

March 1st, 2022

Statement of the German Association of Public Insurers¹ on the European Commission's Proposal for a Regulation on a European Single Access Point for Business Data (ESAP)

The Association of German Public Insurers strongly welcomes the European Commission's initiative to strengthen the availability of sustainability data. As Germany's second-largest primary insurer with a strong regional presence, the group supports the goal of a more sustainable economy. High-quality data is central to this.

The public insurers are signatories to the Principles for Responsible Investment (PRI) and follow environmental, social and governance criteria in their investment decisions. The Sustainable Finance Disclosure Regulation (SFDR) requires insurers to disclose the sustainability data of their investments. The Taxonomy Regulation, specifically Art. 8, requires disclosure of additional sustainability indicators. The public insurers expect ESAP, in combination with the Corporate Sustainability Reporting Directive² (CSRD), to provide this all data in a directly usable form, as well as free of charge, in a public database.

The proposed regulation is therefore an important step into the right direction. The association therefore emphasizes the following four aspects, especially with regard to the contributions of the co-legislators European Parliament and Council:

- 1. Complete dovetailing of SFDR, taxonomy regulation and CSRD**
- 2. Availability of sustainability data for all asset classes**
- 3. No additional reporting burden for companies**
- 4. A Roadmap to ensure a timely ESAP-launch**

¹ The Association of German Public Insurers (Verband öffentlicher Versicherer, VöV, www.voev.de) is the umbrella organisation of the German public insurance companies and a corporation established under public law. Founded in 1911, it represents 10 primary insurers across Germany that are deeply embedded in their regions. The group is the second-largest primary insurance provider in the German market, with more than EUR144 billion of investments under management, thereby making a significant contribution to the European economy. The group is committed by law to support the public good. It has 52 million insurance contracts and pays out EUR18.4 billion each year to its clients. The public insurers employ 30,000 people. Through 17,500 own branches and offices of their partners, they offer advice and protection across most insurance sectors (health, life, pension, motor, indemnity, fire, etc.) for retail clients of all income groups and for professional clients, with a specific focus on small and medium-sized companies. The Association of German Public Insurers represents the interests of its members at the national and the European level through its head offices in Berlin and Düsseldorf and its liaison office in Brussels.

² Compare the statement on this under <https://www.voev.de/wp-content/uploads/2021/07/2021-07-13-VoeV-comments-Corporate-Sustainability-Reporting-Directive.pdf>

1. Complete dovetailing of SFDR, taxonomy regulation and CSRD

Discussions on the data to be disclosed through the CSRD are still ongoing. In combination with ESAP, there should be a close interconnection so that all mandatory data for the disclosure of insurers and other financial market participants according to SFDR and the Taxonomy Regulation can be retrieved in ESAP. Otherwise, the quality and comparability of the data for SFDR and the Taxonomy Regulation would be counteracted.

2. Availability of sustainability data for all asset classes

In line with the first point, the German Association of Public Insurers suggests including data from other investment objects. All asset classes, especially government bonds, which is particularly relevant for insurers, should be taken into account in ESAP. The proposal should therefore be extended such that the data from public institutions required for SFDR and the Taxonomy Regulation must be included by them in ESAP as well. The additional, voluntary inclusion of non-European sustainability data from companies and other asset classes in ESAP should also be made possible.

3. No additional reporting burden for companies

The German Association of Public Insurers strongly welcomes the fact that ESAP does not create any new reporting obligations for the companies, but rather compiles existing data centrally. This principle should be strictly upheld in the negotiations of the co-legislators. The association supports the use of the Legal Entity Identifier (LEI) as the central identifier for ESAP, as was also suggested in the contribution to the impact assessment in the initial phase.³

4. A roadmap to ensure a timely ESAP-launch

In light of the increasing data need and disclosure requirements of insurers, the timely launch of ESAP by December 31, 2024 is essential. An implementation roadmap with milestones on the development of implementing technical standards (ITS), the set-up of the database and other aspects is therefore necessary. Furthermore, given the enormous technical complexity of creating such a database, we suggest to support ESMA with an expert group. For further details for an efficient organisational and technical implementation, we refer to the position of the German Insurance Association (GDV).

³ Compare the statement on this under <https://www.voev.de/european-single-access-point/>

The public insurers support the European Commission in the implementation of this ambitious project. It will be an important link between the different regulatory frameworks in the field of sustainable finance. The German Association of Public Insurers look forward to further exchanges on sustainable finance, the contributions of the Parliament and the Council, as well as the cooperation with them.

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