

**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:	<b>FNMF</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, in Word Format, 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>		

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<b>Reference</b>	<b>Comment</b>	
General Comment	<p>Concerning the french market, we want to highlight the numerous regulations existing yet on national level and specifying pre-contractual and contractual informations for policy holders. It's particularly the case for the health insurance.</p> <p>As mentioned before in our answer to the consultation paper about POG, we want to emphasize that the implementation of IDD would be burdensome in terms of process, procedures, organisation and of course costs. This implementation has been estimated in France by Sia Partners at 365 M€. This cost is adding to the many regulation costs : Solvency 2 in top position, Laundering regulation, FATCA, specific French national regulations. The cost of regulation tends to be no more sustainable.</p> <p>Finally, we regret that the consumers study has not been carried out in France, one of the most important european insurance market.</p>	
Question 1	<p><b>What barriers, if any, do you see to utilising a <u>single</u> 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 approach consisting in having a standardised format for all non-life insurance products, with sufficient flexibility to take into account the differences in terms of non-life insurance products, is interesting. The document has to be brief with only key informations to avoid confusion.</p>	

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Nevertheless, if we don't see real barriers, we want to draw your attention to the following points:

- The fact that the IPID is not a contractual or a pre contractual document has to be clearly indicated in the document. IPID has to be just a summary of the main coverage and exclusions of the insurance product.
- Some insurance policies include access to services : Those services have to be specified in the document.
- IPID can be difficult to implement for insurance products including many options. Do we need a document for each options ?
- It's not clear whether a notice is to be fulfilled for each specific benefit forming the insurance contract and the information level required (in health insurance for instance) or globally. For mutual societies , which provide their members with a table of benefits (this is compulsory ) , it's not clear how this obligation will combine with the upcoming IPID
- The insurers have to be allowed to adapt the standardized document in using their corporate identity (logo, police style ...).

Question 2(a)

**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?**

We agree that the use of icons is helpful for consumers to understand easily relevant informations. Nevertheless, this approach has to be flexible.

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	<p>We would like draw your attention to the following points:</p> <ul style="list-style-type: none"> <li>➤ We think that it's important to be allowed to personalize some icons : the flag of the country for geographical coverage (when it's not a global guarantee) for exemple.</li> <li>➤ The insurers would have to choose their own colours, font type, size and text format. They may also have the possibility to add their logo.</li> <li>➤ The use of colours may be adapted to consumer representations. For example, orange and red refer to danger and interdictions ; so it doesn't seem to be adapted for "insured sums" (a positive colour like green would be more suitable).</li> </ul>	
Question 2(b)	<p><b>Are there any circumstances in which it is necessary to allow for differences in any such <u>icons</u> between member states? If so, please explain the circumstances.</b></p> <p>As mentioned above, the IPID has to be flexible in terms of icons using. According to us, the circumstances in which it's necessary to allow for differences in any such icons between member states are the following :</p> <ul style="list-style-type: none"> <li>➤ The currency</li> <li>➤ The Flag</li> </ul>	
Question 3(a)	<p><b>In what circumstances do you consider that it will not be possible to include the information required under the IPID on two sides of an A4 page?</b></p> <p>As mentioned above, the IPID has to be a short document with only key informations to avoid confusion for the consumers. It's not usefull to have many pages to the extent that the IPID is not a contractual or a pre contractual document. IPID has to be just a summary of the main coverage and exclusions of the insurance product.</p>	

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	<p>For those reasons, we think that a 2 pages (recto verso A4) document has to be the target.</p>	
<p>Question 3(b)</p>	<p><b>Do you foresee any difficulties with prescribing a <u>font</u> type and font size ?</b></p> <p>Yes. The insurers should have to be able to choose the font type and the size in accordance with their own policy. Of course, the font type and size choosed have to be readable. The ITS have just to precize that the document has to be readable, as it is yet regulated in France. Not considering that the recommended font may be not always available on all computers.</p>	
<p>Question 4(a)</p>	<p><b>What challenges do out think a manufacturer would <u>face</u> and how would these be <u>overcome</u>, 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 technical challenges are not easy to estimate. In some cases, for simple non life product, a "PDF" document can be the solution. But for many products including many options, a digital document is more difficult to implement, generating more costs. For that reason, we require flexibility for the insurers which should have the right to choose between a well developed digital solution and a pdf link.</p>	

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Question 4(b)

**What benefits do you see for the manufacturer in making the IPID compatible with the provision via digital media?**

If the use of digital increases and if digital improves interactivity between professionals and consumers, some policy holders are not comfortable with it. That's why, make the IPID compatible with the provision via digital media has to be an option ... only an option.

**What do you consider are the main cost drivers for the standardised presentation format (not including the efforts associated with the collection, identification and assimilation of the information itself) at what point will they occur?**

The main identified costs are the following :

- Costs to create the document,
- IT costs,
- Printing costs,
- Diffusion costs,
- Inventory costs,
- Formation costs (for commercials, for intermediaries),
- Explanation costs to consumers.

Of course, the costs will depend on the solution chosen and will vary from one actor to another.

As mentioned above, we want to repeat that the implementation of IDD would be burdensome in terms of process, procedures, organisation and of course costs. This

Question 5

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	<p>implementation has been estimated in France by Sia Partners at 365 M€. This cost is adding to the many regulation costs : Solvency 2 in top position, Laundering regulation, FATCA, specific French national regulations. The cost of regulation tends to be no more sustainable.</p>	
Question 6	<p><b>Do you agree with EIOPA approach to focus primarily on consumers (i.e. retail consumers) in developing the IPID?</b></p> <p>We agree with EIOPA approach's to focus primarily on consumers in developing the IPID.</p>	