



**eiopa**  
EUROPEAN INSURANCE

AND OCCUPATIONAL PENSIONS AUTHORITY

# IDD - Insurance Product Information Document (IPID)

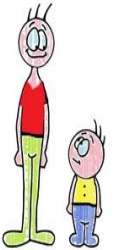
Presentation to ALEA Conference, Paris 30 March 2017  
Adrian O'Brien, Expert in Consumer Protection, EIOPA

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- Empowerment from IDD in Art. 20.9: EIOPA, after
- **consulting national authorities and after consumer testing,**
- shall develop draft **implementing technical standards (ITS)**
- regarding **a standardised presentation format** of the insurance product information document
- specifying the **details of the presentation** of the information referred to in Art. 20.8.
  
- EIOPA shall **submit** those draft implementing technical standards to the Commission **by 23 February 2017**

IDD Art. 20.7 contains additional IPID requirements:

- be **short and stand-alone**;
- **clear** and **easy to read**, using characters of a **readable size**;
- ....or in one of the **official languages**, used in the part of the Member State where the insurance product is offered or, if agreed ....;
- be **accurate and not misleading**;
- contain the **title 'insurance product information document'** at the top of the first page;
- include a **statement** that complete pre-contractual and contractual information on the product is provided in other documents.



IPID “standardised presentation format” seeks to help consumers to:

- o have the **relevant information** about the products they are buying
- o **easily compare** between different product offerings
- o make **informed decisions** on non-life insurance products

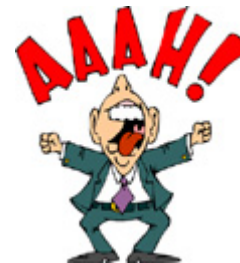


EIOPA's own strategic objectives: *"to assist consumers of insurance products with making informed choices based on their rights and obligations"*.

# What is IPID trying to fix?

What **issues** did we see in the insurance market?

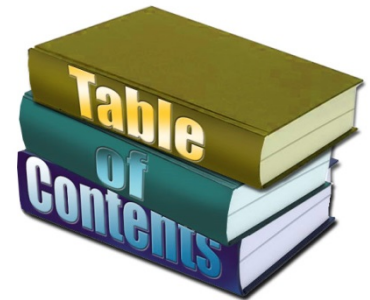
- Consumer **level of engagement** with disclosures
- Difficulty in **comparison** between products
- **Expectations v actual cover** e.g. policy exclusions
- Too much **focus on price**



# What did this mean for EIOPA?



- a **generic document** as opposed to an individualised document
- **One format** for all types of insurances
- **Emphasis** on certain aspects over others through format design
- The **content** was already **fixed**



- Procurement contract signed with London Economics for **design work** and **consumer testing**
- Two rounds of consumer testing in four countries (UK, RO, ES, DE)
- 1st round: qualitative testing of 5 designs in focus groups
- 2nd round: quantitative testing of 3 designs using online questionnaires
- Geographical, age, gender, financial literacy spread



- July – October 2016
- 41 Submissions received
  - 34 financial services industry sources
  - 4 consumer representative bodies
  - Insurance/reinsurance stakeholder group
- Comments very helpful
- Resulted in a number of improvements to IPID





# IPID template in draft ITS...

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## Xxxxx Insurance

### Insurance Product Information Document

Company: <Name> Insurance Company    Product: <Name> Policy

[Statement that complete pre-contractual and contractual information on the product is provided in other documents]

#### What is this type of insurance?

[Description of Insurance]

#### What is insured?

- ✓ Xxxxxx
- ✓ Xxxxxx
- ✓ Xxxxxx
- ✓ Xxxxxx
- ✓ Xxxxxx
- ✓ Xxxxxx
- ✓ Xxxxxx
- ✓ Xxxxxx
- ✓ Xxxxxx
- ✓ Xxxxxx
- ✓ Xxxxxx
- ✓ Xxxxxx

#### What is not insured?

- ✗ Xxxxxx
- ✗ Xxxxxx
- ✗ Xxxxxx
- ✗ Xxxxxx
- ✗ Xxxxxx

#### Are there any restrictions on cover?

- ! Xxxxxx
- ! Xxxxxx
- ! Xxxxxx
- ! Xxxxxx
- ! Xxxxxx

#### Where am I covered?

- ✓ Xxxxxx

#### What are my obligations?

- Xxxxxx
- Xxxxxx
- Xxxxxx
- Xxxxxx

#### When and how do I pay?

Xxxxxx

#### When does the cover start and end?

Xxxxxx

#### How do I cancel the contract?

Xxxxxx

- What does a short document mean?
- What does legible mean?
- How to accommodate digital versions of IPID?
- Engaging, simple language; Q&A format



- EIOPA submitted draft ITS to European Commission (COM) on 7 February 2017
- COM reviews draft ITS: may accept or reject the draft ITS (3 month deadline for completion by 7 May 2017)
- EP does **not** have scrutiny rights (unlike PRIIPs RTS)
- Final ITS publication in the Official Journal could be as early as May??
- IDD Transposition Deadline: 23 February 2018



# Any questions?

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- Thank you for your attention
- I am happy to answer any questions