

Insurance Europe questionnaire on compliance with the EU regulation on disclosures relating to sustainable investments and sustainability risks

Referring to: [Regulation of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector](#)

This document provides a series of questions on the practical implementation of the proposed requirements. Answers should be sent at investments@insuranceeurope.eu before **22 January 2019 cob**. The answers will remain confidential and will be used for the preparation to the ESAs consultation on the Level 2 measures.

A summary of the upcoming regulatory requirements for insurers related to the application of the EU regulation on disclosures for sustainable investments and sustainability risks (based on Insurance Europe analysis) can be found here: [ECO-LTI-19-201](#).

The Regulation on sustainability-related disclosures

The **regulation on disclosures relating to sustainable investments and sustainability risks** was provisionally agreed at political level on March 2019 and is expected to be published in the Official Journal of the EU in **December 2019**. It will then apply to insurers in 15-month time (March 2021 tbc).

As described in the summary document ([ECO-LTI-19-201](#)), there are transparency requirements at entity and product levels as well as specific disclosures for sustainable products, ie having environmental/social characteristics and/or sustainability objectives. In this respect, the European Supervisory Authorities (ESAs) are preparing detailed measures (Level 2) to support the requirements in the Regulation. This work will cover the content, methodologies and presentation of the requirements and will target the following areas (as highlighted in the table below):

1. Disclosures at entity level on websites regarding adverse sustainability impacts (ASIs) on:
 - Climate and environment-related matters
 - Social and employee matters, respect of human rights, anti-corruption and anti-bribery matters
2. Disclosures for products:
 - with environmental/social characteristics
 - with sustainability objectives

These include pre-contractual disclosures and disclosures in websites and periodic reports

<i>Disclosures:</i>	<i>Entity level</i>	<i>Product level</i>	<i>Sustainable products</i>
<i>on sustainability risks (SRs)</i>	Yes	Yes	Yes
<i>on adverse sustainability impacts (ASIs)</i>	Yes	Yes	Yes
<i>specific disclosures</i>	-	-	Yes

Questions on the Regulation on sustainability-related disclosures

On sustainability risks (SRs) and adverse sustainability impacts (ASIs):

1. *Do you currently have sustainability policies which describe how SRs and/or ASIs are dealt with in the investment process? Are these policies public?*
2. *Has your company committed to any sustainability-related initiative related to investments, eg TCFD or any other national regulation? If so, please provide some information.*
3. *Do you have specific company ESG targets? If so, what are they?*
4. *What steps do you currently take or are you considering taking in order to consider SRs/ASIs?*
5. *What type of information would it be technically easier to disclose with respect to the integration of ASIs? Please describe information that would be available in terms of engagement policies, internal investment policies, etc.*
6. *Do you currently have any indicators (qualitative or quantitative) to assess the impact of your investment decisions on sustainability factors or their external implications in general?*

On specific disclosures:

7. *The pre-contractual disclosure of the information should be done according to Article 185 of the Solvency II Directive and Article 29 of IDD, which are quite general in nature and sometimes detailed at national level. Do you have an opinion on where this information should be available and how the provision of information can limit information overload/duplication?*
8. *Do you currently offer a product promoting environmental/social characteristics and/or a product with sustainability objectives? If so, could you indicate what product it is and what type of information you currently provide to your customers (pre-contractual disclosures)? Could you please share any material with respect to such products?*
9. *If you offer a product promoting environmental/social characteristics and/or a product with sustainability objectives, is the sustainability-related information subject to any external verification (eg regulatory review, audit, etc)?*
10. *If your financial product has an index as reference benchmark, how do you define alignment with the sustainability-characteristics of the product? Do you provide comparison with respect to other market indices?*
11. *Do you offer any product with specific carbon emission objectives? If so, how do you measure its objective?*
12. *If you offer a product promoting environmental/social characteristics and/or a product with sustainability objectives, what type of information do you disclose in your websites and periodic reports? Do you have an estimate of related disclosure costs? Could you please share any material with respect to such products?*