

<b>Comments Template on            Consultation Paper on draft Implementing Technical Standards (ITS)            on a standardised presentation format of the Insurance Product            Information Document (IPID)</b>		<b>Deadline            24 October 2016            18:00 CET</b>
Name of Company:	<b>Dutch Association of Insurers</b>	
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 not 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, <u>in Word Format</u>, 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>		



**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**

<b>Reference</b>	<b>Comment</b>	
General Comment	<p><b><i>General comments</i></b></p> <p>The Dutch Association of Insurers appreciates the opportunity to present, by means of this consultation, its vision of the proposed EIOPA presentation format. The Dutch insurance industry has had a standard presentation format since 2009, which was revised in 2014 and meets the needs of consumers and the requirements of the current digital era. The Dutch Association of Insurers therefore holds the view that a standard presentation format for all non-life insurance products is feasible and endorses the wish of the European Parliament and the European Commission for a single standard presentation format.</p> <p>However, in the attempt to achieve an equal level of consumer protection within Europe, the present EIOPA format limits or even prevents existing initiatives providing more radical consumer protection. The Dutch Association of Insurers is, therefore, gravely concerned about the present format, which ignores innovation and experience in this domain. Looking at the current EIOPA IPID, the Dutch Association of Insurers would like to propose alternative ways of presenting the information in the document in order to get a better understanding of the product and improve product comparability for consumers between companies.</p>	



**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**

***The Dutch IPID is greatly appreciated by consumers***

**Current status of the Dutch IPID**

**As of 1 October 2016, Product Information Documents are in place for 35 different insurance products (Non-life, Life and Loss-of-Income). Insurance companies are to complete these model documents and post them on the product page on their own website. 71 insurers have created a total of 325 documents for the first 15 IPIDs developed. Since 1 January 2016, 38,000 consumers (unique visitors) have looked at the IPIDs. There are, on average, 300 visitors a day.**

**As of 1 November 2016, all healthcare insurers in the Netherlands, affiliated in Zorgverzekeraars Nederland, will have a health IPID for basic health insurance available for consumers.**

As stated in section 1.1. of the consultation document, the objective of an Insurance Product Information Document is to ensure that the customer (= consumer) has the relevant information about a non-life insurance product to allow them to easily compare different product offers and to make an informed decision about whether or not to purchase the product.

The Dutch Association of Insurers wholeheartedly supports this objective. Clarity, understanding, findability and comparability are the basic principles of multiple Association projects in the field of customer information. This is in line with the core values of our Code of Conduct.



**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**

Please also refer to the Beleidsregel Informatieverstrekking of the AFM (policy on information provision of the Dutch Financial Markets Authority) that came into effect on 25 September 2013 and that provides practical details for implementation of the Dutch Wet op het Financieel Toezicht (Financial Supervision Act), which stipulates that information provided by a financial institute must be correct, clear and not misleading.

The Dutch Association of Insurers has serious objections to the current EIOPA format. The Dutch Association of Insurers drafted the first Product Information Documents back in 2009 and made these mandatory for its members by means of binding self-regulation. These Product Guides concerned Non-Life Insurance, Life Insurance and Loss-of-Income Insurance to provide consumers with general, objective information, phrased in simple words, on different kinds of insurance during the orientation phase. These are standard documents.

Using the Product Guides, potential policyholders were in a better position to assess whether a certain type of insurance was appropriate for them. Members of the Dutch Association of Insurers had to post the Product Guides of the insurance they offered on their websites. The Product Guides have been regularly updated since.

After a study performed in early 2014 showed that the Product Guides in their present form failed to contribute sufficiently to consumers' understanding of insurance, it was studied under what conditions a Product Information Document would be effective. This was based on both qualitative and quantitative consumer surveys. The results showed that the Product Information Document had to meet the following criteria.



**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**

The IPID should:

- Be concise and compact: the document must make clear at a glance what is and what is not covered by the specific insurance.
- Be recognisable as a product information document: it must be clear to the consumer that an insurance comes with an IPID, with the required information being the same on all product information documents and located in the same place. That requires development of a standardised format.
- Contain layered information. Dutch consumers want outline information first and then have the option of looking further to obtain more detailed information.
- Contain icons or illustrations: It provides structure, improves usability and enables consumers to be selective in assimilating the information they are looking for.
- Be developed for online application and be accessible from a variety of devices.

Together with the Utrecht University a new model for the IPID was developed in 2014. This was tested by research agency Motivaction ([see: \*\*Annex 1 Z6635 Motivaction Report Product Information Document, 10-9-2015\*\*](#)), after which binding self-regulation for new Dutch IPID became effective in June 2015. Insurance companies that are a member of the Dutch Association of Insurers have the obligation to create the IPIDs and post them on their website. They are based on a standard, recognisable format, differentiating for each product by showing the various cover elements. Individual insurance companies can indicate whether a certain specific element is covered, optional, or not covered. The information is shown in a structured manner, with icons combined with permanent sections and short text blocks.



**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**

Information is opened up in layers by means of information buttons (the ⓘ button) behind which additional information is available (second information layer). It is also possible to click through from the IPID to the policy terms (third layer of information). Insurance companies may use their own logo and corporate colours; the fixed format means that the IPID will always be recognisable as such. Independent of the type of insurance, consumers can see that this is an IPID for the product.

**Development of the new Product Information Documents was based on online use.**

Consumers in the Netherlands looking for insurance are doing so increasingly online, as reflected in the Dutch market by the use of comparison websites. The high level of online use is also confirmed by Eurostat data, which show that in 2015 85% of consumers in the Netherlands used online banking services, while 84% of consumers go online to look for information on goods and services.

<http://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&pcode=tin00099&plugin=1>

<http://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&pcode=tin00095&plugin=1>

That ruled out development of a Product Information Document for paper use only.

In order to keep workloads for individual insurance companies in the case of online use of IPIDs as low as possible, the Dutch Association of Insurers has opted for a central web-based application. After log-in, insurance companies can access and edit all model documents here.



**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**

After having been edited by the insurance company, the Dutch IPID is posted on the insurance company's website by means of a URL link. At present, insurance companies must post the Dutch IPID on their product page in an easy-to-find location. The Dutch IPID can be printed or downloaded as PDF. The central web application allows making modifications. The Dutch Association of Insurers has already made adjustments resulting from the IDD (see: [Annex 2 Dutch mock-up Home Contents Insurance & Annex 3 Dutch mock-up car insurance](#) (see sidebar for the mock-up on car insurance front and back)).

**Insurance product information document**

VERBOND VAN VERZEKERAARS

**Car Insurance**  
What is and what is not covered by this car insurance policy?

This Insurance Product Information Document is only intended to provide a summary of the main coverage and exclusions, and is not personalised to your specific individual needs in any way. [Read the complete terms and conditions of the policy.](#)

<p> <b>What is car insurance?</b> This insurance policy provides coverage against damage to your car or damage caused by your car. The Compulsory Liability Insurance (Dutch: WA) is mandatory. You choose additional coverage yourself.</p>	<p> <b>What is insured?</b> Damage caused by theft and total loss, damage due to fire and nature. Window damage and roadside assistance may be insured additionally.</p>
<p> <b>Liability</b> You are liable if you injure other people or damage someone else's car or property with your own car. It is legally required to have this type of insurance.</p>	<p> <b>Assistance after an accident</b> This assistance includes towing, replacement transport, repatriation and emergency repairs. The coverage differs per insurance type. ⓘ</p> <p><small><b>Explanation</b> Repatriation means we bring you home after an accident or death.</small></p>
<p> <b>Theft or total loss</b> In the event of the theft or total loss of the car, you will receive the purchase value instead of the daily value if the damage occurs within 3 years. ⓘ</p> <p><small><b>Explanation</b> In the event of theft, damages is reimbursed if the car was adequately secured.</small></p>	<p> <b>Repairs</b> You are free to choose who carries out the repairs, regardless of the type of damage.</p>
<p> <b>Damage due to fire and nature</b> Damage resulting from, for example, fire, hail, lightning, a flood or a collision with an animal is insured.</p>	<p> <b>Optional: window damage</b> Reimbursement of the cost price in the event of repairs carried out by an affiliated garage.</p>



**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**

A consumer survey carried out last summer by Motivaction (see: [Annex 4 Z7751 Dutch Association of Insurers – IPID, 21-10-2016](#)) tested the extent to which consumers could understand, find and compare IPIDs. The results showed that the Dutch IPID enhances understanding of insurance products. There is a better understanding of what is covered. Comparing is made easier. By using the same icons in combination with short text blocks, the standardised product information of insurance within the separate elements of cover can be compared in a simple(r) manner.

 <p><b>Break-in</b> Damage due to (an attempted) theft is insured, as is theft from the car (a break-in). Car security requirements may apply. This will depend on the make of car. ⓘ</p> <p><b>Explanation</b> For example, a GPS system was stolen during a break-in.</p>	 <p><b>Optional: roadside assistance</b> You choose whether or not roadside assistance is insured. Conditions, such as the manufacturing year of your car, apply in this case.</p>
 <p><b>What is not insured?</b> In the event of damage caused intentionally or while driving without a license. Or due to drug or alcohol abuse. And in the case of damage caused while the car is rented or used to transport people for payment.</p>	 <p><b>Other damage to your own car</b> Not insured</p>
 <p><b>Please note</b> Text of note: most common question, complaint or misunderstanding.</p>	 <p><b>Extra: special feature</b> Text on the special feature.</p>
 <p><b>Deductible</b> € 200 per claim in the event of damage to your own car and the replacement of a window. A higher deductible for drivers under the age of 24. ⓘ</p> <p><b>Explanation</b> Some situations / events may be subject to specific deductibles.</p>	 <p><b>When does the cover start and end?</b> The insurance will take effect on the date specified in the policy. After the first year, you can cancel your insurance at any time.</p>
 <p><b>How and when to pay?</b> You can pay your premium as a one-off payment, annually or in monthly instalments. Payment can be made by bank transfer, direct debit or debit/credit card.</p>	 <p><b>What are your obligations?</b> You must provide us with honest, accurate and complete information, and inform us without delay of any changes in your situation. In the event of a claim, you must notify us as soon as possible and within 72 hours.</p>

More information: [www.vanotzekerheid.nl](http://www.vanotzekerheid.nl)

Version 3, 08-06-2016  
© Verbond van Verzekeraars

It is also an advantage that insurers are permitted to design the IPID in the colours of





**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**

their own corporate identity. This makes it easier to recognise and to distinguish between the insurers when comparing various insurances/documents.

***Interest from other countries***

The approach and format of the Dutch IPID receive interest from other countries. Assuralia, our Belgian sister organisation, has informed us they are very much interested in adopting our Dutch system. Other countries have also expressed this.

The Dutch Association of Insurers is open to enter into a dialogue with other member states about adoption of the Dutch system or the set of icons developed for the Dutch IPID on behalf of the Association.

***Implementation term should be longer***

The IPID must be designed (format and distribution) such that the consumers' interests and the IPID objectives are fully met. This requires a long implementation period, taking into account the careful evaluation of the content to be included in the IPID, which must also be in line with other product documents. Based on its experience, the Dutch Association of Insurers calls for a wider implementation deadline.

***Conclusions and recommendations***

The Dutch Association of Insurers appreciates the opportunity to present, by means of this consultation, its vision of the proposed EIOPA presentation format.  
The Dutch Association of Insurers also appreciated the opportunity to relate Dutch



**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**

experiences with the Dutch IPID during its two visits to EIOPA on 28 September 2015 and 23 June 2016 and also in between. It came as a surprise to the Dutch Association of Insurers, therefore, that despite these contacts the consultation paper does not refer to the Dutch IPID as a good practice (see EIOPA Consultation paper page 28/35).

The Dutch Association of Insurers holds the view that a standard presentation format for all non-life insurance is feasible and endorses the wish of the European Parliament and the European Commission for a single standard presentation format.

The objectives are in line with Dutch activities in the area of consumer empowerment and the organisation of a Dutch IPID since 2009. However, in the attempt to achieve an equal level of consumer protection within the European Union, the present EIOPA format limits or even prevents existing initiatives from providing more radical consumer protection, such as the Dutch IPID. The Dutch Association of Insurers is, therefore, gravely concerned about the present format, which ignores the Dutch IPID and experiences in this field. The Dutch Association of Insurers also holds the view that the EIOPA format insufficiently meets the consumers' wishes and needs in the area of understanding and comparability. Our objections and a possible solution are worked out in more detail in our response.



Question 1	<p><b>What barriers, if any, do you see to utilising a single standardised presentation format for all non-life insurance products? If you believe barriers to a standardised presentation format exist, please describe how they could be overcome.</b></p> <p>The Dutch Association of Insurers holds the view that a standard presentation format for all non-life insurance products is feasible and endorses the wish of the European Parliament and the European Commission for a single standard presentation format. The objectives of the IPID as formulated in Art. 20 IDD are in line with Dutch activities in the area of consumer empowerment and the organisation of a Dutch IPID since 2009. The Dutch Association of Insurers is, therefore, deeply concerned about the present format, which seems to ignore Dutch experiences in this field.</p> <p>Looking at the current EIOPA IPID, the Dutch Association of Insurers would like to propose alternative ways of presenting the information in the document in order to get a better understanding of the product and facilitate product comparability for consumers between companies.</p> <p><b>Concerns</b></p> <ul style="list-style-type: none"><li>• <i>EIOPA IPID offers no scope for flexibility for the consumer</i></li></ul> <p>The Dutch Association of Insurers holds the view that a standard presentation format for all non-life insurance products is feasible but expresses the wish to incorporate, where possible, flexibility within recognisable frameworks. A single presentation format for all non-life products should not be at the expense of the objectives of the IPID: improving understanding of product information and improving comparability. Recognisability of the IPID can be guaranteed even when more flexibility is introduced. For an IPID to be clearly recognisable, a number of elements of the format must be the same.</p> <p>These include the document heading (title, type of product, name of the insurance</p>	
------------	---	--



	<p>company and disclaimer), layout requirements (two columns, use of specific fonts and font size as well as use of fixed titles) and the use of fixed icons and text for each element.</p> <p>Insurance Europe, in close collaboration with its members (including the Netherlands), developed its own mock-up (<a href="#">see: Annex 5 Insurance Europe mock-up motor insurance</a>), embracing the principles and requirements of art. 20.8 of the IDD, by developing a flexible, consumer- and digital-friendly IPID.</p> <p>The Insurance Europe mock-up has the support of the insurance industry and the Dutch Association of Insurers. We have played a key role in developing it.</p> <ul style="list-style-type: none"><li>• <i>EIOPA IPID offers no scope for innovation in terms of consumer empowerment</i></li></ul> <p>The EIOPA single presentation format should not hinder innovation in member states, given that member states such as the Netherlands have already acquired a certain amount of experience developing an IPID. In the attempt to achieve an equal level of consumer protection within Europe, the present EIOPA format limits or even prevents existing initiatives providing more radical consumer protection such as the Dutch IPID.</p> <p>The EIOPA IPID is an excellent starting point for countries that have not set out on this journey yet. For countries that have already implemented an IPID, the EIOPA IPID must be sufficiently flexible in design and offer the opportunity for integrating the national model in the European format. Flexibility is needed for those countries that have a more developed IPID on consumer empowerment than required by the IDD. A supplement to the practical details of the IPID should not be at the expense of the recognisability of the standard format, should be optional and may only be adopted at national level.</p> <p>Innovation in the Dutch market was prompted by wide-scale attention for consumer</p>	
--	---	--



	<p>protection/empowerment since 2008 from politics, consumer organisations, legislative and regulatory authorities. In that context, insurance companies in the Netherlands have been cooperating since 2009 in an 'Insurers Innovate' programme aimed at promoting customers' interests.</p> <p>A key pillar of that programme is improvement of customer information, which is further incentivised by legislature and the regulatory authorities. Insurers in the Netherlands are also subject to a system of self-regulation under which additional guidelines have been drafted, such as the further development of Product Guides in the Dutch IPIDs.</p> <p>Innovation in the Netherlands was also prompted by consumer needs. As indicated above, Dutch consumers primarily look for new information on products and services online, and also increasingly conclude insurance policies online, particularly compared to consumers in other European countries.</p> <p>As a result of these two developments, the Netherlands already has a sound and innovative IPID in place. The EIOPA IPID would mean a step back for the Dutch market, which would certainly not benefit consumers. The Dutch Association of Insurers therefore objects to the present EIOPA format from the point of view of consumer protection and consumer empowerment.</p> <p>In order to guarantee a future-proof IPID and respond to differences in individual countries, the Dutch Association of Insurers advocates an EIOPA format designed as a minimum standard with scope for flexibility in a number of areas allowing for adoption of the EIOPA standard at national level without undermining the recognisability of the IPID.</p> <ul style="list-style-type: none"><li>• <i>EIOPA IPID not well suited for digital use</i></li></ul>	
--	---	--



A key argument related to the need for flexibility concerns the development of the IPID for paper or online. Under art. 20 par. 5 of the IDD, the IPID can be provided on paper or any other sustainable medium. The Dutch Association of Insurers strongly believes that when developing the final IPID, EIOPA should ensure that the proposed standardised format ensures equal access to both digital and paper IPID, without favouring one or the other.

Online application requires a document that is accessible on multiple devices and that is responsive.

Where consumers in Europe are more and more largely online and digitally oriented, the EIOPA presentation format is based upon paper, which can be sent or published in PDF or email attachment. We strongly advise that the presentation format be developed as an online format, or offering member states the scope for doing so at national level. A paper version can then be derived. This matches the ambitions of the European Commission when it comes to digitisation and is the only way an online market for financial services will ever emerge.

Not only the Dutch IPID is designed from a digital perspective, also the Insurance Europe IPID is designed from a digital perspective, where the consumer also has the possibility to read extra information through layered information (*for an example, see [Annex 6 Examples Dutch market or http://www.nh1816.nl/consument/verzekeringen/verzekeringskaarten](http://www.nh1816.nl/consument/verzekeringen/verzekeringskaarten)*).

Having said that, the Dutch Association of Insurers does advocate making this choice at national level so as not to cause differences within a country.

- *Flexibility in the order of elements in the document*



Art. 5 of the draft ITS states that the order of the content in the IPID is determined by the order of the information obligations as contained in Art. 20 (8) of the IDD. Art 20 (8) does not stipulate that the information obligations as contained in the IDD must actually be presented in this order. The Dutch Association of Insurers supports the basic principle of a fixed order because of the recognisability of the information for consumers, but believes it should be possible to include flexibility in the presentation format.

This could include the option of allowing additional cover elements in the block 'main cover' and adding optional extra elements under 'obligations', etc. Adding extra elements does not affect the basic order. The IPID is based on two columns. When constructing a web-based responsive system, the order of information is placed in a ribbon. As such, in the actual presentation in two columns the order will be shown as in a newspaper layout (left to right, top to bottom). The actual layout may therefore differ from the paper format.

- *Need for opportunity to work with layered information*

Consumer research conducted by the Association of Insurers shows that consumers prefer layered information. Both the Dutch and the IE IPID have this option. The present EIOPA IPID format has not. With a layered information option insurers can add an explanation on a certain element in the text.

The layered information is accessible as a pull-down element online. Consumers can choose to print the IPID together with the layered information. The EIOPA IPID format needs to have the flexibility to apply this.

- *EIOPA format offers no scope for corporate identity*

The objective of the IPID is to achieve an increased understanding and better comparability of the product information. Therefore, it is essential that the IPID reflects the corporate identity of the manufacturer of the non-life insurance product. Not only in placing the company logo but also in colours used and font. In this way the



	<p>consumer understands the interrelationship between the IPID and the full policy documentation.</p> <p>This summer the Dutch Association of Insurers completed a consumer survey (impact assessment) of the Dutch IPID. This research showed that consumers appreciate the design of the Dutch IPID. Consumers noticed that the insurers have designed their IPID in the colours of their own company style. Responses were generally positive. The colours of the insurers help identify the various IPIDs (in combination with the name and logo of the insurer) and distinguish them. The different colour schemes are especially convenient when the various documents are put side by side in order to compare them: <i>'Otherwise you keep comparing similar pages with nothing but text and then you tend to forget which IPID belongs to which insurer.'</i> (see <a href="#">Motivaction consumer research, Annex 4 Z7751 Dutch Association of Insurers IPID, 21-10-2016</a>)</p> <p><b>Alternative ways of presenting the information in the IPID</b></p> <p>Given the above objectives and looking at the current EIOPA IPID, the Dutch Association of Insurers would like to propose alternative ways of presenting the information in the document in order to get a better understanding of the product and facilitate product comparability for consumers between companies. The basic principle is flexibility within fixed frameworks so that the recognisability of a European document remains intact.</p> <ul style="list-style-type: none"><li>• <i>Need for flexibility and further differentiation to provide a more detailed description of the cover of specific non-life products</i></li></ul> <p>It should be possible to develop more product-specific documents within the limitations of a recognisable IPID, such as for travel insurance or car insurance. While the format will remain recognisable, it also meets the IPID objectives of understanding and comparability for the consumer.</p>	
--	---	--





	<p>Various consumer surveys show that consumers find product information the most important element. This information must be itemised and comparable. The Dutch Association of Insurers consequently determined that it is not sufficient to leave it to the provider to describe what is covered and what is not, but instead decided to define, together with a team of product specialists, the relevant product characteristics for a range of products. In the Dutch IPID the most relevant cover elements have their own icon and corresponding subtitle.</p> <p>This requires more drastic flexibility of the format than the current elements '<i>main risks covered</i>', '<i>main risks not covered</i>' and '<i>main restrictions and exclusions</i>' as included in the EIOPA IPID.</p> <p>The Dutch Association of Insurers urges EIOPA to also consider countries that, through innovation in consumer empowerment, have developed beyond what the current format prescribes and to incorporate sufficient flexibility for including additional elements to allow further specification of cover.</p> <ul style="list-style-type: none"><li>• <i>Reference to complete pre-contractual information at the top of the document</i> The EIOPA format places the reference to complete pre-contractual information at the top of the document. The Dutch Association highly supports this choice.</li></ul> <p>In the present Dutch IPID the disclaimer is placed at the bottom of the document. Recent consumer research has shown that participants in the research sometimes expect (too) much from the IPID during the period of taking out insurance. They feel the information on the IPID is incomplete and do not sufficiently realise that the IPID provides a summary of the main characteristics of the insurance.</p> <p>Therefore, it would be wise to give the disclaimer and link to the policy conditions greater attention by placing them directly under the blue box at the top of the document.</p>	
--	---	--



In the event of digital application of the IPID, the Dutch Association of Insurers would like to see the option of a link to the policy conditions included in the reference.

- *Desired modifications of the EIOPA format*

Sum insured

The element 'sum insured' is used in its regular form. However, many products provide for more than one sum. Some products do not provide for any sum but pursue a lump approach, e.g. by insuring the vitrification of a building as such. Where it comes to a home contents insurance the optional cover of jewellery may have a different sum insured than regular household items or audio equipment. These examples illustrate that flexibility is needed. It is proposed to add this information as a separate element, independent of the product, or, alternatively, linked to the specific cover.

Geographical scope

The IDD indicates that the element of 'geographical scope' only needs to be included if applicable. In the EIOPA format we found no indication that this element is optional.

Information about the type of insurance

Art. 20 (8a) of the IDD asks for information about the type of insurance placed in the IPID. Both the Dutch IPID and the Insurance Europe mock-up offer this information. This gives the consumer better insight into what the specific insurance product is about. The Dutch Association of Insurers would like to see this element added.

Optional addition of 'special feature' and 'please note'.

The Dutch IPID offers the insurer the option of including an additional element for a special feature of the cover.



	<p>This concerns an element of cover that other insurers do not offer but that is relevant information for the consumer. For a proper understanding of the notion of cover, it is important to allow room for the distinction between different types of insurance, so as not to create a situation that only the most common form of cover is taken out for lack of space on the document. This would be at the expense of the scope for comparison by the consumer.</p> <p>Another element that the Dutch Association of Insurers would like to see added is the element 'Please note'. At the request of consumer organisations, a category was included in the Dutch IPID for information regarding which consumers have the most questions or complaints.</p> <p>Both elements are of importance to the consumer. It enhances understanding of the product and contributes to comparability.</p> <p><u>Optional addition of 'deductible'</u></p> <p>The Dutch IPID includes an element showing the amount of the deductible. A factor in determining mandatory elements was that consumer surveys showed that elements such as this deductible are relevant information for consumers. The Dutch Association of Insurers argues in favour of flexibility in the format to allow for inclusion of an element like this at national level.</p> <ul style="list-style-type: none"><li>• <i>Optional or multi-risk cover</i></li></ul> <p>When determining the IPID, EIOPA considered the way in which multi-cover insurance is indicated in an IPID. EIOPA concludes that it is in the customer's interest to include the additional cover in the primary cover. The Dutch Association of Insurers supports this. When developing the Dutch IPID various multi-cover products were discussed. It is important, however, to define multi-cover in clear terms. Otherwise the IPID runs the risk of being misleading, which is against the IDD requirement (I20.7 (e)).</p>	
--	---	--



	<p>Multiple scenarios are conceivable in this respect:</p> <ol style="list-style-type: none"><li>1) In the event of a multi-cover product the consumer usually has the option of choosing their own cover. It is important to clearly indicate that they have a choice. This is for instance the case with pleasure craft insurance where a consumer has to decide whether or not they want to have cover for theft or full cover in addition to the 'normal' cover of liability. The same applies to legal expenses where the customer can choose between multi-risk cover on work, traffic or home. This information does not fit under the item 'main risk covered'. The Dutch Association of Insurers argues in favour of including the additional or optional cover as separate elements to make it clearer for the consumer.</li><li>2) It should also be possible in the event of additional cover, for instance the combination of travel insurance and cancellation insurance, to only include a reference to the cancellation insurance in the IPID of the travel insurance. This also applies to the situation of comprehensive insurance, where home contents insurance and household policy are sold as a single product while, in actual fact, they are two equivalent products. Integration into the document would be at the expense of its legibility and the obligation of supplying a concise document. Mutual cross-referencing would in this case provide a better understanding of the cover.</li></ol> <ul style="list-style-type: none"><li>• <i>Combining contractual information</i></li></ul> <p>Considering that the IPID has to provide customers the necessary information on the insurance product while being limited in length at the same time, we suggest combining the following sections under one heading. This would ensure a more efficient use of space, while respecting the IDD requirements. According to Article 20 (8) of IDD, there is no requirement for using separate headings for the information that needs to be included in the IPID.</p> <p>Therefore, we propose the following:</p> <ol style="list-style-type: none"><li>1) Art. 7 on page 21 of the consultation paper states that the information indicated in articles 20.8 (e) and 20.8 (f) of the IDD needs to be included under the heading</li></ol>	
--	--	--



'main obligations'. The information on the obligations in case of a claim (art. 20.8 (g) IDD) however, should, according to the consultation paper, be presented in a separate section called 'obligations in case of a claim'. This section is not included in the proposed format on page 24 of the consultation paper. A better alternative would be to present the information on obligations at the start of the contract, during the term of the contract and in the event that a claim is made (art. 20.8 (e-g) IDD) in one single section. This section could have the following heading: 'What are your obligations?' (see: [Annex 2 Dutch mock-up Home Contents Insurance & Annex 3 Dutch mock-up car insurance](#)).

- 2) For the same reasons as stated in the previous comment, we call on EIOPA to merge the sections 'duration of the contract' and 'termination of the contract' into a single section. This section could have the following heading: 'When does the contract start and end?'

- *Company logo*

There should be room for the insurer's logo above the blue box at the top of the IPID next to the title 'Insurance Product Information Document'. See the example of the Dutch IPID or the Insurance Europe mock-up. As costumers are familiar with the logos and company colours it would help them to see at first glance who supplied the product.

The Dutch Association of Insurers would also prefer including the logo rather than just the insurer's name. The logo is placed above the blue box and is large enough to be legible and almost always contains the insurer's name. Consumers have a better association with the insurer's name when they recognise a logo than just seeing a name alone.

Moreover, the blue box not only shows the generic product name but also the insurer's specific product name (see for example the following legal assistance assurance: <https://verzekeringskaarten.nl/arag/ProRechtPolis> or [Annex 6 examples IPID Dutch](#)



*market, example 2).*

Both names (in this case the specific product name 'ARAG ProRechtPolis Particulier' and the generic name 'Rechtsbijstandverzekering') are relevant enough to be included and are often key elements of product marketing by insurers, for which the IDD offers sufficient scope. The generic name is important for the sake of comparing products. The insurer's specific product name is important for recognisability of the product in relation to the policy conditions.

According to art. 3 on page 21 of the consultation paper, the company name that has to be provided at the top of the document has to be the manufacturer of the product. However, in situations where a company Y offers a product to costumers that is in fact manufactured by company X, this should be mentioned in the IPID.

Unique in the Netherlands is that there is an authorisation channel that may collate or sell insurance policies. In both cases the authorised party must be stated on the IPID rather than the underlying insurer. Company Y is the consumer's contact.

- *Headings in the document*

Like Insurance Europe, the Dutch Association of Insurers suggests that rather than using technical headings as titles for each section, questions should be used instead as they increase readability and understanding for consumers. For instance, 'What is insured?' instead of 'Main risks covered'. Another example would be 'How and when to pay?' instead of 'Payment'.

- *Columns*

The Dutch Association of Insurers supports the format based on two columns. However, where the EIOPA format is developed from a paper-based point of view, the



Dutch Association is looking from a digital perspective. To allow the online application of the two-column version, EIOPA is asked to take a flexible attitude towards format order. See also question 3a.

- *Version management*

Finally, there should be space at the bottom of the format to insert the date on which the IPID was developed by the manufacturer. The IPIDs need to be kept up to date, resulting in different versions of the document in a manufacturer's archives.

***Conclusions and recommendations***

The Dutch Association of Insurers has concerns about the present format. The EIOPA format offers insufficient scope for flexibility, innovation, digital use and corporate identity as would benefit the customer. The Dutch Association of Insurers argues in favour of flexibility within fixed limitations so as not to detract from the recognisability of a European document.

Looking at the current EIOPA IPID, the Dutch Association of Insurers therefore proposed in this section alternative ways of presenting the information in the document in order to get a better understanding of the product and facilitate product comparability for consumers between companies.



Question 2(a)	<p><b>Do you agree that visual aids such as icons and symbols used to distinguish different information requirements in the IPID should be highly standardised at a European level?</b></p> <p><b><i>Icons create added value for understanding and comparability of the IPID</i></b> Given the experience in the Dutch market we highly support the use of icons and symbols on the IPID. Based on our consumer research we have found that the use of icons provides structure and improves the process of comparability and understanding. The icons used in the Dutch IPIDs have clear added value. The icons present the main information about the insurance product most clearly. By using the same icons in combination with short text blocks, the standardised information of insurance products of various insurers can be compared in a simple(r) manner.</p> <p>Based on its experience with the Dutch IPID, the Dutch Association of Insurers does have its doubts about a number of the icons currently included in the EIOPA IPID. We are also concerned about the proposed use of colours for the icons and the scope that remains for corporate identity.</p> <p>For the Dutch IPID, the Dutch Association of Insurers has a wide range of icons at its disposal. The Dutch Association of Insurers is open to a dialogue with EIOPA or interested member states for adoption of its set of icons.</p> <p>The question raised is whether the Dutch market agrees with standardising the icons at European level. The Dutch Association of Insurers has no objections to using icons standardised at European level based on the information prescribed by the IDD. Given the desired content flexibility within the format as requested by the Dutch Association of Insurers, there should be room for additional icons adopted at national level. This concerns for instance icons for additional elements (see further question 2b).</p>	
---------------	--	--





Most important is that a consumer understands what is meant by the icon used in combination with a text block within a member state.  
The Dutch Association therefore urges flexibility when needed and determining the set of icons at national level.

***Alternatives to some of the icons***

The Dutch Association of Insurers champions the use of icons in the IPID. For the sake of recognisability of the IPID, EIOPA should only describe the form of the icons that are part of the mandatory IDD elements, as already done in the consultation paper. The Dutch Association of Insurers raises objections to the following icons in the EIOPA format and has considered alternative ways of presenting the specific icon.

- Icon for 'main risks covered'; the icon of an umbrella has different connotations for the consumer and the insurer. It reminds the average consumer of rain, holidays, or even travel insurance. We therefore argue in favour of a uniform check mark as included in the Dutch IPID or de Insurance Europe mock-up:



- Icon for 'duration of the contract'; the icon of an hour glass is not sufficiently clear. We prefer an alternative in the form of a picture of the contract (Dutch IPID) or a calendar (Insurance Europe mock-up).



- Icon for 'main obligations'; an icon of two shaking hands does not necessarily represent the obligations involved. The Dutch Association of Insurers prefers the icons used in the Dutch IPID or the Insurance Europe mock-up.



- Icon for 'geographical scope': The Dutch Association of Insurers feels that the icon of a flag for geographical scope could be misleading. Besides the fact that this element should only be required when applicable, within the Dutch market we use two different icons for geographical scope. For a non-life product with a national geographical scope we show an icon with the map of the Netherlands. For cover for



Europe or worldwide, we use the symbol of a globe. In this way the icon supports the text element best.



***Use of colours of icons***

Although consumers mostly orient themselves online, the IDD indicates that the IPID must be able to be printed in black and white. We are convinced that when printed, most consumers will prefer to print in black and white because colour prints are more expensive than monochrome prints.

The Dutch Association of Insurers strongly argues against including icons in separate colours. Not only does this detract from the legibility of the IPID, it also decreases legibility of the icons when the IPID is printed in black and white. Given this fact, preference is to work with only two colours, a main colour and a spot colour. Icons can then be included in white (spot colour) against the main colour. For the main colour the corporate colour of the insurer can be used.

***Corporate identity and use of icons***

Colour use will not detract from comparability and recognisability as long as room for flexibility in terms of corporate identity is defined at European or national level. Consumer research performed by the Dutch Association of Insurers has shown that consumers appreciate the design of the Dutch IPID. Consumers noticed that the



	<p>insurers have designed their IPID in the colours of their own company style. Responses were generally positive. The colours of the insurers help to identify the various IPIDs (in combination with the name and logo of the insurer) and to distinguish them.</p> <p>The different colour schemes are especially convenient when the various documents are put side by side in order to compare them: <i>'Otherwise you keep comparing similar pages with nothing but text and then you tend to forget which IPID belongs to which insurer.'</i> (See <i>Motivaction consumer research, Annex 4 Z7751 Dutch Association of Insurers – IPID, 21-10-2016</i>)</p> <p>If EIOPA complies with insurers' need to design the IPID such that corporate identity is reflected in the IPID, the Dutch Association of Insurers advises EIOPA to consider Dutch examples of the IPIDs. (See <i>Annex 6 Examples IPID Dutch market examples 3 and 4</i> or <a href="https://verzekeringskaarten.nl/cards/zlm-verzekeringen/Autoverzekering-allrisk.html">https://verzekeringskaarten.nl/cards/zlm-verzekeringen/Autoverzekering-allrisk.html</a> and <a href="https://verzekeringskaarten.nl/generali/AutoverzekeringAllrisk.">https://verzekeringskaarten.nl/generali/AutoverzekeringAllrisk.</a>)</p> <p><b>Design of icons for paper, digital and online</b></p> <p>The Dutch Association of Insurers has no objections to using icons standardised at European level based on the information prescribed by the IDD. Given the desired content flexibility within the format as requested by the Dutch Association of Insurers, there should be room for additional icons adopted at national level. Icons should at all times be suitable for paper, digital and online use.</p> <p>As such, we prefer that EIOPA limit itself by describing the icon belonging to the information prescribed by the IDD, possibly including an example, but leaving the actual design to the member states.</p> <p><b>Conclusion and recommendations</b></p> <p>Given the experience in the Dutch market we highly support the use of icons and</p>	
--	---	--



	<p>symbols on the IPID. The Dutch Association of Insurers does not object to defining the icons for the IDD elements at European level. The flexibility in the format at national level as supported by the Dutch Association of Insurers should offer enough space for additional icons that can best be defined at national level. EIOPA should furthermore have to limit itself to describing the icon, possibly including an example, with the actual design being made by the member states.</p> <p>The Dutch Association of Insurers argues in favour of the use of no more than two colours in the IPID to enhance legibility of the IPID. Finally, the Dutch Association of Insurers is in favour of sufficient flexibility in the IDD to meet the requirement of a recognisable corporate identity.</p>	
Question 2(b)	<p><b>Are there any circumstances in which it is necessary to allow for differences in any such icons between Member States? If so, please explain the circumstances.</b></p> <p>Icons support the information in the IPID. This information should contribute to a better understanding by consumers of the insurance product and the corresponding comparability. The Dutch Association of Insurers recognises developments in the Dutch insurance industry toward the incorporation of the icons from the Dutch IPID into policy conditions and other product information.</p> <p>The set of icons that was developed on behalf of the Dutch Association of Insurers was considered in both the consumer research and the survey among insurers. As a result, the Dutch Association of Insurers knows it has a broad support base for the set of icons used by the Dutch IPID. The Dutch Association of Insurers is open to a dialogue with EIOPA or interested member states about adoption of its set of icons.</p> <p><i>Option for additional icons</i></p> <p>As already indicated under question 1, the Dutch Association of Insurers is in favour of</p>	



	<p>setting up the IPID as a minimum standard, leaving room for the national legislator/regulatory authority to set additional requirements for the content of the document. This would also create scope for countries that have already implemented further innovations in terms of consumer empowerment.</p> <p>The EIOPA format should leave room for additional elements, which includes additional icons.</p> <p>The Dutch Association of Insurers would like to note that, with a view to recognisability and comparability of the IPID, the set of icons and any permitted additions can only be adopted at national level. This is not the case in the Netherlands, where a central web-based application is used.</p> <p>We must prevent a situation in which individual suppliers use different icons, as this would detract from comparability.</p> <p><b><i>Icon content only to be determined at European or national level with room for corporate identity</i></b></p> <p>As indicated above, the set of icons is to be described at European level and, if flexibility allows, additional icons at national level. We must prevent a situation in which each insurer uses its own set of icons, as this would detract from recognisability of the IPID.</p> <p>Experience with the Dutch IPID has shown that several insurers already use their own sets of icons. In those cases, the Dutch Association of Insurers has allowed the use of such sets of icons, as long as the insurer complies with the rules for icon description. This does not detract from comparability. Insurers have also asked whether it would be possible to introduce icons against a round or square background. We have introduced this and this does not detract from comparability but does enhance the insurers' options for using an IPID and offering it to consumers.</p> <p><i>(see: <a href="#">Annex 6 examples IPID Dutch market, examples 5 and 6</a> or <a href="https://verzekeringskaarten.nl/cards/aegon/Autoverzekering-Allrisk-Compleet.html">https://verzekeringskaarten.nl/cards/aegon/Autoverzekering-Allrisk-Compleet.html</a>)</i></p>	
--	--	--



<https://verzekeringskaarten.nl/cards/generali/Personenauto-autoplus.html>

**Conclusion and recommendations**

Based on the Dutch IPID, as already indicated for questions 1 and 2, the Dutch Association of Insurers argues in favour of flexibility in terms of format, offering scope for additional elements that would further enhance the comparability and understanding of the IPID. This flexibility would also allow the definition of additional icons at national level.



**Are there any circumstances in which it will not be possible to include the information required under the IPID on two sides of an A4 page?**

***A concise IPID should be the starting point***

The Dutch Association supports an IPID that is as concise and compact as possible. Consumers should be able to see at a glance what is and what is not covered as part of a product. A document of no more than two A4 pages would, therefore, be preferable. The Dutch IPID is also limited to two A4 pages. Yet there are a number of complicating factors that oppose limiting the printed document to two A4 pages or defining it as two A4 pages. The Dutch Association of Insurers requests EIOPA to leave room for exceptions in the proposed obligation included in art. 9 of the draft ITS. The Association argues in favour of setting a guideline of two A4 pages rather than imposing a hard-and-fast limit for the actual length of the document.

***Nature of the product requires more or less text***

Depending on the nature of the product, more or less space is needed. For 'simple' non-life products, such as cancellation insurance, third-party insurance for motor vehicle or moped insurance, it is certainly possible to stay within the limit of two A4 pages. (see for instance **Annex 6 examples IPID Dutch market, example 7** or <https://verzekeringskaarten.nl/cards/zlm-verzekeringen/Autoverzekering-WA.html>)

As the product comprises more multi-risk cover or modules, it becomes more difficult to remain within the required two A4 pages. Multi-risk products often encompass both standard and optional covers, such as legal aid. It may differ for each individual insurer whether the insurance is built up as multi-risk or modular (optional cover). For both products, the use of layered information would also make it difficult to remain within the required two A4 pages. (see **Annex 6 examples IPID Dutch market, examples 8 and 9** or <https://verzekeringskaarten.nl/cards/das/DAS-voor-Particulieren.html> and <https://verzekeringskaarten.nl/arag/Flexpolis>)

Question 3(a)





If it is not possible to use clearly recognisable blocks for optional cover within the EIOPA format, insurers will need more text to make this information clear. As such information is crucial for a customer's decision-making and understanding of the product, it should be clearly presented in the IPID. Otherwise the IPID runs the risk of being misleading, which is against the IDD requirement (IDD, art. 20.7 (e)).

***Online application cannot be defined in number of pages***

The Dutch situation assumes an online web-based document. Given the fact that consumers tend to go online to find information and compare products, the Dutch Association of Insurers has opted to make the IPID responsive and, as such, accessible from all kinds of devices (laptop, tablet, smartphone). Online applications cannot really be defined in number of pages. There are no hard page breaks and so it is not possible to speak of two A4 pages. The ITS should, therefore, take online application into account.

***Layered information may result in longer printed documents***

For online application we use the option of layered information. For relevant elements, the insurer places an ⓘ behind the text in the element. When the consumer clicks on this ⓘ, they will see a pull-down menu with additional, layered information. A qualitative consumer survey performed in 2012 showed that consumers prefer finding information on products using a reverse funnel model. Consumer first perform an outline search (limited orientation) and only look for additional information if and when required. It is often not until there is actual damage that they will read the policy conditions. The recent consumer survey that was performed by Motivaction confirms the desirability of layered information. 'In this way, the information in the IPID remains concise and well structured.'

At the same time, we try to limit the number of elements containing additional text. Too much layered information could be inconsistent with the IPID's objective of showing information at a glance.



	<p>However, insurers sometimes have no choice but to explain terms in more detail to ensure that the text is not misleading, or to give an example, or clarify information. This is where the layered information comes in.</p> <p>Consumers can print out the layered information, but, depending on the number of elements for which the insurer wants to include additional information, this means that the printed document will be longer.</p> <p><b><i>Two-column document creates more compact document</i></b></p> <p>The Association endorses the results of the consumer survey performed on behalf of EIOPA in which consumers prefer a two-column document. In the Dutch IPID the Association also uses a two-column document, which is easy for consumers to understand.</p> <p>When insurers will be detailing the current format with information on what is and what is not covered, the EIOPA format may result in an asymmetric and unbalanced document, depending on the product involved, with one column showing more white space than the other.</p> <p>This is one of the reasons why the Association argues against a strict policy regarding the order in a document, so that white sections can be avoided when a paper version is taken as the basis. This, too, will impact the length of the document.</p> <p>The Dutch IPID was built from a web-based environment and is responsive. This means that the design adjusts to the device on which it is used (e.g. tablet or smartphone).</p> <p>The laptop and print version currently use a two-column overview, resulting in a compact document that consumers can see at a glance. However, when a one-column document is opted for, this is likely to result in a longer document.</p>	
--	--	--



**Insurance product information document**

**VERBOND VAN VERZEKERAARS**

### Home contents insurance

What is and what is not covered by this home contents insurance policy?

This Insurance Product Information Document is only intended to provide a summary of the main coverage and exclusions, and is not personalised to your specific individual needs in any way. Please the complete terms and conditions of the policy.

<b>What is home contents insurance?</b> <p>This insurance policy provides coverage against damage to the contents of your home. The policy covers damage caused by fire, theft, precipitation, storms and leaks. ⓘ</p> <p><b>Explanation</b> -&gt;Variations per insurer are possible-&gt;</p>	<b>What is insured?</b> <p>Your household items and personal belongings such as furniture, electrical items, clothes, money, jewellery and (audio) equipment are insured. Items outside of the home may be insured additionally.</p>
<b>Jewellery</b> <p>Insured up to a maximum of € 25,000. A maximum of € 10,000 applies in the case of theft. ⓘ</p> <p><b>Explanation</b> -&gt;Packages may vary by region-&gt;</p>	<b>(Audio) equipment</b> <p>We will reimburse the daily value of your equipment. Is your property less than 1 year old? If so, you will receive the replacement value up to a maximum of € 1,000.</p>
<b>Optional: items outside of the home</b> <p>We will reimburse the daily value of your property outside your home up to a maximum of € 20,000. This policy covers plants, garden furniture and fences.</p>	<b>What is not insured?</b> <p>Your property outside your home is not insured. You have the option of insuring this property additionally. We will not reimburse you in the case of earthquakes, floods, wear or faulty construction.</p>
<b>Not insured: falling and bumping</b> <p>Damage to your household contents caused by falling or bumping is not insured. ⓘ</p> <p><b>Explanation</b> For example, a cabinet falls over and gets damaged. Or a cell phone in your pocket which breaks down because you punch it against the corner of a table.</p>	<b>Please note</b> <p>Most common question, complaint or misunderstanding.</p>

<b>Extra: special feature</b> <p>Text on the special feature.</p>	<b>Sum insured</b> <p>We will reimburse a maximum of € 125,000. We will reimburse the daily value of your property. Is your property less than 1 year old? If so, you will receive the replacement value. ⓘ</p> <p><b>Explanation</b> -&gt;Your insurer determines what you get back. Expenses will be deducted-&gt;</p>
<b>Deductible</b> <p>€ 250 per incident.</p>	<b>When does the cover start and end?</b> <p>The insurance will take effect on the date specified in the policy. After the first year, you can cancel your insurance at any time.</p>
<b>How and when to pay?</b> <p>You can pay your premium as a one-off payment, annually or in monthly instalments. Payment can be made by bank transfer, direct debit or debit/credit card.</p>	<b>What are your obligations?</b> <p>You must provide us with honest, accurate and complete information, and inform us without delay of any changes in your situation. In the event of a claim, you must notify us as soon as possible and within 72 hours.</p>

More information: [www.verbondvanverzekeraars.nl](http://www.verbondvanverzekeraars.nl) Version 1, 07-09-2016 © Verbond van Verzekeraars

### Option to limit information

Within the Dutch IPID we have limited the amount of text manufacturers are able to include in the different elements. This is advisable only when there is flexibility in the format at product level, so that elements of the cover are all in different blocks. That way, information will remain visible at a glance for consumers, while the amount of information included by an insurer will remain manageable.

### Conclusion and recommendations

The Dutch Association supports an IPID that is as concise and compact as possible. Consumers should be able to see at a glance what is and what is not covered within a product. A two-column, two A4-page document would, therefore, be advisable. The



	<p>Dutch Association of Insurers requests EIOPA to leave room for exceptions in the proposed obligation included in Art. 9 of the draft ITS.</p>	
Question 3(b)	<p><b>Do you foresee any difficulties with prescribing a font type and font size?</b></p> <p>Prescribing a font will fail when it comes to the question whether it serves the purpose of the IPID. The content of the IPID is much more important than a fixed font. The Dutch Association of Insurers would rather that EIOPA confine itself to recommending a clearly legible font and font size.</p> <p>For the Dutch IPID, insurers are given the choice between three preference fonts as a default (Arial, Verdana and Helvetica). These are platform-independent fonts, accessible at any medium. Insurers choose the font that best matches their corporate identity. The manufacturer should be able to use their own corporate identity, so that as a consequence the consumer understands the interrelationship between the IPID and the policy documents of the specific insurer.</p> <p>Also when comparing, it will be clear for the consumer that a certain IPID belongs to one manufacturer and another IPID belongs to another manufacturer. Font does not impact the comparability of the different IPIDs and the recognisability of an IPID.</p> <p>The EIOPA format indicates a font size between 9.8 and 12. The font size should not be too small. Given the limited number of pages, insurers may tend to include information in a small font size. For the sake of transparency, font size 13 was selected for the Dutch IPID.</p> <p><b>Conclusions and recommendations</b></p> <p>The Dutch market therefore does not support a standard font type and font size as proposed by EIOPA. We would like to see a more flexible approach that is also available on all platforms and optimised for online use.</p>	



Question 4(a)	<p><b>What challenges do you think a manufacturer would face, and how would these be overcome, in adapting the IPID to be compatible with provision via digital media such as websites, tablets or smartphones, including with preserving the fundamental aspects of the standardised presentation format?</b></p> <p>The question that is actually asked in the consultation paper is how difficult it is to provide a PDF digitally or online. The option of providing the IPID in PDF or other format should fit the context in which the service provider or insurance distributor engages with the customer. The Dutch Association of Insurers does not support making the IPID available online in PDF based on a paper format. Eurostat data shows that 63% of European consumers go online to find information and compare goods and services. This percentage will only increase over time. Percentages in the Netherlands and Scandinavian countries are much higher still. For the Dutch Association of Insurers, this information confirms that the EIOPA format must be medium-independent. The format must be described such that it can be used on any medium without limitation of current ICT standards.</p> <p><b><i>IPID format must be medium-independent</i></b></p> <p>Art. 23 IDD mentions the fact that the IPID may be provided via any other durable medium or via a website. Provision via any other durable medium or via a website is permitted as long as provision of that information fits within the context within which the insurance distributor engages with the customer.</p> <p>We cannot readily deduce from Art. 23 IDD that that information is to be provided on</p>	



	<p>paper unless the customer has opted for provision of information in any way other than via any other durable medium or via a website. Under Art. 23 IDD, customers may freely choose their own medium.</p> <p>It should be up to the member states to decide on the approach, in a way that some (more innovative) member states are able to develop a central online web-based application and others are able to choose a PDF file or email attachment.</p> <p>The Dutch Association of Insurers recommends that the format drafted by EIOPA not only take provision of the IPID on paper or as an email attachment into account, but that the format be based on responsive web design for accessibility via a website. It is important in this respect that the layout of the format take into account European and national web guidelines for open and accessible content provision to avoid conflicting legislation.</p> <p>Given the fact that the IT world is developing much faster than insurance regulations, the Dutch Association of Insurers would like to see a flexible format for presenting the IPID to the consumer instead of having a fixed IT standard in the IDD regulations. It should be sufficient to prescribe the icons and the order of the information provided, but the decision about the colours used, font size, text format (bullet points or text), responsive web design or PDF should be left to the insurers. The standard for an EIOPA IPID should therefore be limited to providing a framework.</p> <p><b><i>Dutch IPID: central web-based application broadest support among insurers</i></b></p> <p>Internet density is high in the Netherlands. 87% of Dutch consumers go online to find information and compare products and services. The majority of Dutch consumers also use comparison sites. That gave development of the Dutch IPID a digital starting point.</p>	
--	---	--



	<p>Development of the Dutch IPID focused on the following starting points:</p> <ol style="list-style-type: none"><li>1) The IPIDs have a uniform standard that is recognisable to consumers and insurers alike.</li><li>2) The IPIDs must increase understanding and comparability of a product and further develop the Product Guides.</li><li>3) The IPIDs must be mutually comparable at product level and offer information on pre-defined elements.</li><li>4) Information on the IPID must be clear, understandable and findable in accordance with the Beleidsregel Informatieverstrekking of the AFM (policy on information provision of the Dutch Financial Markets Authority).</li><li>5) Customers will have to be using the IPIDs.</li><li>6) Insurers must support the IPIDs (support base for objective and means, sufficient recognisability of insurer, low administrative costs for individual insurer)</li><li>7) The IPIDs must be easily modifiable to adapt to changed policy conditions or new legislation.</li><li>8) The IPIDs must have a version number that is recognisable to the consumer, with user-friendly version management for the insurer.</li></ol> <p>To meet these basic principles, a central database solution was opted for, with log-in codes for the contacts of each insurer, and security. As part of the central application, all insurers can fill in the standard format for each product.</p> <p>The format is web-based and responsive, so that it can be used on smartphones, tablets, laptops and paper while still being recognisable.</p> <p>The Dutch IPIDs are drafted in the dedicated digital application and opened up via this application on the insurer's website by means of a URL. Rather than seeing a link, consumers find the same button on all insurer websites.</p>	
--	--	--



*(View the Dutch Insurance Product Information Document)*

By referring to a database via a URL, findability of the IPID remains the same for consumers at all times, while it is still possible to update content.

Insurers can manage the content of the IPIDs by means of a user-friendly CMS that is the same for all insurers.

***Preference for responsive web-design over linking to PDF***

EIOPA suggests that a PDF format suffices for the digital use of the IPID. This has unfortunately already been overtaken by time. On page 29/35 of the consultation paper, they voice the expectation that linking to a PDF in a web-based application would be the cheapest solution. The Association would like to point out that a responsive web design is more customer-friendly and not necessarily more expensive if a single central web-based application is used. A responsive website generally attracts more consumers who stay longer, consume more content, become converts more often and return more often. For Dutch insurers, the application comes with low costs and a low administrative burden. Just a single application needs to be managed.

In contrast to responsive web design, an IPID in PDF format does not adjust to the device. The Dutch IPID based on responsive web design adapts to the device on which it is being viewed (e.g. tablet or smartphone). The laptop format is based on a two-column overview, the smartphone format on a one-column overview containing all the information. For tablets, consumers can choose between a two-column IPID and a





	<p>one-column IPID by simply rotating their screen. Responsive web design is more customer-friendly than PDF, particularly on smaller devices.</p> <p>Files in PDF format also prove to be difficult to read on a computer screen. PDF files are laid out in standard A4 or A3 format pages, which are great for printing, but most computer screens fall somewhere between a 4:3 and 16:9 aspect ratio, which means you spend a lot of time scrolling through the pages when viewing them on the screen. An even greater problem is the PDF version. When policy conditions change, the IPID must be changed. How do you guarantee that the correct PDF is used? The EIOPA format should be flexible so as to transform the EIOPA IPID into responsive web design and thus allow a small number of differences in the standardised template.</p> <p><b>Conclusions and recommendations</b></p> <p>Eurostat data shows that 63% of European consumers go online to find information and compare goods and services. This percentage will only increase over time. Percentages in the Netherlands and Scandinavian countries are much higher still. For the Dutch Association of Insurers, this information confirms that the EIOPA format must be medium-independent. The Dutch Association of Insurers does not support the fact that the format was drafted on the basis of paper to be made available online based on a paper format. The format must be described such that it can be used on any medium without limitation of current ICT standards.</p>	
--	---	--



Question 4(b)	<p><b>What benefits do you see for the manufacturer in making the IPID compatible with provision via digital media?</b></p> <p>The Dutch Association of Insurers considers that the digital IPID would have mainly beneficial outcomes for customers. In most of the markets, customers operate on digital platforms, demanding digital interaction with their providers and access to all available information online. In addition, provision of the IPID also has benefits for the insurer, but, as the IPID is intended for the consumer, this is of secondary importance.</p> <p>Internet density is high in the Netherlands. 87% of Dutch consumers go online to find information and compare products and services. The majority of Dutch consumers also use comparison sites. In digital IPID, consumers should be able to click on links that will take them to the insurance companies' website and provide them with additional information about the product.</p> <p>Similarly, as part of a layered approach, clicking on an information symbol (ⓘ) could provide supplementary information for those who are interested in finding out more about the product than the information that is on the IPID. These options are not possible in a PDF file. This layered information is visible by way of a pull-down menu instead of a pop-up (which will be blocked most of the time on the consumer's device). The layered information can also be printed.</p> <p>The main benefits for insurers will be that the customer can be addressed by a single medium and that the insurers fulfil the customers' wish of being provided with the digital document of the insurance cover. Furthermore, customers' acceptance of digital documents may be fostered and thus lead to the strengthening of the digital business.</p> <p>It is crucial therefore to ensure that the IPID is workable both on paper, as a digital document and online to ensure that it remains future-proof in light of the increasing</p>	
---------------	--	--



	<p>digital trend in financial services and to cater to all consumers' needs. The Dutch Association of Insurers believes that the format proposed by EIOPA needs further improvements so as to better suit the ever-changing digital environment.</p>	
Question 5	<p><b>What do you consider to be the main cost drivers for the standardised presentation format (not including the efforts associated with the collection, identification and assimilation of the information itself) and at what point will they occur?</b></p> <p>The costs of implementing the IPID with the suggested template depend highly on the system used and on the amount of flexibility when it comes to length, fonts, colours, outline of information, etc. The Dutch Association of Insurers considered having each insurer draft their own IPID, weighing that against having the Association manage the IPID centrally. In addition to the arguments set forth under questions 4a and 4b, this also took into account the cost aspect of the ICT systems for individual insurers and the aspect of the administrative burden. The primary starting point for the choice of system was that it had to meet consumers' needs.</p> <p>Costs involved:</p> <ol style="list-style-type: none"><li>1) Making product information documents:<ul style="list-style-type: none"><li>• Designing an IPID costs € 1,500 per document (including text editing).</li><li>• Working group, consisting of about eight to 10 employees from different insurance companies: eight to 10 hours per person =&gt; 64 - 100 hours total per document</li><li>• Dutch Association of Insurers; about 25 hours per document</li></ul></li><li>2) Centralised web tool<ul style="list-style-type: none"><li>• Helpdesk: € 17,000 (a year)</li></ul></li></ol>	



	<ul style="list-style-type: none"><li>• Service Level Agreement: between € 13,500 and € 33,200 a year (depending on the level of service and response)</li><li>• Maintenance/releases: € 7,300 (a year)</li></ul> <p>3) Development of the tool (technical)</p> <ul style="list-style-type: none"><li>• € 50,000 (once only)</li><li>• Security testing € 6,000 (once only)</li></ul> <p>4) Consumer research</p> <ul style="list-style-type: none"><li>• 1st survey (2015): € 14,700</li><li>• 2nd survey (2016): € 34,000</li></ul> <p>So far, the costs of the Dutch IPID have been paid from membership fees of the Dutch Association of Insurers.</p>	
Question 6	<p><b>Do you agree with EIOPA's approach to focus primarily on consumers (i.e. retail customers) in developing the IPID?</b></p> <p>The Dutch Association of Insurers has no objections to focusing primarily on retail consumers.</p>	

24 oktober 2016

