

Country-by-country analysis

POLAND

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

POLAND

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	37,654	8.3%
(Re)insurance GWP (in million) ⁴	15,444.623	1.1%
Number of (re)insurance undertakings ⁵	52	3.00%
Number of registered insurance intermediaries	30525	3.5%

National competent authority:

Polish Financial Supervision Authority

³ Based on eurostat data for 1 January 2022:

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

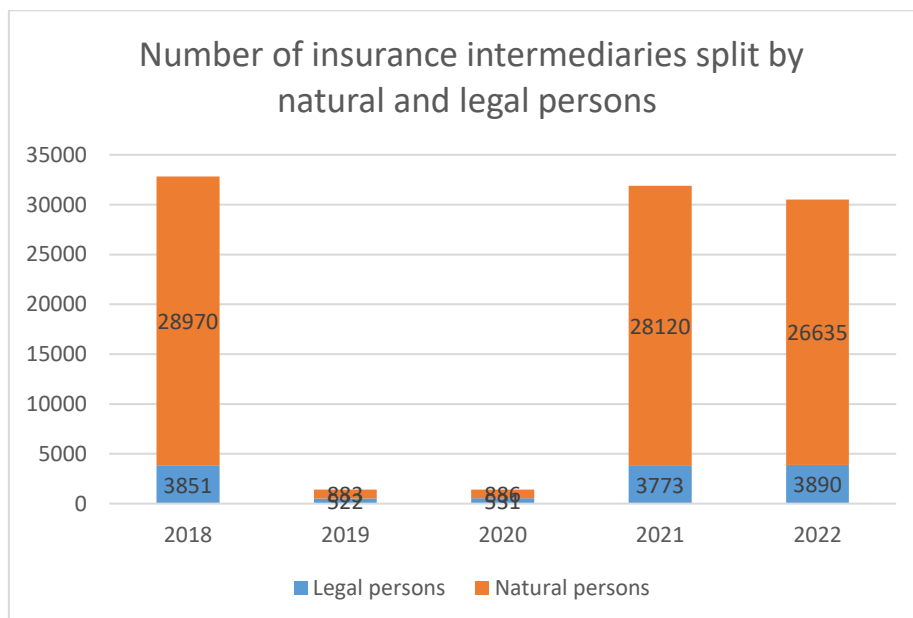
⁴ "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

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:

Please be informed that for 2019 and 2020 we can present number of legal and physical person only in the relation of the insurance brokers.

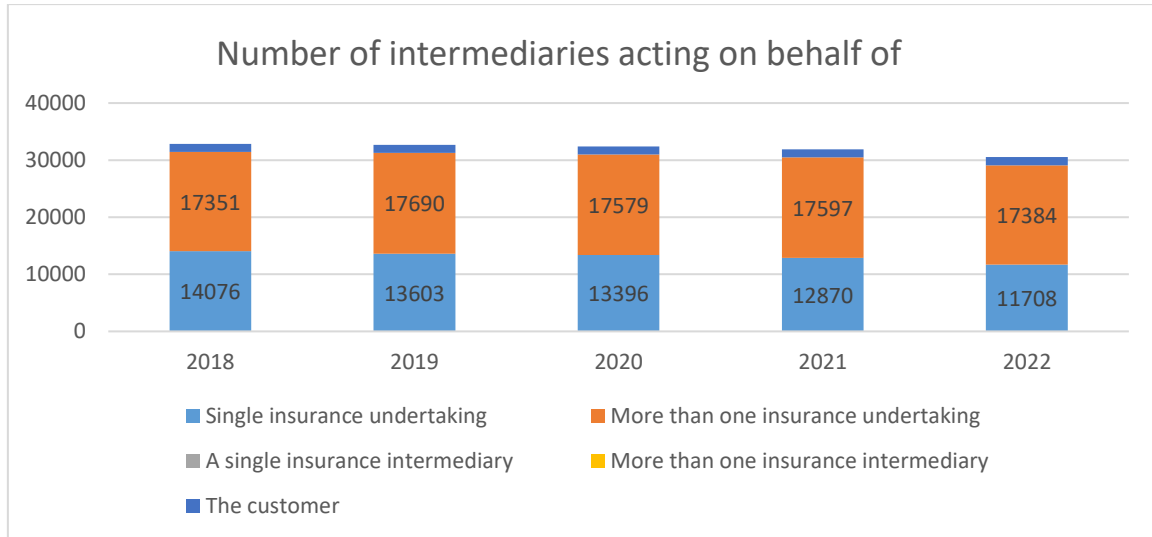
The position "Legal persons" includes:

- legal persons (as defined in PL Civil Code)
- another entities, which are not natural persons (e.g. associations, companies that are not legal persons)

Online registration system:

The register of insurance intermediaries is composed of a part of brokers and agents. Applications for registration, modification and deletion of insurance agents are sent electronically to the register by insurance undertakings. After registration, the insurance undertaking receives feedback about the registrations. The on-line register is updated every 24 hours.

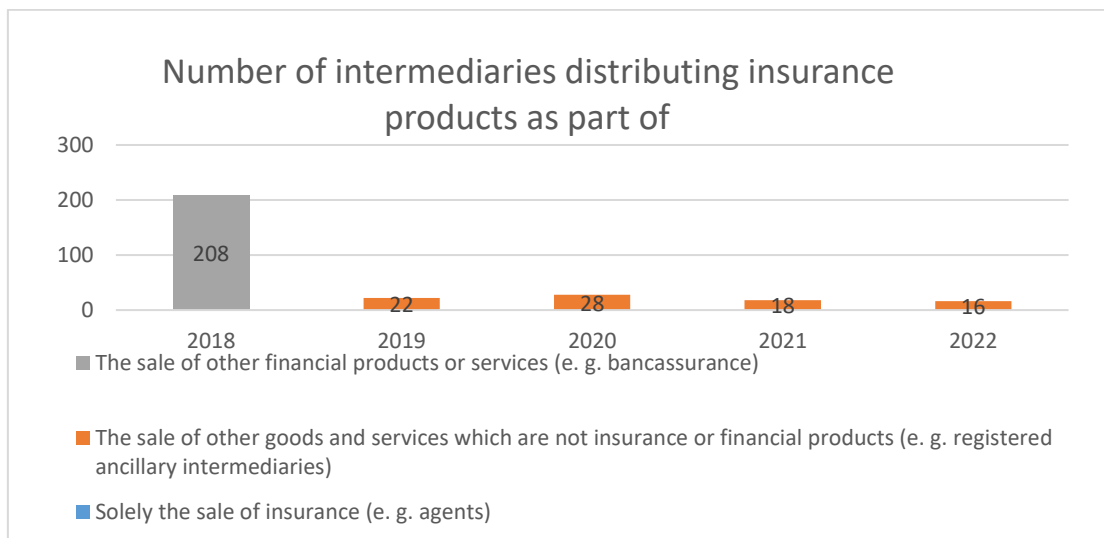
Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



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

In Poland intermediary could not be represented by another intermediary, so categories of insurance intermediaries acting on behalf of a single insurance intermediary and on behalf of more than one insurance intermediary do not apply. Insurance agents are represented in categories of insurance intermediaries acting on behalf of single insurance undertaking and on behalf of more than one insurance undertaking, insurance brokers in category of insurance intermediaries acting on behalf of the customer.

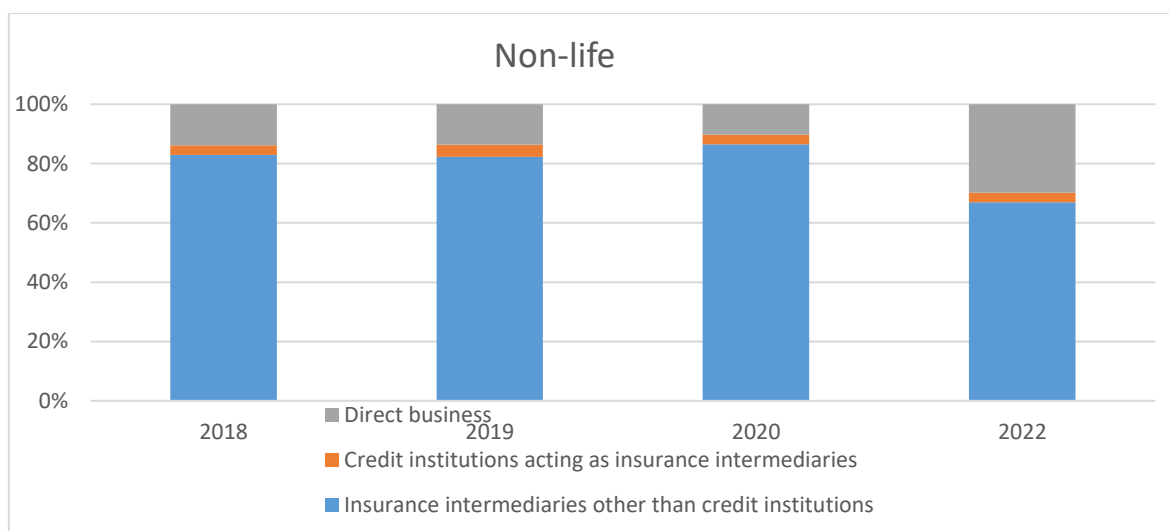
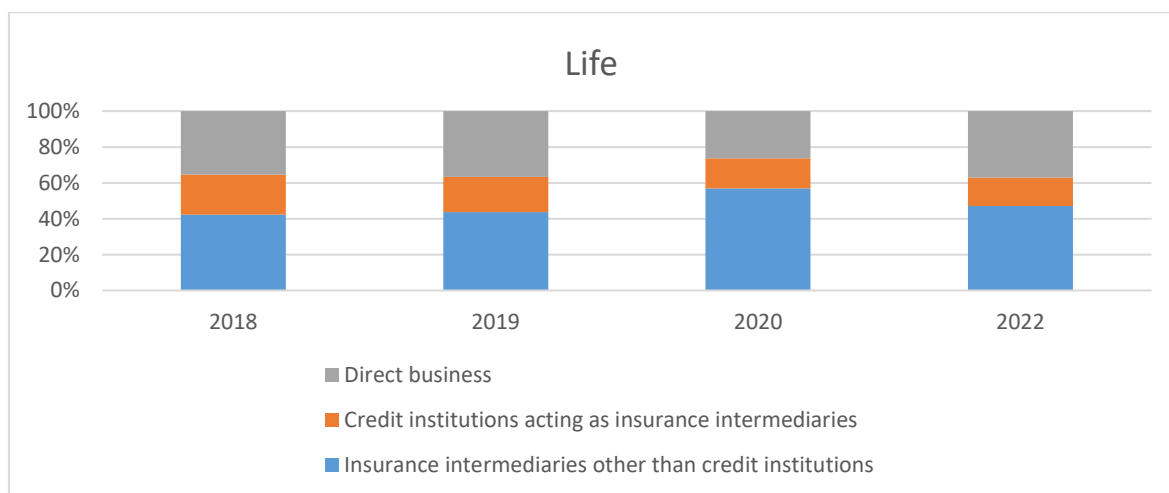
Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



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

KNF does not collect in the register information about the type of intermediary in accordance with categories indicated by EIOPA in the table or similar categories. As a rule, intermediaries are categorized in our register as insurance agents, insurance brokers or ancillary insurance agents - we cannot distinguish intermediaries that solely sell insurance and those that distribute insurance products as a part of other financial products or services. For that reason we could only estimate the number of registered ancillary intermediaries, which is given the category of the sale of other goods and services which are not insurance or financial products).

GWP split by distribution channels:



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

Data comes from national specificity reporting.

In the category named "credit institutions acting as an insurance" there was presented only data for Banks and Co-operative Savings and Credit Unions acting as an insurance.

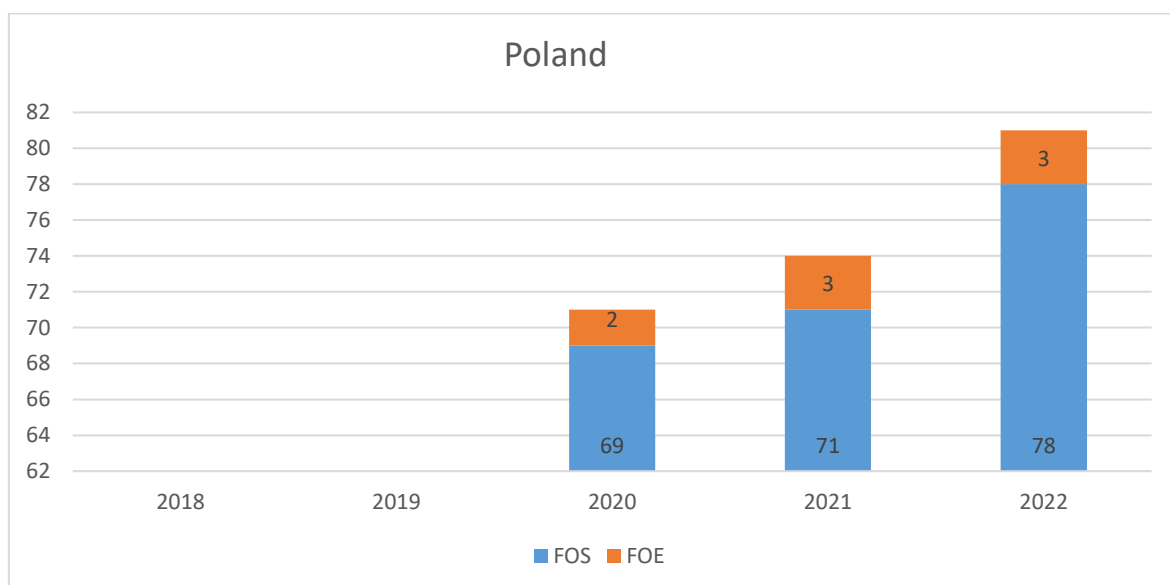
In the category named "insurance intermediaries other than credit institutions" we presented GWP without direct business, banks and credit unions in order to present true "total" values.

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

Life = 0,01%;

Non-life 1,91%

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>	37	0	37
<i>Belgium</i>	30	0	30

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>	25	0	25
<i>Cyprus</i>	26	0	26
<i>Croatia</i>	16	0	16
<i>Czech Republic</i>	48	1	49
<i>Denmark</i>	32	0	32
<i>Estonia</i>	35	0	35
<i>Finland</i>	28	0	28
<i>France</i>	39	0	39
<i>Germany</i>	57	0	57
<i>Greece</i>	23	0	23
<i>Hungary</i>	36	0	36
<i>Iceland</i>	6	0	6
<i>Ireland</i>	35	0	35
<i>Italy</i>	30	1	31
<i>Latvia</i>	35	0	35
<i>Liechtenstein</i>	6	0	6
<i>Lithuania</i>	41	0	41
<i>Luxembourg</i>	29	0	29
<i>Malta</i>	28	0	28
<i>Netherlands</i>	34	0	34
<i>Norway</i>	8	0	8
<i>Poland</i>	0	0	0
<i>Portugal</i>	29	0	29
<i>Romania</i>	38	1	39
<i>Slovakia</i>	39	0	39
<i>Slovenia</i>	26	0	26
<i>Spain</i>	34	0	34
<i>Sweden</i>	33	0	33
<i>Total EEA</i>	883	3	886

Additional information not covered above :

In 2022 insurance brokers share in GWP accounted for 13,68% in life insurance and 19,86 % in non-life insurance.

Information on the powers of the NCA

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

In our opinion KNF is sufficiently empowered to do proper conduct of business supervision, however we do not exclude further increase of our resources if necessary.