

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
Company name:	GEMA (Groupement des Entreprises Mutuelles d'Assurance)	
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 MS Word 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>		

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 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
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Reference	Comment	
General Comment	<p>GEMA observes that the Guidelines on complaint-handling by insurance intermediaries are parallel to the Guidelines published by EIOPA in November 2012 on Complaints-Handling by Insurance Undertakings.</p> <p>The future Insurance Mediation Directive will probably expand its scope to encompass direct sales of insurance contracts by insurance undertakings without the intervention of an insurance intermediary. In that case, the employees of insurance undertakings who are in charge of selling the contracts to the consumers will be regarded as intermediaries. One wonders what guidelines these employees are supposed to apply and a clarification would be much appreciated.</p> <p>It would be untoward that the employee of an insurance undertaking who also commercializes as an intermediary a product of another undertaking has to apply two different guidelines. It is indispensable that complaints management policies are equivalent for employees of insurance undertakings and for intermediaries.</p>	
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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		

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Report Comments (EIOPA-CP-13/006b)		