Environmental Statement

2020 Data

European Insurance and
Occupational Pensions Authority

CONTENTS

1. FOREWORD FROM THE EXECUTIVE DIRECTOR

I am pleased to present the environmental statement of the European Insurance and Occupational Pensions Authority (EIOPA) for 2021.

We have long highlighted the vital role that the insurance and occupational pensions sectors can play in the transition to a green economy. In doing so, we have underlined the importance of taking mitigating actions and adapting to risk.

At EIOPA, we too must practice what we preach and since 2018 we have embarked on a journey to reduce our impact on the environment.

In one area of our focus – business travel – our experience during COVID made our journey much easier. As we cancelled missions, we embraced the use of digital technology to manage our work and as we have emerged from the pandemic, we have been re-evaluating our business travel needs. While we greatly value the positive results of human contact and being together in one place, we also recognise that we are able to work productively without always meeting in person.

We are also making progress in other areas, and we know that there is still much work to be done. Indeed, this is our first environmental statement, it will not be our last as we recognise that in fact our journey is never-ending and is one of continuous improvement.

Our commitment to registration and verification under the EU Eco-Management and Audit Scheme (EMAS) and this environmental statement reflect our values, in particular our commitment to being a transparent and responsible organisation. We believe that in sharing our progress, we are not only demonstrating our accountability, but we also hope to inspire others to take steps to improve their own environmental management systems. In this regard, we are happy to join the growing number of EU agencies that are working towards, or have already achieved, EMAS certification.

2. ABOUT THIS DOCUMENT

This environmental statement provides all relevant stakeholders and other interested parties with information concerning environmental performance and activities of the European Insurance and Occupational Pensions Authority (EIOPA) from 01 January to 31 December 2020.

This document has been drafted in accordance with Eco-Management and Audit Scheme (EMAS) Regulation[1] in its last applicable version [(EU) 2017/1505[2] and (EU) 2018/2026[3]], considering as well the European Commission's sectoral reference document for public administration sector [Commission Decision (EU) 2019/61][4].

Annex I provides the validation of the EMAS verifier. It is available on EIOPA's website.

As per our environmental management system (EMS), EIOPA will publish environmental statements on an annual basis on our website.

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[1] Commission Regulation (EC) No 1221/2009; EUR-Lex - 02009R1221-20190109 - EN - EUR-Lex (europa.eu);

[2] Commission Regulation (EU) 2017/1505 EUR-Lex - 32017R1505 - EN - EUR-Lex (europa.eu)

[3] Commission Regulation (EU) 2018/2026 EUR-Lex - 32018R2026 - EN - EUR-Lex (europa.eu)

[4] Commission Decision (EU) 2019/61 EUR-Lex - 32019D0061 - EN - EUR-Lex (europa.eu)

3. ABOUT EIOPA

MISSION AND TASKS

EIOPA is a European Union financial regulatory institution established in 2010 as a consequence of the reforms to the structure of supervision of the financial sector in the European Union. It is an independent advisory body to the European Commission, the European Parliament and the Council of the European Union carrying out specific legal, technical, or scientific tasks and giving evidence-based advice to help share informed policies and laws at the EU and national level.

Its mission is to protect the public interest by contributing to the short-, medium- and long-term stability and effectiveness of the financial system for the EU's economy, businesses, and citizens.

We achieve our mission by promoting a sound regulatory framework for and consistent supervision of insurance and occupational pensions sectors in Europe. This protects the rights of policyholders, pension scheme members and beneficiaries. It also creates public confidence in the EU's insurance and occupational pensions sectors.

Our main goals are:

- To improve consumer protection and rebuild trust in the financial system;
- To ensure strong, effective and consistent regulation and supervision, taking account of the interests of all member states and the different nature of financial institutions;
- To bring about more harmonised and consistent application of the rules for financial institutions and markets across the EU;
- To strengthen the oversight of cross-border groups;
- To promote coordinated supervisory responses from the EU.

TEAMS AND LOCATION

In 2020, the agency is occupying 5.5 floors (4 665m²) in the Westhafen Tower, located in Frankfurt, Germany. The 2nd and 25th through to 28th floors are rented fully by EIOPA and another half floor is rented on 21st.
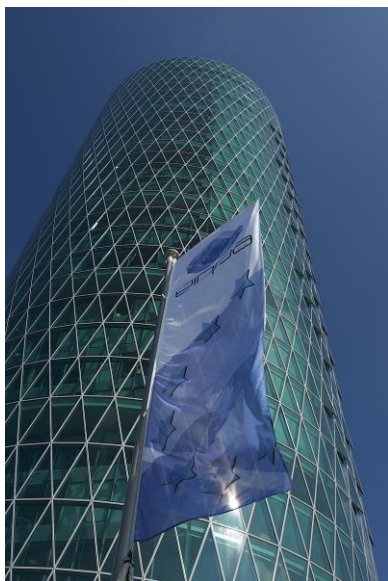
The building owner holds a LEED (Leadership in Energy and Environmental Design) Gold certification for Operations and Maintenance since 2018 for the building.

In 2020, EIOPA employed 170 staff, on-site consultants and trainees add to the teams working in Frankfurt and remote. The environmental management system applies equally to all.

Before the Covid-19 pandemic hit, teleworking was possible according to the Commission implementing rules, but as of 16 March 2020 until the end of the year 2020, staff members were fully teleworking as per the Covid-19 related health directives from the national and EU authorities, with some exceptional office presences.

SCOPE OF EIOPA'S ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

EIOPA recognises its responsibility for making a positive contribution to sustainable development as a long-term goal and considering that the latest EIOPA Regulation[5] states that the authority shall act in its field, "taking into account sustainable business models and the integration of environmental, social and governance related factors" [art. 1(3)], the scope of the (EMAS) registration at EIOPA covers **all activities affecting directly or indirectly the environment**.

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[5] Consolidated text: Regulation (EU) No 1094/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Insurance and Occupational Pensions Authority),

4. DESCRIPTION OF THE ENVIRONMENTAL MANAGEMENT SYSTEM

ABOUT EMAS

The Eco-Management and Audit Scheme[6] (EMAS), approved by the European Parliament and Council, is the European voluntary system designed for organisations wishing to evaluate, manage and improve their environmental performance.

With the developments on the sustainable finance action plan, it became obvious that EIOPA should take into consideration its responsibilities and ensure its own environmental impacts are managed appropriately. This gave birth to the EMAS project, aiming at EMAS registration. Although the Covid-19 crisis held us back from concluding the project earlier, we are now going into a continuous improvement of EIOPA's impacts – positive and negative.

CONTEXT AND PURPOSE OF EIOPA'S ENVIRONMENTAL MANAGEMENT SYSTEM

EIOPA works with a wide range of stakeholders (SH):

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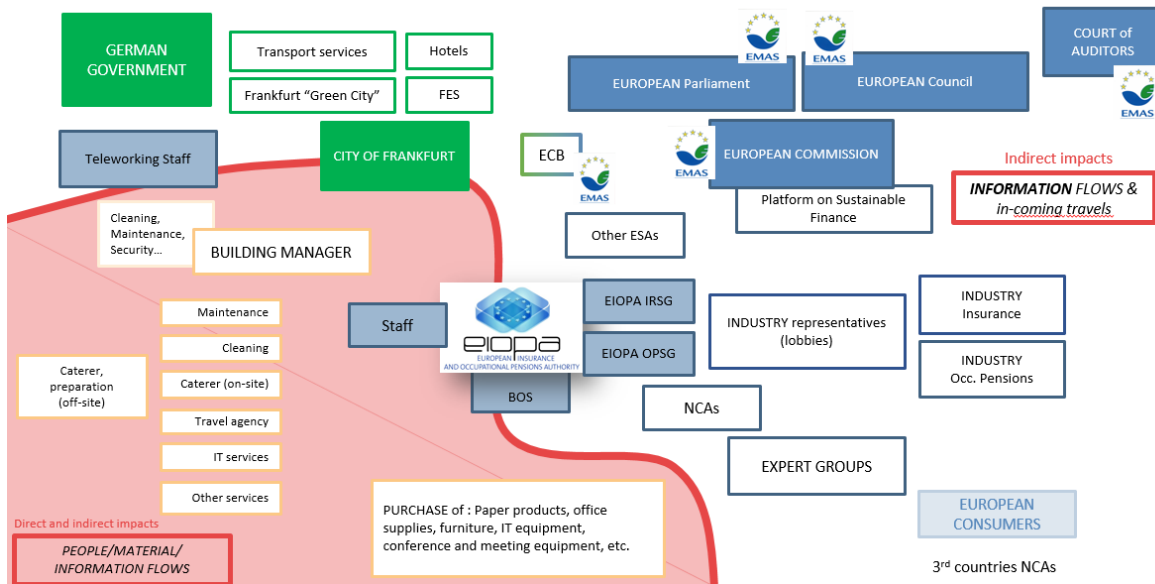
[6] EMAS – Environment - European Commission (europa.eu)

Out of these, 6 were identified a significant for our EMS in 2020:
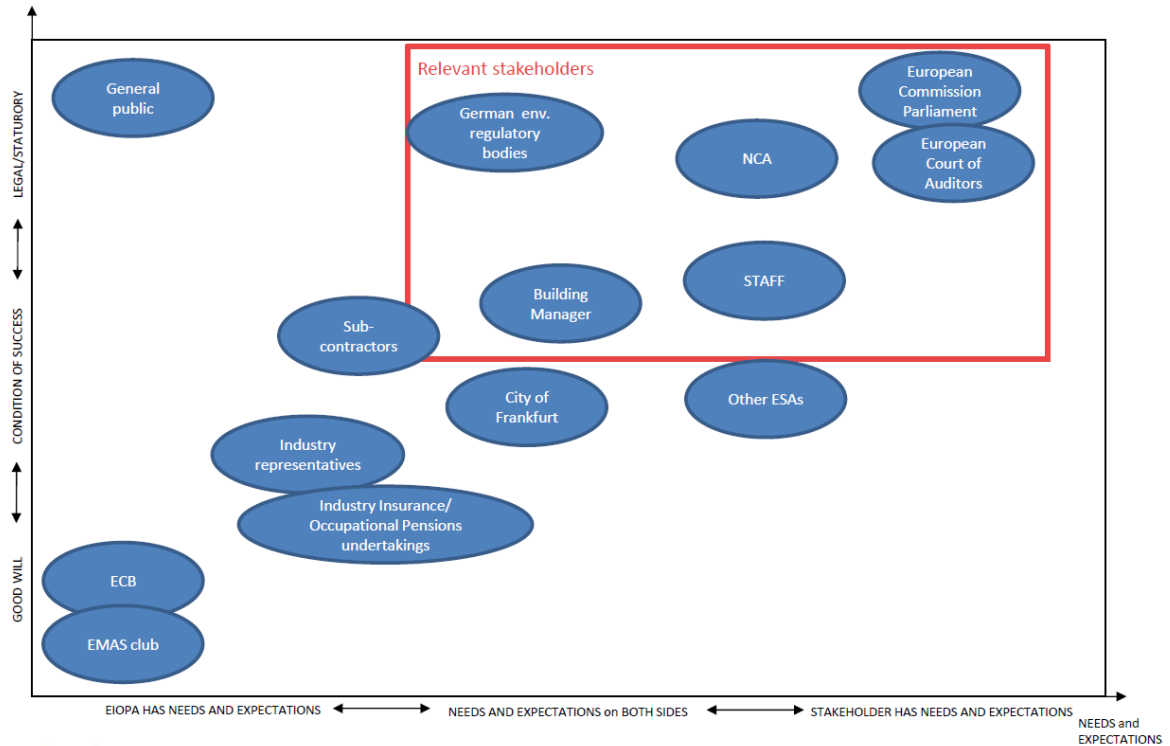
Following a PESTEL analysis (political, economic, social, technological, environmental and legal) and a SWOT analysis (strengths, weaknesses, opportunities and threats), which involved staff through interviews and a survey, the following risks and opportunities were identified:

Risks	Opportunities
The environmental investment lays with the building owner, while the returns are mostly for the tenants, with the risk that progress on building management might be slower than expected.	Green Deal of the EU, new targets on GreenHouse Gas (GHG) emissions to channel support for low-GHG Europe.
Consumers (policyholders and beneficiaries) might fail to take into account the long-term environmental effects on pensions and (life) insurance products.	The development of new Environmental, Social and Governance (ESG) mandates included in the regulation will help improve product sustainability.
Challenges to take into account the impact of climate change on the general working environment.	EIOPA has been given mandates to provide advice and recommendations on sustainable finance.

As many, EIOPA had not anticipated the Covid-19 pandemic. It did nevertheless carry its own risks and opportunities. While the main priority was to adjust to new ways of working, the EMAS project was delayed. These new ways of working however showed an opportunity as well, since all business trips were cancelled, many workflows had to change to electronic format, and almost all staff commute diminished.

GOVERNANCE OF THE ENVIRONMENTAL MANAGEMENT SYSTEM

One of our goals, from the beginning of the project, was to involve staff. We therefore started by asking all staff about their opinion on environmental management and building-up the following structure to ensure long-term contribution:

Level	Description
ED	The Executive Director leads and takes strategic decisions: Policy, Objectives, effectiveness, new orientations, environmental statement
EMAS Steering Committee	Oversees development of EMS and action plan; provides data and recommendations to ED.
Environmental coordinator	Day-to-day operation of EMS, reports on performance
Management roles	Ensure their teams know, understand, contribute and comply with the EMS and its objectives
Green Team	Raise awareness, contribute to checks
Staff and people working under the EIOPA's control	Follow rules, take part in continuous improvement

A responsibility matrix supports the understanding of accountability and responsibility for each EMAS requirement. All staff with a significant role in the EMS have their own "Environmental Job Description", used by managers in annual appraisal exercise to ensure on-going involvement and identify training needs.

5. ENVIRONMENTAL POLICY

EIOPA's environmental policy shows the overall intentions in terms of environmental performance and objectives. Our EMAS engagement is reflected in our Single Programming Document (SPD), approved by the Board of Supervisors (BoS) and in our Consolidated Annual Activity Report (CAAR), which includes a section on EMAS/environmental management.

Environmental Policy

As the European Insurance and Occupational Pensions Authority, long-term mindset is key to our everyday concern. Sustainability is about long-term thinking and should therefore be a vital part of our day-to-day operations, with a focus on environmental aspects.

We are based in a city striving to be amongst the greener in Europe, our staff has expressed through their participation in the environmental review, their expectations for an environmental management system (EMS) with measurable improvements.

Sustainable Finance has become an everyday topic on our agendas, as we propose new ways to integrate sustainability in the operations of the industries in our remit. As an European Supervisory Authority, we form part of the institutions that lead by example, and it is within our responsibility to take steps to reduce our negative environmental impacts and maximise our positive impacts.

Continuing our efforts, we hereby:

- Affirm our commitment to obtaining and maintaining EMAS (Eco-Management and Audit Scheme) registration, taking responsibility for the continuous improvement of the environmental impact of all our activities;
- Ensure compliance with applicable local and European environmental regulation;
- Encourage to develop knowledge, find technical solutions and adjust our organisation, focusing on the following fields:
    - Improve performance on energy and water consumption and on waste management;
    - Use of electronic solutions to minimise paper consumption and adjust travels to the necessary;
    - Green public procurement approach;
    - To provide the best advice and technical work regarding sustainable finance;
- Stress that our strong team spirit is used every day to improve our practices;
- Aim to set up key environmental indicators with concrete objectives to demonstrate the efficiency of our EMS.

Our public environmental statement will regularly and transparently reflect on those commitments and the results.

6. ENVIRONMENTAL ASPECTS AND IMPACTS

METHODOLOGY

Aspects are elements of the activity that have or may have an impact on the environment. Identification of aspects was done through site visits, document analysis and interviews with staff. To evaluate the significance of an aspect we use sets of different criteria depending on whether the aspect is:

- a direct activity, product or service over which EIOPA has immediate control;
- an indirect activity, product or service over which EIOPA has no control, but can exert influence to some extent;
- normal or malfunctioning (abnormal, emergency).

For each aspect, each of the following criteria were rated:

- the nature of negative impacts, and whether the aspect has beneficial impacts;
- the frequency (normal)/probability (abnormal) of the environmental aspect;
- the level of control (direct) or influence (indirect) of the environmental aspect;
- the opinion of staff; from a survey done in EIOPA;
  - *It was important to consider the opinion of staff as a parameter to ensure involvement in the EMS.*
- the quantified impact evaluation based on benchmark from the Sectoral Reference Documents for Public administrations – when they exist.

As an initial evaluation method and to reflect EIOPA's engagement to prevent pollution, the criticality of aspects is calculated by the following formula:

Criticality = (Frequency or Probability) x (Control/Influence) x (Opinion) x (Quantity)* 2 if positive impact

The method may change in future up-dates as opinion should align with reality if our awareness and communications actions are efficient.

SIGNIFICANT ENVIRONMENTAL ASPECTS

Activity	Environmental aspect	Relevant stakeholder
Use of offices	Lights	staff, building management, maintenance
	Heating and Air conditioning	staff, building management, maintenance
	Use of electronic devices	staff
Use of paper	Printing	staff
Organising meetings and conferences	Lights	staff, participants
	Heating and Air conditioning	staff, building management, maintenance
	Use of electronic devices	staff, participants
	Printing paper	staff
Travels	Missions performed by staff members	staff
Use of sanitary facilities	Water usage for Toilets	staff, building management, maintenance
	Water usage for Taps	staff, building management, maintenance
Use of Data Centres	Power Usage Effectiveness	staff, provider
Core Business		
Policy	Determining how ESG criteria can be integrated into insurers and pension fund processes (formal request to EIOPA and ESMA for technical advices on potential to several delegated acts with regard to the integration of sustainability risks and sustainability factors).	European Commission, Council, Parliament, National Competent Authorities (NCAs), Occupational Pensions Stakeholder Group (OPSG), Insurance Reinsurance Stakeholder Group (IRSG)
	Assessing impacts of proposed evolutions (formal request to EIOPA and ESMA for technical advices on potential to several delegated acts with regard to the	European Commission, Council, Parliament, NCAs, OPSG, IRSG

Activity	Environmental aspect	Relevant stakeholder
	integration of sustainability risks and sustainability factors).	
Consumer Protection	Providing advice to EU regulating bodies for level 2 measures regarding quality of design, sales and transparency of products, including sustainability.	European Commission, Council, Parliament, NCAs, OPSG, IRSG
	Monitoring the market, together with NCAs, to encourage early intervention in case of consumer risks: poorly designed products, misselling (ex. green- washing) and poor quality of disclosure on risks.	NCAs, OPSG, IRSG
Risks and Financial Stability	Develop stress-test and/or scenarii (together with partners) implemented by the industry under the supervision of NCAs. NatCat and more and more ESG related risks.	NCAs, OPSG, IRSG, European Central Bank (ECB) and others, depending on scenarii
	Analyse stress tests and scenario results at EU scale and draw conclusions/recommendations (included in financial stability report).	NCAs, European Commission
	Analyse transitions risks; in particular transitions risks associated with the greening of the economy and Paris's Agreement[7].	NCAs, OPSG, IRSG Commission

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[7] The Paris Agreement | UNFCCC

7. ENVIRONMENTAL OBJECTIVES

Our baseline year will be 2019, as the first year where all relevant information could be collected. Year-on-year, and until at least 2024, it will serve as a reference to monitor our improvements.

Policy topic	Objective	Measure	Target 2023
			Baseline 2019
Improve our performance on energy and water consumption and on waste management	Electricity consumption	kWh	-5%
	Heat consumption	kWh	
	Cold consumption	kWh	
	Waste generation	kg	
Use of electronic solutions to minimise paper consumption and adjust travels to the necessary	Paper consumption	kg and pages/day/FTE	-15%
	Missions GHG emissions (transport)	total number of missions and corresponding kgCO$_2$eq.	-35%
	Reduce the number of off-site meetings		-35%
		#	
Green public procurement approach	Consider green procurement approach in all of EIOPA's procurement procedures (apply green criteria wherever feasible)	%	100%
Execute our integrity and independence values to provide the best advice and technical references regarding sustainable finance	Annual work programme on sustainable finance delivered		100%

These objectives will be annually revised in the Management Review and adjusted as much as necessary to the evolving context, our environmental performance or new areas of focus.

8. PERFORMANCE

Prior to sharing our performance and actions, it is important to remember that 2020 performance was greatly influenced by the Covid-19 pandemic, mandatory teleworking and a full cut of all business travels as of 16 March 2020 and therefore should be considered an "outlier" year, with considerable low impact.

8.1. Energy

### HOW WE OPERATE AND OUR PERFORMANCE

As tenant of a building, our energy consumption comes from both our direct consumption on our floors and the energy needed and used by the building to operate, for private or collective areas. We have 3 sources of energy:

- Electricity that is managed
    - o by our own contract for our floors covering our needs for lighting, computers, video-conferencing equipment, cooling of our IT rooms, dishwashers, etc.
    - o by the building manager for collective consumptions (e.g. elevators, lights in common areas, etc.)
- Heating that comes from a Frankfurt heat network, and with a contract managed by the building manager;
- Cooling, produced by a central heating, ventilation, and air conditioning (HVAC) system for the entire building and managed by the building manager.

Their respective share and total energy consumption are reflected in the following graph.

Approximately 65% our energy consumption is connected to consumption on our floors; the rest being required by the building's common areas.

Our energy data is provided by the building manager in December of Y+1 each year. We have yet not been able to collect more regular data but are actively engaging with the landlord to find a solution to receive more regular data on EIOPA's consumption.

Energy consumption kWh/FTE
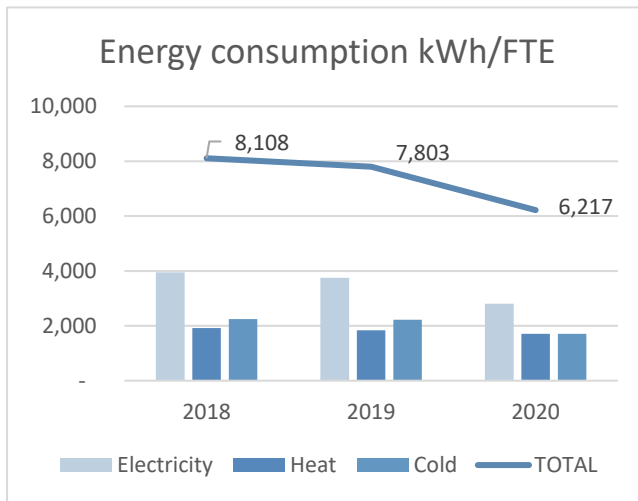
The total energy consumption in 2020 has been 1.063 MWh, which equals approx. 6.217 MWh/FTE.

The rearrangement of our office-space, which started in 2020, and will be concluded in 2022 should allow us to optimise rented space per head count despite the fact that an additional half-floor had to be rented in August 2020 to accommodate the significant staff increase.

In 2019, EIOPA occupied 4,256 sqm of office space to accommodate 175 staff (24.32 sqm per staff member).

In 2022, EIOPA's office space of now 4,664 sqm will house 217 staff members (21.49 sqm per staff member), which means that our "energy-efficiency" per head count should improve.

The total number of available workstations was increased from 188 to 225 and a desk-sharing system has been introduced to accommodate external and temporary staff without the need for establishing additional workspaces.

Energy consumption - kWh
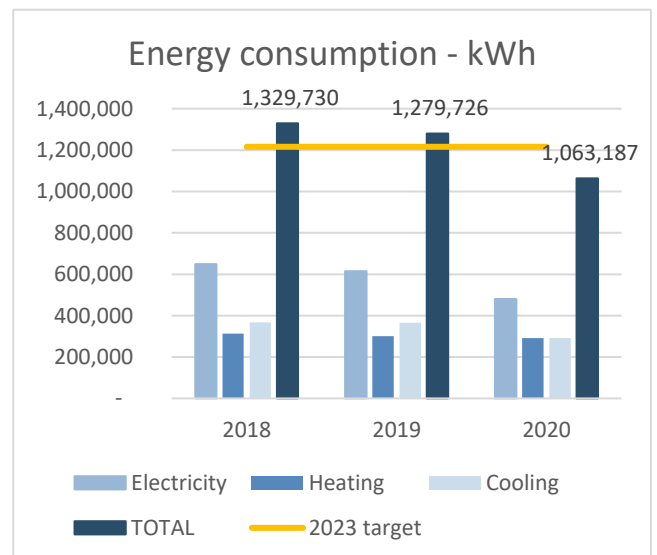
EIOPA is currently using two data centres with a provider in Germany. The electricity consumption of these data centres is not yet included in the overall carbon footprint due to the unavailability of historical qualitative data by the provider dating back to 2020. We intend to monitor the consumption through regular reporting from the provider to consider it as a significant environmental aspect going forward. The PUE (Power Usage Effectiveness) of the two data centres are 1.28 and 1.44, which is considered to be effective.

OUR ACTIONS

Taken	Foreseen
We have worked with the cleaning company to ensure lights are turned off after cleaning	Training of facility management (FM) staff with the building manager to better understand how the heating, ventilation, and air conditioning (HVAC) system operates in order to better make use of it
Set-up IT-managed energy settings of computers	Continue our exchanges with the landlord to promote technical solutions such as: auto-shut down of lights at night, automating blinds in summer, light regulated by adequate lux, LED policy and more
Define best practices for staff on the use of computers, ventilation, and temperature management	
The authority's "work place strategy" developed in 2020 considers maximising natural light and good distribution of heat/cold	

8.2.   Water

HOW WE OPERATE AND OUR PERFORMANCE
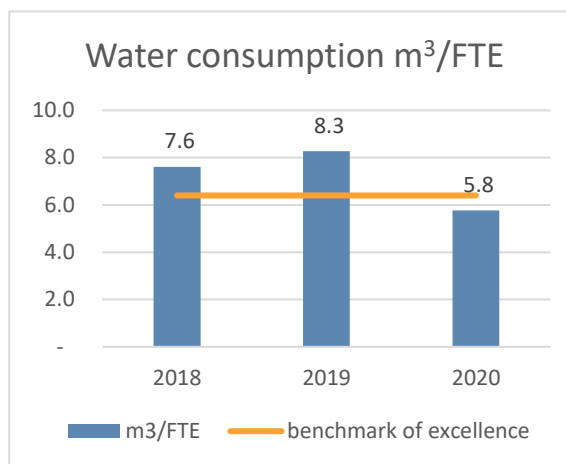

Water consumption - m³
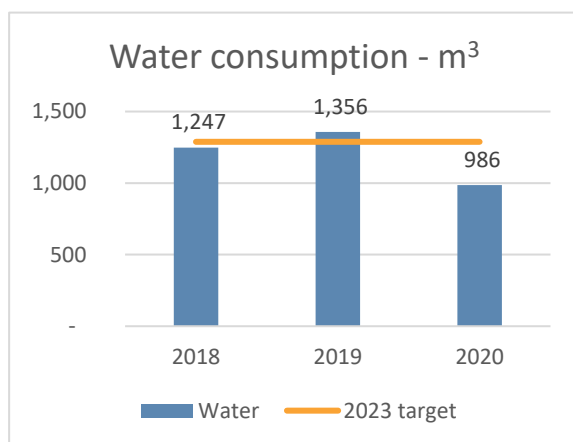
Our water usage comes from drinking and sanitary use (toilets, sinks) as well as water used for cleaning the office space. Water treatment is managed by the building which is connected to the public sewer. We have little chemical use, except from dish soap. Our contract with the cleaning company requires the use of eco-labelled products.

The relative high consumption of water during 2020 lock down periods is in parts resulting from use of sanitary facilities and kitchens during the renovation phase of the floors and partly due to the required legionella flushes that had to be performed.

Water consumption m^3/FTE

OUR ACTIONS

Taken	Foreseen
We developed best practices to avoid pollution	Install aerators/flow reducers on washbasins and sinks – in coordination with the building management
We developed Best Practices to signal any leaks to FM without delay	
As per the contractual requirements, EIOPA's cleaning services provider is using ecological/biodegradable cleaning supplies and products were possible Ecolabel products are being used where available, however due to the supplier's sourcing contracts and overall product availability, this is not the case for all supplies	
EIOPA introduced the exclusive use of recycled toilet paper and kitchen towels since 2019	

8.3. Paper

HOW WE OPERATE AND OUR PERFORMANCE

Paper consumption -
pages/FTE/day

prints par FTE/day worked

Benchmark of excellence
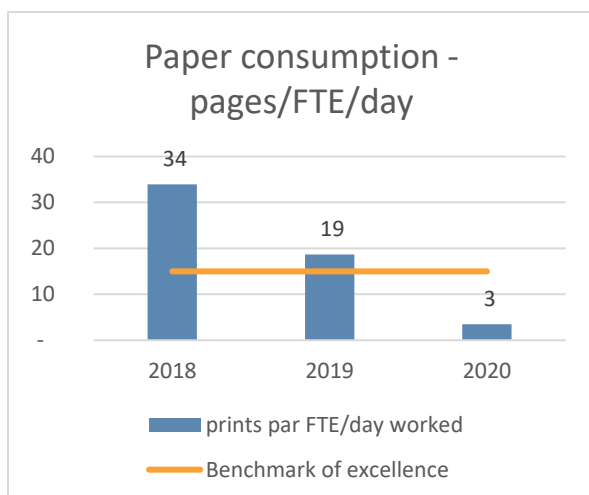
As many office-based operations are still based on hard copies, we looked at ways to reduce the overall paper consumption.

Our first move was to change from automatic printing to badge-to-print practice where the print job was only triggered when the badge is presented at the printer.

We ensured as well that there is no more printing of event material or certificates of attendance. In that respect, 2020 helped speed up the digitalisation of processes, since we were forced to proceed to the paperless office while in lockdown with very limited to no office presence. Though difficult it proved that this practice is sound and solid and will help us reach our goal for 2023 and beyond in reducing print outs.

OUR ACTIONS

Taken	Foreseen
Remove individual printers, except for the 2 Senior Management Members and their respective offices	Set up a library where documents that are frequently consulted by staff can be available for consultation (rather than everyone printing their own)
Centralising printing and badge-to-print in order to reduce errors	Adjust default "standard" for EIOPA documents (narrow margins) and produce a small video to demonstrate adjusting templates
Print on demand only for internal and external meetings	Install white boards and environmentally friendly erasable markers rather than paper boards
Implement e-workflows for standard finance processes	Promote the use of second side of non-confidential paper for notes, rather than notepad/new paper
Adjust default set-up for printing to double-sided and black and white	Add a "think green, read from the screen" type message, by default in all e-mail signatures

| Taken	Foreseen
Increase electronic workflows in the finance department and cross-departmentally	Use a visitor computer/tablet/app for participants registration and signatures upon arrival
Communicate on the advantages of reading from the screen rather than printing out	Buy e-ink devices for those who have many documents to read; start with shared devices, maybe one or two per floor, accompany the transition
Train staff to use comments & track changes, where/how to save on ERIS, save to pdf (included in IT induction session for newcomers)	Count overall prints and communicate a warning message when a defined benchmark is reached
	Implement e-signatures

8.4. Waste

HOW WE OPERATE AND OUR PERFROMANCE

Our waste is managed as such:

- Confidential paper and toners are taken in charge by a specific contract, to be recycled.
- The building manages the following waste, collected on our floors by our cleaning company:
    - Paper and cardboard are selectively collected at the source; to be recycled;
    - The rest of the waste is mixed and burnt for energy.

Both of those categories are taken in charge by the local waste service Frankfurter Erntorsungs Service (FES); without the possibility to have weights reported at building or EIOPA's level.

- As the agency does not produce glass waste, staff is encouraged to use the specific glass bin available opposite the building.
- Exceptional waste such as computers or other waste from electrical and electronic equipment (WEEE) were stored until a specific contract was established to wipe-out the data (if relevant) and recycle and/or reuse.

Waste production (kg)
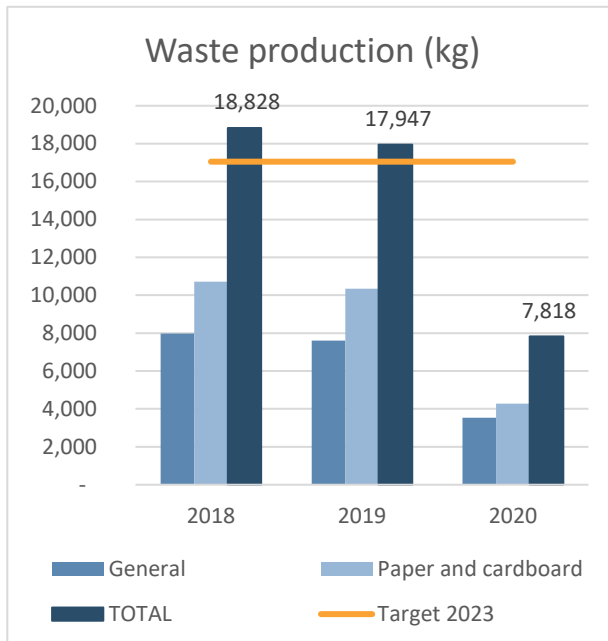
We still purchase bottled water – flat and sparkling – in multi-use PET bottles since the organoleptic quality of the water is not satisfying. We consume water from a regional source (approx. 15km) to avoid long transport ways. Our contract ensures that the bottles/crates are collected and reused.

According to a study[8] of the institute for energy and environmental research (IFEU) these bottles are used up to 20 times. We compared the GHG impact of transport of these bottles compared to glass bottles and they are more efficient because lighter.

In 2020 the production of waste is still comparably high due to the ongoing construction works and related waste production.

Our total waste production is rather low, compared to the benchmark of excellence.

Nevertheless, we can do better, specifically if we look at our bins after lunch.

Not all local restaurants or shops allow to bring your own container to limit the amount of single use plastic containers.

Waste production kg/FTE
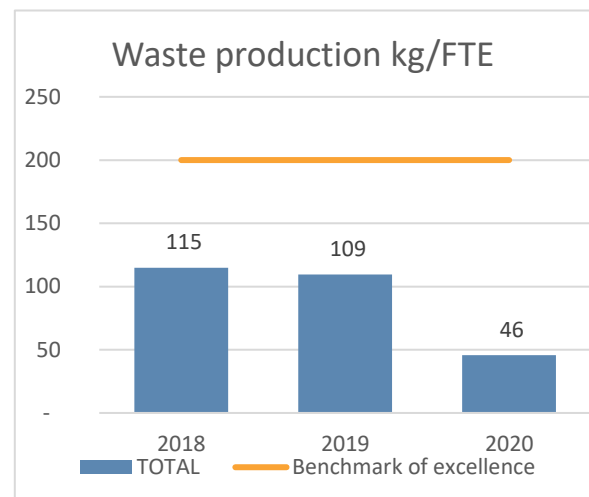
In cooperation with the landlord we will have to improve the waste stream collection to include plastic waste containers in the basement and also improve the collection of data on waste.

Toners were disposed via the framework contract, no data was collected on this.

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[8] http://www.ifeu.de/oekobilanzen/pdf/IFEU%20Handreichung%20zur%20Einweg-Mehrweg-Diskussion%20(13Juli2010).pdf

The gathered WEEE has been collected over the past years and has been disposed of with a specialised company. This resulted in an average disposal rate of 308 kg per year over the last ten years.

OUR ACTIONS

Taken	Foreseen
Adjust the waste bins to the actual separation options	Install non-confidential paper bins on all floors
Clarify Best Practices for staff	Elimination of historical WEEE
Change subscription to electronic newspapers rather than hard copies	Install water purification stations to offer filtered flat and sparkling tap water
	Raise awareness about individual waste production by removing desk bins and installing waste collection points on each floor

8.5. Travel

HOW WE OPERATE AND OUR PERFORMANCE

Our missions

Staff travelling on business missions have to follow the internal travel rules, which are based on the rules from the European Commission. Once the mission has been validated by their line manager, bookings can be made either through the travel agency or booking directly. If the single trip is 400km or below trains are the required method of travelling.
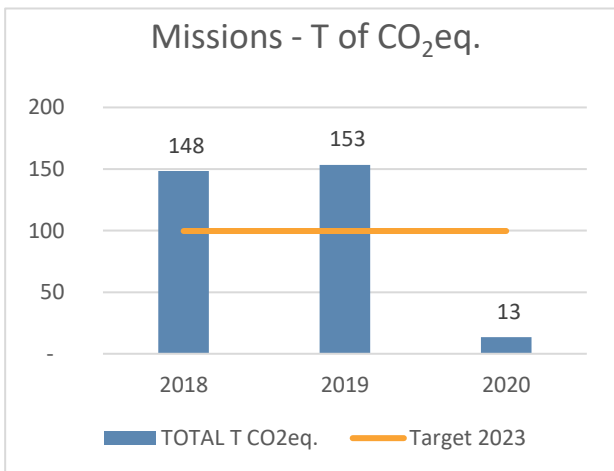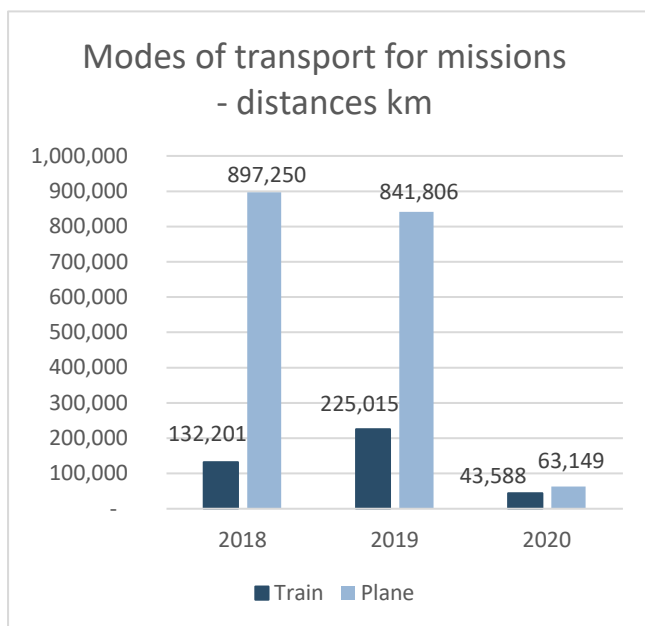
Missions - distances km

Year	TOTAL KM
2018	1,029,452
2019	1,066,821
2020	106,737

Legend: TOTAL KM, Target 2023

Associated GHG emissions are calculated based on the travel agency's report for planes and in case of direct bookings, mostly for Deutsche Bahn tickets, we calculate the distance from/to Frankfurt and use the average emission factor provided by Base Carbone to calculate the total emissions.

Since the lock-down and the resulting travel ban in Mid-March of 2020, our missions dropped drastically, and virtual meetings have become the norm. We build on that new competence to set ambitious targets, aligned with the fact that missions are currently our highest GHG emission post.

Our staff travelled more than 26 times around the globe in 2019. 2.6 times in 2020: a 90% drop.

Had our missions continued on the same trend after the first 2 and a half months, we would have travelled approximately half as much as in 2019.

Missions - T of CO_2eq.

Year	TOTAL T CO2eq.
2018	148
2019	153
2020	13

Legend: TOTAL T CO2eq., Target 2023

Modes of transport for missions - distances km

Year	Train	Plane
2018	132,201	897,250
2019	225,015	841,806
2020	43,588	63,149

■ Train ■ Plane

Meanwhile, our GHG emissions dropped by 91%. This is explained, of course, by the drop in total missions, but as well, and more important, has the share of train travels increased in 2020 to 41%, compared to 21% in 2019.

Very little of the "outstanding performance" from an environmental point of view was our decision. But, 2020 has taught us that we can deliver our work without travelling as much, with adequate conferencing equipment, training, and, even if some trips will remain necessary, we are confident that our ambitious target of a reduction of 35% of missions by 2023 is reasonable.

Our day-to-day commutes

At the initiation of our environmental management system in 2018, we have surveyed EIOPAs staff members to better understand the potential impact of commuting. It proved that, at the time:

- 58% of the distances were done by public transport

- 23% by car

- 19% by foot or bicycle

As the pandemic hit, telework was the norm and we did not renew this analysis, and will only do once a new way to operate has settled.

By nature, we have staff representing many countries of the European Union, we therefore analysed personal commutes to their respective homeland country. We finally decided not to include this aspect in the scope, because, by definition they are personal, and EIOPA has little to no way to influence it.

Our visitors

As we analysed our activities, it was obvious that we needed to liaise with many stakeholders from all over Europe, and beyond. We therefore wanted to know the impact of these visitors that are key to deliver our mission.

As a proxy, and first approach, in 2018 we sampled, for three weeks, where our visitors came from and how they had travelled to Frankfurt. Followed by an evaluation of the related GHG emissions.

Making the hypothesis that these three weeks were representative of our normal activity; our finding was that visitors travelled roughly 90 times around the globe to come and visit us annually and will have to be considered as an environmental impact once a new normal has been established and business travels as well as training and events have resumed fully.

Regularly monitoring origin and means of transport of visitors was not possible in 2019 due to a lack of tools and an additional burden our resources could not face. In 2020, with the pandemic, there were very few meetings and visitors only in the first quarter and none in the rest of the year.

When meetings resume, we will implement ways to collect the data through the registration process to be able to evaluate the impact our visitors represent.

OUR ACTIONS

Taken	Foreseen
Communication on web participation to meetings, trainings and events - supported and communicated by Senior Management	Audio-visual facilities upgrade to promote and facilitate videoconferencing instead of travelling
Offer systematically on-line participation for regular meetings in EU survey registration forms	Manage the visitor registration to include collection of data for carbon footprint calculations
Communicate on CO2 impact of missions: staff and stakeholders	Evaluate GHG emissions related to home-work commuting: redo the survey
Import data on distances and CO2 from the travel agency into KPI panel	Ensure that once the new way or working has established the share of public transport or soft-modes is not degraded

8.6. Core Business

HOW WE OPERATE AND OUR PERFORMANCE

EIOPA supports the European Commission's Sustainable Finance Action Plan including the aim to integrate sustainability considerations into the prudential and conduct framework for insurers, reinsurers and insurance distributors.

OUR ACTIONS

Selection of recent and ongoing actions on ESG
To integrate ESG risks in the prudential framework of insurers and pension funds Proposals for supervisory reporting of climate risks in Solvency II. Methodological paper on potential inclusion of climate change in the natural catastrophe standard formula. Report on-life underwriting and pricing in light of climate change. <u>Ongoing</u>: assessment of prudential treatment under Solvency II of assets and/or activities associated with environmental and / or social objectives or associated substantially with harm to such objectives. Reassessment of natural catastrophe standard formula calibration. Analysis of integration of sustainability considerations in IORPs fiduciary duty.
To consolidate the macro/micro-prudential risk assessment of ESG Inclusion of ESG risks in financial stability tools and methodologies, incl. EIOPA's Financial stability dashboard, insurance and pensions stress testing methodologies. Reports on climate-related physical and transition risk analysis. <u>Ongoing</u>: IORP stress test exercise; development of one-off climate risk stress test for insurance.
To support the supervision of ESG risk and supervisory convergence in the EU Opinion on the supervision of the use of climate change risk scenarios in ORSA. Application guidance on running climate change materiality assessment and using climate change scenarios in the ORSA. Development of supervisory handbook chapters on the supervision of climate-related risks in Solvency II Pillar 2. Cost and Past Performance analysis on ESG products. <u>Ongoing</u>: discussions of climate-related risks in supervisory colleges.
To promote sustainability disclosures and a sustainable conduct of business framework Advice on Regulatory Technical Standards (RTS) on product-related taxonomy disclosures, on RTS on the content, methodologies and presentation of disclosures under the EU Regulation on sustainability-related disclosures in the financial services sector. Guidance on the integration of the customer's sustainability preferences in the suitability assessment under IDD <u>Ongoing</u>: assessment of measures to address greenwashing.

Selection of recent and ongoing actions on ESG
To address protection gaps Pilot dashboard on insurance protection gap for natural catastrophes. Issues paper on shared resilience solutions for pandemics. Paper on measures to improve the insurability of business interruption risk in light of pandemics. Consultation on the Supervisory statement on exclusions in insurance products related to risks arising from systemic events. Consultation on the Supervisory statement on management of non-affirmative cyber underwriting exposures. Ongoing: completion of pilot dashboard on insurance protection gap for natural catastrophes. Analysis of consumer behaviour and contractual terms and conditions with regards to natural catastrophe insurance coverage.
To promote the use of open source modelling and data in relation to climate change risks Ongoing: Analysis of opportunities for the use of open source nat cat modelling tools and of ways to improve the collection of uniform and comprehensive insured loss data.
By contributing to international convergence for the assessment and management of sustainability risks
Contribution to work from the Network for Greening the Financial System, the International Association of Insurance Supervisors' Climate Risk Steering Group and the Sustainable Insurance Forum. Through EU-US climate-related projects on climate risk financial oversight and climate risk & resilience.

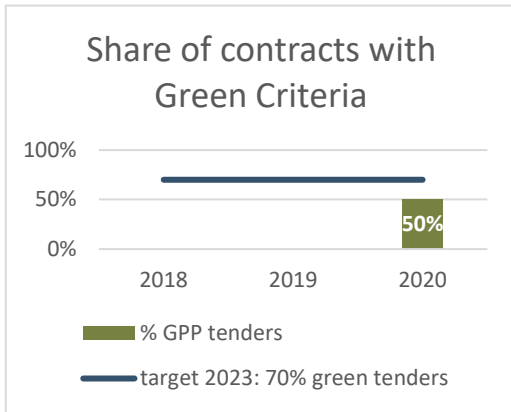All products can be found on our website, as well as future developments.

Our sustainable finance action plan has a similar number of deliverables for 2021: still focusing on climate-change but introducing as well lessons learned from the pandemic.

8.7.   Procurement

HOW WE OPERATE AND OUR PERFORMANCE

As a public body of the European Union, we follow the EIOPA Financial Regulation and "vade-mecum on public procurement in the Commission" which sets out the rules for public procurement.

Our procurement team is trained with Green Public Procurement (GPP). Our procurement process is entirely digital to avoid massive amounts of paper to be used.

Share of contracts with Green Criteria

- 100%
- 50%
- **50%**
- 0%

2018   2019   2020

■ % GPP tenders

▬ target 2023: 70% green tenders

As a rather small public body, to cover our needs:

- we join framework contracts lead by other entities
- and conduct procedures for our specific needs; and potentially those of other organisations.

Our constant challenge, even if we are located in a very dynamic market in Frankfurt, is to find the right balance between our needs, our will to green our procurement and the risks of having no tenders or/and unsuccessful tenders.

Nevertheless, for the contracts we manage, we have trained our team on the green public procurement guidelines, and all our procedures contain at least minimal requirements regarding environmental legal compliance.

For all contracts managed, when relevant, and our market analysis has proven there is no risk of unsuccessful procedure, we introduce green criteria. We aim to consider green criteria in all (100%) of all EIOPA-led procurement procedures. Yet, this does not imply that it will be feasible to apply such criteria in all cases.

OUR ACTIONS

Taken	Foreseen
Joined the Green Public Procurement (GPP) Helpdesk	Update the internal orientation document for tenders above the directive threshold
Procurement team trained with GPP	Adapt e-tendering process to ensure that the authorising officer checks that green criteria have been integrated
	Build repository of "green criteria" that have been used in the past or that can be used – to support project managers
	Raise awareness for project managers who write the specifications to help them integrate green criteria
	Use more proactively the GPP Helpdesk

8.8. GHG emissions

HOW WE OPERATE AND OUR PERFORMANCE

EIOPA's total greenhouse gas emissions in 2020 equalled 123.5tCO$_2$eq. Total greenhouse gas emissions per full time equivalent employee: ~1tCO$_2$eq/FTE.
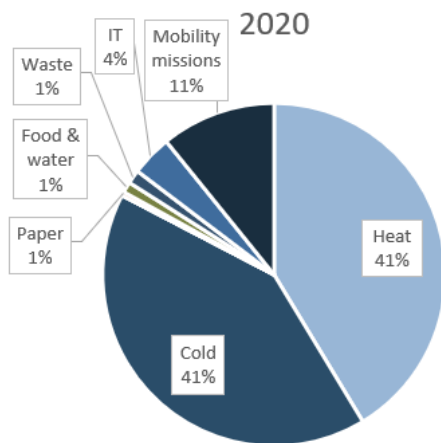
We established a carbon footprint for 2020, based on the following scope:

> Energy: all sources (excluding data centres)

> Mobility: missions

> Inputs: paper, food and water

> Outputs: waste water and waste

> Assets: purchase of electronic equipment.

The methodological assumptions are detailed in annex II.

We have no direct combustion on site; no reported leaks for the refrigerating units operated directly or by the building, no owned vehicles therefore no direct significant emissions in the air.

EIOPA's own cooling system does not work with refrigerants but with water, hence no significant emission.

Comparing the emissions with the base line year 2019 it is visible that the major savings in 2020 were made due to the stop of business travel during the lock down periods.
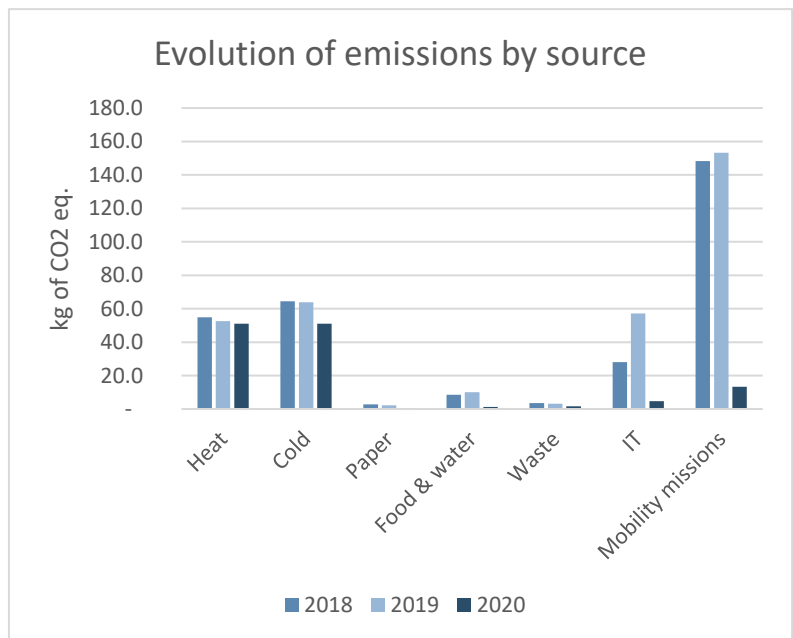
OUR ACTIONS

Related actions are listed in the previous chapters when relevant.

8.9. Other

As tenant in the Westhafen Tower, EIOPA has no direct impact on the biodiversity.

As we have no combustion on-site and no fleet, no direct emissions to the air are produced. Emissions due to business trips are reported via the travel agencies GHG reporting. Since these travels are the source for other pollutants such as SO_2, NOX and PM we consider that the reduction in business trips will also improve these emissions in the same proportion.

9. COMMUNICATION AND AWARENESS

To ensure staff participation from the beginning, we initiated the EMAS journey with a staff survey. This gave insight into their main areas of concern to be addressed with various actions and followed up with a "World Café" to achieve staff's active involvement.

During the pandemic we offered virtual sessions to introduce or refresh the knowledge on EMAS and how we are introducing this environmental management system at EIOPA, explain the Environmental Policy, the Best Practices and answer questions and concerns. All newcomers receive information on EMAS in their introduction sessions hosted by the Corporate Support Department. On a dedicated site in EIOPA's intranet staff members can read up this information again and provide their suggestions, ask questions, give comments, or submit complaints via a dedicated email green@eiopa.europa.eu. Whereas externals can contact EIOPA via email at info@eiopa.europa.eu to require about any time of information.

We established a group of staff members that will be acting as the EMAS ambassadors – the Green Team. These colleagues have been trained to perform quick checks to monitor the implementation of best practices, once we are back in the office under the new normal. They will be able to answer questions in relation to the EMS and EMAS, take on suggestions for improvement, complaints and provide regular feedback to the Environmental Coordinator.

For more day-to-day advice on sustainable living we have created a blog (accessible via the intranet only) to inform our staff members for example about zero waste shopping possibilities in Frankfurt, events like the Earth Hour, the European Week of Waste reduction and raise awareness in general about sustainability topics.

It was clear from the start that EIOPA's staff members are interested in the topic and engaged in making a positive impact.

Further to above mentioned internal communication initiatives, EIOPA is a member in the interinstitutional Greening Network that forms part of the European Agencies Network (EUAN) and follows developments from the Groupe Interinstitutionnel de Management Environmental (GIME) of the European Commission.

10. LEGAL REQUIREMENTS

EIOPA meets the requirements of the EMAS regulations, relevant German and municipal environmental legislation. We have a legal register covering all relevant legal obligations. This document is regularly revised and updated by experts. The legal compliance is assessed annual during the internal audit process.

ANNEX I

ENVIRONMENTAL VERIFIER'S DECLARATION ON VERIFICATION AND VALIDATION ACTIVITIES

Dr. Rainer Feld

with EMAS environmental verifier registration number DE-V-0186

accredited or licensed for the scope 66.2 and 84.1

declares to have verified the whole organisation as indicated in the environmental statement of the organisation EIOPA

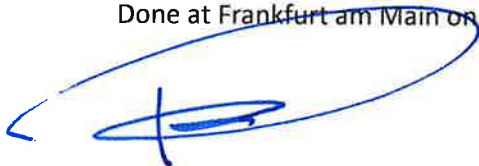with registration number to be completed

meet all requirements of Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS).

By signing this declaration, I declare that:

- the verification and validation have been carried out in full compliance with the requirements of Regulation (EC) No 1221/2009,
- the outcome of the verification and validation confirms that there is no evidence of non-compliance with applicable legal requirements relating to the environment,
- the data and information of the environmental statement/the updated environmental statement (1) of the organisation/site (1) reflect a reliable, credible and correct image of all the organisations/sites (1) activities, within the scope mentioned in the environmental statement.

This document is not equivalent to EMAS registration. EMAS registration can only be granted by a Competent Body under Regulation (EC) No 1221/2009. This document shall not be used as a stand-alone piece of public communication.

Done at Frankfurt am Main on 30 November 2022

Signature

ANNEX II METHODOLOGICAL ASSUMPTIONS FOR THE GHG FOOTPRINT

To address our GHG emissions, we collected data and used either:

- approved emission factors either from Base Carbone[9]®,
- GHG emissions factors provided by our suppliers.

1. Energy

Origin of the data	Emission factors
Building management for all energies. The building being LEED registered gives us confidence on the monitoring of these consumptions. The data is available to us only in the last days of Y+1. There is no change in scope since the beginning of our EMAS implementation.	We contacted MAINOVA, the energy supplier, to have emissions factors: - Electricity – Ökostrom - is made 100% from renewables and amounts to 0 CO2e. emissions, as per German conventions. - Heat and cold: 0,175 kg CO2e./kWh The latest public report of Global Reporting Initiative Indicators of Mainova does not specify the GHG emissions per type of energy supplied (only direct emission from fossil fuels – coal, natural gas, heating oil). We therefore keep the first emission factor that was provided to us.

2. Non energy

Origin of the data	Emission factors
Based on refill of our refrigerant systems (fridges) and building's management information. They are none so far.	The emissions factors used are those established GWP100 from Base Carbone.

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[9] The Base Carbone® is a public database of emission factors, necessary for the realization of a greenhouse gas (GHG) emissions assessment and more generally any carbon accounting exercise.

3. Water

Origin of the data	Emission factors
Building management provides the water consumption. The building being LEED registered gives us confidence on the monitoring of these consumptions. The data is available to us only in the last days of Y+1. There is no change in scope since the beginning of our EMAS implementation.	We used the German ministry of the environment database "Prozessorientierte Basisdaten für Umweltmanagementsysteme"

4. Paper

Origin of the data	Emission factors
Internal follow-up based on purchases. There is no change in scope since the beginning of our EMAS implementation.	We used the German ministry of the environment database "*Prozessorientierte Basisdaten für Umweltmanagementsysteme*"

5. Food & water

Origin of the data	Emission factors
Internal follow-up based on purchases. There is no change in scope since the beginning of our EMAS implementation.	Water: We used the German ministry of the environment database "*Prozessorientierte Basisdaten für Umweltmanagementsysteme*" Food: We used the Bilan Carbone® V7 emission factor for average meal. For sandwiches, we used an aggregate Emission factor. Based on : - 50% bread, emission factor from the German ministry of the environment database *Prozessorientierte*

Origin of the data	Emission factors
	Basisdaten für Umweltmanagementsysteme" - 25% meat, emission factor form the German ministry of the environment database *Prozessorientierte Basisdaten für Umweltmanagementsysteme"* - 25% vegetables, from the French Base Carbone

6. Mobility

Origin of the data	Emission factors
The initial scope covered 3 types of mobility induced by our operations: 1. Commuting: Were we established the quantity of travels from what 61% our staff declared, in an internal survey. That survey covered both day-to-day commuting and "homeland" commuting. 2. Missions: from the GHG emissions declared by our travel agency. 3. Visitors: derived from a sampling our origins of visitors for three weeks in 2018. In the following years: 1. On commuting, we estimated that habits had not changed and only adapted the emissions by head count. We did not conduct a new survey in 2020 and excluded these emissions from the scope (much telework). We will not measure this as long as we are teleworking mostly. 2. The travel agency changed, not offering Deutsche Bahn train tickets. We therefore use data from the travel	1. Commuting: We used Base Carbone emissions factors for car, German trains and airplanes. 2. Missions: We take the emissions calculated by the travel agency for planes, using DEFRA emissions factors. From the moment we had to collect information on train on our own, we used the emissions factors from Base Carbone for German trains.

Origin of the data	Emission factors
agency and our reimbursement of train travels. Visitors: Though a very big emission post, we have not renewed the measurement for lack of resources. We will seek to integrate this data collection at registration phase in the coming years.	

7. IT assets

Origin of the data	Emission factors
The data is collected internally from the assets database. These assets are amortised in 4 years, and so are emissions.	Not all IT asset emissions factors were available in Base Carbone, not ProBas; so we initially used Bilan Carbone® V7 emissions factors. Once approved emissions factors were published in Base Carbone, they proved to be almost 10 times less. We therefore from the up-date in 2020, used the Base Carbone approved emissions factors that cover cradle-to-door extends scope.