

# Consumer Trends Process 2025 Statistical Annex

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Consumer Protection Department  
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08 December 2025

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European Insurance and  
Occupational Pensions Authority

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## ANNEX I – COMPLAINTS

### 1.1. INSURANCE

EIOPA collects data on insurance complaints from two sources:

- Complaints received and managed by insurance undertakings.
- Complaints received and managed by an authority acting like a mediating body and/or Alternative Dispute Resolution body (ADR) – including NCA if that is the case.

**Figure 1 - Total number of complaints reported by undertakings (above) and by authorities (below), 2022 - 2024**

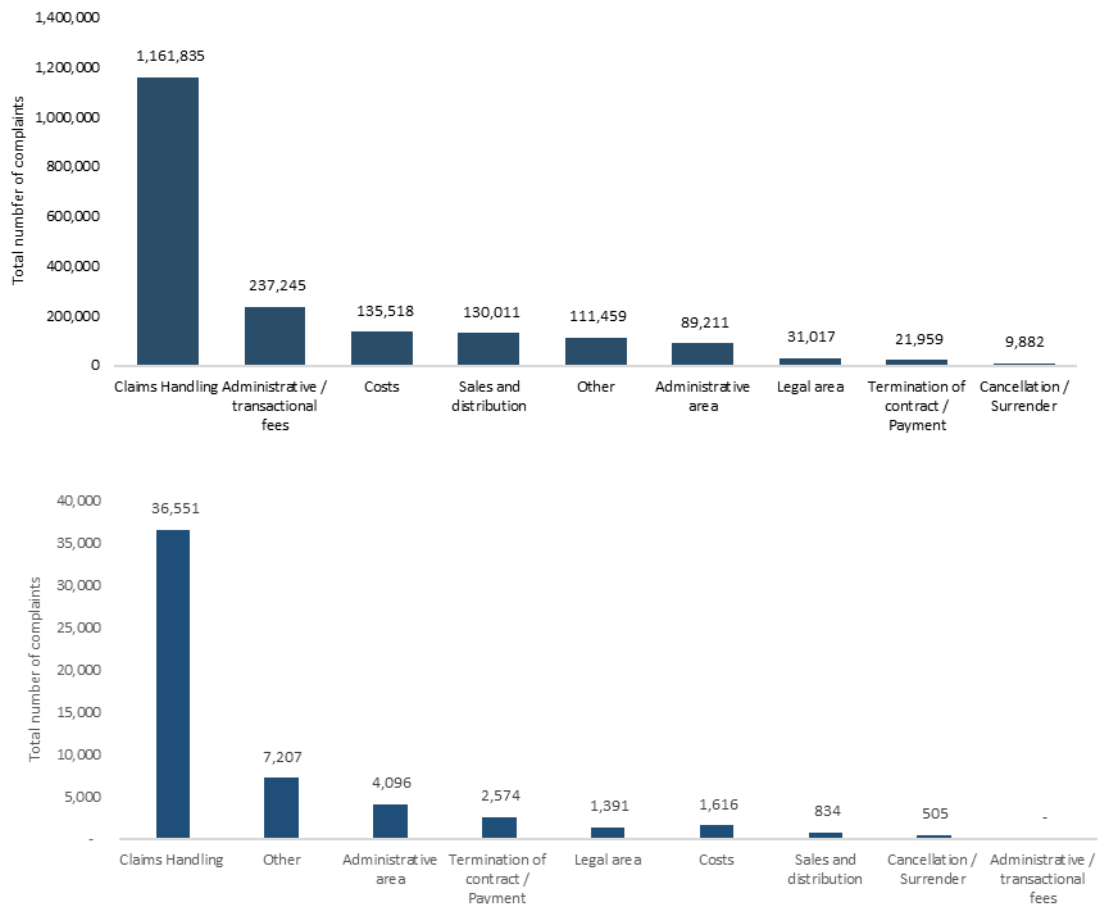


Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2025<sup>1</sup>

<sup>1</sup> Data include 22 Member States for complaints reported by undertakings (AT, HR, CZ, DK, EE, FI, FR, EL, HU, IE, IT, LV, LI, LT, LU, MT, NL, PL, PT, RO, SI, ES) and 20 Member States for complaints reported by mediating bodies and/or ADR (BE, BG, HR, CZ, DK, EE, FI, DE, EL, HU, IT, LV, LI, LT, LU, MT, PL, PT, RO, ES). Only countries with consistent data submissions across all years (2022–2024) were included. For IT

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**Figure 2 – Breakdown of life and non-life complaints by cause for both undertaking level (above) and authority level (below) – 2024<sup>2</sup>**



Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2025<sup>3</sup>

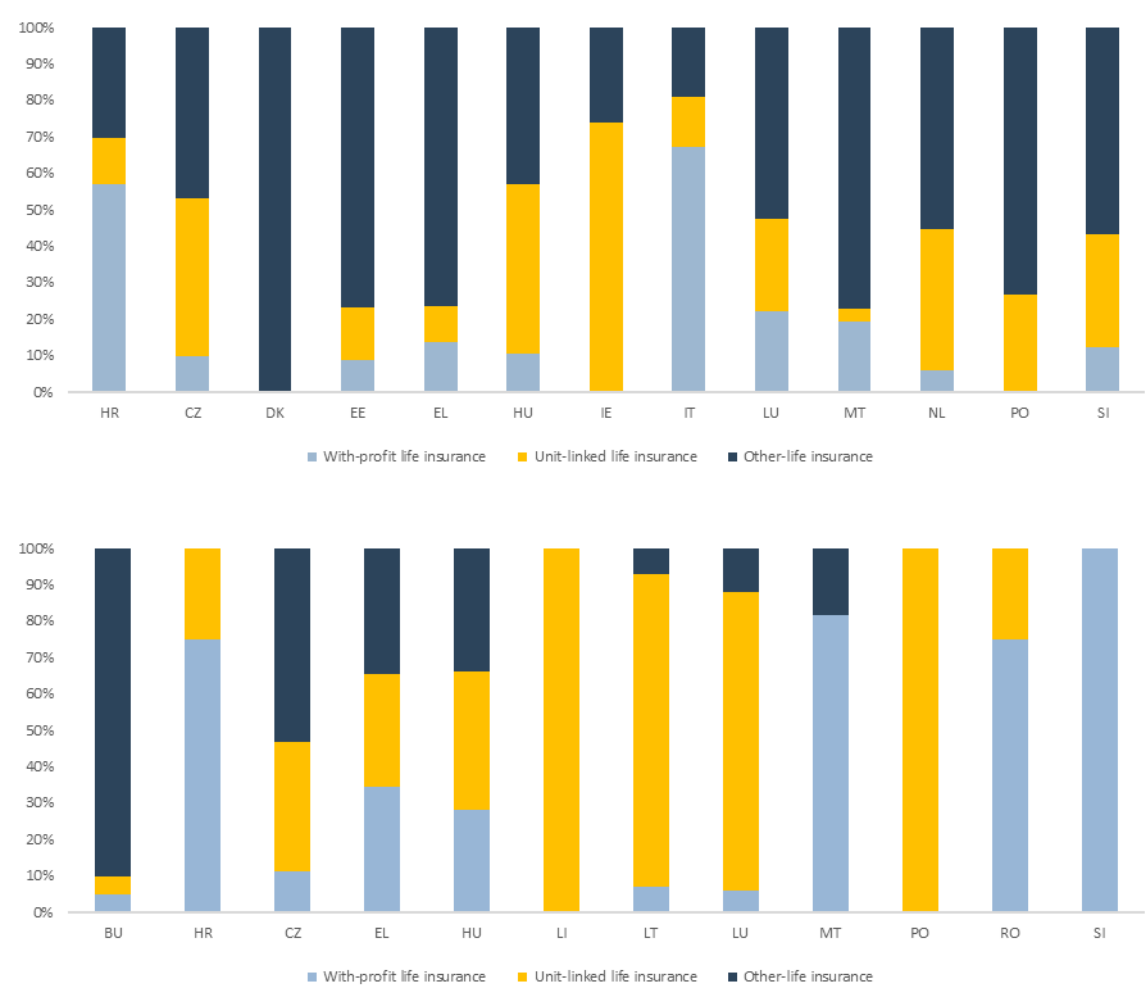
the data are referred to complaints received and managed by the NCA not yet acting as Insurance Ombudsman (the new ADR system will be fully operational from January 15 2026)

<sup>2</sup> The number of total complaints in Figure 1 exceeds the sum of complaints by cause in Figure 2, as not all reported data were classified into the nine defined cause categories.

<sup>3</sup> Data include 21 Member States for complaints reported by undertakings (AT, HR, CZ, DK, EE, FI, FR, EL, HU, IE, IT, LV, LI, LT, LU, MT, NL, PL, PT, RO, SI) and 14 Member States for complaints reported by mediating bodies and/or ADR (BE, BG, HR, FI, EL, HU, IT, LI, LU, MT, PL, PT, RO, SI).

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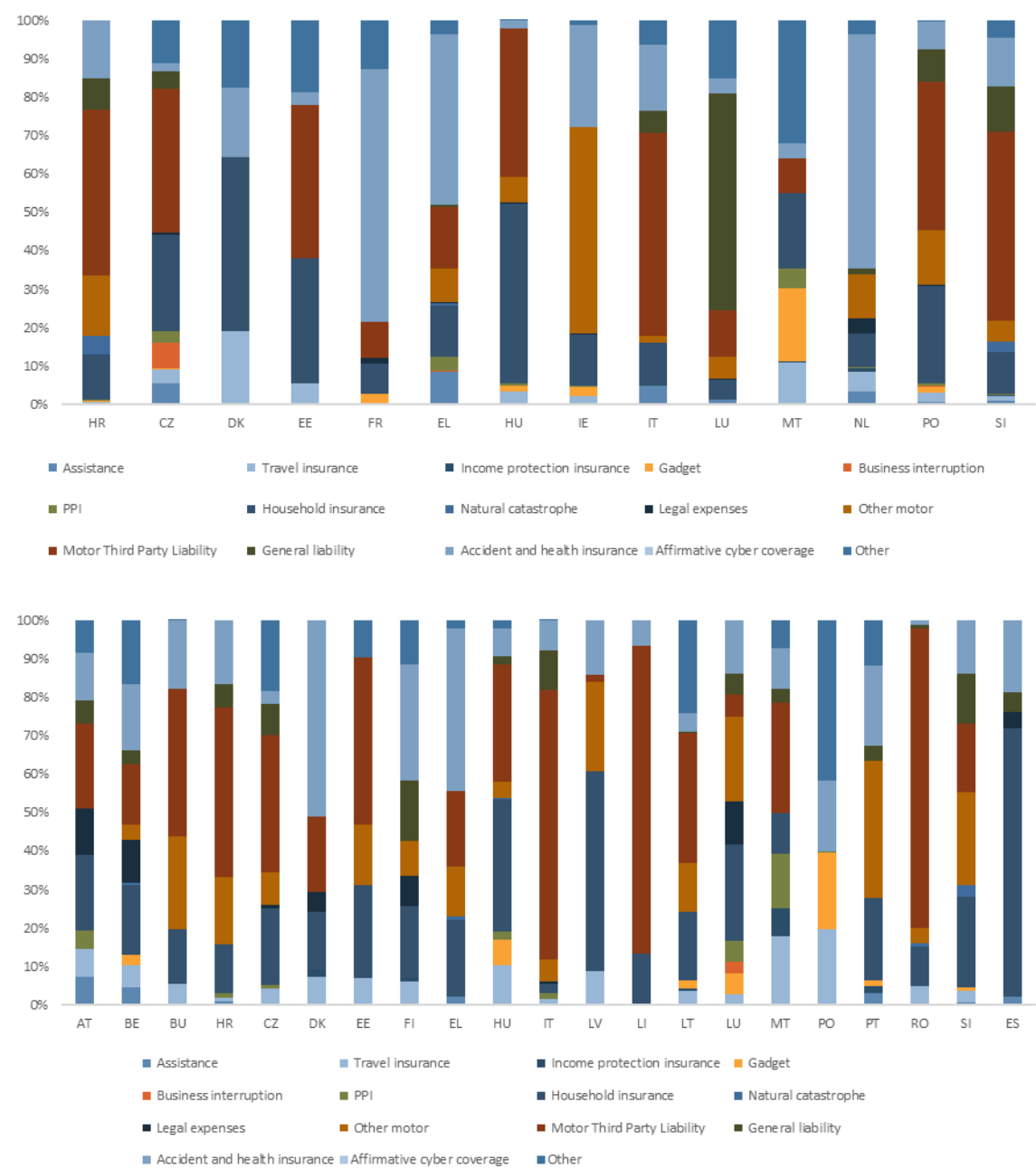
Figure 3 – Proportion of life complaints by product in each Member State as reported at undertaking level (above) and at authorities’ level (below) – 2024



Source: EIOPA’s Committee on Consumer Protection and Financial Innovation in 2025

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Figure 4 - Proportion of non-life complaints by product in each Member States as reported at undertaking level (above) and at authorities' level (below) – 2024



Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2025



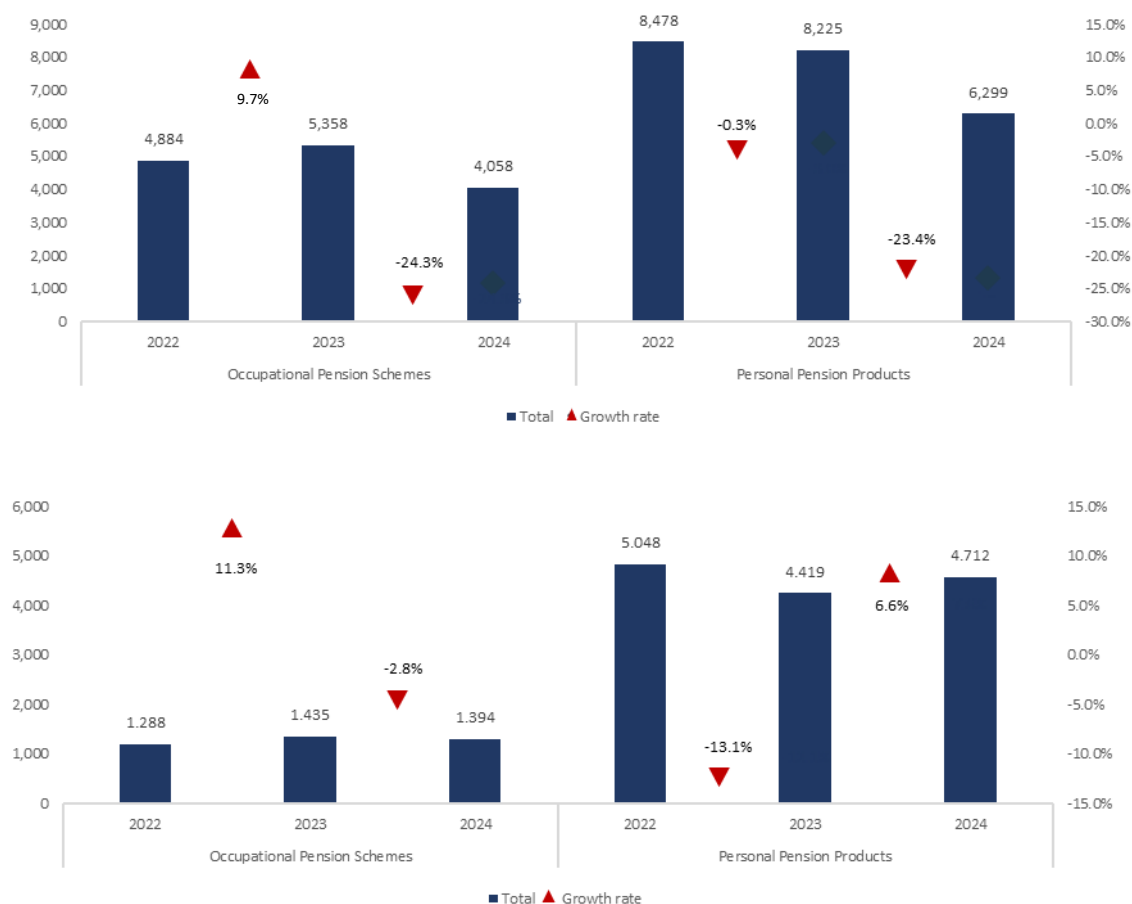
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## 1.2. PENSION

EIOPA collects data on pensions complaints from two sources:

- ▶ Complaints received and managed by pension providers – Occupational Pension Schemes and Personal Pension Products.
- ▶ Complaints received and managed by an entity acting like a mediating body and/or Alternative Dispute Resolution body (ADR) – including NCA if that is the case.

**Figure 5 - Number of complaints reported by pension providers (above) and mediating body and/or ADR (below) for IORPs and PPPs, 2022-2024**

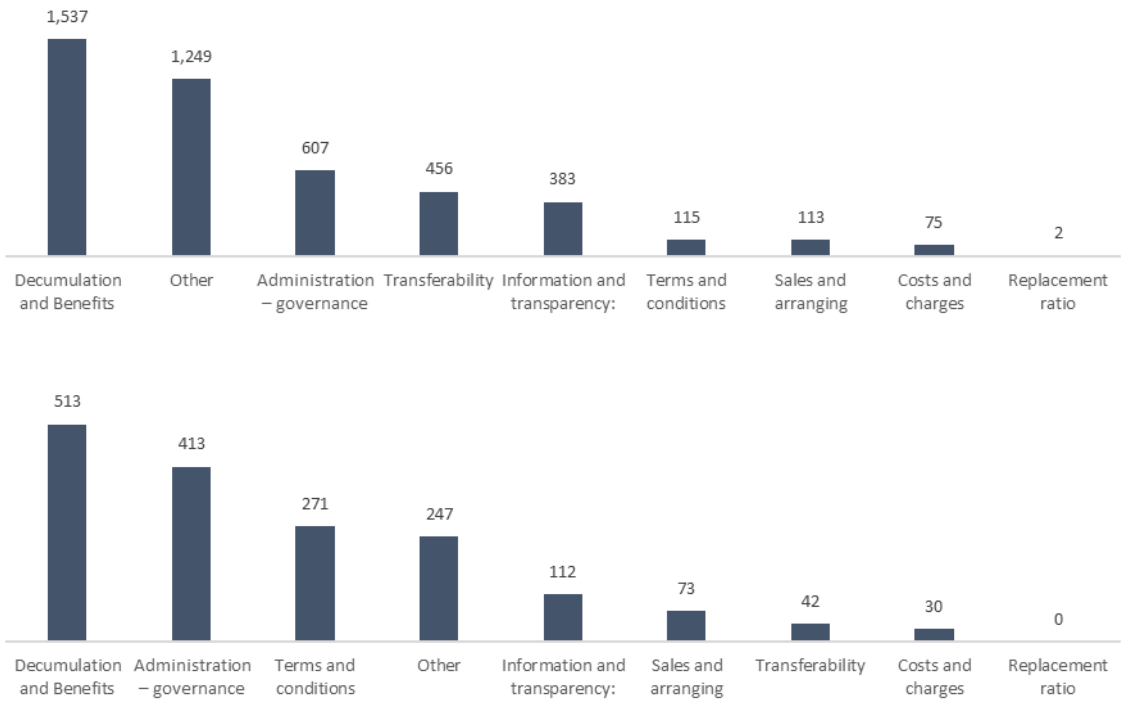


Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2025<sup>4</sup>

<sup>4</sup> Data include 14 Member States for complaints reported by undertakings (BE, HR, CZ, DK, HU, LV, LI, LT, NL, PL, PT, RO, SK, SI) and 16 Member States for complaints reported by mediating bodies and/or ADR (BE, HR, CZ, EE, ES, HU, IT, LV, LI, LT, MT, PL, PT, RO, SK, SI). Only countries with consistent data submissions for all years (2022–2024) are included.<sup>5</sup> Data include 13 Member States for complaints

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Figure 6 - Breakdown of pension complaints by cause as reported by pension providers (above) and by mediating body and/or ADR (below) – 2024



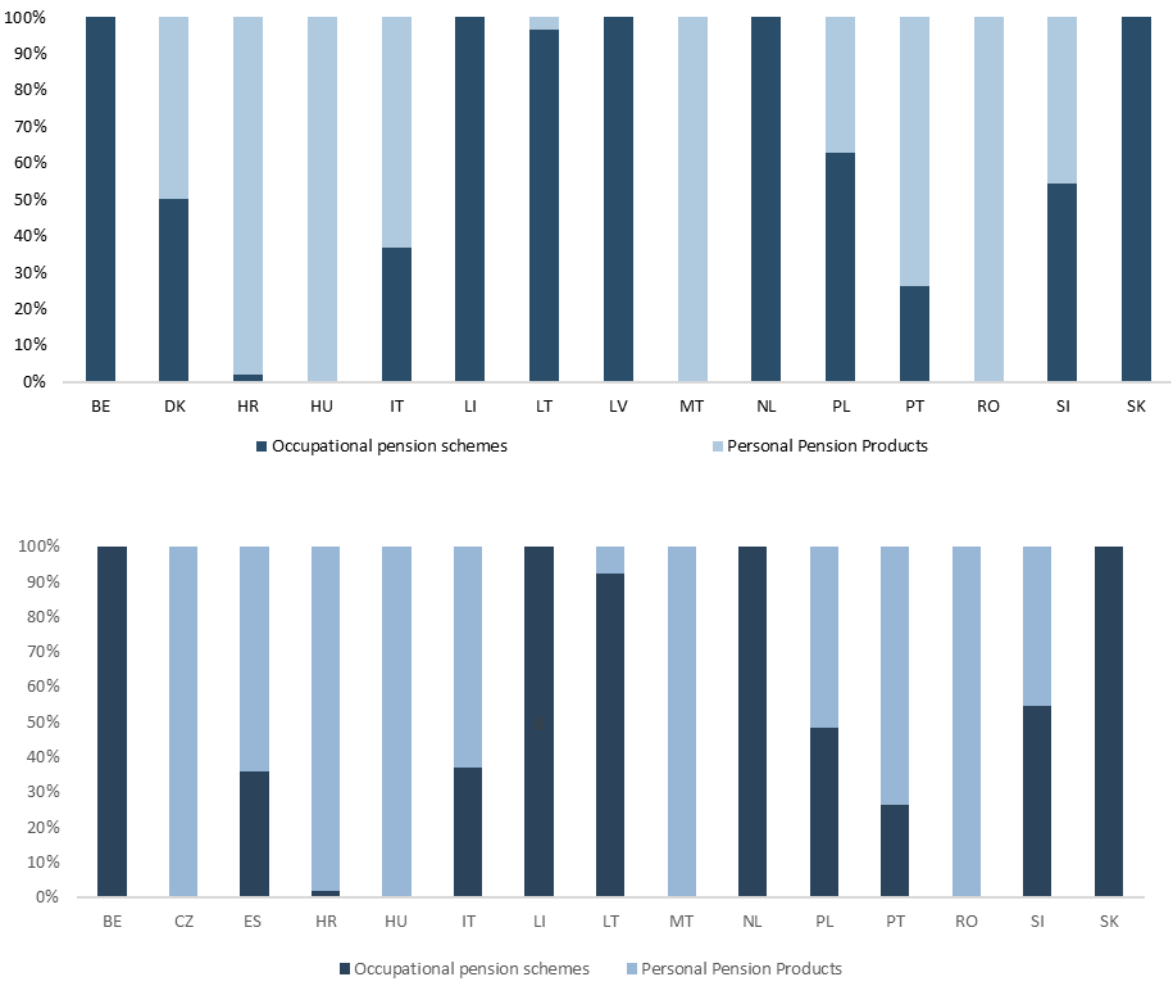
Source: EIOPA’s Committee on Consumer Protection and Financial Innovation in 2025<sup>5</sup>

reported by undertakings (BE, HR, DK, HU, IT, LV, LI, LT, MT, PL, PT, SK, SI) and 12 NCAs for complaints reported by mediating bodies and/or ADR (BE, BG, HR, CZ, HU, IE, LT, MT, NL, PL, PT, SK).

<sup>5</sup> Data include 13 Member States for complaints reported by undertakings (BE, HR, DK, HU, IT, LV, LI, LT, MT, PL, PT, SK, SI) and 12 NCAs for complaints reported by mediating bodies and/or ADR (BE, BG, HR, CZ, HU, IE, LT, MT, NL, PL, PT, SK).

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Figure 7 - Proportion of pensions complaints by product in each Member State as reported by pension providers (above) and by mediating body and/or ADR (below) – 2024



Source: EIOPA’s Committee on Consumer Protection and Financial Innovation in 2025<sup>6</sup>

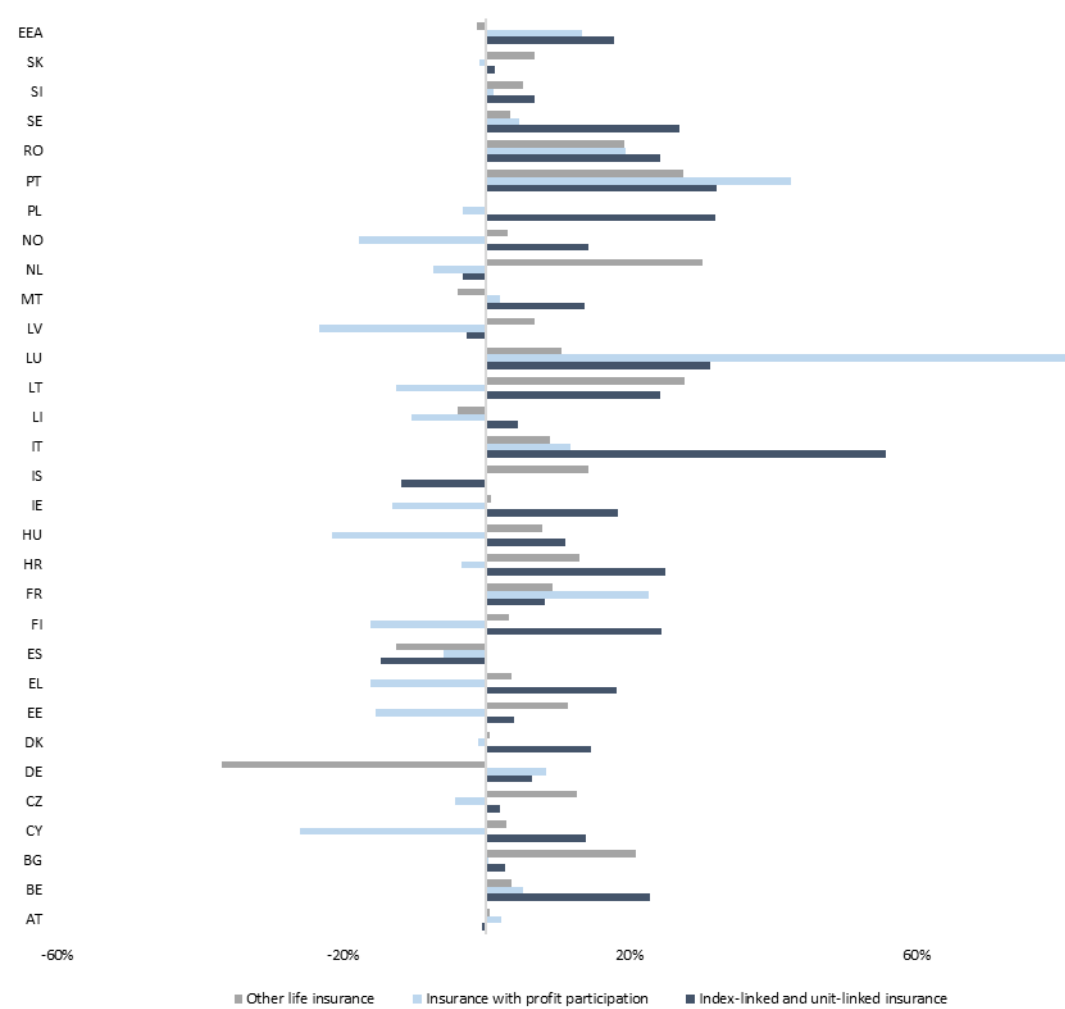
<sup>6</sup> Please note that the distribution of complaints by Member State reflects the pension product types (and data) available in their respective markets. A 100% share may indicate that only one product type exists in that Member State, or that complaints were reported for only one of the available product types. Further, please note that this includes complaints not directly received and / or managed by a mediating body, for example in Italy, but still reported to the NCA.

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# ANNEX II — RETAIL RISK INDICATORS AND INSURANCE LINES OF BUSINESS

## LIFE

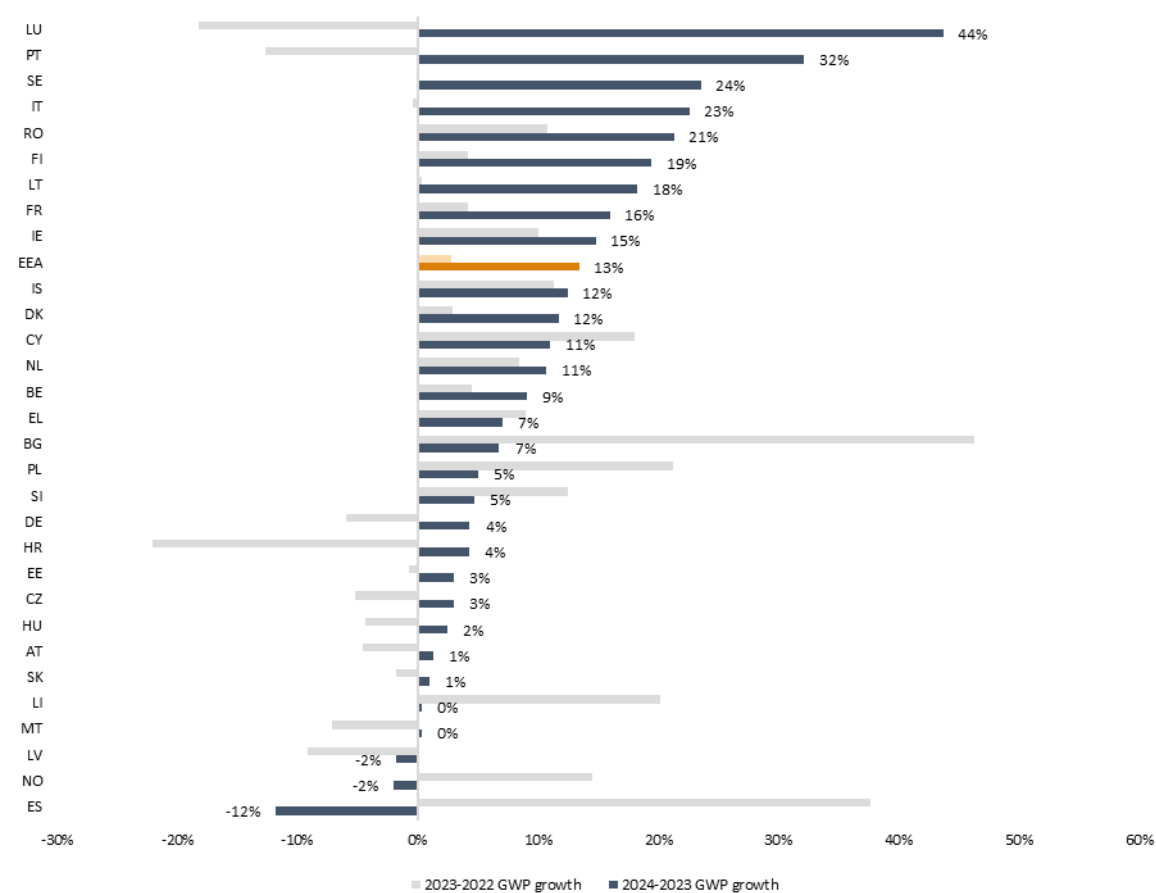
Figure 8 - GWP year on year growth for life lines of business by Member State – 2023-2024



Source: EIOPA Solvency II Database (S.05.01.01.02)

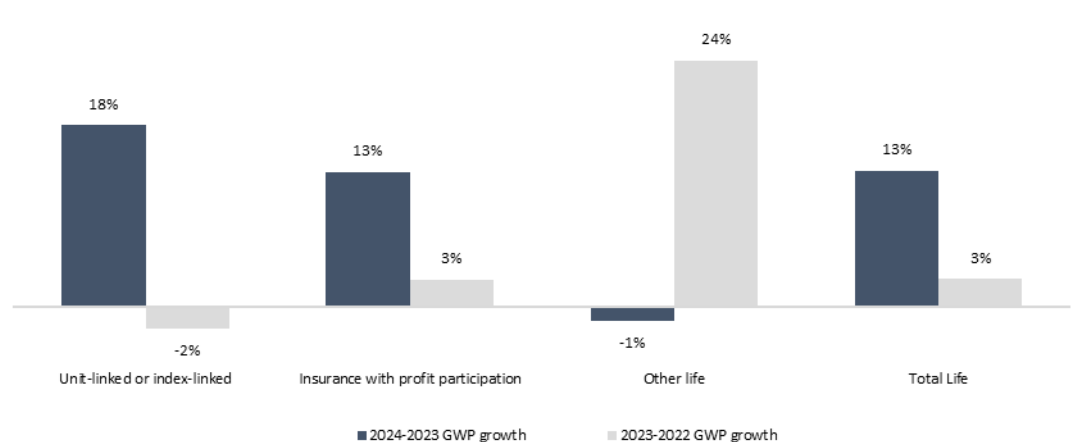
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Figure 9 - GWP year on year growth for life by Member State – 2022-2024



Source: EIOPA Solvency II Database (S.05.01.01.02)

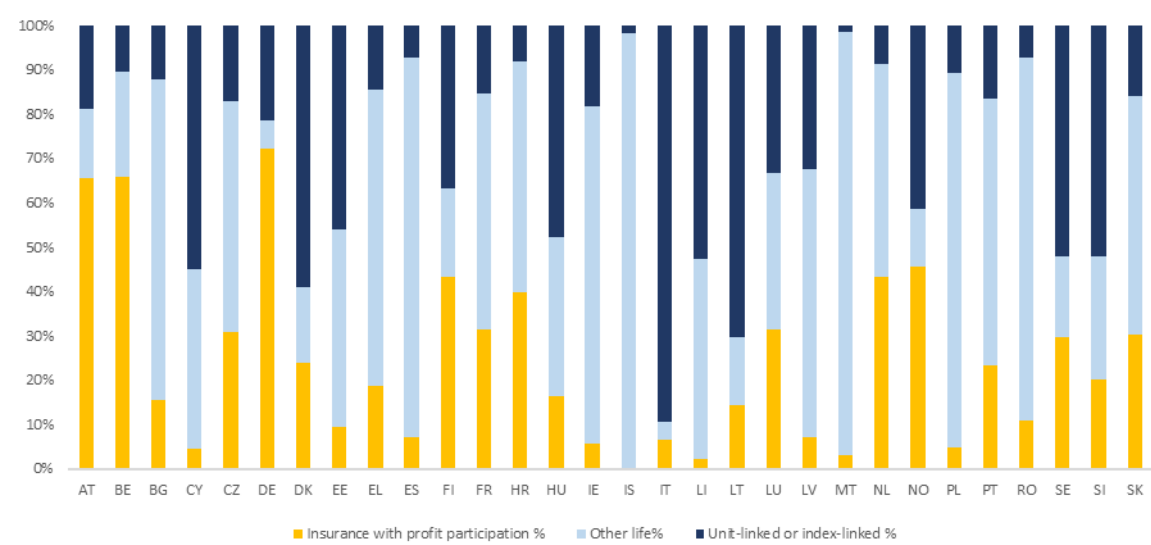
Figure 10 - GWP growth by life line of business – 2022-2024



Source: EIOPA Solvency II Database (S.05.01.01.02)

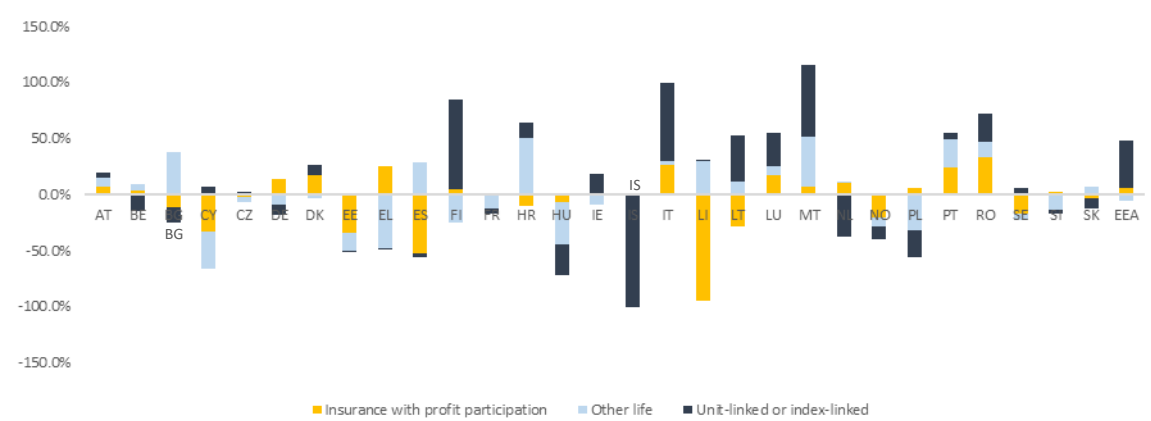
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Figure 11 – Weight of the number of contracts by line of business in each Member State – 2024



Source: EIOPA Solvency II Database (S.14.01.01.01)

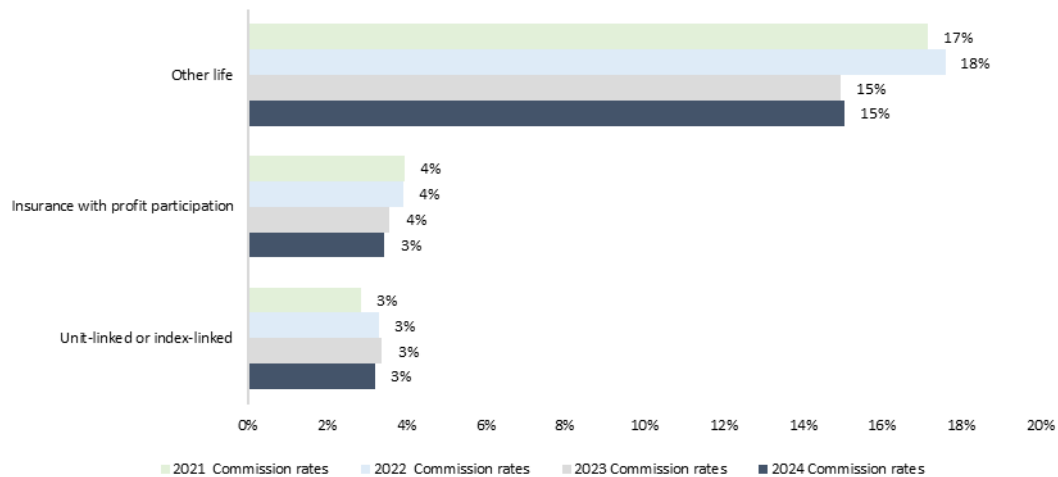
Figure 12 – Growth in new contracts per line of business in each Member State – 2024



Source: EIOPA Solvency II Database (S.14.01.01.01)

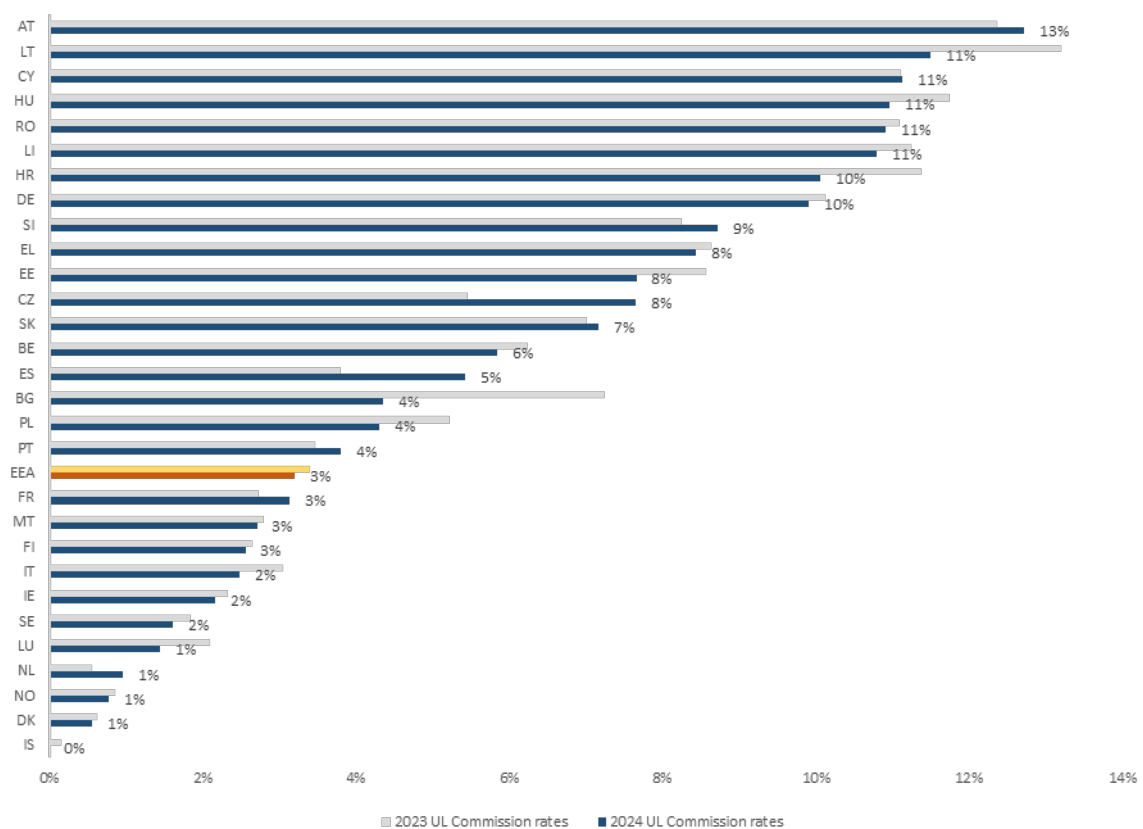
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**Figure 13 – Commission rates by life lines of business – 2021-2024**



Source: EIOPA Solvency II Database (S.05.01.01.02)

**Figure 14 – Commission rates for index-linked and unit-linked by Member State – 2023-2024**

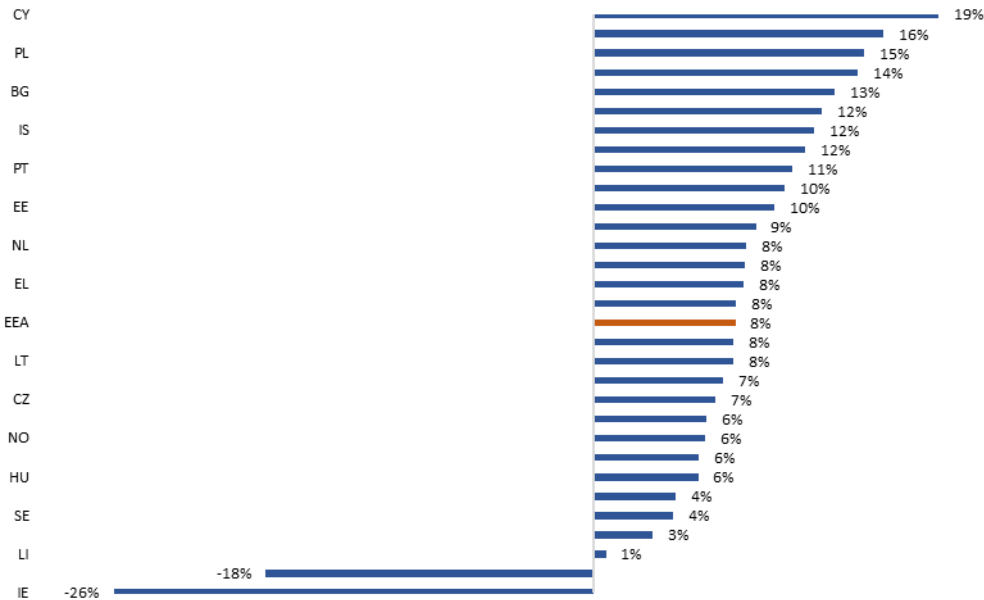


Source: EIOPA Solvency II Database (S.05.01.01.02)

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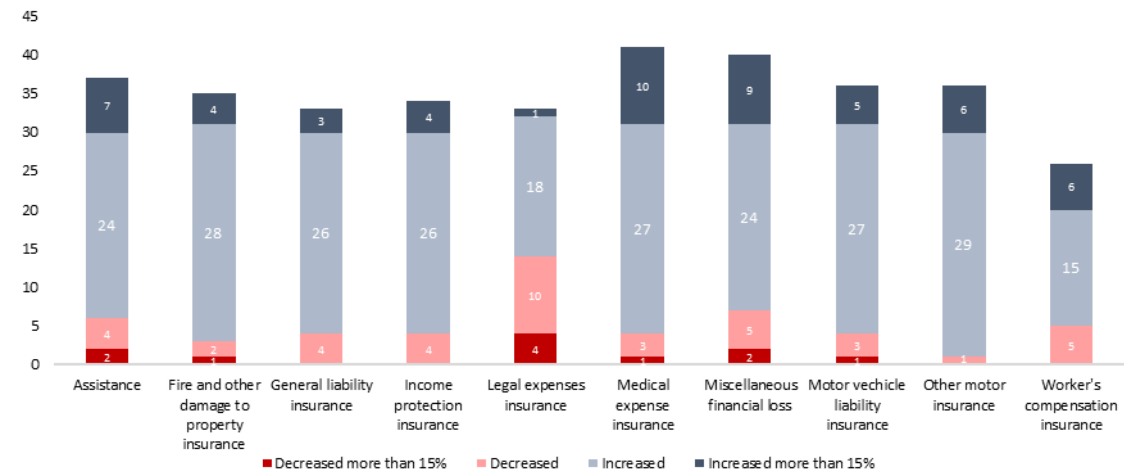
NON-LIFE

Figure 15 - GWP year on year growth for non-life by Member State – 2023-2024



Source: EIOPA Solvency II Database (\$.05.01.01.01)

Figure 16 – Non life insurance GWP growth by number of Member states – 2023-2024

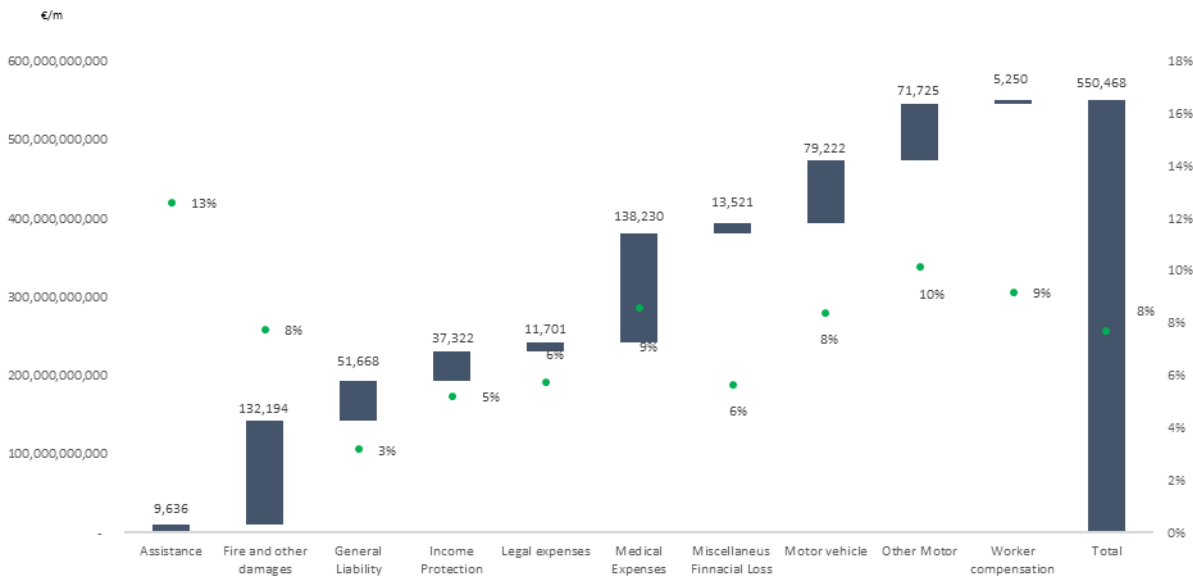


Source: EIOPA Solvency II Database (\$.05.01.01.01)



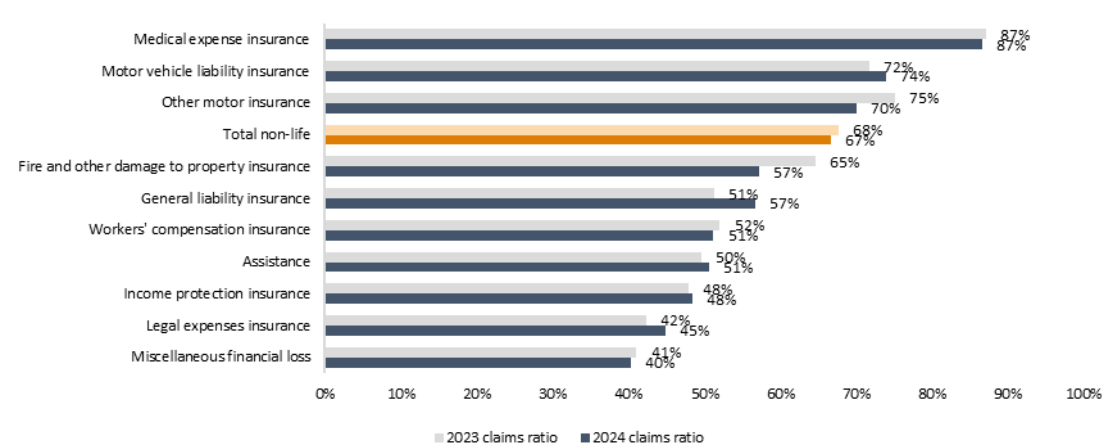
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Figure 17 – GWP in million € (left hand side) and GWP growth (right hand side) by non-life line of business – 2023-2024



Source: EIOPA Solvency II Database (S.05.01.01.01)

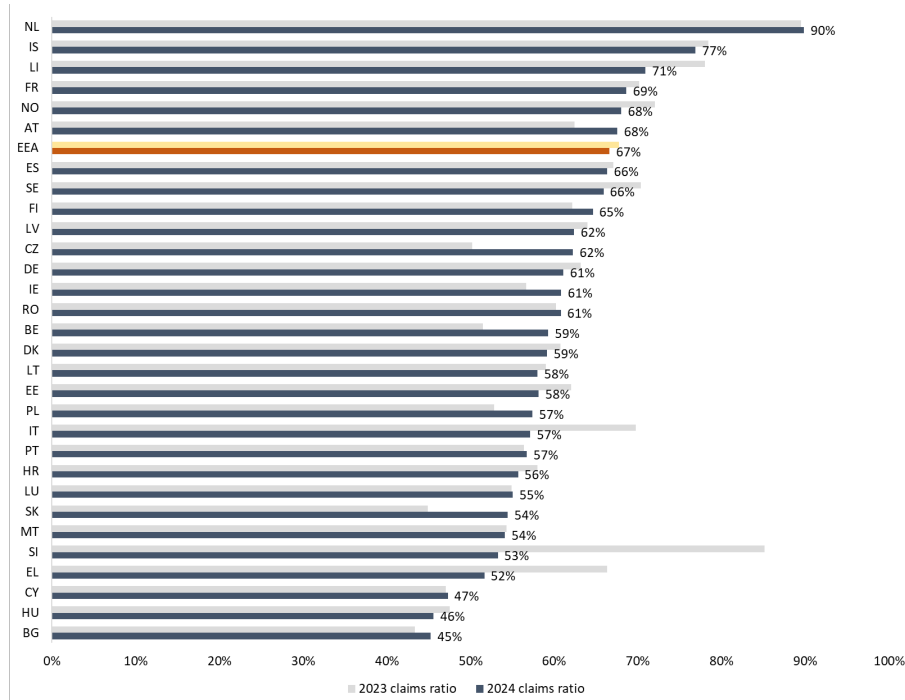
Figure 18 – Claims ratio by non-life line of business – 2023-2024



Source: EIOPA Solvency II Database (S.05.01.01.01)

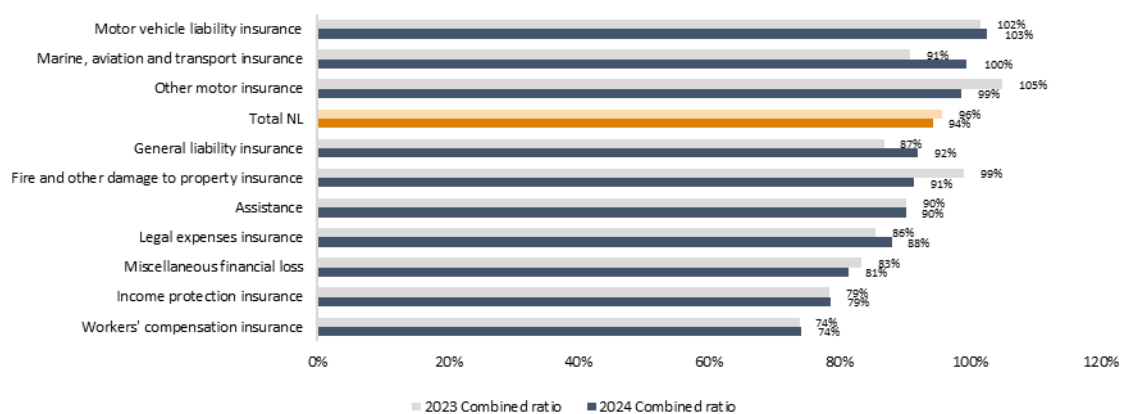
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**Figure 19 – Claims ratio by Member State – 2023-2024<sup>7</sup>**



Source: EIOPA Solvency II Database (S.05.01.01.01)

**Figure 20 – Combined ratio by non-life line of business – 2023-2024**

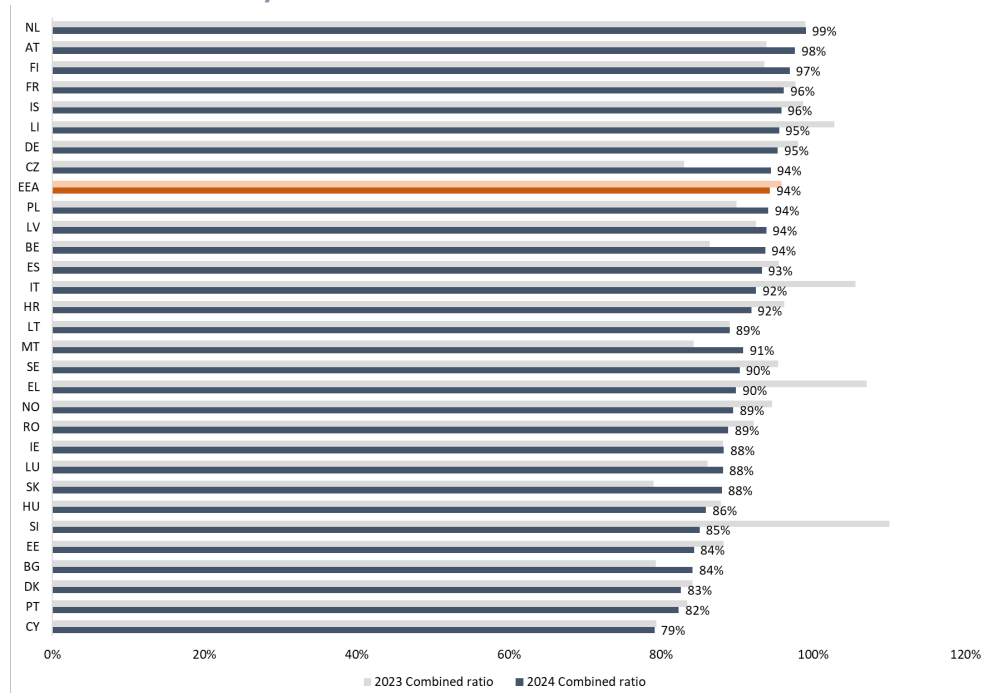


Source: EIOPA Solvency II Database (S.05.01.01.01)

<sup>7</sup> This graph excludes all life obligations to ensure comparability across Member States. Notably, PT Claims ratio that includes “annuities stemming from non-life insurance contracts and relating to health insurance obligations” was 60,7% in 2024 and 58,7% in 2023.

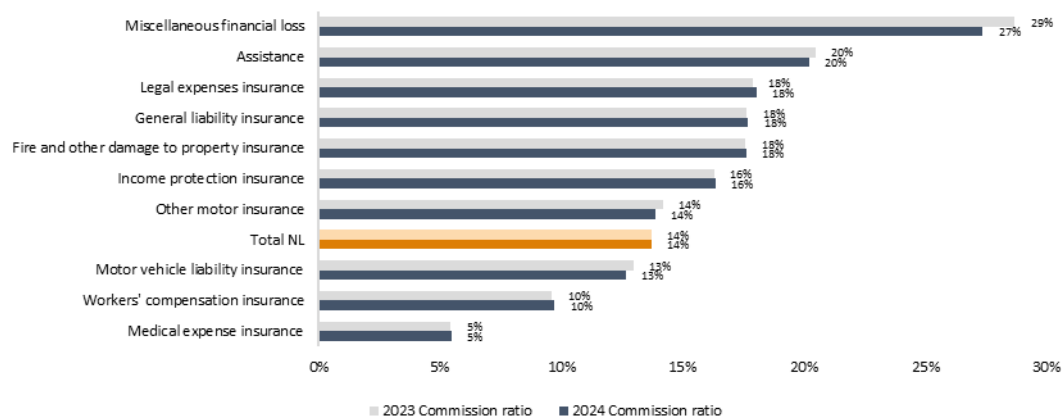
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**Figure 21 - Combined ratio by Member State – 2023-2024<sup>8</sup>**



Source: EIOPA Solvency II Database (S.05.01.01.01)

**Figure 22 – Non-life insurance commission rates by non-life line of business – 2023-2024**

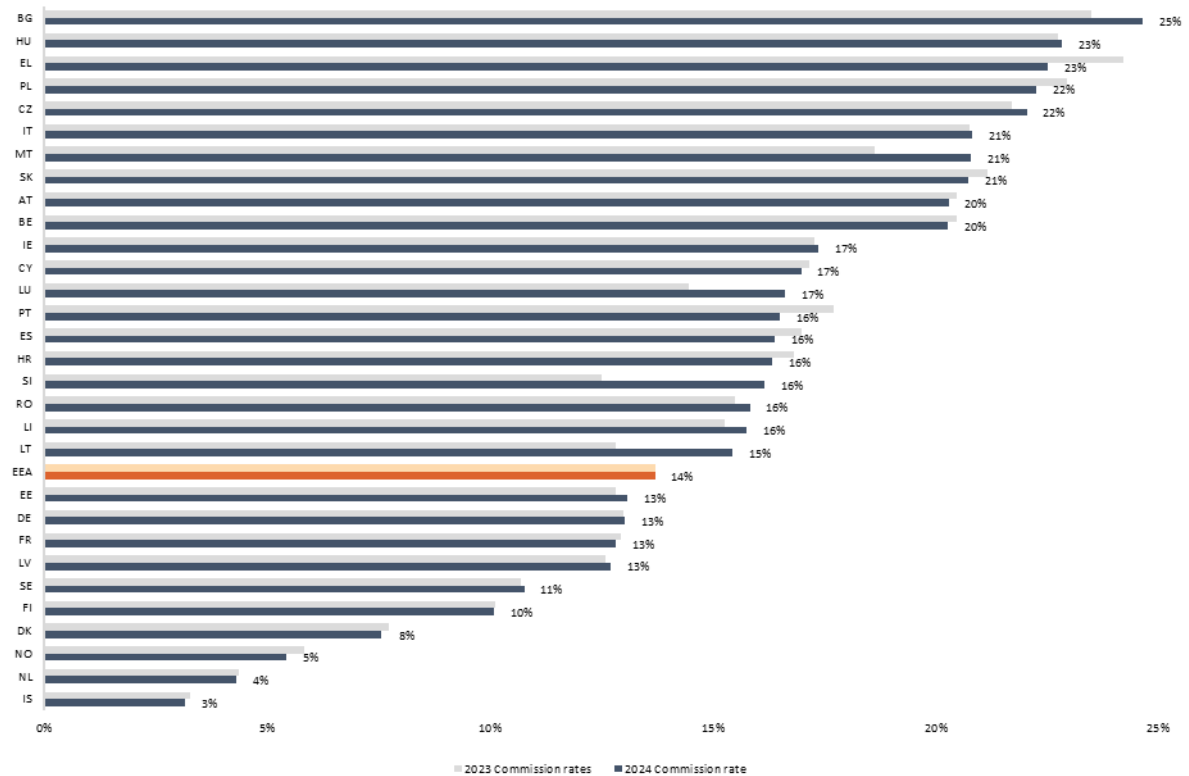


Source: EIOPA Solvency II Database (S.05.01.01.01)

<sup>8</sup> This graph excludes all life obligations to ensure comparability across Member States. Notably, PT Combined ratio that includes “annuities stemming from non-life insurance contracts and relating to health insurance obligations” was 86,4% in 2024.

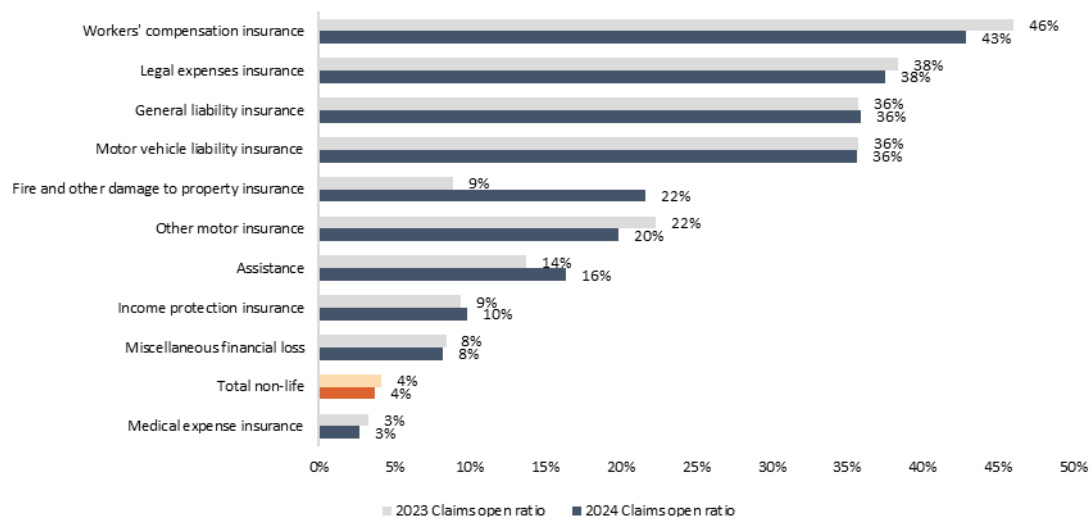
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**Figure 23 – Non-life commission rates by Member State – 2023-2024**



Source: EIOPA Solvency II Database (S.05.01.01.01)

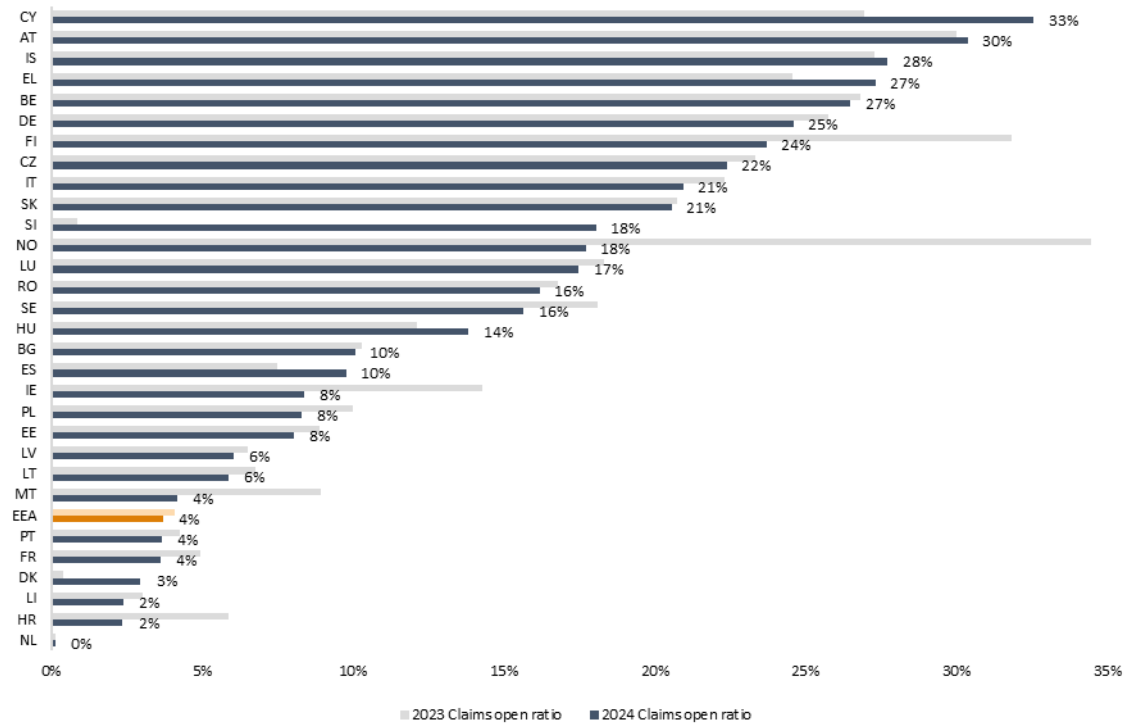
**Figure 24 – Claims open ratio by non-life line of business – 2023-2024**



Source: EIOPA Solvency II Database (S.20.01.01)

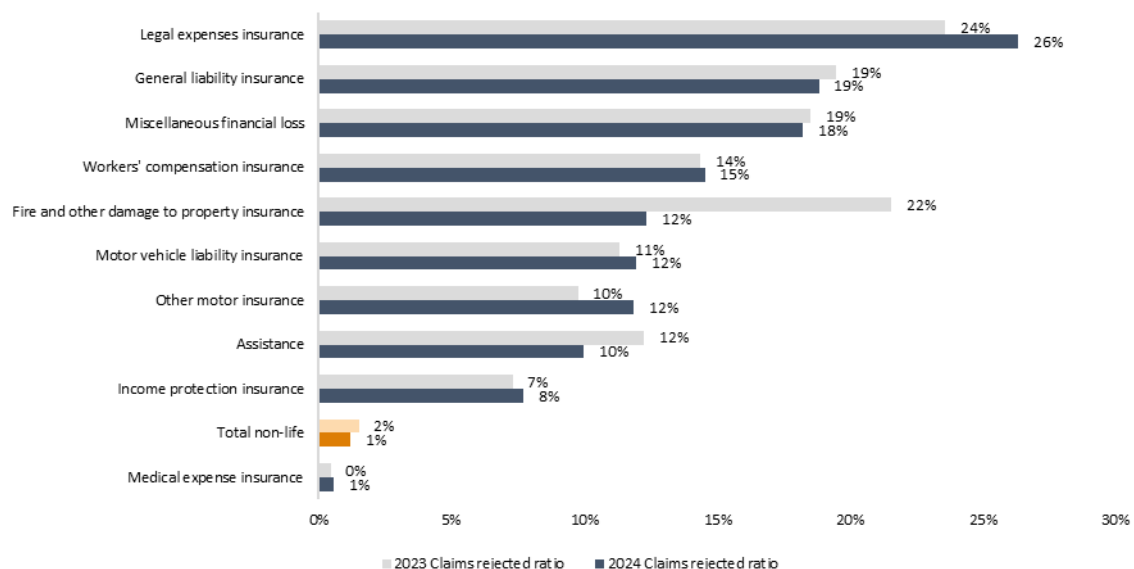
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**Figure 25 – Claims open ratio by Member state – 2023-2024**



Source: EIOPA Solvency II Database (S.20.01.01)<sup>9</sup>

**Figure 26 – Claims rejected ratio by non-life line of business – 2023-2024**

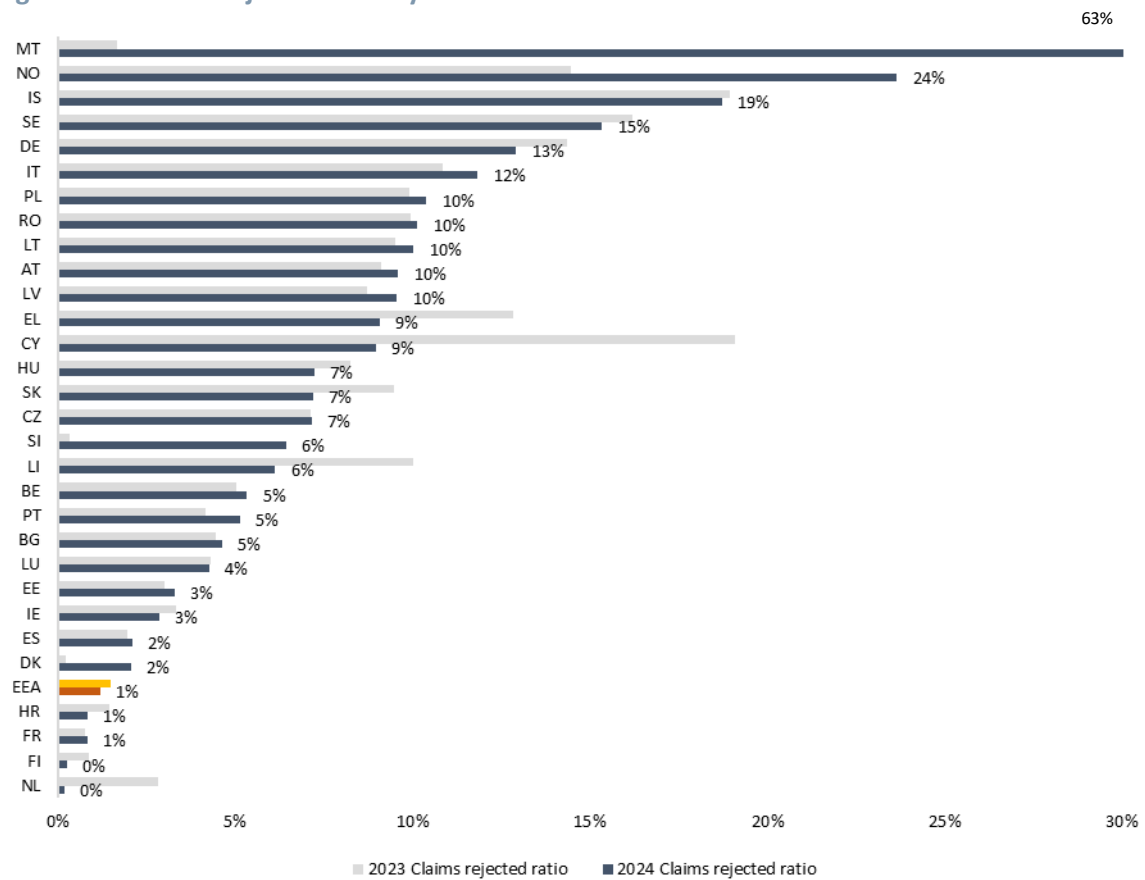


Source: EIOPA Solvency II Database (S.20.01.01)

<sup>9</sup> The Claims open ratio for FI is based on incomplete Solvency II data and is to be treated as provisional.

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**Figure 27 – Claims rejected ratio by Member State – 2023-2024**



Source: EIOPA Solvency II Database (S.20.01.01)<sup>10</sup>

<sup>10</sup> The Claims rejected ratio for FI is based on incomplete Solvency II data and is to be treated as provisional.

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## SOLVENCY II LINES OF BUSINESS

Non-life lines of business	Definition <sup>(11)</sup>
(1) Medical expense insurance	Medical expense insurance obligations where the underlying business is not pursued on a similar technical basis to that of life insurance, other than obligations included in the line of business 3.
(2) Income protection insurance	Income protection insurance obligations where the underlying business is not pursued on a similar technical basis to that of life insurance, other than obligations included in the line of business 3.
(3) Workers' compensation insurance	Health insurance obligations which relate to accidents at work, industrial injury and occupational diseases and where the underlying business is not pursued on a similar technical basis to that of life insurance.
(4) Motor vehicle liability insurance	Insurance obligations which cover all liabilities arising out of the use of motor vehicles operating on land (including carrier's liability).
(5) Other motor insurance	Insurance obligations which cover all damage to or loss of land vehicles (including railway rolling stock).
(7) Fire and other damage to property insurance	Insurance obligations which cover all damage to or loss of property other than those included in the lines of business 5 and 6 due to fire, explosion, natural forces including storm, hail or frost, nuclear energy, land subsidence and any event such as theft.
(8) General liability insurance	Insurance obligations which cover all liabilities other than those in the lines of business 4 and 6.
(10) Legal expenses insurance	Insurance obligations which cover legal expenses and cost of litigation.
(11) Assistance	Insurance obligations which cover assistance for persons who get into difficulties while travelling, while away from home or while away from their habitual residence.

<sup>11</sup> Commission Delegated Regulation (EU) 2015/35 of 10 October 2014 supplementing Directive 2009/138/EC of the European Parliament and of the Council on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II), pages 227 and 228, [Link](#).

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(12) Miscellaneous financial loss	Insurance obligations which cover employment risk, insufficiency of income, bad weather, loss of benefit, continuing general expenses, unforeseen trading expenses, loss of market value, loss of rent or revenue, indirect trading losses other than those mentioned above, other financial loss (non-trading) as well as any other risk of non-life insurance not covered by the lines of business 1 to 11.
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Life insurance lines of business	Definition
(29) Health insurance	Health insurance obligations where the underlying business is pursued on a similar technical basis to that of life insurance, other than those included in line of business 33
(30) Insurance with profit participation	Insurance obligations with profit participation other than obligations included in line of business 33 and 34.
(31) Index-linked and unit-linked insurance	Insurance obligations with index-linked and unit-linked benefits other than those included in lines of business 33 and 34.
(32) Other life insurance	Other life insurance obligations other than obligations included in lines of business 29 to 31, 33 and 34.



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## ANNEX III — LIST OF NATIONAL COMPETENT AUTHORITIES

Austria	AT	Financial Markets Authority (FMA) Federal Ministry for Digital and Economic Affairs with Trade Authorities	Italy	IT	Istituto per la Vigilanza sulle Assicurazioni (IVASS) Commissione di Vigilanza sui Fondi Pensione (COVIP)
Belgium	BE	Financial Services and Markets Authority (FSMA)	Latvia	LV	Latvijas Banka
Bulgaria	BG	Financial Supervision Commission	Liechtenstein	LI	Financial Market Authority (FMA)
Croatia	HR	Croatian Financial Services Supervisory Authority (HANFA)	Lithuania	LT	Bank of Lithuania
Cyprus	CY	Ministry of Finance Insurance Companies Control Service (ICCS) Ministry of Labour, Welfare and Social Insurance; Registrar of Occupational Retirement Benefit Funds	Luxembourg	LU	Commissariat aux Assurances
Czechia	CZ	Czech National Bank	Malta	MT	Malta Financial Services Authority
Denmark	DK	Financial Supervisory Authority (Danish FSA)	Netherlands	NL	Financial Supervisory Authority (AFM)
Estonia	EE	Estonian Financial Supervision Authority	Norway	NO	Financial Supervisory Authority of Norway
Finland	FI	Finnish Financial Supervisory Authority (FIN-FSA)	Poland	PL	Financial Supervision Authority (KNF)
France	FR	Autorité de Contrôle Prudentiel et de Résolution (ACPR)	Portugal	PT	Insurance and Pension Funds Supervisory Authority (ASF)
Germany	DE	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)	Romania	RO	Financial Supervisory Authority (ASF)
Greece	EL	Bank of Greece Hellenic Ministry of Labour, Social Security and Social Solidarity	Slovakia	SK	National Bank of Slovakia
Hungary	HU	Central Bank of Hungary	Slovenia	SI	Insurance Supervision Agency
Iceland	IS	Financial Supervisory Authority (FME)	Spain	ES	Ministry of Economy — Directorate-General of Insurance and Pension Funds
Ireland	IE	Central Bank of Ireland Pensions Authority	Sweden	SE	Finansinspektionen (FI)

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## ANNEX IV — METHODOLOGY

The Consumer Trends Report methodology was adopted in 2012 and revised in 2013 and 2020 to produce more robust Consumer Trends Reports and adapt to the availability of new data to improve the robustness of the report. In terms of data source:

- ▶ As far as the **quantitative information** is concerned, the main database that are leveraged are the Solvency II database and, starting from 2020 the IORPs database.

The Solvency II reporting framework represents the most comprehensive database on the European insurance sector to date. Among other features, it collects premiums, claims and costs data from insurance undertakings on a line of business basis, which has been used in the present report. However, given its prudential nature, Solvency II's lines of business are risk categories and not product categories, meaning that, for example, part of the premiums collected through motor insurance policies can be distributed through different lines of business. It also captures data without distinction between premiums gathered from individual retail consumers and from corporate. Although data quality checks are regularly performed by NCAs and EIOPA, the quality of the data as well as the value that can be extracted from it (e.g. trends in the indicators over time) is improving over the years. Still, in particular when product-by-product information is used, the conclusions should be interpreted cautiously. The analysis of the Solvency II data is mainly performed using a list of Retail Risk Indicators (RRI)<sup>12</sup>.

- ▶ The **qualitative data** are mainly sourced from the Members' Survey, the stakeholders' survey and an EU-wide Eurobarometer survey.

This year, NCAs were requested to fill in two surveys for insurance (1) the top three survey (including consumer issues, positive development, trend scoring and supervisory activities), (2) information on complaints. The same surveys were requested for pensions.

In addition to the Members' contribution, EIOPA gathered inputs from other stakeholders (Insurance Europe, Pensions Europe, Better Finance, BEUC, the European Federation of Insurance Intermediaries — BIPAR, and the Nordic Financial Union), which answered directly through a questionnaire. Additionally, EIOPA received input from its two stakeholder groups, the IRSG and the OPSG. EIOPA also regularly meets stakeholders to discuss concrete insurance and pensions issues. Their feedback is particularly relevant to refine some of the conclusions of

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<sup>12</sup> The Retail Risk Indicators methodology has been revised in November 2021: [Retail risk indicators: methodology update | Eiopa \(europa.eu\)](https://eiuropa.eu)

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the report, in particular with regard to those aspects for which a straightforward interpretation of the data is not possible.

In 2025 EIOPA contracted Ipsos European Public Affairs to carry out an EU-wide Eurobarometer survey covering:

- ▶ **EU citizens, aged 18 and over:** a representative sample of EU citizens, aged 18 and over, in each of the 27 Member States of the EU was interviewed. Between 14 May and 22 May 2025, 25 846 interviews were conducted via computer-assisted web interviewing (CAWI), using Ipsos online panels and their partner network.

The survey aimed at gathering consumers experience with insurance and pension related services.

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