

Country-by-country analysis LUXEMBOURG

Annex VII to the 2nd Report on the application
of the Insurance Distribution Directive (IDD)

Consumer Protection Department
EIOPA REGULAR USE
EIOPA-BoS-23-480
29 November 2023

Note:

Powers of national competent authorities (NCAs):

In February 2023, EIOPA launched an online survey addressed to NCAs to gather input as to whether they are sufficiently empowered to carry out their tasks. The following information is based on the responses from 30 NCAs¹ to this survey.

Changes in the EU insurance distribution market:

In February 2023, EIOPA launched a survey addressed to NCAs to gather information on the insurance intermediaries' market structure and patterns of cross-border activities. The following information is based on the responses from 30 NCAs² to this survey.

The figures should be interpreted with some caution as there are differences as to how intermediaries are registered in their home Member State, in the national categories of insurance intermediaries and in the approaches by NCAs to collect data.

¹ AT (BMAW and FMA), BE, BG, CY, CZ, DK, EE, ES, FI, FR, GR (UHC and BOG), HR, HU, IE, IT, LI, LT, LU, LV, MT, NL, NO, PL, PT, RO, SE, SI, SK

² AT (BMAW and FMA), BE, BG, CY, CZ, DK, EE, ES, FI, FR, GR (UHC and BOG), HR, HU, IE, IT, LI, LT, LU, LV, MT, NL, NO, PL, PT, RO, SE, SI, SK

LUXEMBOURG

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ³	645.397	0.1%
(Re)insurance GWP (in million) ⁴	53,064.155	4%
Number of (re)insurance undertakings ⁵	71	4.1%
Number of registered insurance intermediaries	4138	0.5%

National competent authority:

Commissariat aux Assurances (CAA)

³ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

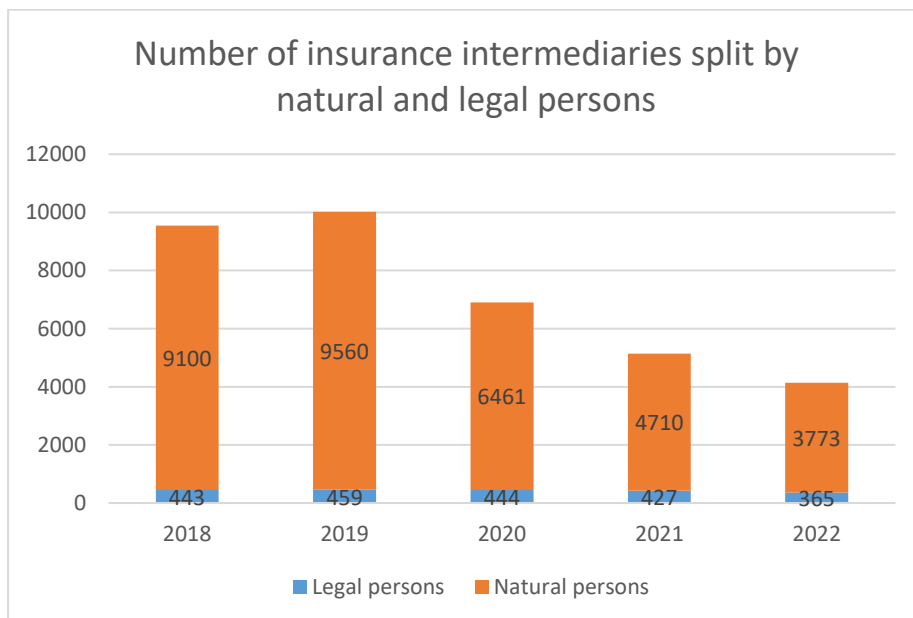
⁴ "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁵ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



Comments provided by the NCA on the figures included in the chart above:

The decrease in the number of insurance intermediaries over the past years is related to the CAA's enquiry to identify the agents who are still active and those who did not complete the annual trainings requirements.

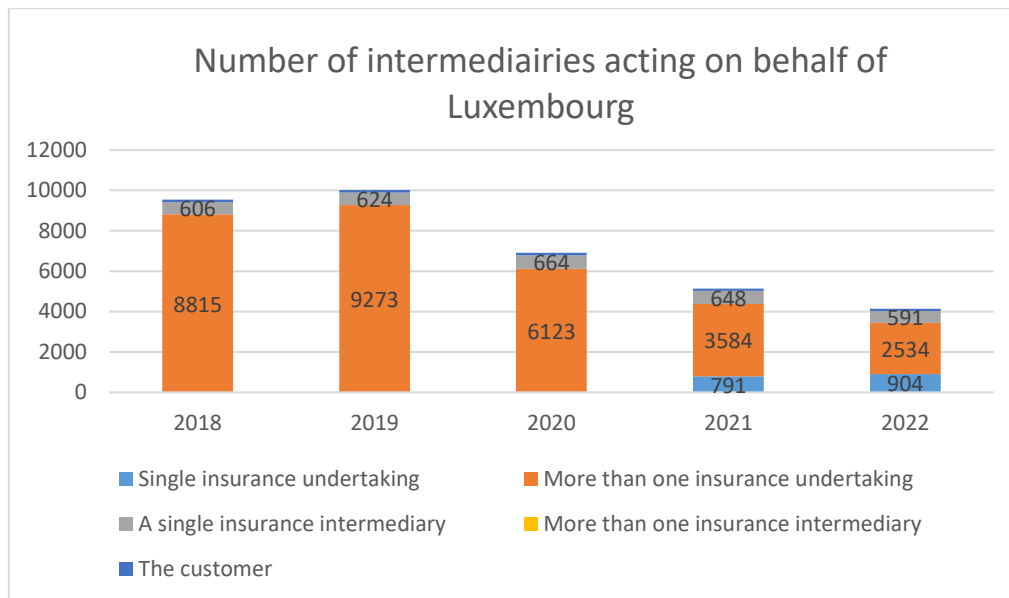
Please note that the numbers in the above table include all registered intermediaries. Some of them have been counted twice, as they are registered as both brokerage firms' director and brokers. When double counting is not taken into account, the total number of registered intermediaries is 4489 for 2021 and 3547 for 2022.

Online registration system:

The forms for the various applications for approval or registration are available on the CAA website.

These can be completed electronically and provided to the CAA by email.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

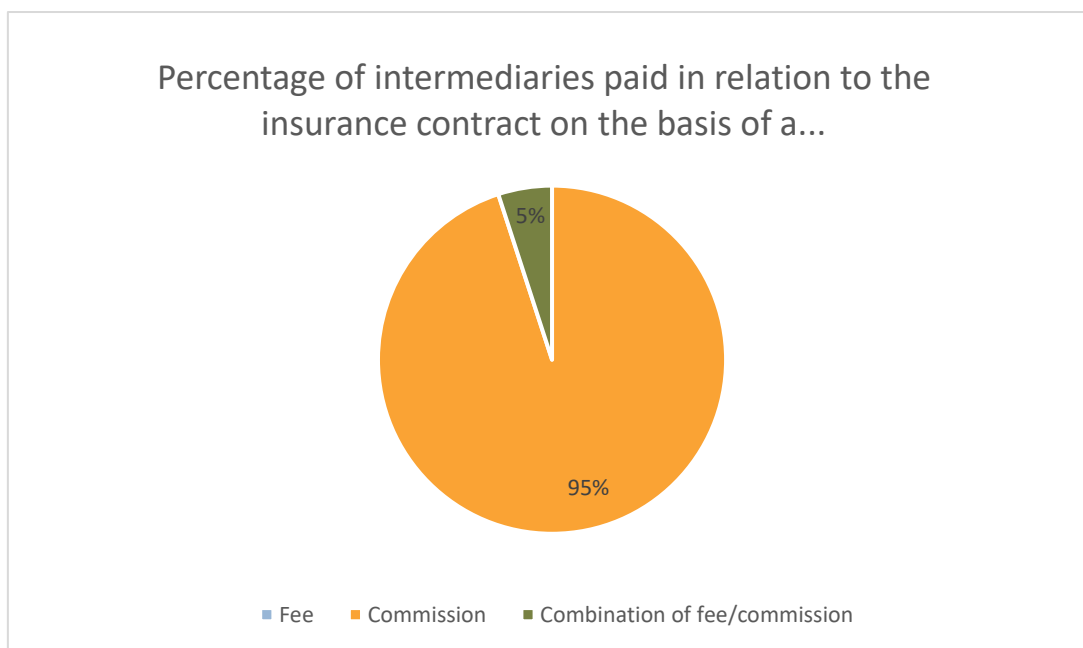
Compared to last years' surveys, we have been able to distinguish between agents acting on behalf of a single insurance undertaking and those acting on behalf on more than one insurance undertaking.

In accordance with Luxembourg law, no agent may receive approval for several insurance undertakings in the same class of insurance.

An agent may receive approval for more than one insurance undertaking in different classes of insurance (f.i. for IU1 in life insurance and for IU2 in non-life insurance).

An agent can also received approval in the same class for several undertakings, if these undertakings jointly so request.

Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



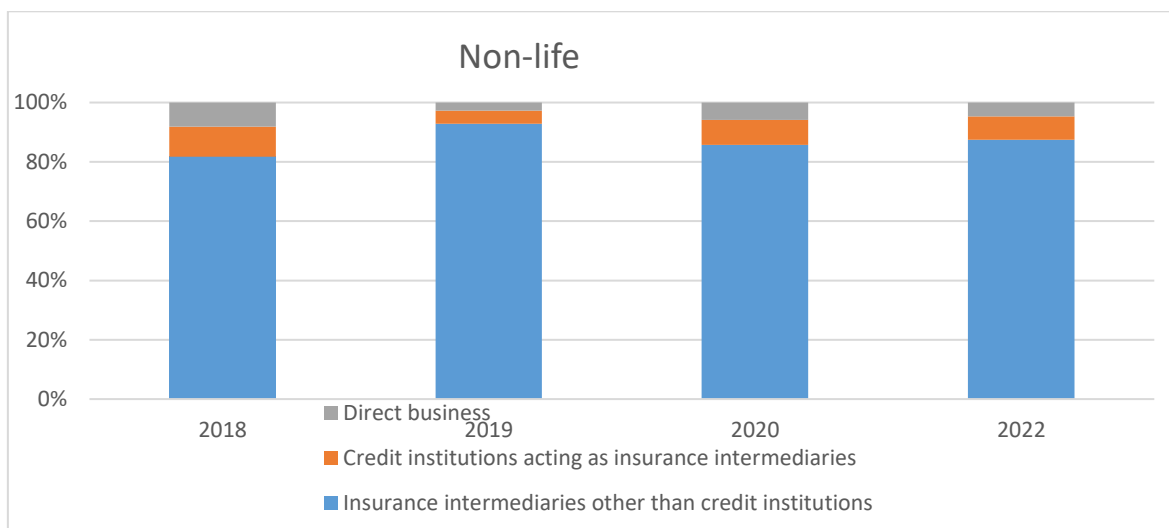
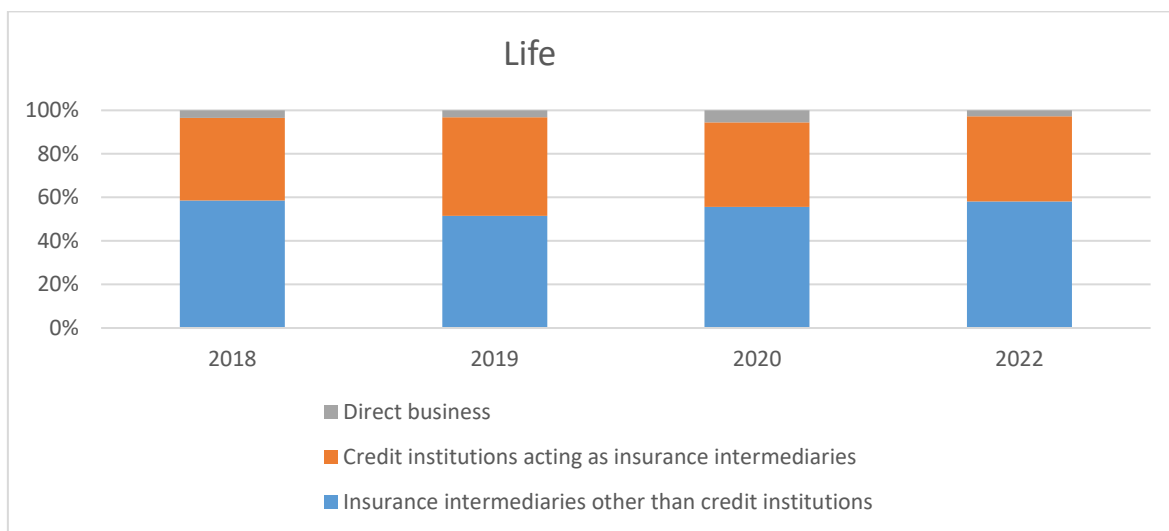
Comments provided by the NCA on the figures above :

The data in the above table only includes information related to brokerage firms and brokers, for which CAA receives an annual Reporting. These data are estimated percentage, as the verification of annual reporting for 2022 is still ongoing.

As a whole, no insurance brokerage firms is paid solely based on a fee (remuneration paid directly by the customer).

Please be informed that an annual reporting for agencies is currently being developed, and clearer information should be available next year.

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

These data are obtained from annual Reporting of Luxembourg insurance undertakings and therefore also include data on non-Luxembourg intermediaries.

Data are subject to modifications as verifications on insurers' 2022 Reporting are still ongoing.

Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

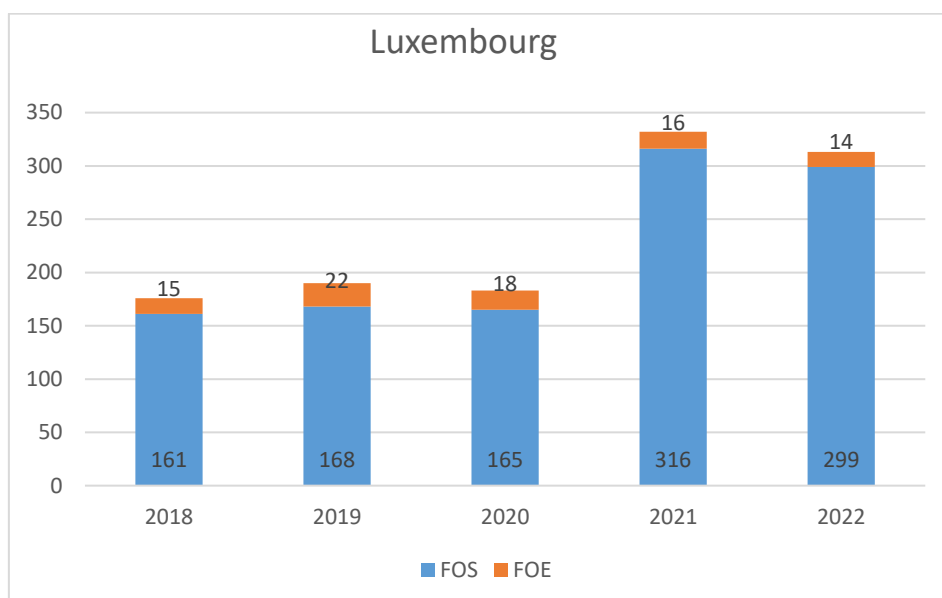
Based on the information obtained from insurance undertakings, there hasn't been any direct online sales for life insurance business. Regarding non-life insurance business, the new production for 2022 of direct online sales represent 0,33% of the total non-life new production. (21.634.583€).

Comments provided by the NCA on the data above:

CAA does not have information coming directly from intermediaries related to online sales.

The only data CAA can provide is information obtained from the annual Reporting of Luxembourg insurance undertakings. The provided information thus only includes direct sales. The data for 2022 are still subject to modifications as verifications on insurers' 2022 Reporting are still ongoing.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Comments provided by the NCA on the figures included in the chart above:

The increase in FOS numbers compared to previous years surveys is linked to the fact that the data provided for 2022 now includes agents and brokerage firms operating in FOS in the EEA (which was not the case in previous reports)

Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁶

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	64	0	64
<i>Belgium</i>	277	2	277

⁶ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Bulgaria</i>	47	0	47
<i>Cyprus</i>	57	0	57
<i>Croatia</i>	36	0	36
<i>Czech Republic</i>	56	0	56
<i>Denmark</i>	57	1	57
<i>Estonia</i>	50	0	50
<i>Finland</i>	62	0	62
<i>France</i>	175	8	175
<i>Germany</i>	143	3	143
<i>Greece</i>	63	0	63
<i>Hungary</i>	55	0	55
<i>Iceland</i>	31	0	31
<i>Ireland</i>	60	1	60
<i>Italy</i>	89	5	90
<i>Latvia</i>	51	0	51
<i>Liechtenstein</i>	31	0	31
<i>Lithuania</i>	55	0	55
<i>Luxembourg</i>	0	0	0
<i>Malta</i>	61	0	61
<i>Netherlands</i>	89	2	89
<i>Norway</i>	44	0	44
<i>Poland</i>	61	0	61
<i>Portugal</i>	92	0	92
<i>Romania</i>	51	0	51
<i>Slovakia</i>	56	0	56
<i>Slovenia</i>	53	0	53
<i>Spain</i>	100	3	101
<i>Sweden</i>	73	1	73
<i>Total EEA</i>	999	14	300

Comments provided by the NCA on the figures included in the table above:

The data provided for 2022 now includes agents operating in FOS in the EEA (which was not the case in previous reports).

