

To: Corporate Reporting - Investments & Sustainable Finance WG
 From: Maria Del Mar Narvaez Pineda
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 Reference: ECO-CRISF-25-054
 Subject: EC FAQ's on Taxonomy Climate, Environmental, and Disclosures Delegated Acts

Summary

On 5 March, the European Commission (EC) published a Commission Notice on the interpretation and implementation of certain legal provisions of the EU Taxonomy Environmental Delegated Act, the EU Taxonomy Climate Delegated Act and the EU Taxonomy Disclosures Delegated Act: [here](#).

According to the EC procedures, this document formally adopts the [draft Frequently Asked Questions \(FAQs\)](#) on the EU Taxonomy Environmental, Climate and Disclosures Delegated Acts published by the EC on 29 November 2024, which Insurance Europe shared with members on 3 December 2024, highlighting the most relevant questions: [here](#).

The secretariat has compared the FAQs of March 2025 against the draft FAQs of November 2024 to spot any changes of substance, particularly with regards to the relevant questions previously highlighted. The changes (if any) do not appear of substance, namely:

FAQ #	Draft FAQs of November 2024	FAQs of March 2025
1	For companies falling within the scope of the Corporate Sustainability Due Diligence Directive (CSDDD) after the date of its application and for any other companies voluntarily complying with its provisions, full compliance with the CSDDD should normally constitute compliance with the OECD Guidelines for Multinational Enterprises or the UN Guiding Principles.	For companies falling within the scope of the Corporate Sustainability Due Diligence Directive (CSDDD) after the date of its application and for any other companies voluntarily complying with its provisions, full compliance with the CSDDD should normally constitute compliance with the relevant standards in OECD Guidelines for Multinational Enterprises or the UN Guiding Principles.
47 -> 62	How should one define 'operational primary energy demand', to which reference is made in the substantial contribution criteria of Section 7.7. 'Acquisition and ownership of buildings? The definition provided in the reply to FAQ 153 in Commission Notice C/2023/267 is confusing because it cites the legal definition of primary energy demand without explaining what 'operational' means in that context.	FAQ 47 in the November Draft FAQs has been moved from Section 7.1. 'Construction of new buildings' to section 7.7. 'Acquisition and ownership of buildings', becoming FAQ 62 in the March FAQs.

Next Steps

The secretariat will continue to monitor any further clarifications from the EC regarding the EU Taxonomy's Delegated Acts and inform members accordingly.

