Produktinformationsblätter” already in use, so the mandatory introduction of uniform icons and symbols will strongly enhance consumer intelligibility, as the consumer testings have proofed.</p>	
Question 2(b)	<p>No, we do not see any circumstances in which it is necessary to allow for differences in any such icons between Member States. The higher the level of standardization, the easier it will be to identify and compare specific characteristics. Only the symbol for the “Geographic Scope” may change following to the flag of the concerned Member State. But if the cover is given on an international scope (EU-wide or world-wide), identical icons must be stipulated, too.</p>	
Question 3(a)	<p>No, we do see any circumstances in which it will not be possible to include the information required under the IPID on two sides of an A4 page. The German experience since 2008 shows what happens, if the length of the IPID is not clearly fixed by law. The length of the existing « Produktinformationsblätter » vary from 2 to 4 pages or even more.</p> <p>That is the reason why the expected positive impact for customers, particularly in terms of familiarity and comparability of the IPIDs, is nearly completely wiped out. For customers, there should be significant benefit to be derived from the familiar layout and presentation of information and this will aid comparison between products and support good decision-making.</p> <p>As the German experience proofs since 2008: if manufacturers were given the freedom to choose their own layout, this undermines the whole concept of a standardized presentation format and leads to confusion for consumers. It makes it more difficult for them to find key information particularly when trying to compare product offerings from rival manufacturers.</p>	

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Question 3(b)	No, we do not foresee any difficulties with prescribing a font type and font size. These are necessary additional prescriptions in order to achieve the uniform length of two A4 pages of the IPIDs. Common font type and font size would assist customers with becoming more familiar with the content of IPIDs and make it easier for them to find and identify particular pieces of information.	
Question 4(a)	We agree with EIOPA's assessment that for manufacturers there will be one-off IT costs for the incorporation of the IPID into their web-based applications. Related to the German experience with the « Produktinformationsblätter » since 2008, the manufacturers never complained about any additional costs. These additional requirements are quite usual procedures of IT based document management and represent in no way any extra-ordinary « challenges ». There is no technical difference of presenting a two pages IPID on a website for example in a PDF format for online reading or printing. The presentation format should be « neutral » from a purely technical point of view. So, following to EIOPA, we believe that it will be acceptable to display the IPID in a « medium-friendly » format provided the fundamental aspects of the standardised presentation format are observed.	
Question 4(b)	The main benefits we see for the manufacturers in making the IPID compatible with provision via digital media, are related to the distribution strategies via Internet. Non-life insurance products are even more appropriate for online distribution strategies than life insurances (PRIIPs), because their product features are more easily to be standardised. From a purely technical point of view this represents in no way any extra-ordinary challenge as already mentioned above.	
Question 5	We agree with EIOPA's assessment that for manufacturers there will be one-off IT costs for the incorporation of the IPID into their web-based applications. But these additional requirements are quite usual procedures of any kind of IT based document management and represent in no way any extra-ordinary « challenges ». Related to the German experience with the « Produktinformationsblätter » since 2008, the manufacturers never complained about any additional costs. So, if the industry provides data on their estimates of the costs that the standardised presentation format proposed by EIOPA will generate (CP, p. 29), than EIOPA will have to examine these data very closely in order to prevent from being misled by any possible cost	

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	over-estimations.	
Question 6	<p>We agree with EIOPA’s approach to focus primarily on consumers (i.e. retail customers) in developing the IPID. Consumer testings have shown how important are clearly standardised product information presentations in order to prevent from mis-selling practices and to reduce consumer detriment. The IPID is an essential part of IDD and constitutes therefore the necessary supplement to the KID for PRIIPs, which clearly refers to the retail customer.</p> <p>The proposed EU standards for the access to disabled persons and possibly for the use of simple language should be applied (European Accessibility Act).</p>	