

<b>Comments Template on EIOPA-CP 13/006a and EIOPA-CP 13/006b            Consultation Paper on the Proposal for Guidelines on Complaints-Handling by Insurance Intermediaries and Draft Report on Best Practices by Insurance Intermediaries in handling complaints</b>		<b>Deadline            28 June 2013            12:00 CET</b>
Company name:	APRIL	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential.  <i>Please indicate if your comments on this CP should be treated as confidential, by deleting the word <b>Public</b> in the column to the right and by inserting the word <b>Confidential</b>.</i>	Public
<p><b>Please follow the instructions for filling in the template:</b></p> <ul style="list-style-type: none"> <li>⇒ Do <b>not</b> change the numbering in column "Reference", or any other formatting in the file.</li> <li>⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph, keep the row <u>empty</u>. Please do not delete rows in the table.</li> <li>⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below.               <ul style="list-style-type: none"> <li>○ If your comment refers to multiple paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other paragraphs this also applies.</li> <li>○ If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment relating to the corresponding paragraph.</li> </ul> </li> </ul> <p><b>Please send the completed template to <a href="mailto:CP-13-006@eiopa.europa.eu">CP-13-006@eiopa.europa.eu</a>, in MS Word Format, (our IT tool does not allow processing of any other formats).</b></p> <p>The paragraph numbers and questions below correspond to document no. EIOPA-CP-13/006a.            There is an additional section at the end of the table for general comments on the draft Best Practices Report (document no. EIOPA-CP-13/006b).</p>		

**Comments Template on EIOPA-CP 13/006a and EIOPA-CP 13/006b  
 Consultation Paper on the Proposal for Guidelines on Complaints-Handling by Insurance  
 Intermediaries and Draft Report on Best Practices by Insurance Intermediaries in  
 handling complaints**

**Deadline  
 28 June 2013  
 12:00 CET**

<b>Reference</b>	<b>Comment</b>	
General Comment		
1.		
2.		
3.		
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16.	The complaints management function should be made compulsory only if the structure and the size of insurance intermediaries allow it. The principle of proportionality mentioned at the reference n°7 of this consultation paper should be applied in such case.	
17.		
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21.		

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22.		
23.		
24.		
25.		
26.		
Q1. - on Impact Assessment		
Q2a. - on Impact Assessment		
Q2b. - on Impact Assessment		
Q2c. - on Impact Assessment		
Q2d. - on Impact Assessment		
Q3. - on Impact Assessment		
Best Practices Report Comments (EIOPA-CP-13/006b)		