

Comments Template on EIOPA-CP13/006a 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 June2013 12:00 CET
Company name:	BZB (Beroepsvereniging van zelfstandige bank- en verzekeringsbemiddelaars)	
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 Public in the column to the right and by inserting the word Confidential.</i>	Public
<p>Please follow the instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ Do not change the numbering in column "Reference", or any other formatting in the file. ⇒ 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. ⇒ 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"> ○ 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. ○ If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment relating to the corresponding paragraph. <p>Please send the completed template to CP-13-006@eiopa.europa.eu, in MSWord Format, (our IT tool does not allow processing of any other formats).</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-CP13/006a 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 June2013
 12:00 CET**

Reference	Comment	
General Comment	<p>BZB has reservations about the introduction of an internal complaint procedure for the insurance intermediaries. Since the major part of the insurance intermediaries are rather small entities, this would entail disproportionate costs in these companies. Indeed, only a small part of the complaints concerns the insurance intermediaries. The majority of the complaints are addressed to the insurer. Also, a large part of the insurance intermediaries is registered as tied agent, which means that they act in the name and on behalf of the insurer. Consequently, they will not be able to handle the complaint themselves. Moreover, at most insurance intermediaries, the person handling the complaint is the same as the one who manages the business. This means that an internal policy for complaints-handling will have little or no added value. Finally, the obligation of an internal procedure for handling and reporting complaints also entails higher costs for the supervisor. After all, collecting reports and monitoring this obligation require the necessary resources and manpower.</p> <p>Consequently, BZB is in favor of maintaining the current system. Clients easily have access to the ombudsman. They are also sufficiently informed on this possibility.</p> <p>This does not preclude the possibility of a complaint policy being appropriate for large insurance intermediaries. In this regard, they can be deemed equivalent to insurance companies.</p>	
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17.	Although this is very useful for the internal use to follow up complaints and possibly to adapt the own operation as a result of this, BZB believes that the supervisor should not have access to these data.	
18.	According to BZB, it is acceptable that the supervisor, in the context of general supervision, can ask to communicate the number of complaints. However, it should be avoided that the supervisor can use this information to perform additional checks in order to take sanctions.	
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Q1. - on Impact Assessment	Except for the larger insurance intermediaries, we expect little or no positive impact.	
Q2a. - on Impact Assessment		
Q2b. - on Impact		

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Assessment		
Q2c. - on Impact Assessment		
Q2d. - on Impact Assessment		
Q3. - on Impact Assessment		
Best Practices Report Comments(EIOPA-CP-13/006b)		