



Public consultation regarding the Review of the Insurance Disclosures under article 8 of the Taxonomy Regulation

Fields marked with * are mandatory.

INSTRUCTIONS

EIOPA welcomes comments on the **Consultation Paper on the review of insurance disclosures under the Disclosure Delegated Act under the EU Taxonomy framework.**

Comments are most helpful if they: respond to the question stated, where applicable; contain a clear rationale; and describe any alternatives EIOPA should consider.

Please send your comments to EIOPA via EU Survey by **12 August 2026.**

Contributions not provided via EU Survey or after the deadline will not be processed. In case you have any questions please contact Ursula.Bordas@eiopa.europa.eu and sergio.delgado_cuello@eiopa.europa.eu

Publication of responses

Your responses will be published on the EIOPA website unless: you request to treat them confidential, or they are unlawful, or they would infringe the rights of any third-party. Please, indicate clearly and prominently in your submission any part you do not wish to be publicly disclosed. EIOPA may also publish a summary of the survey input received on its website.

Please note that EIOPA is subject to Regulation (EC) No 1049/2001 regarding public access to documents and EIOPA's rules on public access to documents.

Declaration by the contributor

By sending your contribution to EIOPA you consent to publication of all non-confidential information in your contribution, in whole/in part – as indicated in your responses, including to the publication of the name of your organisation, and you thereby declare that nothing within your response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.

Data protection

Please note that personal contact details (such as name of individuals, email addresses and phone numbers) will not be published. EIOPA, as a European Authority, will process any personal data in line with Regulation (EU) 2018/1725. More information on how personal data are treated can be found in the privacy statement at the end of this material.

PRIVACY STATEMENT RELATED TO PUBLIC ONLINE CONSULTATIONS AND SURVEYS

Introduction

1. The European Insurance and Occupational Pension authority (EIOPA) is committed to protecting individuals' personal data in accordance with Regulation (EU) 2018/17251 (*Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39–98*, further referred to as “the EUDP Regulation”).
2. In line with Articles 15 and 16 of the EUDP Regulation, this privacy statement provides information to the data subjects relating to the processing of their personal data carried out by EIOPA.

Purpose of the processing of personal data

3. Personal data is collected and processed to manage online public consultations EIOPA launches, and to conduct online surveys, including via online platform EUSurvey (*For more information on the processing of personal data in EUSurvey, please see the [dedicated privacy statement](#)*), and to facilitate further communication with participating stakeholders (e.g., when clarifications are needed on the information supplied or for the purposes of follow-up discussions that the participating stakeholders may agree to in the context of the consultations or surveys).
4. The data will not be used for any purposes other than the performance of the activities specified above. Otherwise you will be informed accordingly.

Legal basis of the processing of personal data and/or contractual or other obligation imposing it

5. The legal basis for this processing operation are the following:
 - Regulation (EU) 1094/2010, and notably Articles 8, 10, 15, 16, 16a, 29 and 71 thereof
 - EIOPA's Public Statement on Public Consultations
 - EIOPA's Handbook on Public Consultations

6. In addition, in accordance with Article 5(1)(a) of the EUDP Regulation, processing is lawful as it is necessary for the performance of a task carried out in the public interest.

Controller of the personal data processing

7. EIOPA's controller responsible for the processing of personal data is the Executive Director.

8. Address and email address of the controller:

Westhafen Tower, Westhafenplatz 1

60327 Frankfurt am Main

Germany

DataController@eiopa.europa.eu

Contact detail of EIOPA's Data Protection Officer (DPO)

9. Westhafen Tower, Westhafenplatz 1, 60327 Frankfurt am Main, Germany

dpo@eiopa.europa.eu

Types of personal data collected

10. The following personal data might be processed:

- Personal details (e.g. name, contact details: e.g. email address, phone number).
- Employment details (company and job title).

Recipients/processors of the personal data collected

11. Data will be collected and disclosed to the relevant staff members part of the Department/Unit in charge of the consultation/surveys and also to other EIOPA's staff on a need-to-know basis (e.g IT staff, security officer).

Retention period

12. Personal data collected are kept by until the finalisation of the project the public consultation or the survey relate to.

13. The personal data collected in EUSurvey are deleted from EUSurvey as soon as the period to provide answers elapsed.

Transfer of personal data to a third country or international organisations

14. No personal data will be transferred to a third country or international organisation. The service provider is located in the European Union.

Automated decision-making

15. No automated decision-making including profiling is performed in the context of this processing operation.

What are the rights of the data subject?

16. Data subjects have the right to access their personal data, receive a copy of them in a structured and machine-readable format or have them directly transmitted to another controller, as well as request their rectification or update in case they are not accurate. Data subjects also have the right to request the erasure of their personal data, as well as object to or obtain the restriction of their processing.

17. Where processing is based solely on the consent, data subjects have the right to withdraw their consent to the processing of their personal data at any time.

18. Restrictions of certain rights of the data subject may apply, in accordance with Article 25 of the EUDP Regulation.

19. For the protection of the data subjects' privacy and security, every reasonable step shall be taken to ensure that their identity is verified before granting access, or rectification, or deletion.

20. Should the data subjects wish to exercise any of the rights provided in paragraphs 16 and 17 above, please contact EIOPA's DPO (dpo@eiopa.europa.eu).

Who to contact if the data subjects have any questions or complaints regarding data protection?

21. Any questions or complaints concerning the processing of the personal data can be addressed to the internal data Controller (dpo@eiopa.europa.eu) or EIOPA's DPO (dpo@eiopa.europa.eu).

22. Alternatively, the data subjects can have recourse to the **European Data Protection Supervisor** (www.edps.europa.eu) at any time, **as provided in Article 63 of the EUDP Regulation**.

About the respondent

* Please indicate the desired disclosure level of the responses you are submitting,

Maximum 1 selection(s)

- ☒ Public
- ☐ Confidential
- ☐ Partly confidential

If you selected "Partly confidential", please indicate clearly any part of the response you do not wish to be publicly disclosed.

* Stakeholder name

GDV

* Stakeholder type

Minimum 1 selection(s)

- ☒ Insurance undertaking
- ☐ NGO
- ☐ Think-tank
- ☐ Academic organisation

- ☐ Auditor firm
- ☐ Consultancy
- ☐ Consumer association
- ☒ Other

* Contact person (Name and Surname)

Elias Hartmann

* Contact person (e-mail)

e.hartmann@gdv.de

Consultation questions

Underwriting KPI

Q1. Do you agree that the proposed revisions improve the decision-usefulness of Taxonomy disclosures while reducing reporting burden for insurance undertakings?

Maximum 1 selection(s)

- ☐ Yes
- ☐ No
- ☒ Partially
- ☐ Not applicable

Please explain

GDV welcomes EIOPA's efforts to improve the relevance, comparability and usability of Taxonomy disclosures. Any revision of the Underwriting KPI (UW KPI) should remain proportionate, operationally feasible and aligned with the economic realities of insurance business models. We support measures that focus the KPI on genuinely climate-relevant non-life activities and promote greater consistency in reporting practices across undertakings.

Experience from the first years of implementation demonstrates that the current UW KPI provides only a partial representation of insurers' contribution to sustainability objectives. While insurers play a key role in supporting climate adaptation through risk transfer, prevention, resilience-building and climate risk management, these contributions are only partially captured by the existing framework. As a result, the KPI does not provide a comprehensive measure of insurers' role in supporting the transition to a more resilient and sustainable economy.

From a user perspective, the practical value of the KPI remains limited. Investors generally rely on a much broader set of sustainability information, including transition plans, governance arrangements, risk management frameworks and other sustainability disclosures. Consequently, the current UW KPI is so far rarely used as a standalone indicator and provides only a narrow insight into insurers' overall sustainability performance.

A further challenge is that the current methodology inherently constrains reported alignment levels. Because only a limited share of underwriting activities falls within the scope of the Taxonomy, alignment ratios are structurally low, regardless of an insurer's broader sustainability efforts. Reported outcomes therefore often reflect the design of the framework rather than the level of sustainability ambition or performance of individual

undertakings, limiting both interpretability and comparability.

At the same time, German insurers do not consider a fundamental redesign of the UW KPI to be a proportionate response. Significant investments have already been made in methodologies, systems, governance arrangements, controls and assurance processes, while broader sustainability information is already available through CSRD disclosures.

GDV nevertheless supports targeted improvements to the existing framework. Priorities should include narrowing the KPI perimeter to climate-relevant non-life lines of business, harmonising the calculation of eligibility and alignment ratios, and reducing interpretative differences across undertakings. Such measures would increase relevance, comparability and consistency without creating disproportionate implementation burdens. We also support the removal of disclosure elements that have demonstrated limited informational value, including the gas and nuclear breakdowns and the combined KPI.

For similar reasons, GDV do not support the introduction of a Green Insured Activities (GIA) KPI. Such a metric would require significant additional investments in data collection, governance, reporting and assurance, while its relevance remains unproven. Moreover, it would largely reflect the sustainability characteristics of insured assets and policyholders rather than insurers' own sustainability performance.

Finally, the objective of regulatory simplification should be pursued consistently across the EU sustainable finance framework. Where appropriate, the Taxonomy framework should be aligned with the revised ESRS reporting principles and simplification measures. Greater coherence across reporting regimes would reduce duplication, lower compliance costs and support a more proportionate disclosure framework while maintaining transparency for users.

Q2. Do you agree with renaming the current underwriting KPI to "Adaptation Underwriting KPI" to better reflect its scope?

Maximum 1 selection(s)

- ☐ Yes
- ☐ No
- ☒ Partially
- ☐ Not applicable

Please explain

GDV supports the proposed renaming of the current Underwriting KPI as this could improve transparency regarding its scope and reduce the risk of misinterpretation. Even so, renaming the term Underwriting KPI alone will not address the significant limitations of the current scope and design of the EU Taxonomy framework, it enhances transparency regarding its scope and reduces the risk of misinterpretation.

The change clarifies that the KPI captures only underwriting activities that contribute to the environmental objective of climate change adaptation under the current EU Taxonomy framework, rather than insurers' overall contribution to sustainability.

We consider that the proposed name could be enhanced further by explicitly referring to the 'Climate Change Adaptation Underwriting KPI', as this would more accurately reflect the metric's specific environmental objective.

The KPI should be understood as a metric for climate change adaptation-related underwriting activities rather than a measure of insurers' overall sustainability contribution.

Q3. Do you support to keep the “split premium” approach for the Adaptation Underwriting KPI?

Maximum 1 selection(s)

- ☐ Yes
- ☐ No
- ☒ Partially
- ☐ Not applicable

Please provide reason

Yes, although the GDV has pointed out from the outset that this approach does not reflect the underlying principles of their business model such as risk pooling and diversification.

From the very beginning, it was impossible to achieve a result of 100 % with the original method of calculating the Underwriting KPI key figures. Because the denominator includes all non-life premiums, including lines unrelated to adaptation, the KPI mechanically understates insurers' role. The premium split made matters even more challenging. While the Technical Screening Criteria (TSC) for underwriting of climate-related perils have been used by insurers to adapt underwriting practices, the current Underwriting KPI does not reflect insurers'

real role in climate adaptation because it requires “splitting” premiums and counting only climate-risk components, which ends in limited results. This also applies to products that fully protect against climate-related losses.

Nevertheless, in terms of practical implementation, German insurers have already invested considerable resources in implementing the current framework. Any further changes to the methodology would create an additional operational burden and generate extra costs.

A minor modification which could improve the situation would be introducing an additional alignment/eligibility ratio. Given the circumstances, it would be a logical step and ensure consistency in method. Further details see Q4.

Q4. Do you agree with the proposal to limit the denominator of the alignment and eligibility ratios to the 8 Eligible Lines of Business?

Maximum 1 selection(s)

- ☐ Yes
- ☐ No
- ☒ Partially

Explain why

GDV supports EIOPA's proposal to narrow the denominator of the Underwriting KPI, as a more targeted reporting perimeter would improve the relevance, comparability and interpretability of the metric. However, limiting the denominator to the eight eligible lines of business identified by EIOPA does not fully achieve this objective. Instead, the denominator should be more closely aligned with the activities reflected in the numerator and focus on business that provides coverage for climate-related risks.

A stronger alignment between numerator and denominator would enhance the conceptual consistency of the KPI and strengthen its ability to measure insurers' contribution to the Taxonomy's climate adaptation objective. Where eligibility and alignment are determined by reference to climate-related activities, the denominator should follow the same logic. Including premiums from lines of business that do not cover climate-related perils dilutes the metric.

GDV therefore support a common industry-based denominator covering the lines of business most closely associated with climate-related exposures, namely motor third-party liability insurance, other motor insurance, marine, aviation and transport insurance, and fire and other damage to property insurance. At the same time, the framework should remain sufficiently flexible to capture material climate adaptation or climate-related peril exposures that may arise outside these categories.

Such an approach is consistent with the broader direction of the EU sustainable finance framework, which increasingly seeks to prioritise material and relevant information over purely scope-based reporting. It would improve the representativeness of the KPI, better reflect the activities that can contribute to climate adaptation and do so without introducing unnecessary complexity or operational burden.

To maintain transparency and support comparability across different business models, German insurers also support the disclosure of a coverage ratio showing the share of the selected lines of business within the overall non-life portfolio. This would provide important context for users and facilitate a more informed assessment of insurers' contribution to Taxonomy-relevant underwriting activities.

Additionally, GDV notes that the current framework results in underwriting alignment ratios that are structurally constrained. Even if the denominator were limited to the proposed eight eligible lines of business, it would still be too broad to adequately reflect insurers' potential adaptation contribution as intended. To improve cross-industry comparability and provide greater transparency regarding the extent to which undertakings convert eligible activities into aligned activities, it would be beneficial to consider a consistent approach across sectors whereby Taxonomy KPIs are measured as aligned activities relative to eligible activities. This proposal is particularly relevant in light of the recent Omnibus amendments, which already require non-financial undertakings to additionally disclose the relationship between Taxonomy-aligned and Taxonomy-eligible activities.

As this ratio is becoming increasingly relevant across other sectors, we believe that an equivalent KPI should also be established for (re)insurers. As the underlying data points are already reported, the proposal could be implemented without additional reporting burden and would support the European Commission's objective of improving the interpretability of Taxonomy disclosures.

Q5. For the numerator of the eligibility ratio, do you agree with the proposed standardisation of determination of eligibility?

Maximum 1 selection(s)

- ☒ Yes
- ☐ No
- ☐ Partially
- ☐ Not applicable

Explain why

Even though the GDV pointed out from the beginning, the 'premium split' approach results in low ratios, we do not oppose it, when assessing taxonomy eligibility and alignment.

German insurers have already invested considerable resources in implementing the current framework. A standardised approach would improve consistency and comparability across the entire market, whilst avoiding further implementation costs and reporting burdens.

Green Insured Activities KPI

Q.6 Do you support the introduction of a “Green Insured Activities KPI” measuring exposure to Taxonomy-aligned counterparties or assets?

Maximum 1 selection(s)

- ☐ Yes
- ☒ No
- ☐ Partially
- ☐ Not applicable

Please provide reasons for your answer.

GDV does not support the introduction of a Green Insured Activities KPI (GIA KPI). In our view, the proposed metric is neither conceptually appropriate nor likely to enhance the assessment of insurers' contribution to sustainability objectives.

The fundamental principle of the GIA KPI does not reflect the specific nature of insurance activities. Unlike investment- and lending-related Taxonomy metrics, which assess the allocation of capital to economic activities, insurance is based on the transfer and pooling of risks. Insurers enable economic activity by providing protection against risks and facilitating recovery following insured events; they do not typically direct capital towards specific activities. Consequently, applying a look-through approach that focuses on the sustainability characteristics of insured assets or counterparties would introduce a reporting concept that is disconnected from the core purpose of underwriting and from the way insurers contribute to the economy and the transition. As a result, the proposed KPI would provide limited insight into insurers' own sustainability performance. The reported outcome would primarily be driven by the Taxonomy alignment of policyholders, insured assets or insured activities, rather than by decisions and actions taken by insurers themselves. A high GIA KPI would therefore not necessarily reflect an insurer's underwriting strategy, climate-related commitments or contribution to sustainability objectives, but rather the characteristics of its customer base and portfolio composition. The metric would consequently offer only limited value for evaluating or comparing insurers' sustainability performance.

The implementation of a GIA KPI would entail significant operational and financial costs. Insurers would need to establish new data collection processes, adapt systems and reporting infrastructures, increase their reliance on external ESG data providers and implement additional governance and assurance procedures. Given the substantial effort required and the limited relevance of the resulting metric, the cost-benefit balance of such a

KPI appears highly questionable.

For these reasons, GDV considers that the introduction of a GIA KPI would add complexity and reporting burdens without materially improving the relevance of insurance-related Taxonomy disclosures. Efforts should instead focus on improving the usability, consistency and interpretability of existing KPIs and ensuring that insurance-specific disclosures remain aligned with the economic substance of insurance business models.

Q.6. If you selected yes:

Maximum 1 selection(s)

- ☐ a) Do you consider that the KPI should be applied on a voluntary or mandatory basis?
- ☐ b) Do you consider that the introduction of such a KPI should be deferred to the longer term?

Please provide reasons for your answer.

Q.7 Should this KPI complement or replace the current KPI over time?

Maximum 1 selection(s)

- ☐ Yes
- ☒ No
- ☐ Partially
- ☐ Not applicable

Please explain

GDV does not support the introduction of the proposed GIA KPI as a complement or a replacement of the current KPI.

Either way, the introduction of this KPI would not only mean even more complexity and incomprehension, but it would also be fundamentally challenging because data relevant for taxonomy assessment is not part of insurers' underwriting processes. Unlike banks or investors which assess counterparties in the context of financing decisions and ongoing credit monitoring, insurers primarily assess the risk characteristics of the insured activity rather than its sustainability profile.

German insurers consider that replacing the current KPI would be less appropriate than retaining it, as this would eliminate a metric specifically designed to reflect insurers' contribution to climate change adaptation through Taxonomy-aligned underwriting activities. Although the KPI is subject to the methodological limitations described above, it nevertheless serves an important purpose that would not be preserved through its replacement.

Q.8 Do you support the methodology for the Green Insured Activities KPI?

Maximum 1 selection(s)

- ☐ Yes
- ☒ No
- ☐ Partially
- ☐ Not applicable

Please explain

GDV does not support the introduction of a Green Insured Activities (GIA) KPI, whether as a complement to or replacement for the existing Underwriting KPI. In our view, the proposed KPI would introduce significant operational complexity while providing only limited additional value for users of sustainability disclosures. A key challenge relates to data availability and feasibility. The proposed methodology relies on Taxonomy information regarding insured counterparties and underlying insured assets, much of which is currently unavailable, incomplete or outside insurers' control. Calculating the KPI would require insurers to obtain, maintain and verify large volumes of highly granular sustainability data, resulting in substantial investments in data management, IT systems, methodologies, governance arrangements and reporting processes. Practical implementation challenges are particularly pronounced in retail and personal lines of business, where comparable Taxonomy information is generally not available. Similar difficulties arise in reinsurance, especially treaty reinsurance, where underlying risks are typically not assessed at the level of individual insured assets. Beyond these operational considerations, the proposed KPI raises fundamental concerns regarding its representativeness and relevance. As acknowledged by EIOPA, insurance policies linked to counterparties outside the scope of CSRD reporting, as well as policies for which Taxonomy eligibility cannot be reliably determined, would be excluded from both the numerator and denominator. Consequently, the KPI would cover only a limited subset of insurers' underwriting portfolios and would not provide a representative picture of underwriting activities as a whole.

The proposed metric would also largely reflect the Taxonomy characteristics of policyholders, insured assets or economic activities rather than insurers' own actions, strategies or sustainability performance. As a result, reported outcomes would depend primarily on the composition of the insured portfolio rather than on underwriting decisions or measures undertaken by insurers to support sustainability objectives. This limits the ability of the KPI to provide meaningful insights into insurers' actual contribution to the transition or to facilitate meaningful comparisons between undertakings.

In addition, introducing a new KPI alongside the existing Underwriting KPI would increase reporting complexity and reduce overall transparency for users. Insurers would be required to establish extensive new data collection, reporting and assurance processes, despite continuing uncertainty regarding the future scope, methodology and practical application of the indicator.

If you selected "No", what alternative calculation approaches would work better to identify the Taxonomy-alignment of insured companies and objects?

Against this background, GDV does not see a need for an additional KPI or an alternative methodology to assess insured activities. Rather than expanding the reporting framework, efforts should focus on improving the usability, comparability and proportionality of the existing Underwriting KPI. Targeted refinements to the current framework represent a more effective and proportionate approach.

Furthermore, insurers already provide extensive sustainability-related information under the CSRD and ESRS frameworks. Reporting practices continue to evolve and increasingly include entity-specific metrics and disclosures that help users assess insurers' impacts, risks, opportunities and transition-related activities. Given the significant implementation burden, the limited representativeness of the proposed KPI and the availability of broader sustainability information through existing disclosure frameworks, GDV does not consider the introduction of a GIA KPI to be justified. A more proportionate approach would be to allow existing reporting practices to further mature within a stable and simplified regulatory framework and to assess, on that basis, whether any material information gaps remain that cannot be addressed through existing disclosures.

Other simplifications

Q.9 Do you agree with simplifying the Investment KPI by removing the breakdowns for gas and nuclear activities?

Maximum 1 selection(s)

- ☒ Yes
- ☐ No
- ☐ Partially
- ☐ Not applicable

Please explain

GDV fully supports the removal of the gas and nuclear breakdown from both the investment and underwriting KPI. At present, neither investors nor policyholders are seeking taxonomy information. Therefore, we propose further simplifications, in particular for the investment KPI.

In the German market, gas and nuclear exposures are generally immaterial (ratio of only a few basis points) to the investment portfolios of German insurers. Therefore, simplification is necessary and consistent with the objectives of improving the usability, proportionality, and decision-usefulness of Taxonomy reporting while reducing unnecessary reporting burden. Such improvements would significantly help to improve acceptance of Taxonomy in the market.

For the underwriting KPI EIOPA has acknowledged that the gas and nuclear breakdown is not applicable. Retaining a dedicated breakdown for these activities would perpetuate the complexity of the reporting framework without providing users with a meaningfully better understanding of insurers' sustainability profile. But simplifying the reporting templates just in the proposed way would improve clarity and comparability in our view not sufficiently. Therefore, GDV proposes to simplify Annex X further as follows:

Annex X of Delegated Regulation 2021/2178 new

Financial year (N)	Taxonomy eligible and aligned activities	Taxonomy aligned activities	Covered Assets	Breakdown by environmental objectives of Taxonomy aligned activities		
KPI	Proportion of Taxonomy eligible activities	Proportion of Taxonomy aligned activities	Assets in % with data for the KPI (of the relevant Portfolio)	CCM	CCA	Taxonomy aligned activity in previous reported period (N-1)

Text		%		%		%		%		%		%
Turnover		%		%		%		%		%		%
CapEx		%		%		%		%		%		%

Furthermore, the following comments should be integrated in Annexes IX and XI:

1. Exclusion of investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holder from the nominator and denominator.
2. No further breakdown of the nominator and the denominator
3. Reflecting data availability: reducing the reporting on climate objectives (with the option to add further objectives, depending on the data availability after a profound market test)
4. All calculations are based either on book values or on market values. The chosen approach must be disclosed.

This further simplification would make Taxonomy reporting considerably easier and less burdensome.

Q.10 Do you agree with removing the combined KPI (weighted average of underwriting and investment KPIs)?

Maximum 1 selection(s)

- ☒ Yes
- ☐ No
- ☐ Partially
- ☐ Not applicable

Please explain

GDV strongly supports removing the combined KPI.

The combined KPI aggregates two fundamentally different activities. They rely on different methodologies and reflect different parts of insurers' business activities. The underlying metrics for the calculation of the KPIs, insurance premiums and investments, are not comparable and therefore, the combined KPI gives no added value or relevant information for investors.

Therefore, we support EIOPA's approach to retain the separate disclosure of the underwriting and investment KPIs and remove the combined KPI.

Q.11 Do you support the introduction of an executive summary (dashboard) containing key Taxonomy and ESRS indicators in the Annual Report?

Maximum 1 selection(s)

- ☐ Yes
- ☒ No
- ☐ Partially
- ☐ Not applicable

Please explain

GDV does not support the proposal to introduce a dashboard-style executive summary in annual reports. We appreciate EIOPA's efforts to improve the decision-usefulness of disclosures and strengthen the link between Taxonomy and broader sustainability reporting. However, the overall aim must be simplifying reporting

and reducing burden. Any measures aimed at improving usability are supported by GDV. Introducing a mandatory dashboard would create an additional disclosure requirement and require new reporting and governance processes. It would therefore create instead additional disclosures and contradict this publicly promoted objective.

Due to the current reporting framework, Taxonomy and ESRS disclosures are included in Annual Reports and are subject to established reporting requirements. A separate dashboard would duplicate information and not simplifying it. Furthermore, insurers give already additional information, whether this information is introductory or contextual where relevant.

There is also limited evidence that a mandatory executive summary would materially improve the usability of disclosures or increase the use of Taxonomy KPIs by users. The main limitations of these KPIs stem from their underlying methodology rather than from how the information is presented.

Proposing a mandatory dashboard would also contradict the revised ESRS framework that allows undertakings to provide an executive summary on a voluntary basis. German insurers should therefore retain the flexibility to provide such a summary when considered appropriate. Efforts should focus on simplifying and streamlining existing disclosure requirements rather than introducing new reporting layers.

Use of OpEx

Q.12 Bearing in mind that OpEx is not included in the current disclosure template for insurance undertakings' Investment KPI, could the OpEx KPI of investee companies become relevant for voluntary reporting by insurance undertakings, in combination with the CapEx KPI?

Maximum 1 selection(s)

- ☐ Yes
- ☒ No
- ☐ Partially
- ☐ Not applicable

Please explain

GDV does not support introducing the voluntary use of investee companies' OpEx KPI. As already mentioned in Q11, the overall aim must be simplifying reporting and reducing burden. Moreover, we find it questionable if an OpEx KPI would give additional relevant information or insights in insurers' portfolios to investors. The current definition in the DDA of OpEx departs significantly from standard OpEx definitions. Therefore, reporting on OpEx by insurers might be misleading for investors. Furthermore, already gathering data for reporting on the current investment KPI faces significant limitations due to missing data and poor coverage. Reporting on OpEx would increase the effort in obtaining the relevant data.

Group reporting

Q13. The ESAs are proposing to remove the weighted average for group reporting. Do you agree that, in cases where a single KPI figure is required (such as for investment KPIs or investments made by financial products disclosed under SFDR), the KPI of the main business of the group should be used?

Maximum 1 selection(s)

- ☒ Yes
- ☐ No
- ☐ Partially
- ☐ Not applicable

Please explain

GDV supports replacing the weighted-average approach with reporting based on the main business of the group.

We agree that combining KPIs across different types of undertakings, each designed around a distinct business model and methodology, is overcomplicated and does not produce a meaningful figure. Where a single KPI is required for specific reporting purposes, using the KPI of the group's main business activity is a more proportionate and workable approach than calculating a weighted average.

This better reflects the economic reality of the group and avoids the methodological challenges and interpretability issues associated with aggregating KPIs that were never designed to be combined.

If not, what alternative methodology would you propose?

Q.14 Do you agree that computing group level KPIs for mixed groups as currently described in the FAQs of the Third Commission Notice poses challenges?

Maximum 1 selection(s)

- ☒ Yes
- ☐ No
- ☐ Partially
- ☐ Not applicable

If not, please explain how the identified issues could be solved in practice.

GDV agrees that the current approach to computing group-level KPIs for mixed groups as currently described in the FAQs of the Third Commission Notice poses significant practical and conceptual challenges. The current weighted-average approach may create double counting risks, particularly where sectoral KPIs are already based on consolidated financial information and are then aggregated again at group level. Moreover, it requires the aggregation of KPIs that are based on different methodologies and measure fundamentally different activities, such as investment and underwriting activities in the case of insurance groups, or financial and non-financial activities in mixed groups.

This aggregation reduces the transparency, interpretability and decision usefulness of Taxonomy disclosures. German insurers therefore support reconsidering the current approach and avoiding a mechanical weighted-average KPI that aggregates non-comparable indicators.

Q.15 Do you have comments on the common principles based on which possible solutions have been developed by the ESAs?

GDV broadly supports the common principles identified by the ESAs, in particular the focus on meaningful disclosures, proportionality and avoiding the aggregation of fundamentally different KPIs. German insurers support the principle that the group's main reporting regime should be based only on group-

level disclosures. No additional mandatory disclosures should be required for other activities or at subsidiary or sub-group level.

Q.16 Do you see specific challenges on how to determine the group main reporting regime or prevalent business of a mixed group or financial conglomerate?

Maximum 1 selection(s)

- ☐ Yes
- ☒ No
- ☐ Partially
- ☐ Not applicable

Please provide examples if relevant.

Undertakings should retain the discretion to determine the most relevant reporting regime and KPI based on their business activities and management's assessment of which metric best reflects the nature of the group and provides the most decision-useful information to users.

Undertakings should retain the discretion to determine the most relevant reporting regime and KPI based on their business activities and management's assessment of which metric best reflects the nature of the group and provides the most decision-useful information to users. GDV does not see specific challenges in determining the main reporting regime or predominant business of a mixed group or financial conglomerate. In practice, undertakings already apply judgement and discretion when determining the main business activity of the group and have developed practicable and auditable approaches for doing so.

German insurers therefore do not consider it necessary to introduce a new framework based exclusively on either the nature of the parent undertaking or a mechanically determined predominant activity. Such an approach could create additional complexity.

Undertakings should retain the discretion to determine the most relevant reporting regime and KPI based on their business activities and management's assessment of which metric best reflects the nature of the group and provides the most decision-useful information to users.

Please explain

Undertakings should retain the discretion to determine the most relevant reporting regime and KPI based on their business activities and management's assessment of which metric best reflects the nature of the group and provides the most decision-useful information to users.

Undertakings should retain the discretion to determine the most relevant reporting regime and KPI based on their business activities and management's assessment of which metric best reflects the nature of the group and provides the most decision-useful information to users. GDV does not see specific challenges in determining the main reporting regime or predominant business of a mixed group or financial conglomerate. In practice, undertakings already apply judgement and discretion when determining the main business activity of the group and have developed practicable and auditable approaches for doing so.

German insurers therefore do not consider it necessary to introduce a new framework based exclusively on either the nature of the parent undertaking or a mechanically determined predominant activity. Such an approach could create additional complexity.

Undertakings should retain the discretion to determine the most relevant reporting regime and KPI based on their business activities and management's assessment of which metric best reflects the nature of the group and provides the most decision-useful information to users.

If not, please explain how the identified issues could be solved in practice.

Q.17 Do you support introducing a 10% materiality threshold based on the turnover generated by the other businesses a mixed group engages in?

Maximum 1 selection(s)

- ☐ Yes
- ☒ No
- ☐ Partially
- ☐ Not applicable

If not, please explain why.

GDV opposes the introduction of a 10% materiality threshold based on the turnover generated by other business activities in a mixed group.

A fixed quantitative threshold would entail additional KPIs reporting for secondary business activities once the threshold is met, irrespective of whether such information would provide material additional insight into the group's overall Taxonomy profile. This would add a new layer of reporting and increase complexity without necessarily improving the decision-usefulness of group-level disclosures.

The proposed threshold would also be inconsistent with existing reporting practices and with the objective of simplifying the Taxonomy reporting framework. As highlighted in Q16, undertakings already apply judgement and discretion to determine the reporting regime and KPI that best reflect the nature of the group and its business activities. Introducing an automatic threshold would interfere with these practices without demonstrating that the resulting disclosures would provide meaningful additional information to users.

German insurers do not support additional mandatory KPI reporting for subsidiaries, sub-groups or secondary business activities.

Q.18 Do you think that the proposal regarding sub-group level disclosures would provide a sufficiently transparent depiction of the Taxonomy profile of a mixed group?

Maximum 1 selection(s)

- ☐ Yes
- ☒ No
- ☐ Partially
- ☐ Not applicable

Please explain your views on the different criteria identified.

GDV does not support the introduction of additional mandatory sub-group level disclosures for mixed groups. While insurers recognise the importance of transparent group-level Taxonomy disclosures, requiring information at sub-group level would introduce an additional reporting layer and increase complexity, contrary to the objective of simplifying the Taxonomy reporting framework.

Applying the criteria identified by the ESAs could require mixed groups to perform additional assessments and prepare separate disclosures for subsidiaries or sub-groups whose activities differ from the group's predominant business, without necessarily providing additional decision-useful information to users. In particular, materiality alone should not trigger separate sectoral KPI reporting, as a subsidiary or business segment may conduct only a limited range of activities and may therefore not be meaningfully represented by the full reporting regime applicable to that sector.

The group's main reporting regime should therefore remain the basis for group-level Taxonomy disclosures.

Q19. What are your views on the types of disclosures which should be required for the other activities businesses?

Do you think that the full templates should be disclosed to enable easier comparability with undertakings engaging in similar activities or would you support lighter disclosures?

Please explain.

GDV does not support requiring additional disclosures for other business activities, whether through full templates or simplified KPI disclosures.

As explained under Q18, the group's main reporting regime should remain the basis for group-level Taxonomy disclosures, without additional mandatory reporting at subsidiary or sub-group level. Insurers therefore consider that neither full templates nor lighter mandatory disclosures should be required for other business activities. Full templates would create a disproportionate additional reporting layer, while simplified disclosures may entail substantially the same data collection, calculations and assessments. Neither option would therefore provide a proportionate or decision-useful addition to the group-level KPI.

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