

# Environmental Statement

2021 Data

EIOPA(2023)0086714  
Corporate Support Department  
EIOPA REGULAR USE –  
EIOPA-23/774  
29 September 2023

*Handling instructions for documents with security markings:*

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European Insurance and  
Occupational Pensions Authority

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# EMAS

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**VERIFIED  
ENVIRONMENTAL  
MANAGEMENT  
DE-125-00066**

## 1. FOREWORD FROM THE EXECUTIVE DIRECTOR



At the European Insurance and Occupational Pensions Authority (EIOPA) we are committed to reducing our environmental impact and reporting on our performance. Thus, I am pleased to present EIOPA's environmental statement for 2021.

The insurance and occupational pensions sectors can play an important role in the transition to a green economy, both in the way we conduct our core business and in how we run our administrations. At EIOPA, we are mindful of the impact our operations have on the environment and this consideration informs our day-to-day decisions.

2021 was a year in which both business and administrative activities were still heavily impacted by the state of COVID and by local and national measures intended to contain its spread. As was the case during the first year of the pandemic, EIOPA continued to reduce its carbon footprint.

By embracing the newly learned hybrid way of working, we benefited from the essential in-person contact among colleagues and with our stakeholders, while making use of new tools to maintain a high level of productivity, connection, and collaboration when we were not together. Moving important meetings online resulted in fewer missions and a reduced staff presence at the office, thus positively impacting both our budget and environmental footprint.

The swift adaptation to working and meeting remotely, which was precipitated by pandemic conditions, is a valuable lesson EIOPA will carry forward into new times as we re-evaluate our business travel needs and further align our administrative practices with our mission of sustainability.

Environmental corporate governance encompasses areas beyond travel and office occupancy and our progress in those areas is likewise detailed in the report. While there is still room for improvement, I am pleased that the adjustments we have made have contributed to sustainability in measurable ways.

EIOPA's participation in the EU Eco-Management and Audit Scheme (EMAS), as well as this environmental statement, reflect our core values, chief among them a commitment to being a transparent and responsible organisation.

I am pleased that EIOPA is part of a growing community of EU institutions, bodies and agencies that share a commitment to greater sustainability and continuously take steps to improve their environmental management systems.

## 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 2021.

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

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

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

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

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

### 3. ACRONYMS

EIOPA – European Insurance and Occupational Pensions Authority

EMAS – Eco Management and Audit Scheme

EMS – Environmental Management System

LEED – Leadership in Energy and environmental Design

SH - Stakeholder

PESTEL – Political, Economic, Social, Technological, Environmental, Legal

SWOT – Strength, Weakness, Opportunity, Threats

GHG – Greenhouse Gas

ESG – Environmental Social Governance

ED – Executive Director

SPD – Single Programming Document

BoS – Board of Supervisors

CAAR – Consolidated Annual Activity Report

NCA – National Competent Authority

OPSG – Occupational Pensions Stakeholder Group

IRSG – Insurance and Reinsurance Stakeholder Group

ECB – European Central Bank

GPP – Green Public Procurement

PUE – Power Usage Efficiency

FM – Facility Management

HVAC – Heating ventilation and air conditioning

LED – Light emitting diode

FES – Frankfurter Entsorgungs- und Service GmbH

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WEEE – Waste from electrical and electronical equipment

IFEU - Institut für Energie- und Umweltforschung

SO<sub>2</sub> – Sulphur Dioxides

NO<sub>X</sub> – Nitrogen Oxides

PM – Particulate Matter

EUAN – European Agencies Network

GIME – Groupe Interinstitutionelle de Management Environmental

DEFRA – Department of Food and Rural Affairs



## 4. ABOUT EIOPA

### MISSION AND TASKS

The European Insurance and Occupational Pensions Authority (EIOPA) is a decentralised agency of the European Union (EU), based in Frankfurt am Main, Germany.

Its overarching mission is to contribute to the short-, medium- and long-term stability, sustainability and effectiveness of the financial system for the benefit of Europe's economy, businesses and citizens. EIOPA's main tasks are to enhance supervisory convergence, strengthen consumer protection and preserve financial stability.

Achieving these goals depends on close cooperation with national supervisory authorities, as well as regular consultation with stakeholders, notably consumer organisations and industry representatives. This ensures that the Authority's work meets the needs of the people that it serves.

The Authority's strategic priorities for 2021 were to:

- › Strengthen the protection of consumers;
- › Support the functioning of the EU internal market in the field of pensions and insurance;
- › Strengthen the financial stability of the insurance and occupational pensions sectors;
- › Contributing to sustainable finance, including climate change, and digitalisation;
- › Be a responsible, competent and professional organisation.

### TEAMS AND LOCATION

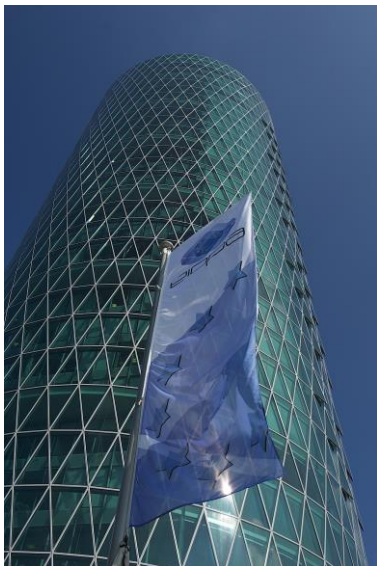
In 2021, the agency is occupying 5.5 floors (4 664m<sup>2</sup>) in the Westhafen Tower, located in Frankfurt am Main, Germany. The 2<sup>nd</sup> and 25<sup>th</sup> through to 28<sup>th</sup> floor are rented fully by EIOPA; on the 21<sup>st</sup> floor EIOPA occupies one half-floor.

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The building owner holds a LEED (Leadership in Energy and Environmental Design) Gold certification for Operations and Maintenance since 2018 for the building, which will be renewed in 2023/2024.

In 2021, EIOPA employed 193 staff, on-site consultants and trainees add to the teams working in Frankfurt and remote. The environmental management system applies equally to all.

The year of 2021 continued under the influence of the Covid-19 pandemic, which reflected on EIOPA's core business activities. Since 16 March 2020 until the end of June 2021, staff members were fully teleworking as per the Covid-19 related health directives from the national and EU authorities, with some exceptional office presences. In July EIOPA partially opened the offices for approximately 25% of the workforce to guarantee social distancing. With a further relaxation of the rules in October 2021.

### 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<sup>5</sup> 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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<sup>5</sup> [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),

## 5. DESCRIPTION OF THE ENVIRONMENTAL MANAGEMENT SYSTEM

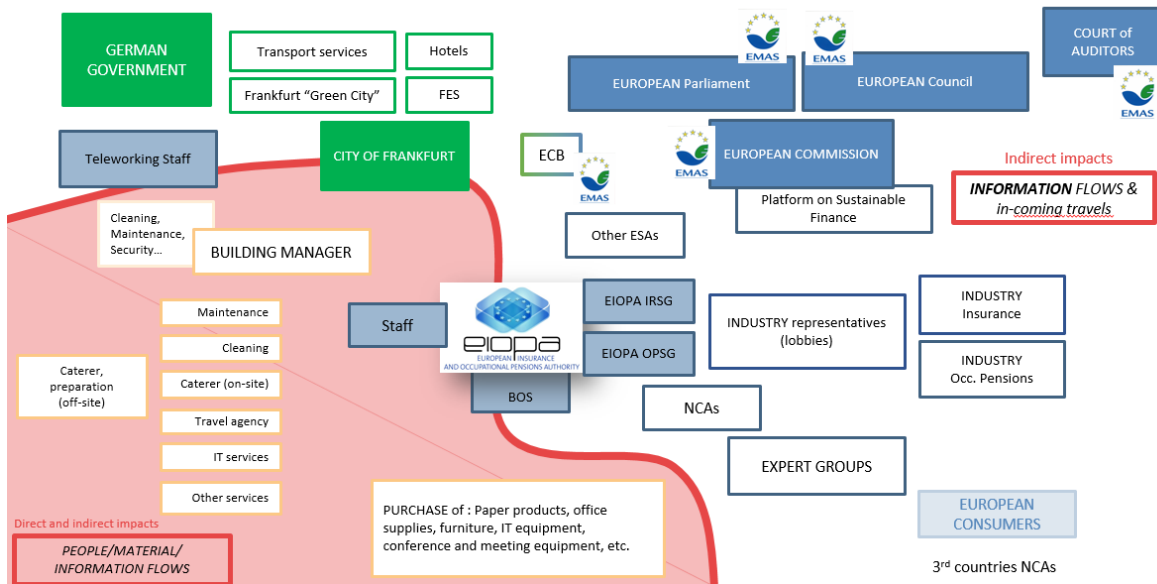
### ABOUT EMAS

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

With developments in sustainable finance, 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. Despite the Covid-19 crisis that held us back from concluding the project earlier, we are now proud to hold the EMAS certification and aim at the continuous improvement of EIOPA’s impacts – positive and negative.

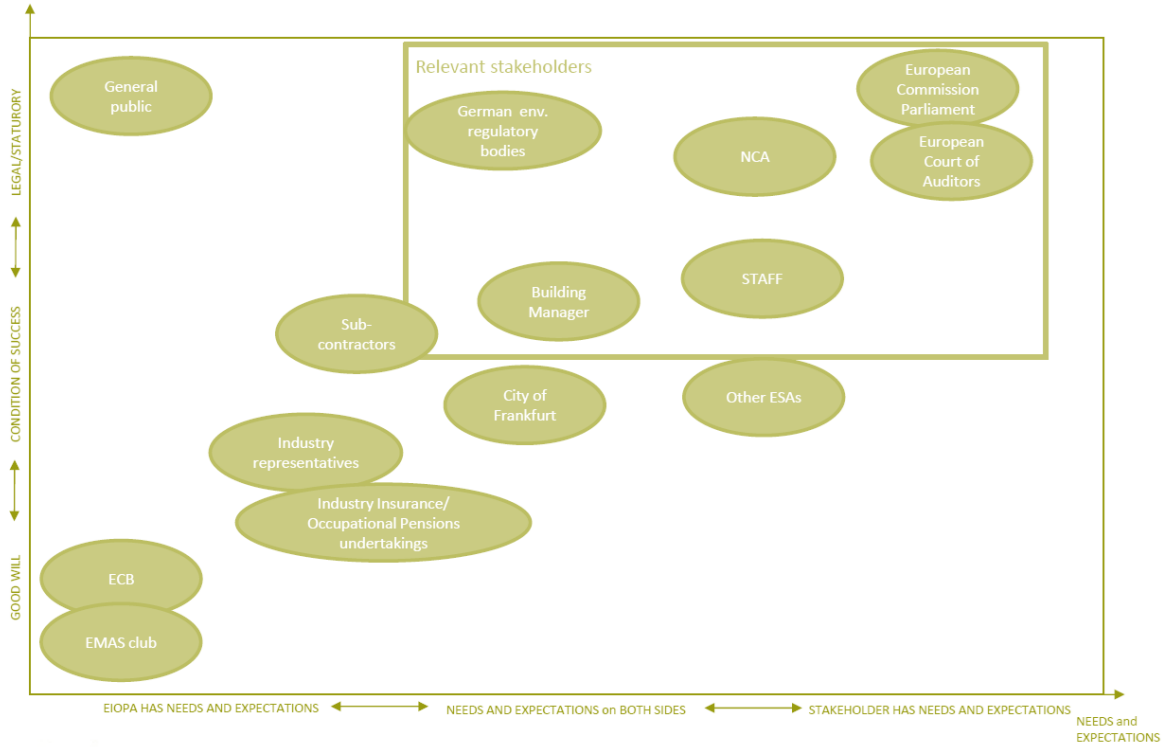
### CONTEXT AND PURPOSE OF EIOPA’S ENVIRONMENTAL MANAGEMENT SYSTEM

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



<sup>6</sup> [EMAS – Environment - European Commission \(europa.eu\)](https://europa.eu)

Out of these, 6 were identified a significant for our EMS in 2021:



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 consider 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 consider the impact of climate change on the general working environment.	EIOPA has been given mandates to provide advice and recommendations on sustainable finance.

With another business year mostly under the influence of the Covid-19 pandemic, the main priority remained to adjust to new ways of working, which proved to also be an opportunity. Business travel only resumed at the end of 2021 and workflows remained, where possible, in electronic format. With the gradual return to the office, staff commute started slowly taking up speed again.

### 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:



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

## 6. 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.

## 7. 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 initially through site visits, document analysis and interviews with staff. A review of the environmental aspects has been done through a staff survey in 2023 and the aspects have been agreed upon by the Top Management through the Management Review.

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<sup>7</sup> – 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:

$$\text{Criticality} = (\text{Frequency or Probability}) \times (\text{Control/Influence}) \times (\text{Opinion}) \times (\text{Quantity}) * 2 \text{ if positive impact}$$

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

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<sup>7</sup> [L\\_2019017EN.01000101.xml \(europa.eu\)](#)

### SIGNIFICANT ENVIRONMENTAL ASPECTS

Activity	Environmental aspect	Relevant stakeholders	Environmental impacts
<b>Use of offices</b>	Lights	staff, building management, maintenance	(Non) Renewable natural resource consumption Other (noise, ...)
	Heating and air conditioning	staff, building management, maintenance	Water pollution (Non) Renewable natural resource consumption Other (noise, ...)
	Waste collection	staff, building management, maintenance	Water pollution (Non) Renewable natural resource consumption Other (noise, ...)
	Use of electronic devices (staff)	staff	(Non) Renewable natural resource consumption Other (noise, ...)
	Use of electronic devices (meetings and conferences)	staff, participants to meetings and conferences, Training & event team	(Non) Renewable natural resource consumption Other (noise, ...)
	Meetings and conferences	Training & event team	(Non) Renewable natural resource consumption Other (noise, ...)
<b>Use of paper</b>	Printing	staff	Water pollution Air pollution (Non) Renewable natural resource consumption Other (noise, ...)
<b>Travels</b>	Missions performed by staff members	staff	Air pollution Non-renewable natural resource consumption Other (noise, ...)
<b>Mobility</b>	Staff commute to the office	staff	Water pollution Air pollution (Non) Renewable natural resource consumption Other (noise, ...)
<b>Use of sanitary facilities</b>	Water usage for toilets and taps	staff, building management, maintenance	Water pollution Non-renewable natural resource consumption
<b>Use of Data Centres</b>	Power Usage Effectiveness	provider	Water pollution Air pollution Soils pollution (Non) Renewable natural resource consumption Other (noise, ...)



Activity	Environmental aspect	Relevant stakeholders
<b>Core Business</b>		
<b>Policy</b>	Determining how ESG criteria can be integrated into insurers and pension fund processes (formal request to EIOPA and ESMA for technical advice 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 advice on potential to several delegated acts with regard to the integration of sustainability risks and sustainability factors).	European Commission, Council, Parliament, NCAs, OPSG, IRSG
<b>Consumer Protection</b>	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
<b>Risks and Financial Stability</b>	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 <sup>8</sup> .	NCAs, OPSG, IRSG Commission

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<sup>8</sup> [The Paris Agreement | UNFCCC](#)

## 8. ENVIRONMENTAL OBJECTIVES

Our baseline year will continue to be 2019, as this was the first year where all relevant information could be collected and the year with “normal” (pre-pandemic) business activity. Year-on-year, and until at least 2024, it will serve as a reference to monitor our improvements.

Policy topic	Objective	Measure	Target 2023	Target reached?
			Baseline 2019	
Improve our performance on energy and water consumption and on waste management	Electricity consumption	kWh	-5%	✓
	Heat consumption	kWh	-5%	✗
	Cold consumption	kWh	-5%	✓
	Waste generation	kg	-5%	
Use of electronic solutions to minimise paper consumption and adjust travels to the necessary	Paper consumption	pages/day/FTE	-15%	✓
	Missions GHG emissions (transport)	total number of missions and corresponding kgCO <sub>2</sub> eq.	-35%	✓
	Reduce the number of off-site meetings		-35%	✓
Green public procurement approach	Consider green procurement approach in all EIOPA’s procurement procedures (apply green criteria wherever feasible)	%	100%	In progress
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 revised in the Management Review annually and adjusted when necessary to the evolving context, our environmental performance, or new areas of focus.

## 9. PERFORMANCE

Prior to sharing our performance and actions, it is important to remember that 2021 performance, like 2020, remained greatly influenced by the Covid-19 pandemic, mandatory teleworking and only partial resuming of business travels. Therefore 2021 should also be considered another “outlier” year, with considerably lower impact compared to the baseline year 2019.

Furthermore, the figures presented below should also be assessed against the background of the growing number of staff members working for EIOPA:

Staff evolution	2019	2020	2021
Full time equivalents	164	171	193

### 9.1. Energy

#### HOW WE OPERATE AND OUR PERFORMANCE

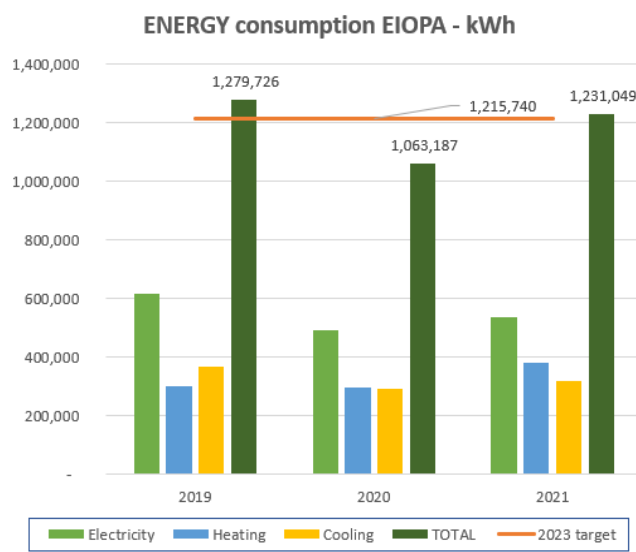
As one tenant of many in the Westhafen Tower, our energy consumption results from both our own direct consumption on rented floors and the energy needed and used by the building to operate common areas such as the elevators, lobbies, hallways, and the underground garage.

We have 3 sources of energy:

- Electricity
  - o Managed by EIOPA via a contract for each floor covering our needs for lighting, computers, video-conferencing equipment, cooling of our IT rooms, dishwashers, etc.
  - o Managed by the building manager for collective consumptions (e.g. elevators, lights in common areas, etc.).
- Heating
  - o Managed by the building manager and delivered by a Frankfurt heat network.
- Cooling
  - o Managed by the building manager and produced by a central heating, ventilation, and air conditioning (HVAC) system for the entire building.

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

For 2021, approximately 53% our energy consumption is connected to consumption on our floors while the rest relates to the usage in the building’s common areas.

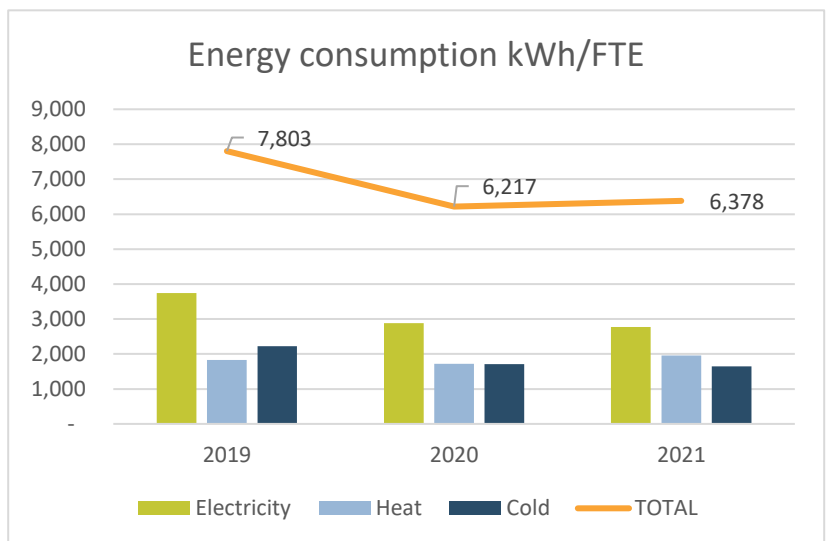


Our energy data is provided by the building manager in December of Y+1. Despite efforts made we have not been able to collect more regular data but continue to engage with the landlord to find a solution for receiving reliable data on EIOPA's consumption on a quarterly basis. The total energy consumption in 2021 has been 1.252 MWh, which equals approx. 6.488 kWh/FTE.

An increase compared to 2020 which mostly can be attributed to the ongoing construction works that were performed throughout the year 2021 and the use of the 21<sup>st</sup> floor.

The rearrangement of our office-space, which started in 2020, and was finally concluded in 2022 allowed us to optimise rented space per head count as the table per FTE already indicates.

In 2019, EIOPA occupied 4,256 sqm of office space to accommodate 175 staff. With the actual number of staff members in that year the consumption per FTE was 25.95 sqm/staff member.



With the increase of staff members, it is now, in 2022, possible on a total of 4,664 sqm, to house 217 staff members. With the actual number of staff members in that year the consumption per FTE was 24.17 sqm per staff member.

Despite the increase in total energy consumption, there is still a significant improvement per FTE compared to the base line year of 2019.

The total number of available workstations has increased to 225 and the use of a desk-sharing system accommodates staff as well as external and temporary staff without the need for establishing additional workspaces.

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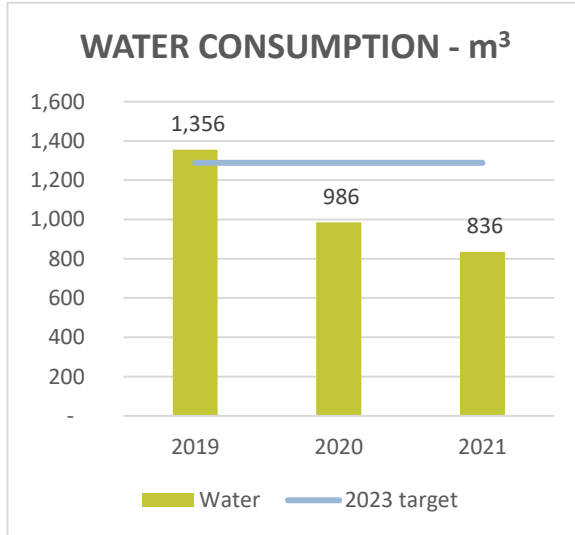
EIOPA is currently using two data centres with a provider in Germany. The electricity consumption of these data centres is not yet included in the overall carbon footprint due to the unavailability of historical qualitative data by the provider dating back to 2021. The PUE (Power Usage Effectiveness) of these two data centres is 1.38 and 1.28, 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	Continue our exchanges with the landlord to promote technical solutions such as LED policy and more
Define best practices for staff on the use of computers, ventilation, and temperature management	Electric chargers for cars to be installed in the underground parking facilities
The authority's "workplace strategy" developed in 2020 considers maximising natural light and good distribution of heat/cold	
Continuous 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	
Managed auto shut-off of lights at night	

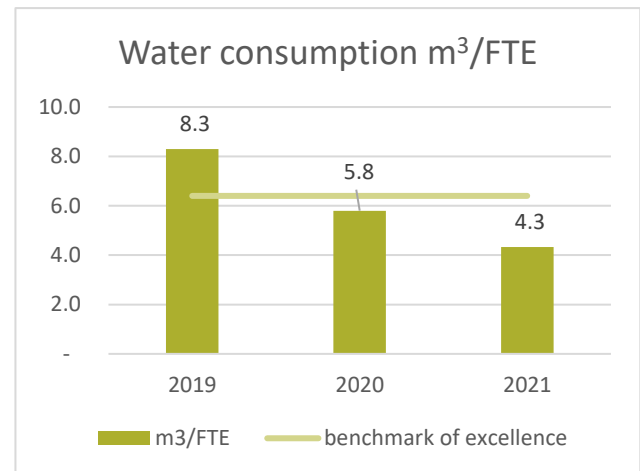
## 9.2. Water

### HOW WE OPERATE AND OUR PERFORMANCE



Our water usage comes from drinking and sanitary use (toilets, sinks) as well as water used for cleaning the office space and watering the plants. 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 reduction in water consumption compared to 2020 is related to the partial closure of the office. The consumption of water during 2021 results in parts from the 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 on a regular basis before reopening the offices in the second half of 2021.



OUR ACTIONS

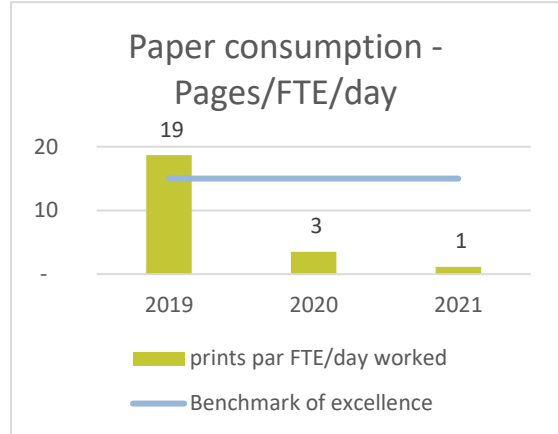
Taken	Foreseen
Install aerators/flow reducers on washbasins and sinks – in coordination with the building management	Awareness raising campaigns on the considerate use of water and signalling of leakages
We developed best practices to signal any leaks to FM without delay	
<p>As per the contractual requirements, EIOPA's cleaning services provider is using ecological/biodegradable cleaning supplies and products where possible.</p> <p>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</p>	
EIOPA introduced the exclusive use of recycled toilet paper and kitchen towels since 2019	

### 9.3. Paper

#### HOW WE OPERATE AND OUR PERFORMANCE

We continue to investigate ways to reduce the overall paper consumption with the aim to become paperless in the future. However, some operations are still based on hard copies which will require some innovative solutions in the future.

Moving from automatic printing to badge-to-print practice where the print job was only triggered when the badge is presented at the printer was a first step. We will have to continue monitoring the evolution of the printing habits once we return fully to the office.



#### 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

## 9.4. Waste

### HOW WE OPERATE AND OUR PERFORMANCE

Our waste in 2021 was managed as such:

- Confidential paper and toners are taken in charge by a specific contract, to be destroyed and recycled.
- The building managed the following waste streams, collected on our floors by our cleaning company:
  - o Paper and cardboard are selectively collected at the source to be recycled;
  - o 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 Entsorgungs- und Service GmbH (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.



**Corrigendum on reported waste data**

Data for the years 2019 and 2020 presented in this section differs from the figures reported in the Environmental Statement 2020 due to a clerical error in the previous calculations.

Due to a formula error, general waste was counted twice, thereby vastly overstating the agency's actual waste production. The corrected figures are presented in the charts on this page.

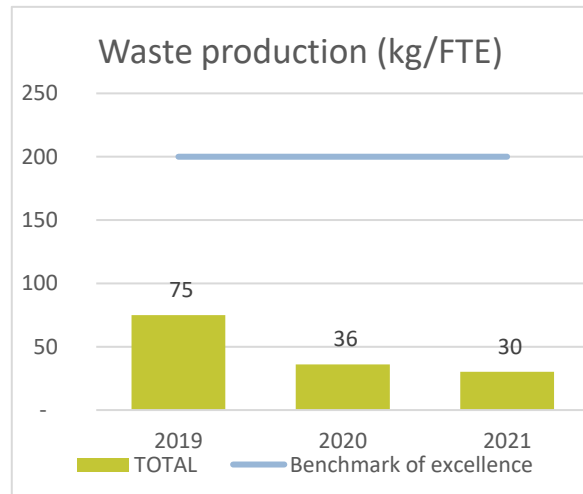
In 2021, like the previous year, the production of waste was much lower than 2019 due to the pandemic-related office closure. Still, despite the office closure, waste figures for 2021 are comparatively high because of ongoing construction works and waste production thereof.

The total waste production however is rather low, compared to the benchmark of excellence.<sup>9</sup>

In cooperation with the landlord, we have improved the waste stream collection to include plastic waste containers in the basement and are further working on improving the collection of data on waste.

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

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.



<sup>9</sup> [L 2019017EN.01000101.xml \(europa.eu\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:2019017EN.01000101.xml)

## OUR ACTIONS

Taken	Foreseen
Adjust the waste bins to the actual separation options	Install water purification stations to offer filtered flat and sparkling tap water
Inform staff about best practices	Raise awareness about individual waste production by removing desk bins and installing waste collection points on each floor
Install non-confidential paper bins on all floors	Replace capsule coffee machines with machines for coffee beans to reduce capsule packaging waste
Elimination of historical WEEE	

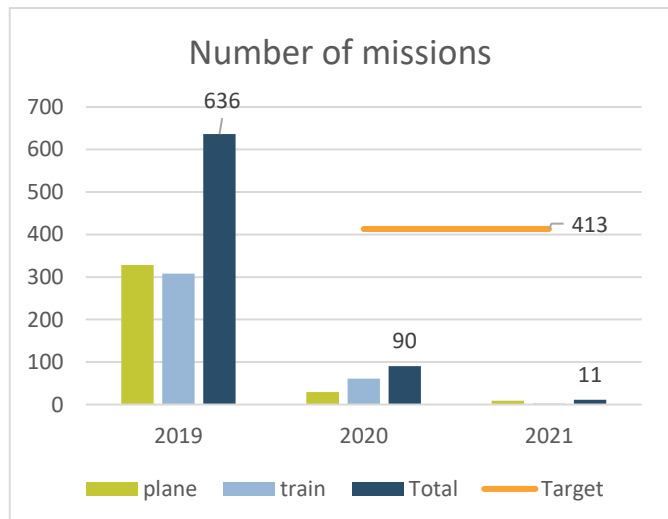
## 9.5. Travel

### HOW WE OPERATE AND OUR PERFORMANCE

#### Our missions

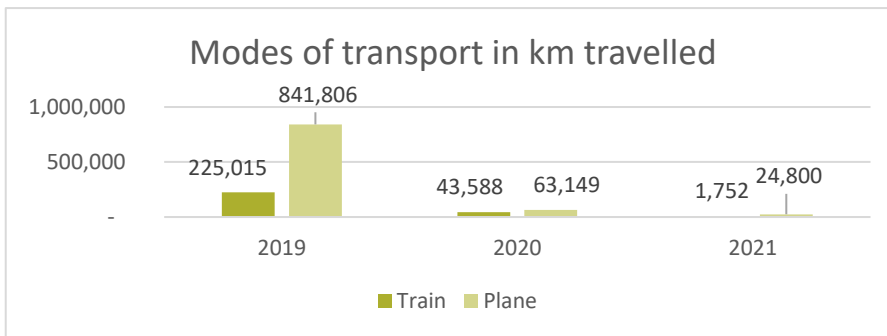
Staff travelling on business missions must follow the internal travel rules, which are based on the rules from the European Commission.

Once the mission has been validated by the line manager, bookings can be made either through the travel agency or booking directly. If the single trip is 400km or less, trains are the required method of travelling.



In 2021 we have only resumed partial business travel in December. We were still very much operating under the Covid-19 travel restrictions, which explains the low number of missions.

It has been agreed to continue with the reduction of 35% in number of missions compared to 2019.

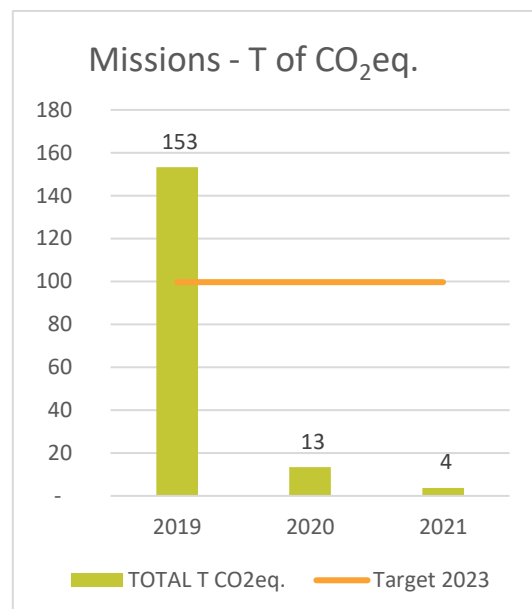


We will continue to emphasise the more ecological means of transport, encouraging staff, if not possible to attend a meeting virtually, to take the train whenever possible.

Associated Greenhouse gas (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 of the trip.

Since the lock-down and the resulting travel ban in 2020, our missions dropped drastically, and virtual meetings have become the norm.

For 2021 we have to say once more that the "outstanding performance" from an environmental point of view was still dictated by the pandemic, travel restrictions and a gradual return to normal travelling in December only.



### Our day-to-day commutes

At the initiation of our environmental management system in 2018, we have surveyed EIOPA's 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

We will renew this analysis once a new way to operate has settled.

By nature, we have staff representing many countries of the European Union, personal commutes to their respective homeland country are by definition, personal, and EIOPA can only encourage and

support staff to integrate into the community and were possible use sustainable modes of travel when travelling to their home countries.

### 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.

During 2021 we did not open our offices to visitors or host meetings at EIOPA, once this restarts, we will be monitoring the number of participants/meetings held at EIOPA. With this information and going forward we plan to analyse the origin and means of transport of visitors to evaluate their impact on the emissions.

### OUR ACTIONS

Taken	Foreseen
Communication on virtual 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

## 9.6. Core Business

### HOW WE OPERATE AND OUR PERFORMANCE

EIOPA supports the European Commission's Sustainable Finance Agenda including the Renewed Sustainable Finance Strategy, in striving for greater protection against climate and environmental risks through insurance coverage and integrating sustainability risks in the prudential framework for insurers.

### OUR ACTIONS

#### Selection of recent and ongoing actions on ESG

##### **To integrate ESG risks in the prudential framework of insurers and pension funds**

COM adoption of EIOPA proposal for revised ITS on supervisory reporting of climate risks to investments in Solvency II.

Methodological paper on potential inclusion of climate change in the natural catastrophe standard formula. ([Final paper July 2021](#))

Report on-life underwriting and pricing in light of climate change (Final report July '21)

Ongoing: 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**

[Thematic article on climate change, catastrophes and the macro-economic benefits for insurance](#)

Inclusion of ESG risks in financial stability tools and methodologies, incl. EIOPA's Financial stability dashboard, insurance and pensions stress testing methodologies.

Ongoing: 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.

Development of supervisory handbook chapters on the supervision of climate-related risks in Solvency II Pillar 2.

### Selection of recent and ongoing actions on ESG

Ongoing: discussions of climate-related risks in supervisory colleges. Development of application guidance on running climate change materiality assessment and using climate change scenarios in the ORSA.

#### **To promote sustainability disclosures and a sustainable conduct of business framework**

[Final Report with draft Regulatory Technical Standards \(RTS\) on product-related taxonomy disclosures](#)

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.

[Advice on KPI for environmentally sustainable activities by insurers or pension funds under Article 8 of the taxonomy regulation \(Feb '21\)](#)

Ongoing: assessment of measures to address greenwashing.

#### **To address protection gaps**

Staff 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 natural catastrophe 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**

### Selection of recent and ongoing actions on ESG

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.



## 9.7. Procurement

### HOW WE OPERATE AND OUR PERFORMANCE



As a public body of the European Union, we follow the EIOPA Financial Regulation and “vademecum 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.

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 plan to 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 as certain types of supplies and services may not have an environmental component. In certain other cases, the introduction of green criteria may be possible but considered unreasonable or not useful due to a disproportionate negative impact on the likelihood of a successful procedure or expected costs.

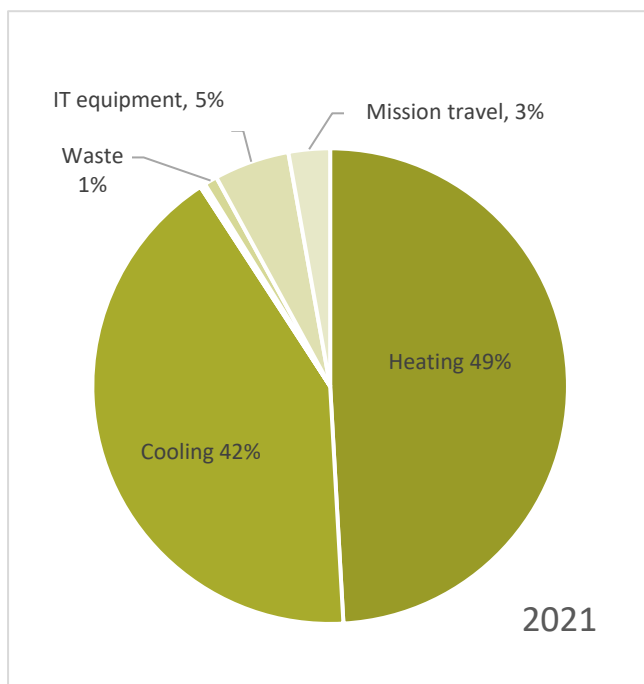
In the yearly environmental statement, we will continue to report on the share of procedures including green criteria and provide explanations for those procedures where such criteria are considered either not applicable or unreasonable.

OUR ACTIONS

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

## 9.8. Greenhouse gas (GHG) emissions

### HOW WE OPERATE AND OUR PERFORMANCE



EIOPA's total greenhouse gas emissions in 2021 equalled 135.3tCO<sub>2</sub>eq. Total greenhouse gas emissions per full time equivalent employee: ~1tCO<sub>2</sub>eq/FTE.

We established a carbon footprint for 2021, based on the following scope:

- > Energy: all sources (excluding data centres)
- > Mobility: missions
- >> Outputs: 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 again the major savings 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.

## 9.9. 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<sub>2</sub>, NO<sub>x</sub> and PM we consider that the reduction in business trips will also improve these emissions in the same proportion.

## 10. 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](mailto:green@eiopa.europa.eu). Whereas externals can contact EIOPA via email at [info@eiopa.europa.eu](mailto:info@eiopa.europa.eu) to require about any time of information.

We established a group of staff members that are 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 fully back in the office. 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.

It was clear from the start that EIOPA’s staff members are interested in the topic and engaged in making a positive impact, which was confirmed again through a staff survey.

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.

## 11. LEGAL REQUIREMENTS

EIOPA meets the requirements of the EMAS regulations, relevant German national and municipal environmental legislation. All of which are summarised in a online legal register which is revised regularly to reflect changes to the legislation. Most of the obligations lie within the remits of the landlord and are being assessed in close cooperation. Should it be necessary to implement an action to correct or prevent a non-compliance, these will be included in the Action Plan and followed up by the Environmental Coordinator.

The overall legal compliance is assessed annual during the internal audit process. No deviations have been identified during the process.

## ANNEX I

### ENVIRONMENTAL VERIFIER'S DECLARATION ON VERIFICATION AND VALIDATION ACTIVITIES

Dr. Rainer Feld

with EMAS environmental verifier registration number DE-V-0186 licensed for the scope NACE 66 and 84.1 on behalf of BSI Group Deutschland GmbH accredited under DE-V-0228 for the scope NACE 66 and 84.1

declares to have verified whether the site(s) or the whole organisation as indicated in the updated environmental statement of the organisation EIOPA with registration number DE-125-0066 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 on 12 October 2023.

Dr Rainer Feld  
Geschäftsführer/General Manager  
BSI Group Deutschland GmbH

## 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<sup>10</sup>,
- GHG emissions factors provided by our suppliers.

### 1. Energy

Origin of the data	Emission factors
<p>Building management for all energies.</p> <p>The building being LEED registered gives us confidence on the monitoring of these consumptions.</p> <p>The data is available to us only in the last days of Y+1.</p> <p>There is no change in scope since the beginning of our EMAS implementation.</p>	<p>We contacted MAINOVA, the energy supplier, to have emissions factors:</p> <ul style="list-style-type: none"> <li>- Electricity – Ökostrom - is made 100% from renewables and amounts to 0 CO2e. emissions, as per German conventions.</li> <li>- Heat and cold: 0,175 kg CO2e./kWh</li> </ul> <p>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.</p>

### 2. Non energy

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

<sup>10</sup> The Base Carbone<sup>®</sup> is a public database of emission factors, necessary for the realisation of a greenhouse gas (GHG) emissions assessment and more generally any carbon accounting exercise.



## 3. Water

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

## 4. Paper

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

## 5. Food &amp; water

Origin of the data	Emission factors
<p>Internal follow-up based on purchases.</p> <p>There is no change in scope since the beginning of our EMAS implementation.</p>	<p>Water: We used the German ministry of the environment database “Prozessorientierte Basisdaten für Umweltmanagementsysteme”</p> <p>Food:</p> <p>We used the Bilan Carbone® V7 emission factor for average meal.</p> <p>For sandwiches, we used an aggregate Emission factor. Based on :</p> <ul style="list-style-type: none"> <li>- 50% bread, emission factor from the German ministry of the environment database <i>Prozessorientierte</i></li> </ul>

Origin of the data	Emission factors
	<p><i>Basisdaten für Umweltmanagementsysteme</i></p> <ul style="list-style-type: none"> <li>- 25% meat, emission factor from the German ministry of the environment database <i>Prozessorientierte Basisdaten für Umweltmanagementsysteme</i></li> <li>- 25% vegetables, from the French Base Carbone</li> </ul>

## 6. Mobility

Origin of the data	Emission factors
<p>The initial scope covered 3 types of mobility induced by our operations:</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. Missions: from the GHG emissions declared by our travel agency.</li> <li>3. Visitors: derived from a sampling our origins of visitors for three weeks in 2018.</li> </ol> <p>In the following years:</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. The travel agency changed, not offering Deutsche Bahn train tickets. We therefore use data from the travel</li> </ol>	<ol style="list-style-type: none"> <li>1. Commuting: We used Base Carbone emissions factors for car, German trains and airplanes.</li> <li>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.</li> </ol>

Origin of the data	Emission factors
<p>agency and our reimbursement of train travels.</p> <p>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.</p>	

7. IT assets

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

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