

**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:	Federal Chamber of Labour, Prinz Eugenstrasse 20-22; Austria 1041 Vienna (www.arbeiterkammer.at)	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential. 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.	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ <u>Do not change the numbering</u> in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool ⇒ Leave the last column <u>empty</u>. ⇒ 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>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <p>Please send the completed template, in Word Format, to CP-16-007@eiopa.europa.eu.</p> <p>Our IT tool does not allow processing of any other formats.</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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Reference	Comment	
General Comment	<p>The Federal Chamber of Labour welcomes the IPID and the efforts to establish standards of readable and understandable pre-contractual information. There is a clear necessity to put the emphasis on precise standards. A survey of the Chamber of Labour has shown some shortcomings in pre-contractual information of insurance contracts (11 Member States): http://www.akeuropa.eu/_includes/mods/akeu/docs/main_report_en_327.pdf</p>	
Question 1	<p>Based on the experience of the financial services industry in Austria, insurance undertakings are supposedly not willing and prepared to use and hand out standardized information sheets. Some EU legislation on the banking industry (Consumer Credit Directive, Mortgage Credit Directive, key investor information document (KIID) on investment funds/UCITS) stipulates that standardized information sheets have to be provided to consumers <u>in time</u> and/or together with a contract <u>at the latest</u>. This gives providers the leeway to hand out standardized information sheet after the decision to buy has been made. Therefore, banks tend to use primarily their own information sheets and advertising materials. Mandatory standardized information sheets are often handed out at the end of the sales pitch. The following steps must be taken as part of the implementation of the insurance product information document (IPID) in the insurance industry:</p> <ul style="list-style-type: none"> • Advisers and all types of insurance intermediaries should be made aware that the product information sheet is also very useful to them. They should utilize it as a guideline for advice. • There should be a clear obligation to hand out the IPID in the standardized presentation format to consumers when written proposals are being presented. • Emphasis should be put on making sure the contents of the IPID are understandable and meaningful. A survey of the Chamber of Labour on the key investor information document (UCITS) has indicated some shortcomings in this regard: https://emedien.arbeiterkammer.at/viewer/fulltext/AC13311953/2/ Findings from that study showed that information should not be overly general but more to the point. 	

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Question 2(a)	There must be clear-cut definitions of the meanings of icons and symbols, and these definitions must be applied across all member states.	
Question 2(b)		
Question 3(a)	There may be some difficulties in cases involving home and household insurance and legal expenses insurance. Those tariffs include a lot of different coverage modules with very specific exclusions from coverage and varying sublimits of coverage. Bundled insurance contracts may be hard to present on two sides of an A4 sheet of paper. Analogous to the PRIIP regulation, we would propose a presentation on three sides of two A4 sheets, see Article 6 (4): http://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32014R1286&from=DE	
Question 3(b)		
Question 4(a)	The Federal Chamber of Labour has observed that it is often difficult for consumers to easily find terms and conditions on the website of an insurance undertaking.	
Question 4(b)	The IPID would be readily available to consumers and costs could be saved by digitally distributing information.	
Question 5	To make updates.	
Question 6	Yes	