CMA Markets Strategic Review Consultation Response from PIB Insurance

PIB Group Response

On 27 November 2025, BIBA submitted a letter from CEO Graeme Trudgill to the CMA on behalf of its members, requesting that the requirement for insurance intermediaries to submit the annual private motor insurance protected no-claims bonus declaration be reviewed, and preferably removed. We agree with the points raised in BIBA's letter and support the view that the continued requirement for insurance intermediaries to submit the annual private motor insurance protected no-claims bonus statement to the CMA is no longer justified, for the following reasons:

1. **Duplication of data and unnecessary burden**
   Insurers already provide the CMA with the relevant data, and our intermediary submission simply replicates information that is held and reported elsewhere. This duplication represents an inefficient use of resources for both insurance intermediaries and the CMA, without delivering any additional regulatory or consumer benefit. As the CMA would continue to receive the relevant information directly from insurers, there would be no customer detriment if the obligation on intermediaries were removed.

2. **Timeliness and operational constraints**
   Our ability to prepare and submit the statement is dependent on insurers publishing their tables and rates. In practice, these are sometimes made available only very close to the CMA deadline, in some cases just one or two working days before submission is due. This limits our ability to plan and allocate resources effectively and introduces unnecessary operational risk and pressure, with no corresponding benefit to oversight or outcomes.

3. **Disproportionate administrative effort for groups of firms**
   As a group comprising multiple firms, dealing with dozens of insurers, the process to gather tables is time-intensive. Insurers use different methods to publish their tables; some display them on their own websites, some send them by email and others make them available through broking systems such as Acturis. Overall, the process is highly manual and administratively intensive, often taking several days to complete. This resource burden is disproportionate to the limited value of the

intermediary submissions, particularly in circumstances where the CMA already receives comprehensive data directly from insurers.

For these reasons, we request that the Order should be amended to remove the requirement for insurance intermediaries to submit the annual statement to the CMA.