

Updated Sustainable Finance position

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1. Insurers as preparers: Minimising Burden and Enhancing Operability

Supporting the transition and smarter and simpler rules

The insurance industry fully supports the objectives of the European Green Deal — achieving a net-zero EU economy by 2050, with strong 2030 milestones. However, sustainability regulation should enable this transition, not divert resources away from it. Compliance obligations must remain proportionate to the goal, ensuring that efforts and capital are focused on real transition activities rather than administrative reporting.

Sustainability-related regulation should help embed sustainability in business and investment practice, rather than layering new compliance obligations. Reliable, comparable sustainability data can enable insurers to steer capital effectively toward the EU's green transition objectives.

Corporate Sustainability Reporting Directive (CSRD)

While insurers support the objectives of increased transparency and standardisation of the CSRD, its implementation risks creating excessive and duplicative reporting burdens. Policymakers should ensure that sustainability reporting requirements remain targeted, practical, and cost-effective — supporting, not hindering, competitiveness and innovation.

Sustainable Finance Disclosure Regulation (SFDR)

The SFDR requirements should focus on material, investor-relevant information and be applied proportionately to relevant asset classes, and be consistent across the sustainable finance regulatory architecture, including the SFDR, the CSRD, the European Sustainability Reporting Standards (ESRS), the Insurance Distribution Directive (IDD), and the EU Taxonomy. A revised SFDR framework should focus on usability, clear definitions, and a pragmatic approach that facilitates transparency and enables insurers to channel capital toward sustainable investments. In addition, it must acknowledge the special features of an insurer's General Account.

EU Taxonomy

Reporting requirements under the EU Taxonomy should focus on creating a usable, practical tool for investment decision-making. Simplification and clearer guidance are key to ensuring that it supports, rather than constrains, sustainable investment. The framework should also strive to adequately consider transition finance, not only activities which are already green.

European Single Access Point (ESAP)

The creation of a centralised EU electronic register (ESAP) for public data remains strongly supported, as it would improve comparability, transparency, and cost efficiency while reducing repeated information requests. However, burden stemming from tagging requirement should not outweigh the benefits for investors.

2. Insurers as investors: Ensuring Stability, Predictability, and Availability

Stable and predictable frameworks

The insurance industry can play a key role in the sustainability transition in both investing in sustainable assets and providing insurance coverage to help the society to deal with sustainability risks.

Regulatory stability is essential to investor confidence. Sudden or frequent changes to sustainability frameworks—such as the SFDR, CSRD, EU Taxonomy, or EU Green Bond Standard—as well as shifts in capital requirements or policy commitments on renewable energy and transition projects, risk undermining long-term investment planning and slowing Europe’s transition ambitions. Insurers remain bound by their obligations to deliver returns to policyholders and shareholders and require regulatory certainty to align investment strategies with long-term sustainability goals.

Transparency and comparability

The sustainable finance framework should focus on delivering transparent and comparable information to investors, while avoiding information duplication and overload for businesses and consumers. Enhanced transparency can help make sustainability more mainstream in an affordable, simple and streamlined way by mobilising retail investors and citizens.

Availability of green investment opportunities

The availability of assets that meet investors’ needs to be improved. While progress has been made, currently, the demand for attractive sustainable assets is still not matched by the availability of such assets. Given the lack of suitable sustainable investment opportunities, the right incentives are needed to stimulate sustainable transformation, by supporting projects and activities that will increase the volume of such investments.

When it comes to higher-risk investments — particularly in early-stage or innovative green technologies — enhanced public-private risk sharing is essential. Venture capital and infrastructure financing for the transition require frameworks that de-risk private participation through public guarantees, co-investment mechanisms, or blended finance structures.

Appropriate design and calibration of prudential rules

Prudential regulation should reflect the long-term nature of insurance and pension business models and be risk-based. Adjustments to capital requirements must be carefully calibrated to avoid creating artificial incentives or disincentives based on green/brown classifications. Instead, rules should support investments that drive the transition while preserving financial stability and the sector’s capacity to absorb shocks.

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