

Country-by-country analysis PORTUGAL

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
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eioipa

European Insurance and
Occupational Pensions Authority

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

PORTUGAL

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	10,352	2.3%
(Re)insurance GWP (in million) ⁴	11,999.855	1%
Number of (re)insurance undertakings ⁵	37	2%
Number of registered insurance intermediaries	10687	1.2%

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) include the domestically registered undertakings. Based on SII information:

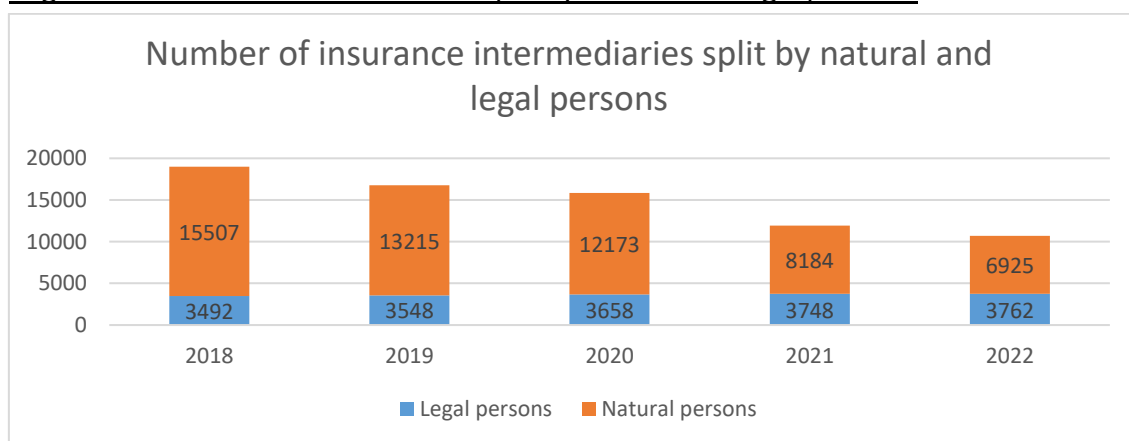
https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

To ensure that the information about "(Re)insurance GWP (in million)", based on annual report, corresponds to the "Number of (re)insurance undertakings", based on an annual average, "(Re)insurance GWP (in million)" refers to the 37 insurance undertakings (instead of 35 insurance undertakings as indicated in the 4th quarter report)."

National competent authority:

Portuguese Insurance and Pension Funds Supervisory Authority

Registered insurance intermediaries split by natural and legal persons:



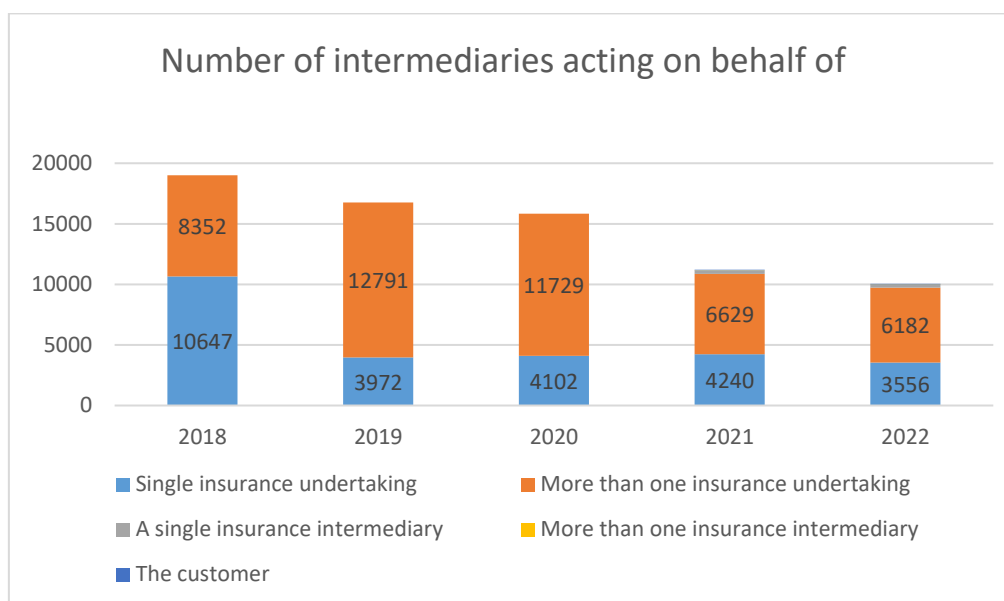
Comments provided by the NCA on the figures included in the chart above:

The decrease of registered intermediaries is probably due to the additional requirements regarding the proper qualification requirements provided for in the legal regime that transposed the IDD.

Online registration system:

The Portuguese online registration system is in place since 2007 and the information on the number of registered insurance, reinsurance and ancillary insurance intermediaries is daily available.

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:

The criteria used in 2021 and 2022 is different from the one applied in the previous years (2018; 2019; and 2020), on the number of intermediaries acting on behalf of a single insurance undertaking.

In 2018, the criteria applied was based on the number of registered tied insurance intermediaries and the number of registered intermediaries (insurance agents) acting on behalf of a single insurance undertaking.

In 2019 and 2020, the criteria was based on the number of registered intermediaries (insurance agents) acting on behalf of a single insurance undertaking.

In 2021 and 2022, the criteria was based on the reporting of remuneration paid to the intermediaries.

It should be stressed that this latter criteria doesn't provide the exact number of insurance intermediaries acting nationally, since it depends on the fulfillment of the report duty by all the undertakings and intermediaries (including from another MS). However, the number is very close to the actual figures.

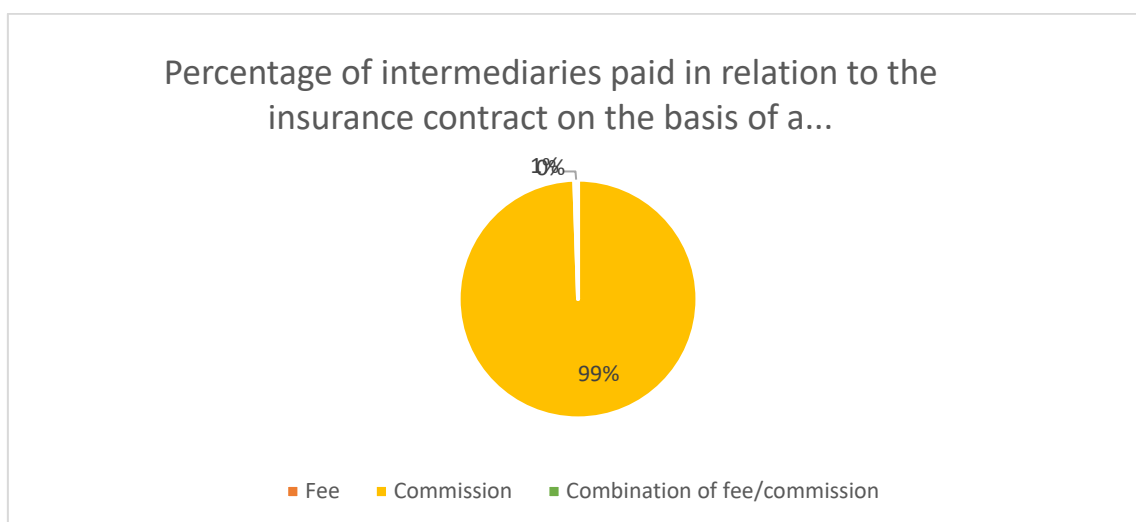
It should be highlighted that the data provided regards to the information registered at 31st of December of each year (2022).

In order to enhance the comparison possibilities, please consider the 2020 figures, aligned with the criteria followed in 2021 and 2022:

Number of insurance intermediaries acting on behalf of:

1. a single insurance undertaking: 5609
2. more than one insurance undertaking: 7149
3. a single insurance intermediary: 233
4. more than one insurance intermediary: 18
5. the customer: 67
6. Total number of registered intermediaries (6=1+2+3+4+5): 13076

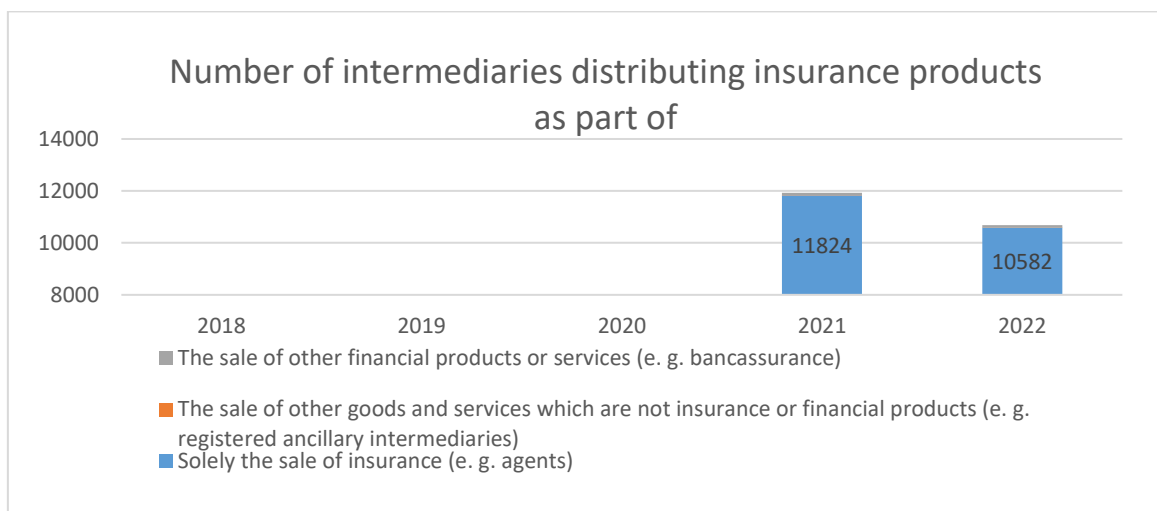
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figures above :

The data indicated above reflects our estimates based on the ongoing supervisory activity (for instance, analysis of mediation agreements and exchange of information with the operators during onsite and offsite inspections).

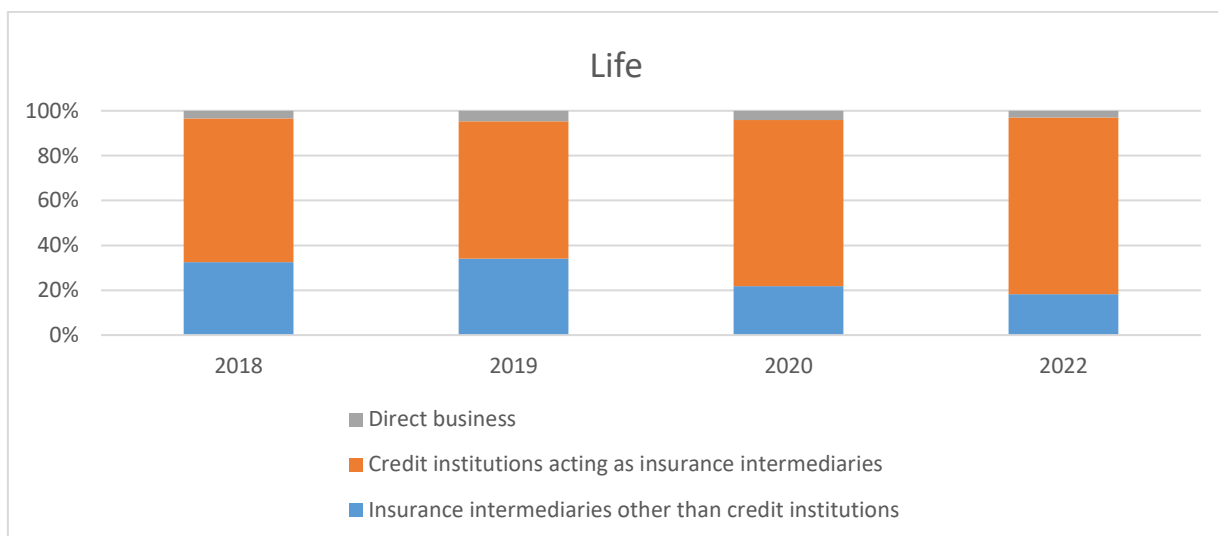
Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:

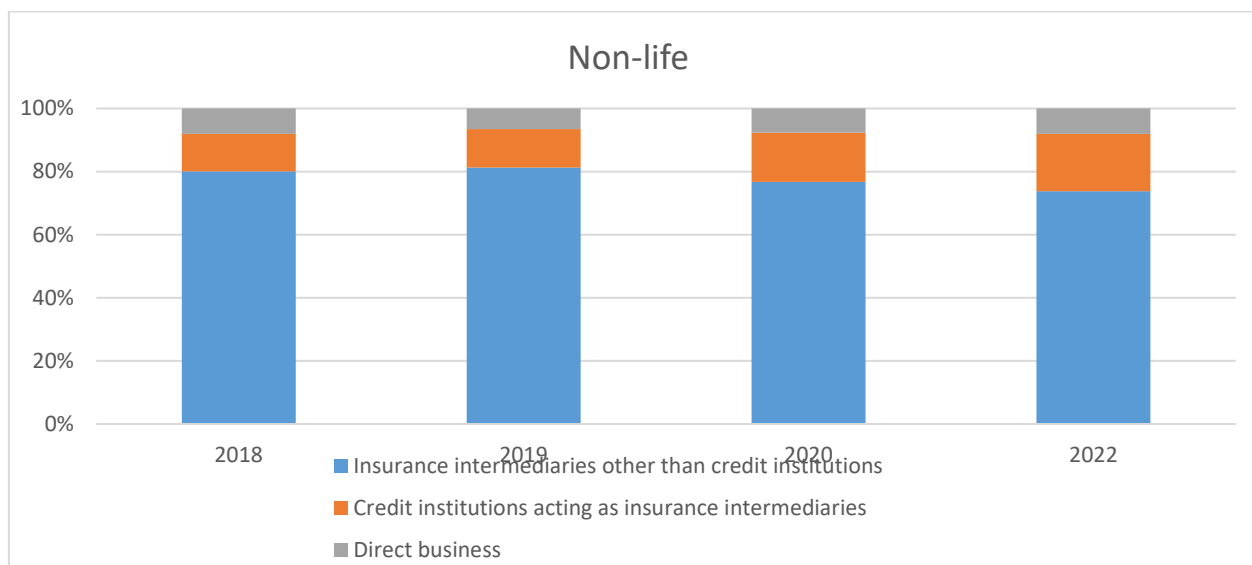


Comments provided by the NCA on the figures included in the chart above:

The data indicated in the category of the sale of other financial products or services (e.g bancassurance) is based on information available on Banco de Portugal's website (National Banking Supervisory Authority) since it is not possible for ASF to obtain this information directly.

GWP split by distribution channels:





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

The data is still provisional and is based on the report made by insurance undertakings to ASF.

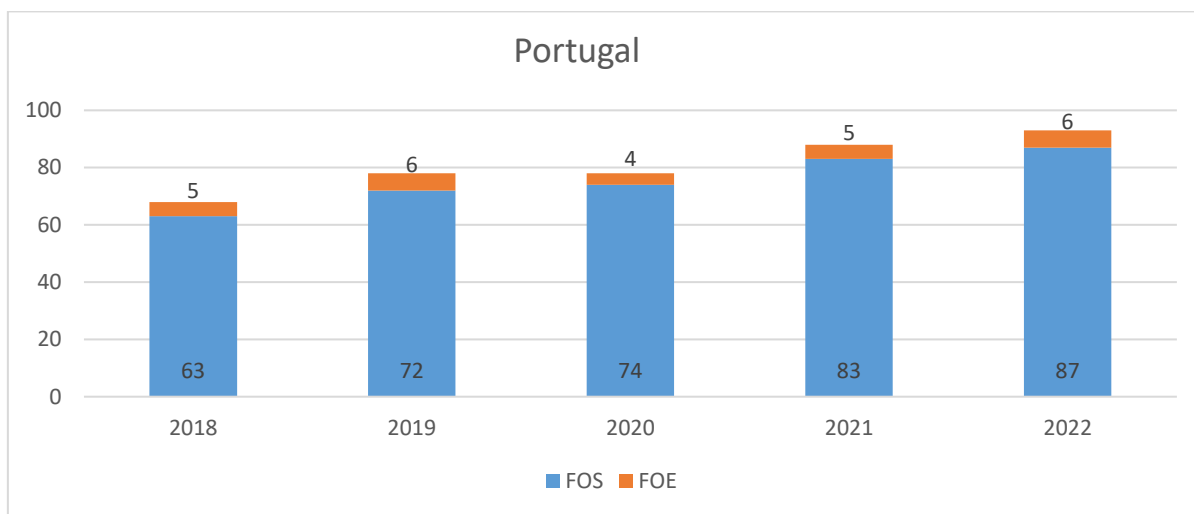
Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

0,28%

Comments provided by the NCA on the data above:

The data above only takes in consideration the information reported by insurance undertakings regarding the proportion of online intermediation/sales via websites direct business, since ASF does not have access to the same data from insurance intermediaries.

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)



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>	7	0	7
<i>Belgium</i>	18	0	18
<i>Bulgaria</i>	6	0	6
<i>Cyprus</i>	7	0	7
<i>Croatia</i>	4	0	4
<i>Czech Republic</i>	5	0	5
<i>Denmark</i>	6	0	6
<i>Estonia</i>	4	0	4
<i>Finland</i>	5	0	5
<i>France</i>	24	2	25
<i>Germany</i>	15	0	15
<i>Greece</i>	7	0	7
<i>Hungary</i>	5	0	5
<i>Iceland</i>	3	0	3
<i>Ireland</i>	13	0	13
<i>Italy</i>	14	0	14
<i>Latvia</i>	3	0	3
<i>Liechtenstein</i>	2	0	2

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>Lithuania</i>	4	0	4
<i>Luxembourg</i>	14	0	14
<i>Malta</i>	6	0	6
<i>Netherlands</i>	11	0	11
<i>Norway</i>	4	0	4
<i>Poland</i>	8	0	8
<i>Portugal</i>	0	0	0
<i>Romania</i>	6	0	6
<i>Slovakia</i>	5	0	5
<i>Slovenia</i>	6	0	6
<i>Spain</i>	74	4	76
<i>Sweden</i>	9	0	9
<i>Total EEA</i>	87	6	90

General qualitative description of the “patterns of cross-border activity”:

The majority of insurance intermediaries registered in Portugal that carry out cross-border activities operates under the freedom to provide services (approximately 98%) and with regards to non-Life insurance classes. The cross-border activity is carried out mostly in Spain (approximately 30%) and France (approximately 10%) possibly due to the geographical proximity of Spain and to the high number of Portuguese living in France.

Information on the powers of the NCA

New statutory powers to implement the IDD received since 2022

ASF did not receive any new statutory powers since 2022 to ensure the implementation of the IDD.

Extent to which NCA has not been sufficiently empowered to ensure the implementation of the IDD:

We did not verify any areas regarding which ASF has not been sufficiently empowered to do proper conduct of business supervision.