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Consultation on the renewed sustainable finance strategy

Fields marked with * are mandatory.

Introduction

This consultation is also available in German and French.

On 11 December 2019, the European Commission adopted its Communication on a European Green Deal, which significantly increases the EU's climate action and environmental policy ambitions.

A number of levers will need to be pulled in order to build this growth strategy, starting with enshrining the climate-neutrality target in law. On 4 March 2020, the European Commission proposed a European Climate Law to turn the political commitment of climate-neutrality by 2050 into a legal obligation. This follows the European Parliament's declaration of a climate emergency on 28 November 2019 and the European Council conclusions of 12 December 2019, endorsing the objective of achieving a climate-neutral EU by 2050.

The ongoing COVID-19 outbreak in particular shows the critical need to strengthen the sustainability and resilience of our societies and the ways in which our economies function. This is necessary to, above all, minimise the risk of similar health emergencies in the future, which are more likely to occur as climate and environmental impacts escalate. In parallel, it will be paramount to ensure the resilience and capacity of our societies and economies to resist and recover from such emergencies. The COVID-19 outbreak underscores some of the subtle links and risks associated with human activity and biodiversity loss. Many of the recent outbreaks (e.g. SARs, MERS, and avian flu) can be linked to the illegal trade in, and consumption of, often endangered wild animal species. Furthermore, experts suggest that degraded habitats coupled with a warming climate may encourage higher risks of disease transmission, as pathogens spread more easily to livestock and humans. Therefore, it is important – now more than ever – to address the multiple and often interacting threats to ecosystems and wildlife to buffer against the risk of future pandemics, as well as preserve and enhance their role as carbon sinks and in climate adaptation.

Financing the European Green Deal and increasing the financial resilience of the economy, companies and citizens

Above all, the transition to a sustainable economy will entail significant investment efforts across all sectors, meaning that financing frameworks, both public and private, must support this overall policy direction: reaching the current 2030 climate and energy targets alone would already require additional investments of approximately €260 billion a year by 2030. And as the EU raises its ambition to cut emissions, the need for investment will be even larger than the current estimate. In addition, significant investments in the upskilling and reskilling of the labour force will be necessary to enable a just transition for all. Hence, the scale of the investment needs goes well beyond the capacity of the public sector. Furthermore, if the climate and biodiversity crises are to be successfully addressed and reversed before potentially dangerous tipping points are reached, much of the investment needs to happen in the next 5-10 years. In this context, a more sustainable financial system should also contribute to mitigate existing and future risks to wildlife habitats and biodiversity in general, as well as support the prevention of pandemics - such as the COVID-19 outbreak.

In this context, the European Green Deal Investment Plan – the Sustainable Europe Investment Plan – announced on 14 January 2020 aims to mobilise public investment and help to unlock private funds through the **EU budget** and associated instruments, notably through the InvestEU programme. Combined, the objective is to mobilise at least €1 trillion of sustainability-related investments over the next decade. In addition, for the next financial cycle (2021-2027) the **External Investment Plan (EIP) and the European Fund for Sustainable Development Plus (EFSD+)** will be available for all partner countries with a new External Action Guarantee of up to €60 billion. It is expected to leverage half a trillion Euros worth of sustainable investments. Lastly, the **European Investment Bank (EIB)** published on 14 November 2019 its new climate strategy and Energy Lending Policy, which notably sets out that the EIB Group will align all their financing activities with the goals of the Paris Agreement from the end of 2020. This includes, among other measures, a stop to the financing of fossil fuel energy projects from the end of 2021.

However, the financial system as a whole is not yet transitioning fast enough. Substantial progress still needs to be made to ensure that the financial sector genuinely supports businesses on their transition path towards sustainability, as well as further supporting businesses that are already sustainable. It will also mean putting in place the buffers that are necessary to support de-carbonisation pathways across all European Member States, industries that will need greater support, as well as SMEs.

For all of these reasons, the European Green Deal announced a Renewed Sustainable Finance Strategy. The renewed strategy will build on the 10 actions put forward in the European Commission's initial 2018 Action Plan on Financing Sustainable Growth, which laid down the foundations for channelling private capital towards sustainable investments.

As the EU moves towards climate-neutrality and steps up the fight against environmental degradation, the financial and industrial sectors will have to undergo a large-scale transformation, requiring massive investment. Progress has already been made, but efforts need to be stepped up. Building on the achievements of the Action Plan on Financing Sustainable Growth, the current context requires a more comprehensive and ambitious strategy. **The Renewed Sustainable Finance Strategy will predominantly focus on three areas:**:

1. **Strengthening the foundations for sustainable investment by creating an enabling framework, with appropriate tools and structures**. Many financial and non-financial companies still focus excessively on short-term financial performance instead of their long-term development and sustainability-related challenges and opportunities.

2. **Increased opportunities to have a positive impact on sustainability for citizens, financial institutions and corporates**. This second pillar aims at maximising the impact of the frameworks and tools in our arsenal in order to "finance green".

3. **Climate and environmental risks will need to be fully managed and integrated into financial institutions and the financial system as a whole**, while ensuring social risks are duly taken into account where relevant. Reducing the exposure to climate and environmental risks will further contribute to "greening finance".

Objectives of this consultation and links with other consultation activities

The aim of this consultation, available for 14 weeks (until 15 July), is to collect the views and opinions of interested parties in order to inform the development of the renewed strategy. All citizens, public authorities, including Member States, and private organisations are invited to contribute. Given the diversity of topics under consultation, stakeholders may choose to provide replies to some questions only. Section I (covering questions 1-5) is addressed to all stakeholders, including citizens, while Section II (covering questions 6-102) requires a certain degree of financial and sustainability-related knowledge and is primarily addressed at experts.

This consultation builds on a number of previous initiatives and reports, as well as complementing other consultation activities of the Commission, in particular:

- The final report of the High-Level Expert Group on Sustainable Finance (2018);
- The EU Action Plan on Financing Sustainable Growth (2018);
- The communication of the Commission on 'The European Green Deal' (2019);
- The communication of the Commission on 'The European Green Deal Investment Plan' (2020);
- The reports published by the Technical Expert Group on sustainable finance (TEG) with regard to an EU taxonomy of sustainable activities, an EU Green Bond Standard, methodologies for EU climate benchmarks and disclosures for benchmarks and guidance to improve corporate disclosure of climate-related information.

This consultation also makes references to past, ongoing and future consultations, such as the public consultation and inception impact assessment on the possible revision of the non-financial reporting directive (NFRD), the inception impact assessment on the review of the Solvency II Directive or the future consultation on investment protection.

Please note: In order to ensure a fair and transparent consultation process **only responses received through our online questionnaire will be taken into account** and included in the report summarising the responses. Should you have a problem completing this questionnaire or if you require particular assistance, please contact fisma-sf-consultation@ec.europa.eu.

More information:

- on this consultation
- on the consultation document
- on sustainable finance
- on the protection of personal data regime for this consultation

About you

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* Language of my contribution

- Bulgarian
- Croatian
- Czech

- Danish
- Dutch
- (x) English
- Estonian
- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

*I am giving my contribution as

- Academic/research institution
- (x) Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

*First name

Elina

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Surname

Kamppi

* Email (this won't be published)

elina.kamppi@finanssiala.fi

* Organisation name

255 character(s) maximum

Finance Finland

* Organisation size

- ○ Micro (1 to 9 employees)
- ○ Small (10 to 49 employees)
- ● Medium (50 to 249 employees)
- ○ Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

7328496842-09

* Country of origin

Please add your country of origin, or that of your organisation.

○ Afghanistan	○ Djibouti	○ Libya	○ Saint Martin
○ Åland Islands	○ Dominica	○ Liechtenstein	○ Saint Pierre and Miquelon
○ Albania	○ Dominican Republic	○ Lithuania	○ Saint Vincent and the Grenadines
○ Algeria	○ Ecuador	○ Luxembourg	○ Samoa
○ American Samoa	○ Egypt	○ Macau	○ San Marino

- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba

- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
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- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe

- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
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- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru

- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland

- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d’Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

* Field of activity or sector (if applicable):

at least 1 choice(s)

- [ ] Accounting
- [ ] Auditing
- [x] Banking
- [ ] Credit rating agencies
- [x] Insurance
- [x] Pension provision
- [x] Investment management (e.g. hedge funds, private equity funds, venture capital funds, money market funds, securities)

- [ ] Market infrastructure operation (e.g. CCPs, CSDs, Stock exchanges)
- [ ] Social entrepreneurship
- [ ] Other
- [ ] Not applicable

* Publication privacy settings

The Commission will publish the responses to this consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- ( ) **Anonymous**
  Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.
- (•) **Public**
  Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

- [x] I agree with the personal data protection provisions

Section I. Questions addressed to all stakeholders on how the financial sector and the economy can become more sustainable

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Question 1. With the increased ambition of the European Green Deal and the urgency with which we need to act to tackle the climate-related and environmental challenges, do you think that:

- ( ) major additional policy actions are needed to accelerate the systematic sustainability transition of the EU financial sector.
- (•) incremental additional actions may be needed in targeted areas, but existing actions implemented under the Action Plan on Financing Sustainable Growth are largely sufficient.
- ( ) no further policy action is needed for the time being.
- ( ) Don’t know / no opinion / not relevant

Question 2. Do you know with sufficient confidence if some of your pension, life insurance premium or any other personal savings are invested in sustainable financial assets?

- ○ Yes
- ○ No
- ○ Don’t know / no opinion / not relevant

Question 3. When looking for investment opportunities, would you like to be systematically offered sustainable investment products as a default option by your financial adviser, provided the product suits your other needs?

- ○ Yes
- ○ No
- ○ Don’t know / no opinion / not relevant

Question 4. Would you consider it useful if corporates and financial institutions were required to communicate if and explain how their business strategies and targets contribute to reaching the goals of the Paris Agreement?

- ○ Yes, corporates
- ○ Yes, financial institutions
- ◉ Yes, both
- ○ No
- ○ Don’t know / no opinion / not relevant

Question 5. One of the objectives of the European Commission's 2018 Action Plan on Financing Sustainable Growth is to encourage investors to finance sustainable activities and projects.

Do you believe the EU should also take further action to:

	1 (strongly disagree)	2 (disagree)	3 (neutral)	4 (agree)	5 (strongly agree)	Don't know / No opinion
Encourage investors to engage, including making use of their voting rights, with companies conducting environmentally harmful activities that are not in line with environmental objectives and the EU-wide trajectory for greenhouse gas emission reductions, as part of the European Climate Law, with a view to encouraging these companies to adopt more sustainable business models	○	○	●	○	○	○
Discourage investors from financing environmentally harmful activities that are not in line with environmental objectives and the EU-wide trajectory for greenhouse gas emission reductions, as part of the European Climate Law	○	○	●	○	○	○

Section II. Questions targeted at experts

The following section asks further technical and strategic questions on the future of sustainable finance, for which a certain degree of financial or sustainability-related expertise may be useful. This section is therefore primarily addressed at experts.

Question 6. What do you see as the three main challenges and three main opportunities for mainstreaming sustainability in the financial sector over the coming 10 years?

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Opportunities
We need to make sure that promoting sustainability goes beyond mere reporting. Policy should be made with a goal of changing behavior, not just adding administrative tasks to companies. If this happens, we are much closer to achieving our goals. This is helped by e.g. the Green Deal for Europe, which should connect the financial sector's actions with the real economy, so that they would support each other in sustainable activities. Predictable policy making will aid the financial sector in their own planning and supports a smoother transition.

As much as data is a challenge it is also a big opportunity with initiatives like the NFRD revision to address key data gaps and issues, as data is a key dependency to many other initiatives in the action plan. We propose an ESG data register to be set up for this purpose. The register would collect material information about companies' sustainability impacts and would be based on an EU minimum standard on ESG reporting and taxonomy reporting.

Better investor information will hopefully lead to more capital being allocated to sustainable investments. EU has moved fast in recent years and created a framework to empower investors to act with their money.

Challenges
Incentives and disincentives for the real economy need to complement what is being done in the financial services, i.e. financial services cannot be the only channel for bringing about change.

There are obvious issues with data availability, lack of standardization of data, its verification and digital solutions to its handling. We need fast development with creating a reporting framework for also other environmental targets in addition to climate change mitigation.

Several overlapping pieces of legislation are coming into application in a short space of time. This creates a lot of challenges for firms to navigate the new requirements, e.g. understanding dependencies, linkages, and sequencing. This creates serious duplication and delivery

Question 7. Overall, can you identify specific obstacles in current EU policies and regulations that hinder the development of sustainable finance and the

integration and management of climate, environmental and social risks into financial decision-making?

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Legislation should be predictable and enable financial sector to make long-term risk assessments. Especially with regards to transition risks predictability of policy-making is critical. Investors need shared information that helps them to assess sustainability risks and access the data needed to do that.

Legislation should be coherent and consistent throughout individual regulations and directives to the extent possible. The aim should be to build on existing widely used definitions and legislation whenever possible.

Thirdly, financial sector legislation is detailed and prepared at different points in time and the implementation may be difficult or even lead to contradictory outcomes. Ideally, sustainability should be integrated to every review process of existing legislation and avoid excess complexity due to regulation piling up. Whenever new legislation is created, it should be evaluated whether something old could and should be withdrawn, to keep the overall amount of regulation manageable.

Question 8. The transition towards a climate neutral economy might have socio-economic impacts, arising either from economic restructuring related to industrial decarbonisation, because of increased climate change-related effects, or a combination thereof. For instance, persons in vulnerable situations or at risk of social exclusion and in need of access to essential services including water, sanitation, energy or transport, may be particularly affected, as well as workers in sectors that are particularly affected by the decarbonisation agenda.

How could the EU ensure that the financial tools developed to increase sustainable investment flows and manage climate and environmental risks have, to the extent possible, no or limited negative socio-economic impacts?

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Transition in the economy means also transition in the labor market. Some jobs will disappear, but new ones will be created. This phenomenon is part of a functioning economy. However, adverse social impacts should also be addressed, and the Just Transtition Fund and other EU mechanisms are welcome steps in this respect.

Question 9. As a corporate or a financial institution, how important is it for you that policy-makers create a predictable and well-communicated policy

framework that provides a clear EU-wide trajectory on greenhouse gas emission reductions, based on the climate objectives set out in the European Green Deal, including policy signals on the appropriate pace of phasing out certain assets that are likely to be stranded in the future?

- 1 - Not important at all
- 2 - Rather not important
- 3 - Neutral
- 4 - Rather important
- (selected) 5 - Very important
- Don’t know / no opinion / not relevant

Question 9.1 What are, in your view, the mechanisms necessary to be put in place by policy-makers to best give the right signals to you as a corporate or a financial institution?

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

> The EU should create a credible carbon budget at least until 2050.

Question 10. Should institutional investors and credit institutions be required to estimate and disclose which temperature scenario their portfolios are financing (e.g. 2°C, 3°C, 4°C), in comparison with the goals of the Paris Agreement, and on the basis of a common EU-wide methodology?

- Yes, institutional investors
- Yes, credit institutions
- (selected) Yes, both
- No
- Don’t know / no opinion / not relevant

Question 11 Corporates, investors, and financial institutions are becoming increasingly aware of the correlation between biodiversity loss and climate change and the negative impacts of biodiversity loss in particular on corporates who are dependent on ecosystem services, such as in sectors

like agriculture, extractives, fisheries, forestry and construction. The importance of biodiversity and ecosystem services is already acknowledged in the EU Taxonomy.

However, in light of the growing negative impact of biodiversity loss on companies' profitability and long-term prospects (see for instance The Nature of Risk - A Framework for Understanding Nature-Related Risk to Business, WWF, 2019), as well as its strong connection with climate change, do you think the EU's sustainable finance agenda should better reflect growing importance of biodiversity loss?

- (x) Yes
- ( ) No
- ( ) Don't know / no opinion / not relevant

Question 11.1 If yes, please specify potential actions the EU could take:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

We need more knowledge about biodiversity and how to take it into account in economic activities. There is plenty of methodological development to be done to create understanding of what protecting biodiversity should and could mean in practice. This is a much more difficult thing to consider than for example climate change, on which knowledge has been built up for decades now. The accumulation and sharing of information and know-how on biodiversity needs to be faster.

Question 12. In your opinion, how can the Commission best ensure that the sustainable finance agenda is appropriately governed over the long term at the EU level in order to cover the private and public funding side, measure financial flows towards sustainable investments and gauge the EU's progress towards its commitments under the European Green Deal and Green Deal Investment Plan?

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

This can only be ensured with credible and sufficient supervision on how money is spent and what its impacts are. The impact of what has been implemented and how much of the needed funding has been mobilized should be measured by means of key KPIs.

The EU Green Deal should be a transversal priority to all EU policies. EU Green Governance should be embedded in the Multiannual Financial Framework. This is the best way to ensure accountability and predictability on the public funding side on the long term. Therefore, the MFF must include a European

Green Deal and Green Deal Investment Plan.

Inside the European Commission it is important to ensure greater co-ordination to avoid initiatives such as experts' groups on sustainable-linked topic or call for proposal on sustainable linked projects launched by single DG without coordination with all relevant DGs.

Question 13. In your opinion, which, if any, further actions would you like to see at international, EU, or Member State level to enable the financing of the sustainability transition? Please identify actions aside from the areas for future work identified in the targeted questions below (remainder of Section II), as well as the existing actions implemented as part of the European Commission's 2018 Action Plan on Financing Sustainable Growth.

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The EU should be active in all the global forums to bring other countries on the table and create global shared understanding and rules.

1. Strengthening the foundations for sustainable finance

In order to enable the scale-up of sustainable investments, it is crucial to have sufficient and reliable information from financial and non-financial companies on their climate, environmental and social risks and impacts. To this end, companies also need to consider long-term horizons. Similarly, investors and companies need access to reliable climate-related and environmental data and information on social risks, in order to make sound business and investment decisions. Labelling tools, among other measures, can provide clarity and confidence to investors and issuers, which contributes to increasing sustainable investments. In this context, the full deployment of innovative digital solutions requires data to be available in open access and in standardised formats.

1.1 Company reporting and transparency

In its Communication on the European Green Deal, the Commission recognised the need to improve the disclosure of non-financial information by corporates and financial institutions. To that end, the Commission committed to reviewing the **non-financial reporting directive (NFRD)** in 2020, as part of its strategy to strengthen the foundations for sustainable investment. A public consultation is ongoing for that purpose.

The political agreement on the Regulation on establishing a framework to facilitate sustainable investment ('Taxonomy Regulation') places **complementary reporting requirements on the companies that fall under the scope of the NFRD**.

In addition to the production of relevant and comparable data, it may be useful to ensure open and centralised access not only to company reporting under the NFRD, but also to relevant company information on other available ESG metrics and data points (please also see the dedicated section on sustainability research and ratings 1.3). To this end, a **common database** would ease transparency and comparability, while avoiding duplication of data collection efforts.

The Commission is developing a common European data space in order to create a single market for data by connecting existing databases through digital means. Since 2017, Commission Directorate General for Financial Stability, Financial Services and Capital Markets Union (DG FISMA) has been assessing the prospects of using Distributed Ledger Technologies (including blockchain) to federate and provide a single point of access to information relevant to investors in European listed companies (European Financial Transparency Gateway - EFTG).

Question 14. In your opinion, should the EU take action to support the development of a common, publicly accessible, free-of-cost environmental data space for companies' ESG information, including data reported under the NFRD and other relevant ESG data?

- (●) Yes
- ( ) No
- ( ) Don't know / no opinion / not relevant

Question 14.1 If yes, please explain how it should be structured and what type of ESG information should feature therein:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

> The EU should see establishment of the public ESG data register as a strategic infrastructure project - as part of the digitalization strategy - enabling efficient climate work. We propose that the collection of ESG data in the register is voluntary for companies, but it would serve wide range of stakeholders, from financial sector to researchers and policy makers. This kind of a register requires a unified reporting model for its basis. The minimum ESG reporting standard would gather the most relevant non-financial information from each company.

Question 15. According to your own understanding and assessment, does your company currently carry out economic activities that could substantially contribute to the environmental objectives defined in the Taxonomy Regulation[1]?

[1] The six environmental objectives are climate change mitigation and adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, protection and restoration of biodiversity and ecosystems.

- ( ) Yes
- ( ) No
- (●) Don't know / no opinion / not relevant

1.2 Accounting standards and rules

Financial accounting standards and rules can have a direct impact on the way in which investment decisions are made since they form the basis of assessments that are carried out to evaluate the financial position and performance of real economy and financial sector companies. In this context, there is an ongoing debate around whether existing financial accounting standards might prove challenging for sustainable and long-term investments. In particular, some experts question whether existing impairment and depreciation rules fully price in the potential future loss in value of companies that today extract, distribute, or rely heavily on fossil fuels, due to a potential future stranding of their assets.

Recognising the importance of ensuring that accounting standards do not discourage sustainable and long-term investments, as part of the 2018 Action Plan on Financing Sustainable Growth, the Commission already requested the European Financial Reporting Advisory Group (EFRAG) to explore potential alternative accounting treatments to fair value measurement for long-term investment portfolios of equity and equity-type instruments. EFRAG issued its advice to the Commission on 30 January 2020. Following this advice, the Commission has requested the IASB to consider the re-introduction of re-cycling through the profit or loss statement of profits or losses realised upon the disposal of equity instruments measured at fair value through other comprehensive income (FVOCI).

Question 16. Do you see any further areas in existing financial accounting rules (based on the IFRS framework) which may hamper the adequate and timely recognition and consistent measurement of climate and environmental risks?

- (x) Yes
- ( ) No
- ( ) Don't know / no opinion / not relevant

Question 16.1 What is in your view the most important area(s)?

Please select as many options as you like.

- [ ] Impairment and depreciation rules
- [ ] Provision rules
- [ ] Contingent liabilities
- [x] Other

Please specify which other area(s):

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Standards in general exist (IAS1, IAS 36, IFRS 13, IFRS 9, IAS 37) but more guidelines (e.g. illustrative examples) should be provided on how climate and environmental risk information should be assessed in different investments in these standards.

1.3 Sustainability research and ratings

A variety of sustainability-related assessment tools (ratings, research, scenario analysis, screening lists, carbon data, ESG benchmarks, etc.) are offered by specialised agencies that analyse individual risks and by traditional providers, such as rating agencies and data providers. In the autumn of 2019, the Commission launched a study on the market structure, providers and their role as intermediaries between companies and investors. The study will also explore possible measures to manage conflicts of interest and enhance transparency in the market for sustainability assessment tools. The results are due in the autumn of 2020. To complement this work, the Commission would like to gather further evidence through this consultation.

Question 17. Do you have concerns on the level of concentration in the market for ESG ratings and data?

- ○ 1 - Not concerned at all
- ● 2 - Rather not concerned
- ○ 3 - Neutral
- ○ 4 - Rather concerned
- ○ 5 - Very concerned
- ○ Don’t know / no opinion / not relevant

Question 17.1 If necessary, please explain your answer to question 17:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

We are not concerned with the concentration but on the contrary: by the de-concentration of ESG rating providers. Regarding the role of policy makers, we believe it would be premature to have any major policy initiatives at this stage but make some recommendations in response to Q21.

According to Sustainability annual report "Rate the raters 2020": (https://sustainability.com/our-work/reports/rate-raters-2020/) there are 600 rating providers as of 2020. We support the initiative according to which raw corporate ESG data collection should be done as a strategic public infrastructure under Eurostat (or other major public statistics office) and materiality assessment should be standardized and included into the NFRD or incorporated into the ESG database as a screen along with the EU Taxonomy screen.

Question 18. How would you rate the comparability, quality and reliability of ESG *data* from sustainability providers currently available in the market?

- ○ 1 - Very poor
- ● 2 - Poor
- ○ 3 - Neutral
- ○ 4 - Good
- ○ 5 - Very good
- ○ Don’t know / no opinion / not relevant

Question 18.1 If necessary, please explain your answer to question 18:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

There is lack of methodological and data robustness transparency. There are also deficiencies in quantification of companies' environmental impacts & external costs. For environmental issues to be accounted for properly there needs to be clear disclosure for companies of their natural resource use as "external costs". EU lacks common financial materiality standard, but it should be created based on 'double materiality' concept.

In general, we believe the industry would benefit from some standardisation and improvement in data collection and quality. However, given the assessments qualitative nature and that not one provider will have all information or be able to make comprehensive analysis, then there should be some tolerance for variations in assessments. Further, that data from one provider may complement or add to that of another would also be acceptable. So, standardisation to a point, but not so that all assessments should necessarily completely align.

Question 19. How would you rate the quality and relevance of ESG ***research*** material currently available in the market?

- ○ 1 - Very poor
- ◉ 2 - Poor
- ○ 3 - Neutral
- ○ 4 - Good
- ○ 5 - Very good
- ○ Don't know / no opinion / not relevant

Question 19.1 If necessary, please explain your answer to question 19:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

ESG research needs to be incorporated to mainstream financial research and not stay separate. Current ESG research is done by analysts who are distanced from companies: ESG rating agencies' analysts usually do not know their companies very well as they cover a much higher amount of companies than mainstream investment analysts do. Mainstream investment analysts usually cover about 5-20 companies per person while ESG analysts can cover hundreds of companies.

Question 20. How would you assess the quality and relevance of ESG *ratings* for your investment decisions, both ratings of individual Environmental, Social or Governance factors and aggregated ones?

	1 (very poor quality and relevance)	2 (poor quality and relevance)	3 (neutral)	4 (good quality) and relevance)	5 (very good) and relevance)	Don't know / No opinion
Individual	○	●	○	○	○	○
Aggregated	○	○	●	○	○	○

Question 20.1 If necessary, please explain your answer to question 20:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

There is value in both and therefore neither can be ignored. Aggregate ratings are useful in sorting out the best and worst, however, individual measures are needed where specific issues relating to a company requires closer inspection and to support assessment of those companies somewhere in the middle of the aggregate assessments.

Question 21. In your opinion, should the EU take action in any of these areas?

- (x) Yes
- ( ) No
- ( ) Don’t know / no opinion / not relevant

Question 21.1 If yes, please explain why and what kind of action you consider would address the identified problems.

In particular, do you think the EU should consider regulatory intervention?

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Given the increasing importance of ESG data and analysis then we would, at a future point, we recommend the introduction of some basic level of regulatory requirements, registration, and supervision for providers.

However, at this stage we would not call for major policy measures, as a softer approach at the beginning would avoid impacting development and competition in this space. We would like to suggest some measures at this stage for the EC’s consideration.
• Non-regulatory measure that could support or otherwise promote standardization.
• Targeted regulation and oversight of entities providing green bond certification.
• Ensure any measures would still allow space for smaller niche research/data providers, including NGOs, investor initiatives, semi-commercial operators) as an overall compliment to the larger and potentially supervised data providers/rating providers.
• Ensure sell-side research providers, who are already regulated, are not discouraged from developing their own models. Such entities can provide competition to the big data providers.

1.4 Definitions, standards and labels for sustainable financial assets and financial products

The market for sustainable financial assets (loans, bonds, funds, etc.) is composed of a wide variety of products, offered under various denominations like ‘green', ‘SDG’, 'transition', ‘ESG’, 'ethical', 'impact', ‘sustainability-linked’, etc. While a variety of products allows for different approaches that can meet the specific needs and wishes of those investing or lending, it can be difficult for clients, in particular retail investors, to understand the different degrees of climate, environmental and social ambition and compare the specificities of each product. Clarity on these definitions through standards and labels can help to protect the integrity of and trust in the market for sustainable financial products, enabling easier access for investors, **companies**, and savers.

As set out in the 2018 Action Plan on Financing Sustainable Growth, the Commission services started working on:

1. developing possible technical criteria for the EU Ecolabel scheme to retail funds, savings and deposits, and
2. establishing an EU Green Bond Standard (EU GBS).

The Commission also committed to specifying the content of the **prospectus** for green bond issuances to provide potential investors with additional information, within the framework of the Prospectus Regulation.

EU Green Bond Standard

The Technical Expert Group on Sustainable Finance (TEG) put forward a report in June 2019 with 10 recommendations for how to create an EU Green Bond Standard (EU GBS). This was completed with a usability guide in March 2020, as well as with an updated proposal for the standard (see Annex 1).

The TEG recommends the creation of an official voluntary EU GBS building on the EU Taxonomy. Such an EU Green Bond Standard could finance both physical assets and financial assets (including through covered bonds and asset-backed securities), capital expenditure and selected operating expenditure, as well as specific expenditure for sovereigns and sub-sovereigns. The standard should in the TEG's view exist alongside existing market standards.

The overall aim of the EU GBS is to address several barriers in the current market, including reducing uncertainty on what is green by linking it with the EU Taxonomy, standardising costly and complex verification and reporting processes, and having an official standard to which certain (financial) incentives may be attached. The TEG has recommended that oversight and regulatory supervision of external review providers eventually be conducted via a centralised system organised by ESMA. However, as such a potential ESMA-led supervision would require legislation and therefore take time, the TEG suggests the set-up of a market-based, voluntary interim registration process for verifiers (the Scheme) of EU Green Bonds for a transition period of up to three years.

Below you will find four questions in relation to the EU GBS. **A separate dedicated consultation with regards to a Commission initiative for an EU Green Bond Standard will be carried out in the future**. Please note that questions relating to green bond issuances by public authorities are covered in section 2.7 and questions on additional incentives can be found in section 2.6.

Question 22. The TEG has recommended that verifiers of EU Green Bonds (green bonds using the EU GBS) should be subject to an accreditation or authorisation and supervision regime. Do you agree that verifiers of EU Green Bonds should be subject to some form of accreditation or authorisation and supervision?

- (selected) Yes, at European level
- Yes, at a national level
- No
- Don't know / no opinion / not relevant

Question 22.1 If necessary, please explain your answer to question 22:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Yes, at European level to ensure transparency, credibility and comparability (same accreditation process for all EU verifiers). Avoid green washing and ensure that information reported is correct. Ensure there is no conflict of interest, the verifiers follow “basic rules”, that they are registered and have the required experience. Should be based on existing market practices to ensure current verifiers’ ability to conduct the same business operations as currently.

Question 23. Should any action the Commission takes on verifiers of EU Green Bonds be linked to any potential future action to regulate the market for third-party service providers on sustainability data, ratings and research?

- (x) Yes
- ( ) No
- ( ) Don’t know / no opinion / not relevant

Question 23.1 If necessary, please explain your answer to question 23:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Yes, but should be implemented in a way that does not distort the current market practices i.e. result in a few multinational third-party service providers dominating the market.

Question 24. The EU GBS as recommended by the TEG is intended for any type of issuer: listed or non-listed, public or private, European or international. Do you envisage any issues for non-European issuers to follow the proposed standard by the TEG?

- (x) Yes
- ( ) No
- ( ) Don’t know / no opinion / not relevant

Question 24.1 If necessary, please explain your answer to question 24:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Yes, in terms of full alignment, might be cases where all requirements are not met. e.g. may contribute to an EU environmental objective, but compliance with minimum safeguards may be challenging e.g. in non-OECD countries. But this doesn't make taxonomy irrelevant outside of Europe. Using taxonomy should improve comparability as well.

It is likely that not all criteria defined in Taxonomy will be applicable or relevant in all places due to differences in legislation, availability of data or geological site-specific factors. It would be beneficial to give guidance where and what level of tolerance for deviation would be acceptable.

Prospectus and green bonds

Question 25. In those cases where a prospectus has to be published, do you believe that requiring the disclosure of specific information on green bonds in the prospectus, which is a single binding document, would improve the consistency and comparability of information for such instruments and help fight greenwashing?

- 1 - Strongly disagree
- 2 - Disagree
- (selected) 3 - Neutral
- 4 - Agree
- 5 - Strongly agree
- Don't know / no opinion / not relevant

Question 25.1 If necessary, please explain your answer to question 25:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Use of proceeds differs from traditional bonds and hence, sufficient disclosure on green bonds and related document references should be included in the prospectus.
The prospectus is the appropriate place to explain how and if any green labels (EU GBS, GBP, etc.) are used when / if green bonds are issued. There should be a link or other guidance to where the relevant detailed documents will be provided. The documents themselves will be updated from time to time (Green Bond Framework, reporting, third party reviews).

Question 26. In those cases where a prospectus has to be published, to what extent do you agree with the following statement: "Issuers that adopt the EU GBS should include a link to that standard in the prospectus instead of being subject to specific disclosure requirements on green bonds in the prospectus"?

1 - Strongly disagree
- 2 - Disagree
- 3 - Neutral
- 4 - Agree
- 5 - Strongly agree
- Don’t know / no opinion / not relevant

Question 26.1 If necessary, please explain your answer to question 26:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Issuers should include a link to EU GBS and other relevant documentation e.g. the Green Bond Framework (re: reporting, use-of-proceeds and verification). Further information regarding the application of the standard can be included if deemed necessary. The commitment to follow the EU GBS would be best placed in the legal documentation Terms and Conditions. This includes a commitment to be transparent as defined in the EU GBS. However, as the EU GBS and particularly the Taxonomy are subject to change, it would be good to be clear about the timing of the label, to show the relevant terms at the time of issuance and verification.

Other standards and labels

Already now, the Disclosure Regulation defines two categories of sustainable investment products: those promoting environmental or social characteristics and those with environmental or social objectives, the latter being defined as ‘sustainable investments’. Both types of products have to disclose their use of the EU Taxonomy, for the environmental portion of the product.

Question 27. Do you currently market financial products that promote environmental characteristics or have environmental objectives?

- Yes
- No
- Don’t know / no opinion / not relevant

Question 28. In its final report, the High-Level Expert Group on Sustainable Finance recommended to establish a minimum standard for sustainably denominated investment funds (commonly referred to as ESG or SRI funds, despite having diverse methodologies), aimed at retail investors.

What actions would you consider necessary to standardise investment funds that have broader sustainability denominations?

No regulatory intervention is needed

- [x] The Commission or the ESAs should issue guidance on minimum standards
- [ ] Regulatory intervention is needed to enshrine minimum standards in law
- [ ] Regulatory intervention is needed to create a label
- [ ] Don’t know / no opinion / not relevant

Question 29. Should the EU establish a label for investment funds (e.g. ESG funds or green funds aimed at professional investors)?

- [ ] Yes
- [x] No
- [ ] Don’t know / no opinion / not relevant

Question 29.1 If necessary, please explain your answer to question 29:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

There is no need to develop a specific ESG/green fund for professional investors, since they can invest in the same funds as retail customers. Professional investors do not need a separate ESG/green label.

Question 30. The market has recently seen the development of sustainability-linked bonds and loans, whose interest rates or returns are dependent on the company meeting pre-determined sustainability targets. This approach is different from regular green bonds, which have a green use-of-proceeds approach.

Should the EU develop standards for these types of sustainability-linked bonds or loans?

- [ ] 1 - Strongly disagree
- [ ] 2 - Disagree
- [x] 3 - Neutral
- [ ] 4 - Agree
- [ ] 5 - Strongly agree
- [ ] Don’t know / no opinion / not relevant

Question 30.1 If necessary, please explain your answer to question 30:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

LMA guidelines for sustainability-lined loans offer sufficient guidance for the process and are currently used as common market practice. In terms of sustainability performance targets (SPTs) used in the loan agreements, there remains a risk of greenwashing, but rather than developing new standards, the EU could encourage SPT alignment with existing standards e.g. GRI and SASB to ensure materiality. Ultimately, the ambition level of the targets remains the weakest link and is rather difficult to be guided by a standard albeit LMA is trying to address this issue as well.

Question 31: Should such a potential standard for target-setting sustainability-linked bonds make use of the EU Taxonomy as one of the key performance indicators?

- ○ 1 - Strongly disagree
- ○ 2 - Disagree
- ○ 3 - Neutral
- ◉ 4 - Agree
- ○ 5 - Strongly agree
- ○ Don’t know / no opinion / not relevant

Question 31.1 If necessary, please explain your answer to question 31:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The potential standard could use the taxonomy as reference for environmental target setting e.g. aiming to align the company’s business activities to a certain degree by a certain year. However, sustainability-linked loans may cover also social and governance targets, hence a broader sustainability framework would be required.

Question 32. Several initiatives are currently ongoing in relation to energy-efficient mortgages (see for instance the work of the EEFIG (Energy Efficiency Financial Institutions Group set by the EC and the United Nations Environment Program Finance Initiative or UNEP FI) on the financial performance of energy efficiency loans or the energy efficient mortgages initiatives) and green loans more broadly. Should the EU develop standards or labels for these types of products?

- ◉

Yes
- No
- Don’t know / no opinion / not relevant

Question 32.1 If yes, please select all that apply in the following list:

Please select as many options as you like.

- [ ] a broad standard or label for sustainable mortgages and loans (including social and environmental considerations
- [x] a standard or label for green (environmental and climate) mortgages and loans
- [ ] a narrow standard or label only for energy-efficient mortgages and loans for the renovation of a residential immovable property
- [x] other

Question 32.2 Please specify what other type of standard or label on sustainability in the loan market you would like to see:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

A standard for environmentally sound and climate-friendly mortgages which also covers energy-efficient mortgages as a subgroup.

Question 33. The Climate Benchmarks Regulation creates two types of EU climate benchmarks - ‘EU Climate Transition’ and ‘EU Paris-aligned’ - aimed at investors with climate-conscious investment strategies. The regulation also requires the Commission to assess the feasibility of a broader ‘ESG benchmark’.

Should the EU take action to create an ESG benchmark?

- (x) Yes
- No
- Don’t know / no opinion / not relevant

Question 33.1 If yes, please explain what the key elements of such a benchmark should be:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Further EU action is not necessary at this stage. Instead, it is important to first analyse how the EU Climate and Paris Aligned Benchmarks are used in the market before determining the need for further regulated benchmarks.

Question 34. Beyond the possible standards and labels mentioned above (for bonds, retail investment products, investment funds for professional investors, loans and mortgages, benchmarks), do you see the need for any other kinds of standards or labels for sustainable finance?

- ○ Yes
- ● No
- ○ Don't know / no opinion / not relevant

1.5 Capital markets infrastructure

The recent growth in the market for sustainable financial instruments has raised questions as to whether the current capital markets infrastructure is fit for purpose. Having an infrastructure in place that caters to those types of financial instruments could support and further enhance sustainable finance in Europe.

Question 35. Do you think the existing capital market infrastructure sufficiently supports the issuance and liquidity of sustainable securities?

- ○ 1 - Strongly disagree
- ○ 2 - Disagree
- ● 3 - Neutral
- ○ 4 - Agree
- ○ 5 - Strongly agree
- ○ Don't know / no opinion / not relevant

Question 36. In your opinion, should the EU foster the development of a sustainable finance-oriented exchange or trading segments that caters specifically to trading in sustainable finance securities and is better aligned with the needs of issuers?

- ( ) Yes
- (x) No
- ( ) Don’t know / no opinion / not relevant

Question 36.1 If necessary, please explain your answer to question 36:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

All financial instruments should just have transparency as regards their climate and environmental + other ESG impacts. Over time ESG will be integrated to all financial instruments to some degree and there will not be need for a separate exchange.

Question 37. In your opinion, what core features should a sustainable finance–oriented exchange have in order to encourage capital flows to ESG projects and listing of companies with strong ESG characteristics, in particular SMEs?

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

A separate financial exchange for ESG products is not needed. Resources are better used to improve transparency of all financial instruments as regards to ESG. ESG should be integrated into everything - at least on a transparency reporting level.

1.6 Corporate governance, long-termism and investor engagement

To reflect long-term opportunities and risks, such as those connected to climate change and environmental degradation, **companies and investors need to integrate long-term horizons** and sustainability in their decision-making processes. However, this is often difficult in a context where market pressure and prevailing corporate culture prompt corporate managers and financial market participants to focus on near-term financial performance at the expense of mid- to long-term objectives. Focusing on short-term returns without accounting for long-term implications may lead to underperformance of the corporation and investors in the long-term, and, by extension, of the economy as a whole. In this context, investors should be driving long-termism, where this is relevant, and not pressure companies to deliver short-term returns by default.

The ongoing COVID-19 outbreak in particular underscores that companies should prioritise the long term interests of their stakeholders. Many companies in the EU have decided to prioritise the interests of key stakeholders, in particular employees, customers and suppliers, over short-term shareholder interest (The European Central Bank also recommended on 27 March 2020 that significant credit institution refrain from distributing dividend so that “they can continue to fulfil their role to fund households, small and medium businesses and corporations” during the COVID-19 economic shock). These factors contribute to driving long-term returns as they are crucial in order to maintain companies’ ability to operate. Therefore, institutional investors have an important role to play in this context. As part of action 10 of the Action Plan on Financing Sustainable Growth, in December 2019 the European Supervisory Authorities delivered reports, the European Supervisory Authorities delivered reports in December 2019 (ESMA report, EBA report and EIOPA report) that had the objective of assessing evidence of undue short-term pressure from the financial sector on corporations. They identified areas within their remit where they found some degree of short-termism and issued policy recommendations accordingly. For instance, they advise the adoption of longer-term perspectives among financial institutions through more explicit legal provisions on sustainability.

Question 38. In your view, which recommendation(s) made in the ESAs’ reports have the highest potential to effectively tackle short-termism?

Please select among the following options:

- ◯ Adopt more explicit legal provisions on sustainability for credit institutions, in particular related to governance and risk management
- ◯ Define clear objectives on portfolio turn-over ratios and holdings periods for institutional investors
- ◯ Require Member States to have an independent monitoring framework to ensure the quality of information disclosed in remuneration reports published by listed companies and funds (UCITS management companies and AIFMs)
- ◉ Other

Question 38.1 Please specify what other recommendation(s) have the highest potential to effectively tackle short-termism:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Improve information flows, data access and support the role of the financial sector in raising awareness on ESG risks, for example through the development of platforms or by setting-up a centralized database on environmental data for financial sector.

Commission should start development of a centralized database that would facilitate building of ESG disclosures and the access to relevant and reliable data at the EU level (ideally in a standardized form but also providing access to disaggregated raw data).

Continue enhancing disclosures of long-term risks and opportunities, by both corporations and financial market participants, by setting principles and requirements that can ensure comparability and reliability of disclosure e.g. through amendments to the Non-Financial Reporting Directive.

Question 39. Beyond the recommendations issued by the ESAs, do you see any barriers in the EU regulatory framework that prevent long-termism and/or do you see scope for further actions that could foster long-termism in financial markets and the way corporates operate?

- ○ Yes
- ● No
- ○ Don’t know / no opinion / not relevant

The Shareholder Rights Directive II states that directors’ variable remuneration should be based on both financial and non-financial performance, where applicable. However, there is currently no requirement regarding what the fraction of variable remuneration should be linked to, when it comes to non-financial performance.

Question 40. In your view, should there be a mandatory share of variable remuneration linked to non-financial performance for corporates and financial institutions?

- ○ Yes
- ● No
- ○ Don’t know / no opinion / not relevant

Question 41. Do you think that a defined set of EU companies should be required to include carbon emission reductions, where applicable, in their lists of ESG factors affecting directors’ variable remuneration?

- ○ Yes
- ● No
- ○ Don’t know / no opinion / not relevant

The Shareholder Rights Directive II introduces transparency requirements to better align long-term interests between institutional investors and their asset managers.

Question 42. Beyond the Shareholder Rights Directive II, do you think that EU action would be necessary to further enhance long-term engagement between investors and their investee companies?

- ○ Yes
- ● No
- ○ Don’t know / no opinion / not relevant

Question 43. Do you think voting frameworks across the EU should be further harmonised at EU level to facilitate shareholder engagement and votes on ESG issues?

- (x) Yes
- ( ) No
- ( ) Don't know / no opinion / not relevant

Question 44. Do you think that EU action is necessary to allow investors to vote on a company's environmental and social strategies or performance?

- ( ) Yes
- (x) No
- ( ) Don't know / no opinion / not relevant

Questions have been raised about whether passive index investing could lower the incentives to participate in corporate governance matters or engage with companies regarding their long term strategies.

Question 45: Do you think that passive index investing, if it does not take into account ESG factors, could have an impact on the interests of long-term shareholders?

- ( ) Yes
- (x) No
- ( ) Don't know / no opinion / not relevant

Question 45.1 If no, please explain your answer to question 45, if necessary:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Investors each have their own preferences and presumably cannot influence each other as regards whether to invest into ESG or not.

To foster more sustainable corporate governance, as part of action 10 of the 2018 action plan Plan on Financing Sustainable Growth the Commission launched a study on due diligence (i.e. identification and mitigation of adverse social and environmental impact in a company's own operations and supply chain), which was published in February 2020. This study indicated the need for policy intervention, a conclusion which was supported by both multinational companies and NGOs. Another study on directors' duties and possible sustainability targets will be finalised in Q2 2020.

Question 46. Due regard for a range of 'stakeholder interests', such as the interests of employees, customers, etc., has long been a social expectation vis-a-vis companies. In recent years, the number of such interests have expanded to include issues such as human rights violations, environmental pollution and climate change.

Do you think companies and their directors should take account of these interests in corporate decisions alongside financial interests of shareholders, beyond what is currently required by EU law?

- ◯ Yes, a more holistic approach should favour the maximisation of social, environmental, as well as economic/financial performance.
- ◉ Yes, as these issues are relevant to the financial performance of the company in the long term.
- ◯ No, companies and their directors should not take account of these sorts of interests.
- ◯ Don't know / no opinion / not relevant

Question 47. Do you think that an EU framework for supply chain due diligence related to human rights and environmental issues should be developed to ensure a harmonised level-playing field, given the uneven development of national due diligence initiatives?

- ◯ Yes
- ◉ No
- ◯ Don't know / no opinion / not relevant

Question 48. Do you think that such a supply chain due diligence requirement should apply to all companies, including small and medium sized companies?

- ◯ Yes
- ◉ No
- ◯ Don't know / no opinion / not relevant

Question 48.1 If necessary, please explain your answer to question 48:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

2. Increasing opportunities for citizens, financial institutions and corporates to enhance sustainability

Increased opportunities need to be provided to citizens, financial institutions and corporates in order to enable them to have a positive impact on sustainability. Citizens can be mobilised by providing them with opportunities to invest their pensions and savings sustainably or by using digital tools to empower them to make their communities, their homes and their businesses more resilient. Financial institutions and corporates can increase their contribution to sustainability if the right policy signals and incentives are in place. Furthermore, international cooperation and the use of sustainable finance tools and frameworks in developing countries can help build a truly global response to the climate and environmental crisis.

As part of the European Green Deal, the Commission has launched a European Climate Pact to bring together regions, local communities, civil society, businesses and schools in the fight against climate change, incentivising behavioural change from the level of the individual to the largest multinational, and to launch a new wave of actions. A consultation on the European Climate Pact is open until 27 May 2020 in order to better identify the areas where the Commission could support and highlight pledges as well as set up fora to work together on climate action (including possibly on sustainable finance).

2.1 Mobilising retail investors and citizens

Although retail investors today are increasingly aware that their own investments and deposits can play a role in achieving Europe's climate and environmental targets, they are not always offered sustainable financial products that match their expectations. In order to ensure that the sustainability preferences of retail investors are truly integrated in the financial system, it is crucial to help them to better identify which financial products best correspond to these preferences, providing them with user-friendly information and metrics they can easily understand. To that end, the European Commission will soon publish the amended delegated acts of MIFID II and IDD, which will require investment advisors to ask retail investors about their sustainability preferences.

Question 49. In order to ensure that retail investors are asked about their sustainability preferences in a simple, adequate and sufficiently granular way, would detailed guidance for financial advisers be useful when they ask questions to retail investors seeking financial advice?

- ( ) Yes
- ( ) No
- (•) Don't know / no opinion / not relevant

Question 49.1 If necessary, please explain your answer to question 49:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The need for additional guidance can be estimated only after we know how the MiFID II and IDD changes look like. If there remains uncertainty about how sustainability considerations should be discussed with clients, non-binding guidance might be helpful.

Question 50. Do you think that retail investors should be systematically offered sustainable investment products as one of the default options, when the provider has them available, at a comparable cost and if those products meet the suitability test?

- (x) Yes
- ( ) No
- ( ) Don’t know / no opinion / not relevant

Question 51. Should the EU support the development of more structured actions in the area of financial literacy and sustainability, in order to raise awareness and knowledge of sustainable finance among citizens and finance professionals?

- ( ) 1 - Strongly disagree
- ( ) 2 - Disagree
- ( ) 3 - Neutral
- (x) 4 - Agree
- ( ) 5 - Strongly agree
- ( ) Don’t know / no opinion / not relevant

Question 51.1 If you agree, please choose what particular action should be prioritised:

	1 (strongly disagree)	2 (disagree)	3 (neutral)	4 (agree)	5 (strongly agree)	Don't know / No opinion
Integrate sustainable finance literacy in the training requirements of finance professionals.					X	
Stimulate cooperation between Member States to integrate sustainable finance as part of existing subjects in citizens' education at school, possibly in the context of a wider effort to raise awareness about climate action and sustainability.[1-5]			X			
Beyond school education, stimulate cooperation between Member States to ensure that there are sufficient initiatives to educate citizens to reduce their environmental footprint also through their investment decisions.					X	
Directly, through targeted campaigns.				X		
As part of a wider effort to raise the financial literacy of EU citizens.			X			
As part of a wider effort to raise the knowledge citizens have of their rights as consumers, investors, and active members of their communities.			X			
Promote the inclusion of sustainability and sustainable finance in the curricula of students, in particular future finance professionals.					X	
Other						

2.2 Better understanding the impact of sustainable finance on sustainability factors

While sustainable finance is growing, there are questions on how to measure and assess the positive impact of sustainable finance on the real economy. Recently, tools have been developed that can be used to approximate an understanding of the climate and environmental impact of economic activities that are being financed. Examples of such tools include the EU Taxonomy, which identifies under which conditions economic activities can be considered environmentally sustainable, use-of-proceeds reporting as part of green bond issuances, or the Disclosure Regulation, which requires the reporting of specific adverse impact indicators.

Yet, an improved understanding of how different sustainable financial products impact the economy may further increase their positive impact on sustainability factors and accelerate the transition.

Question 52. In your view, is it important to better measure the impact of financial products on sustainability factors?

- ○ 1 - Not important at all
- ○ 2 - Rather not important
- ○ 3 - Neutral
- ● 4 - Rather important
- ○ 5 - Very important
- ○ Don’t know / no opinion / not relevant

Question 52.1 What actions should the EU take in your view?

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

> Measuring the impact is important but it should not lead to an oversimplification and at the detriment of comparability. Carbon footprint is important to know, however, the added value of this information only comes when put into context. It should also not be the only measure that is considered. For instance, there are many important qualitative criteria in the taxonomy which may be overlooked if all focus is on limited numeric measurements. Ultimately the financial products measurement is an indirect one, better accuracy and impact is achieved if the companies / issuers themselves all disclose comparable, comprehensive and relevant information.

Question 53: Do you think that all financial products / instruments (e.g. shares, bonds, ETFs, money market funds) have the same ability to allocate capital to sustainable projects and activities?

- ○ Yes
- ● No
- ○ Don’t know / no opinion / not relevant

Question 53.1 If no, please explain what you would consider to be the most impactful products/instruments to reallocate capital in this way:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The most impactful products are those where the capital flows directly into the company or its business.

2.3 Green securitisation

Securitisation is a technique that converts illiquid assets, such as bank loans or trade receivables, into tradeable securities. As a result, banks can raise fresh money as well as move credit risk out of their balance sheets, thereby freeing up capital for new lending. Securitisation also facilitates access to a greater range of investors, who can benefit from the banks' expertise in loan origination and servicing, thereby diversifying risk exposure. Green securitisations and collaboration between banks and investors could play an important role in financing the transition as banks' balance sheet space might be too limited to overcome the green finance gap. The EU's new securitisation framework creates a specific framework for high-quality Simple, Transparent and Standardised (STS) securitisations, together with a more risk-sensitive prudential treatment for banks and insurers.

Question 54. Do you think that green securitisation has a role to play to increase the capital allocated to sustainable projects and activities?

- ○ 1 - Not important at all
- ○ 2 - Rather not important
- ○ 3 - Neutral
- ◉ 4 - Rather important
- ○ 5 - Very important
- ○ Don't know / no opinion / not relevant

Question 54.1 If necessary, please explain your answer to question 54:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Green securitisation does have an important role to play to increase the amount of capital allocated to sustainable projects and activities. The contribution is twofold, i.e. both directly by providing capital benefits to sustainable loans and indirectly, by freeing up capital that can be redeployed to sustainable projects and investments.

Question 55: Do the existing EU securitisation market and regulatory frameworks, including prudential treatment, create any barriers for securitising 'green assets' and increasing growth in their secondary market?

- ○ Yes
- ◉ No
- ○ Don't know / no opinion / not relevant

Question 56. Do you see the need for a dedicated regulatory and prudential framework for 'green securitisation'?

- ○ Yes
- ◉ No
- ○ Don't know / no opinion / not relevant

2.4 Digital sustainable finance

The ongoing COVID-19 outbreak is highlighting the key role of digitalisation for the daily personal and professional lives of many Europeans. However, it has also revealed how digital exclusion can exacerbate financial exclusion – a risk that needs to be mitigated.

Digitalisation is transforming the provision of financial services to Europe's businesses and citizens As shown in the Progress Report of the UN Secretary-General's Task Force on Digital Financing of the Sustainable Development Goals (SDGs), digital finance brings a wide array of opportunities for citizens worldwide by making it easier to make payments, save money, invest, or get insured. However, digital finance also brings new risks, such as deepening the digital divide. It is therefore paramount to ensure that the potential of digitalisation for sustainable finance is fully reaped, while mitigating associated challenges appropriately. In this context, the Commission has launched a consultation dedicated to digital finance.

In the area of sustainable finance, technological innovation such as Artificial intelligence (AI) and machine learning can help to better identify and assess to what extent a company's activities, a large equity portfolio, or a bank's assets are sustainable. The application of Blockchain and the Internet of Things (IoT) may allow for increased transparency and accountability in sustainable finance, for instance with automated reporting and traceability of use of proceeds for green bonds.

Question 57. Do you think EU policy action is needed to help maximise the potential of digital tools for integrating sustainability into the financial sector?

- ◉ Yes
- ○ No
- ○ Don't know / no opinion / not relevant

Question 57.1 If yes, what kind of action should the EU take and are there any existing initiatives that you would like the European Commission to consider?

Please list a maximum of 3 actions and a maximum of three existing initiatives:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The EU should promote the standardization and transformation of ESG data into easily transferrable digital format. In the light of the scheduled update of the EU Non-Financial Reporting Directive, approaching reporting requirements for the EU Taxonomy Regulation and the Disclosure Regulation the burden on report preparers have increased instantaneously. Therefore we would like the EU, as policy maker, to include automatization and digitalisation into EFRAG's assignment in developing an EU Sustainable Reporting Standard. If a standard would be prepared in such a way it could be automated, that would strike two wins in one hit.

Assess how digitalization can support an increased transparency on- and increased alignment with the EU Taxonomy for companies with economic activities covered by the Taxonomy. The work could be carried out on the EC's Platform for Sustainable Finance, planned to be established in September. If Taxonomy alignment could be measured in a digital way and automated it would likely fasten the EU action plan objective to "reorient capital flows" from unclassified to green and it would facilitate banks' assessment on assets' Taxonomy alignment. A digital policy action, and/or strategy, could very well connect to the EU Taxonomy.

In particular, digitalisation has the potential to empower citizens and retail investors to participate in local efforts to build climate resilience. For instance, M-Akiba is a Government of Kenya-issued retail bond that seeks to enhance financial inclusion for economic development. Money raised from issuance of M-Akiba is dedicated to infrastructural development projects, both new and ongoing.

Question 58. Do you consider that public authorities, including the EU and Member States should support the development of digital finance solutions that can help consumers and retail investors to better channel their money to finance the transition?

- (x) Yes
- ( ) No
- ( ) Don't know / no opinion / not relevant

Question 58.1 If yes, please explain what actions would be relevant from your perspective and which public authority would be best-positioned to deliver it?

Please list a maximum of 3 actions:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The role for public authorities is to create incentives, develop policies and facilitate access to data from corporates (listed, unlisted, SMEs) in a proportional manner. The financial institutions should be developing the digital finance solutions.

Question 59. In your opinion, should the EU, Member States, or local authorities use digital tools to involve EU citizens in co-financing local sustainable projects?

- Yes
- No
- Don’t know / no opinion / not relevant

2.5. Project Pipeline

The existing project pipeline (availability of bankable and investable sustainable projects) is generally considered to be insufficient to meet current investor demand for sustainable projects. Profitability of existing business models plays a role, with some projects (e.g. renewable energy), being more bankable than others (e.g. residential energy efficiency). Identifying the key regulatory and market obstacles that exist at European and national level will be key in order to fix the pipeline problem. Please note that questions relating to incentives are covered in section 2.6.

Question 60. What do you consider to be the key market and key regulatory obstacles that prevent an increase in the pipeline of sustainable projects?

Please list a maximum of 3 for each:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

New businesses tend to be small to start with. Further clarity on real economy policies, for example related to energy production, transportation, industrial outputs, and agriculture would be welcome in order to better understand the long-term financial viability of certain investments. T&D investments in Europe are important to facilitate the testing and scaling of innovations, both by SMEs and large companies.

Mispricing of externalities guides financing and risk decisions. Widely applied pricing of externalities would provide a level starting point for the low carbon solutions and better reveal the business models associated with higher physical and transition risks caused by climate change. These could be addressed with carbon price/ tax. Additional policy measures could be used to accelerate and scale up uptake of the new low carbon solutions. Other environmental factors should be included; including better use of natural resources through reducing, recycling and reallocating.

A further barrier to greater flows of funds to sustainable projects is investors liquidity requirements. The lack of sustainable assets decreases the issue size of green bonds and the greater demand results in less liquidity which tends to limit investments. Sustainable infrastructure projects are typically highly illiquid; this illiquidity makes their valuation difficult on a real-time basis, a requirement for some portfolios (no Mark-to-market).

Question 61. Do you see a role for Member States to address these obstacles through their NECPs (National Energy and Climate Plans)?

- (x) Yes
- ( ) No
- ( ) Don't know / no opinion / not relevant

Question 61.1 If necessary, please explain your answer to question 60 and provide details:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Yes, incentives and policy measures to make certain projects more bankable/lucrative and to create new sustainable projects, cooperation (member states and regional can lead to e.g. establishment of different programs that promote sustainability). Promotes long-termism (NCEPs are for 10 years). It is important to avoid fragmentation across Member States regulations, nevertheless it might be useful if the NECPs would include fiscal incentive frameworks and/or other benefits to propel sustainable finance (government guarantee funds to facilitate access to credit for companies that require financial support in order to implementation eco-sustainable projects, preferential tax policies for enterprises that invest in eco-sustainable projects etc.).

Question 62. In your view, how can the EU facilitate the uptake of sustainable finance tools and frameworks by SMEs and smaller professional investors?

Please list a maximum of 3 actions you would like to see at EU-level:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

EU initiatives on Sustainable Finance and sustainable financial tools (e.g. green bond, green loans, taxonomy aligned investments) currently available are mainly addressed to large companies and relevant operations/projects. A different, proportional, simplified and less costly approach should be adopted to allow and foster SMEs and smaller investors to invest in sustainability and green transition. A simplified and still harmonized guidance on how to address the taxonomy criteria based, for example, on limited impact or business model or local regulation that ensures DNSH and social safeguards are adequately met. Increased deployment of guarantees, subsidy schemes and simplified disclosures tools (with appropriate technical assistance) should also be envisaged.

Question 63. The transition towards a sustainable economy will require significant investment in research and innovation (R&I) to enable rapid commercialisation of promising and transformational R&I solutions, including possible disruptive and breakthrough inventions or business

m o d e l s .

How could the EU ensure that the financial tools developed to increase sustainable investment flows turn R&I into investable (bankable) opportunities?

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

While some European firms are very innovative and operate in high-tech areas, many innovative firms have difficulties in scaling up. Public investment in R&I in the EU is on a par or higher compared to competitors, however, industrial deployment of innovation is still facing obstacles.
For this to change, EU strategy should play in 2 directions:
- to support selected companies and their R&I projects through financial structures that are inclusive (crowd-in) vis-à-vis private capital;
- building on the experience gained in the Public-Private Partnerships to develop a dynamic industrial innovation ecosystem involving broad research and innovation communities.

Question 64. In particular, would you consider it useful to have a category for R&I in the EU Taxonomy?

- (x) Yes
- ( ) No
- ( ) Don't know / no opinion / not relevant

Question 65. In your view, do you consider that the EU should take further action in:

	Yes	No	Don't know / No opinion
Bringing more financial engineering to sustainable R&I projects?	(x)	( )	( )
Assisting the development of R&I projects to reach investment-ready stages, with volumes, scales, and risk-return profiles that interest investors (i.e. ready and bankable projects that private investors can easily identify)?	(x)	( )	( )
Better identifying areas in R&I where public intervention is critical to crowd in private funding?	( )	(x)	( )

Ensuring alignment and synergies between Horizon Europe and other EU programmes/funds?	◉	○	○
Conducting more research to address the high risks associated with sustainable R&I investment (e.g. policy frameworks and market conditions)?	◉	○	○
Identifying and coordinating R&I efforts taking place at EU, national and international levels to maximise value and avoid duplication?	○	◉	○
Facilitating sharing of information and experience regarding successful low-carbon business models, research gaps and innovative solutions?	◉	○	○
Increasing the capacity of EU entrepreneurs and SMEs to innovate and take risks?	◉	○	○

Question 65.1 If necessary, please explain your answers to question 65:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

2.6 Incentives to scale up sustainable investments

While markets for sustainable financial assets and green lending practices are growing steadily, they remain insufficient to finance the scale of additional investments needed to reach the EU's environmental and climate action objectives, including climate-neutrality by 2050. For instance, companies' issuances of sustainable financial assets (bonds, equity) and sustainable loans currently do not meet investors' increasing interest. The objective of the European Green Deal Investment Plan, published on 14 January 2020, is to mobilise through the EU budget and the associated instruments at least EUR 1 trillion of private and public sustainable investments over the coming decade. The purpose of this section is to identify whether there are market failures or barriers that would prevent the scaling up of sustainable finance, and if yes what kinds of public financial incentives could help rectify this.

Question 66. In your view, does the EU financial system face market barriers and inefficiencies that prevent the uptake of sustainable investments?

○ 1 - Not functioning well at all

◉ 2 - Not functioning so well

○ 3 - Neutral

- ◯ 4 - Functioning rather well
- ◯ 5 - Functioning very well
- ◯ Don’t know / no opinion / not relevant

Question 66.1 If necessary, please explain your answers to question 66:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

A lot of barriers exist. ESG data is currently in larger scale so expensive that small investors (e.g. small pension funds) do not have resources to buy it directly. Even if they had resources to buy it - they would not likely have resources to understand and analyze it correctly. The EU lacks standardization of ESG reporting - . there is no financial materiality definition in the EU.

Question 67. In your view, to what extent would potential public incentives for issuers and lenders boost the market for sustainable investments?

- ◯ 1 - Not effective at all
- ◯ 2 - Rather not effective
- ◯ 3 - Neutral
- ◉ 4 - Rather effective
- ◯ 5 - Very effective
- ◯ Don’t know / no opinion / not relevant

Question 67.1 Since you see a strong need for public incentives, which specific incentive(s) would support the issuance of which sustainable financial assets, in your view?

Please rate the effectiveness of each type of asset for each type of incentive:

a) Revenue-neutral subsidies for issuers:

	1 (not effective at all)	2 (not effective)	3 (neutral)	4 (effective)	5 (very effective)	Don't know / No opinion
Bonds	◯	◯	◯	◉	◯	◯
Loans	◯	◯	◯	◉	◯	◯
Equity	◯	◯	◯	◉	◯	◯

Other			x			

Please specify the reasons for your answers to question 65.1 a) (provide if possible links to quantitative evidence) and add any other incentives you would like the Commission to consider:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

b) De-risking mechanisms such as guarantees and blended financing instruments at EU-level:

	1 (not effective at all)	2 (not effective)	3 (neutral)	4 (effective)	5 (very effective)	Don't know / No opinion
Bonds				x		
Loans				x		
Equity			x			
Other			x			

Please specify the reasons for your answers to question 65.1 b) (provide if possible links to quantitative evidence) and add any other incentives you would like the Commission to consider:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

c) Technical assistance:

	1 (not effective at all)	2 (not effective)	3 (neutral)	4 (effective)	5 (very effective)	Don't know / No opinion
Bonds	○	○	○	●	○	○
Loans	○	○	●	○	○	○
Equity	○	○	○	●	○	○
Other	○	○	○	●	○	○

Please specify the issuance of what other type(s) of asset would be supported by technical assistance:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Please specify the reasons for your answers to question 65.1 c) (provide if possible links to quantitative evidence) and add any other incentives you would like the Commission to consider:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

d) Any other public sector incentives:

	1 (not effective at all)	2 (not effective)	3 (neutral)	4 (effective)	5 (very effective)	Don't know / No opinion
Bonds						
Loans						
Equity						
Other						

Please specify the reasons for your answers (provide if possible quantitative evidence) and other incentives you would like the Commission to consider:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Incentives would be important especially for green bond market: more issuance, speed up market growth & access to investors help to meet climate goals. Entering the GB market entails a lot of costs and requires resources, administrative considerations – subsidies would reduce the initial cost and encourage issuance and the growth of the market. Revenue neutral subsidies might be most efficient, and in general subsidies seem to be the most commonly used incentives.

As we are already driven by regulation, especially technical assistance would be beneficial and decrease the amount of required resources, especially when adopting new guidelines and regulations (e.g. taxonomy and GB standard).

The EU could set-up a consultancy and technical support service, aimed to help banks in defining exhaustive and achievable metrics for sustainable finance. The sharing of specific know-how within the EU is fundamental; such process may be supported through dedicated EU funded training initiatives addressed to financial sector professionals.

For green finance in general, the market for sustainable investments could be boosted by creating more conducive environment for sustainable activities by first gradually withdrawing various subsidies from brown activities.

Question 68. In your view, for *investors* (including retail investors), to what extent would potential financial incentives help to create a viable market for sustainable investments?

- 1 - Not effective at all
- 2 - Rather not effective
-

3 - Neutral
- 4 - Rather effective
- 5 - Very effective
- Don’t know / no opinion / not relevant

Please specify the reasons for your answer (provide if possible links to quantitative evidence) and the category of investor to whom it should be addressed (retail, professional, institutional, other):

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Best incentive is transparency. Retail investors according to market research studies note the "lack of sufficient ESG information" as the biggest barrier to their understanding & investment into ESG themes. So EU needs to improve standardization of ESG reporting, which will improve disclosure and thus eventually transparency & motivation of retail investors to invest.

Providing technical support for investors and particularly issuers on interpretation and implementation of the EU taxonomy could ease its uptake and create a more positive approach among companies and other issuers of financial instruments.

Question 69. In your view, should the EU consider putting in place specific incentives that are aimed at facilitating access to finance for SMEs carrying out sustainable activities or those SMEs that wish to transition?

- (selected) Yes
- No
- Don’t know / no opinion / not relevant

Question 69.1 If yes, what would be your main three suggestions for actions the EU should prioritise to address this issue?

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Simplified reporting requirements for SMEs.

Support sustainable lending through guarantee schemes and targeted capital release schemes to create new sources of (earmarked) funding with more attractive terms and conditions. These de-risking mechanisms would support (moderately) increased risk-taking by the bank and facilitate access to finance for SMEs. SMEs would also be incentivized through lower pricing and / or longer maturities to carry out sustainable activities / to transition.

Set-up of a dedicated platform that would allow SMEs to access easily technical assistance services by ESG experts and, implicitly, decrease the costs related to these services.

2.7 The use of sustainable finance tools and frameworks by public authorities

Even though the potential scope of sustainable finance is broad, it is often viewed as being only confined to the ambit of private financial flows within capital markets. Nevertheless, the boundary between public and private finance is not always strict and some concepts that are generally applied to private finance could also be considered for the public sector, such as the EU Taxonomy. This is recognised in the European Green Deal Investment Plan and the Climate Law, where the Commission committed to exploring how the EU Taxonomy can be used in the context of the European Green Deal by the public sector, beyond InvestEU. The InvestEU programme, proposed as part of the EU's Multiannual Financial Framework 2021 – 2027, combines public and private funding and once the taxonomy is in place (from end-2020 onwards) will serve as a test case for its application in public sector-related spending.

Question 70. In your view, is the EU Taxonomy, as currently set out in the report of the Technical Expert Group on Sustainable Finance, suitable for use by the public sector, for example in order to classify and report on green expenditures?

- ○ Yes
- ● Yes, but only partially
- ○ No
- ○ Don't know / no opinion / not relevant

Question 70.1 Please explain which public authority could use it, how and for what purposes, as well as the changes that would be required to make it fit for purpose:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The public sector has limited capability to change its reporting and budgeting techniques and the application would need to be prioritized and, where necessary, amended to create meaningful outcomes (opex/ capex definitions, annual budgeting instead of project level).

Question 71. In particular, is the EU Taxonomy, as currently set out in the report of the Technical Expert Group on Sustainable Finance, suitable for use by the public sector in the area of green public procurement?

- ○ Yes

- [x] Yes, but only partially
- [ ] No
- [ ] Don’t know / no opinion / not relevant

Question 71.1 If "no" or "yes, but only partially", please explain why and how those reasons could be best addressed in your view:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The procurement practise is an important driver for demand and could offer necessary references to vendors. However, as the taxonomy is still under development, the coverage is too limited for mandatory use. the DNSH concept could be a more relevant framework to start with, with “extra points” for taxonomy aligned significant contribution where applicable. Some simplified taxonomy based harmonized key indicators/ KPI’s could be useful for this purpose, if the alternative is no reference at all.

Question 72. In particular, should the EU Taxonomy[2] play a role in the context of public spending frameworks at EU level, i.e. EU spending programmes such as EU funds, Structural and Cohesion Funds and EU state aid rules, where appropriate?

[2] The six environmental objectives set out in the Taxonomy Regulation are the following: (1) climate change mitigation, (2) climate change adaptation, (3) sustainable use and protection of water and marine resources, (4) transition to a circular economy, (5) pollution prevention and control, (6) protection and restoration of biodiversity and ecosystems.

- [ ] Yes, the taxonomy with climate and environmental objectives set out in the Taxonomy Regulation
- [ ] Yes, but only if social objectives are incorporated in the EU Taxonomy, as recommended by the TEG, and depending on the outcome of the report that the Commission must publish by 31 December 2021 in line with the review clause of the political agreement on the Taxonomy Regulation
- [ ] No
- [x] Don’t know / no opinion / not relevant

Question 72.1 If necessary, please explain your answers to question 72:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 73. Should public issuers, including Member States, be expected to make use of a future EU Green Bond Standard for their green bond issuances, including the issuance of sovereign green bonds in case they decide to issue this kind of debt?

- (x) Yes
- ( ) No
- ( ) Don’t know / no opinion / not relevant

2.8 Promoting intra-EU cross-border sustainable investments

In order to attract and encourage cross-border investments, a range of investment promotion services have been put in place by public authorities. Investment promotion services include for instance information on the legal framework, advice on the project, such as on financing, partner and location search, support in completing authorisations and problem-solving mechanisms relating to issues of individual or general relevance. In some cases specific support is provided for strategic projects or priority sectors.

Question 74. Do you consider that targeted investment promotion services could support the scaling up of cross-border sustainable investments?

- (x) Yes
- ( ) No
- ( ) Don’t know / no opinion / not relevant

Question 74.1 If yes, please specify what type of services would be useful for this purpose:

Please select as many options as you like.

- [x] Information on legal frameworks
- [ ] Individualised advice (e.g. on financing)
- [ ] Partner and location search
- [x] Support in completing authorisations
- [x] Problem-solving mechanisms
- [ ] Other

2.9 EU Investment Protection Framework

To encourage long-term sustainable investments in the EU, it is essential that investors are confident that their investments will be effectively protected throughout their life-cycle in relation to the state where they are located. The EU investment protection framework includes the single market fundamental freedoms, property protection from expropriation, the principles of legal certainty, legitimate expectations and good administration which ensure a stable and predictable environment, including remedies and enforcement in national courts. These elements can have an impact on cross-border investment decisions, especially for long-term investments. While a separate consultation on investment protection will take place soon, the purpose of this section is to investigate whether the above-mentioned factors have an impact on sustainable projects in particular, such as for instance for long-term infrastructure and innovation projects necessary for the EU's industrial transition towards a sustainable economy.

Question 75. Do you consider that the investment protection framework has an impact on decisions to engage in cross-border sustainable investment?

Please choose one of the following:

- ○ Investment protection has **no impact**
- ○ Investment protection has **a small impact** (one of many factors to consider)
- ○ Investment protection has **medium impact** (e.g. it can lead to an increase in costs)
- ● Investment protection has **a significant impact** (e.g. influence on scale or type of investment)
- ○ Investment protection is a factor that can have **a decisive impact** on cross-border investments decisions and can result in cancellation of planned or withdrawal of existing investments
- ○ Don’t know / no opinion / not relevant

2.10 Promoting sustainable finance globally

The global financial challenge posed by climate change and environmental degradation requires an **internationally coordinated**. To complement the work done by the Network of Central Banks and Supervisors for Greening the Financial system (NGFS) on climate-related risks and the Coalition of Finance Ministers for Climate Action mainly on public budgetary matters and fiscal policies, **the EU has launched together with the relevant public authorities from like-minded countries the International Platform on Sustainable Finance (IPSF)**. The purpose of the IPSF is to promote integrated markets for environmentally sustainable investment at a global level. It will deepen international coordination on approaches and initiatives that are fundamental for private investors to identify and seize environmentally sustainable investment opportunities globally, in particular in the areas of taxonomy, disclosures, standards and labels.

Question 76. Do you think the current level of global coordination between public actors for sustainable finance is sufficient to promote sustainable finance globally as well as to ensure coherent frameworks and action to deliver on the Paris Agreement and/or the UN Sustainable Development Goals (SDGs)?

- [ ] 1 - Highly insufficient
- [x] 2 - Rather insufficient
- [ ] 3 - Neutral
- [ ] 4 - Rather sufficient
- [ ] 5 - Fully sufficient
- [ ] Don’t know / no opinion / not relevant

Question 76.1 What are the main missing factors at international level to further promote sustainable finance globally and to ensure coherent frameworks and actions?

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 77. What can the Commission do to facilitate global coordination of the private sector (financial and non-financial) in order to deliver on the goals of the Paris Agreement and/or SDGs?

Please list a maximum of 3 proposals:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 78. In your view, what are the main barriers private investors face when financing sustainable projects and activities in emerging markets and developing economies?

Please select all that apply:

Please select as many options as you like.

- [x] Lack of internationally comparable sustainable finance frameworks (standards, taxonomies, disclosure, etc.)
- [ ] Lack of clearly identifiable sustainable projects on the ground
- [x] Excessive (perceived or real) investment risk
- [x] Difficulties to measure sustainable project achievements over time
- [ ] Other

Question 79. In your opinion, in the context of European international cooperation and development policy, how can the EU best support the mobilisation of international and domestic private investors to finance sustainable projects and activities in emerging markets and developing countries, whilst avoiding market distortions?

Please provide a maximum of 3 proposals:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Whenever public guarantees are used to promote private investments into emerging markets, the criteria for granting the guarantee should be based on the promotion of climate and SDG goals.

Question 80. How can EU sustainable finance tools (e.g. taxonomy, benchmarks, disclosure requirements) be used to help scale up the financing of sustainable projects and activities in emerging markets and/or developing economies?

Which tools are best-suited to help increase financial flows towards and within these countries and what challenges can you identify when implementing them?

Please select among the following options:

- ( ) All EU sustainable finance tools are already suitable and can be applied to emerging markets and/or developing economies without any change
- (•) Some tools can be applied, but not all of them
- ( )

These tools need to be adapted to local specificities in emerging markets and /or developing economies

- Don’t know / no opinion / not relevant

Question 80.1 If necessary, please explain you answer to question 80:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 81. In particular, do you think that the EU Taxonomy is suitable for use by development banks, when crowding in private finance, either through guarantees or blended finance for sustainable projects and activities in emerging markets and/or developing economies?

- [x] Yes
- [ ] Yes, but only partially
- [ ] No
- [ ] Don’t know / no opinion / not relevant

3. Reducing and managing climate and environmental risks

Climate and environmental risks, including relevant transition risks, and their possible negative social impacts, can have a disruptive impact on our economies and financial system, if not managed appropriately. Against this background, the three European supervisory authorities (ESAs) have each developed work plans on sustainable finance[3]. Building, among others, on the ESAs’ activities further actions are envisaged to improve the management of climate and environmental risks by all actors in the financial system. In particular, the political agreement on the Taxonomy Regulation tasks the Commission with publishing a report on the provisions required for extending its requirements to activities that do significantly harm environmental sustainability (the so-called “brown taxonomy”).

[3] More information on the ESAs’ activities on sustainable finance is available on the authorities’ websites. See in particular ESMA’s strategy, EBA Action Plan, and EIOPA’s dedicated webpage.

3.1 Identifying exposures to harmful activities and assets and disincentivising environmentally harmful investments

Question 82. In particular, do you think that existing actions need to be complemented by the development of a taxonomy for economic activities that are most exposed to the transition due to their current negative environmental impacts (the so-called "brown taxonomy") at EU level, in line with the review clause of the political agreement on the Taxonomy Regulation?

- ○ Yes
- ○ No
- ◉ Don't know / no opinion / not relevant

Question 83: Beyond a sustainable and a brown taxonomy, do you see the need for a taxonomy which would cover all other economic activities that lie in between the two ends of the spectrum, and which may have a more limited negative or positive impact, in line with the review clause of the political agreement on the Taxonomy Regulation?

- ○ Yes
- ◉ No
- ○ Don't know / no opinion / not relevant

3.2 Financial stability risk

The analysis and understanding of the impact of climate-related and environmental risks on financial stability is improving, thanks in particular to the work done by supervisors and central banks (see for instance the Network of Central Banks and Supervisors for Greening the Financial System (NGFS)), regulators and research centres. However, significant progress still needs to be made in order to properly understand and manage the impact of these risks.

Question 84. Climate change will impact financial stability through two main channels: physical risks, related to damages from climate-related events, and transition risks, related to the effect of mitigation strategies, especially if these are adopted late and abruptly. In addition, second-order effects (for instance the impact of climate change on real estate prices) can further weaken the whole financial system.

What are in your view the most important channels through which climate change will affect your industry?

Please select all that apply:

Please select as many options as you like.

- [x] Physical risks
- [x] Transition risks
- [x] Second-order effects
- [ ] Other

Please specify, if necessary, what are these physical risks:

Please provide links to quantitative analysis when available:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Physical risks include the economic costs and financial losses resulting from the increasing severity and frequency of extreme climate change-related weather events as well as longer term progressive shifts of the climate. Physical hazards pose potentially significant challenges for those sectors with fixed assets and a revenue dependency on predictable climate conditions as well as for household lending (e.g. mortgages). Changes to natural disturbance regimes, growing conditions, water availability and sea-level are some of the potential effects that could impact to key sectors ranging from power production to food and beverage processing. Uncertainty on planetary tipping points (e.g. melting icecaps) coupled with global emissions trajectory means “extreme” physical risk scenarios are possible. As such, physical risks are likely to impact the financial industry through multiple channels.

Changes in precipitation patterns and extreme variability in weather patterns that affect the number of different sized incidents caused by extreme weather conditions such as heavy storms are more likely to happen and lead to increase insurance claims and compensations.

Please specify, if necessary, what are these transition risks:

Please provide links to quantitative analysis when available:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Transition risks relate to the process of adjustment towards a low-carbon economy. Emissions must eventually reach “net zero” to prevent further climate change. The process of reducing emissions is likely to have significant impact on all sectors of the economy affecting financial asset values. While urgent action is desirable, an abrupt transition could also have an impact on financial stability and the economy more broadly. Transition risks can be sub-divided into policy & regulatory, technology, market & economic and reputational categories of risk. Those are the main channels through which transition risks are expected to impact in the financial industry, from sectors linked to fossil assets and reliant on fossil infrastructure to those that can transition to low-carbon alternative technologies and processes.

The Finnish economy is touted as being energy intensive thus making it vulnerable towards increases in energy prices which are commonly expected to rise due to increases in carbon emissions prices. This may not only affect the financial institution itself but also the profitability of its corporate customers. This risk is even more imminent as the Finnish government's climate policies are extremely ambitious.

Please specify, if necessary, what are these second-order effects:

Please provide links to quantitative analysis when available:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

For physical risks, second-order effects are an important consideration. Re-pricing and uninsurability resulting in physical stranding of assets are important channels for consideration by the financial industry. For example, with Sea Level Rise (SLR) total value-added losses in Copenhagen from 100 cm of SLR are projected to be EUR 4.7 billion p.a. without further adaptation investments (roughly equivalent to 16.5% of local value-added p.a.). A national study for 2750 counties in USA found the average property discount in high climate risk exposure coastal areas was -7% .

Climate-related social unrest and global massive migration could also affect Europe as it is expected to be less adversely affected by climate change than many other regions. This could in turn increase real estate values in Europe due to population projection changes whilst also creating multiple social challenges.

Question 85. What key actions taken in your industry do you consider to be relevant and impactful to enhance the management of climate and environment related risks?

Please identify a maximum of 3 actions taken in your industry

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Establishing top level Governance, to enable direction setting and prioritisation. This has initially led to firms committing to a number of voluntary initiatives (TCFD etc.), setting specific policies covering high-risk sectors and segments and more broadly minimum safeguards, and ensuring ESG considerations have sufficient Board and Executive level attention and adequate resources assigned.

Increase knowledge on climate related risks and to apply the knowledge in appropriate financial products.

Client engagement: Urging corporate clients to assess their climate-related risks and to support in transition and incentivize clients to invest in sustainable activities e.g. by applying the EU's taxonomy.

Question 86. Following the financial crisis, the EU has developed several new macro-prudential instruments, in particular for the banking sector (CRR /CRDIV), which aim to address systemic risk in the financial system.

Do you consider the current macro-prudential policy toolbox for the EU financial sector sufficient to identify and address potential systemic financial stability risks related to climate change?

- 1 - Highly insufficient
- 2 - Rather insufficient
- 3 - Neutral
- 4 - Rather sufficient (selected)
- 5 - Fully sufficient
- Don’t know / no opinion / not relevant

Insurance prudential framework

Insurers manage large volumes of assets on behalf of policyholders and they can therefore play an important role in the transition to a sustainable economy. At the same time, insurance companies have underwriting liabilities exposed to sustainability risks. In addition, the (re)insurance sector plays a key role in managing risks arising from natural catastrophes though risk-pooling and influencing risk mitigating behaviour. The Solvency II Directive sets out the prudential framework for insurance companies. The Commission requested technical advice from the European Insurance and Occupation Pensions Authority (EIOPA) on the integration of sustainability risks and sustainability factors in Solvency II. The Commission also mandated EIOPA to investigate whether there is undue volatility of liabilities in the balance sheet or undue impediments to long-term investments, as part of the 2020 Review of Solvency II. The Commission also mandated EIOPA to investigate whether there is undue volatility of their solvency position that may impede to long-term investments, as part of the 2020 Review of Solvency II. EIOPA is expected to submit its final advice in June 2020.

In September 2019, EIOPA already provided an opinion on sustainability within Solvency II. EIOPA identified additional practices that should be adopted by insurance companies to ensure that sustainability risks are duly taken into account in companies’ risk management.

On that basis, the Commission could consider clarifications of insurers’ obligations as part of the review of the Solvency II Directive. Stakeholders will soon be invited to comment on the Commission’s inception impact assessment as regards the review. The Commission will also launch a public consultation as part of the review.

Question 87. Beyond prudential regulation, do you consider that the EU should take further action to mobilise insurance companies to finance the transition and manage climate and environmental risks?

- Yes
- No (selected)
- Don’t know / no opinion / not relevant

Banking prudential framework

In the context of the last CRR/D review, co-legislators agreed on three actions aiming at integrating ESG considerations into EU banking regulation:

- a mandate for the EBA to assess and possibly issue guidelines regarding the inclusion of ESG risks in the supervisory review and evaluation process (SREP) (Article 98(8) CRD);
- a requirement for large, listed institutions to disclose ESG risks (Article 449a CRR) (note that some banks are also in the scope of the NFRD;
- a mandate for the EBA to assess whether a dedicated prudential treatment of exposures related to assets or activities associated substantially with sustainability objectives would be justified (Article 501c CRR).

Because the work on ESG risks was at its initial stages, co-legislators agreed on a gradual approach to tackling those risks. However, given the new objectives under the European Green Deal, it can be argued that the efforts in this area need to be scaled up in order to support a faster transition to a sustainable economy and increase the resilience of physical assets to climate and environmental risks. Integrating sustainability considerations in banks' business models requires a change in culture which their governance structure needs to effectively reflect and support.

Question 88. Do you consider that there is a need to incorporate ESG risks into prudential regulation in a more effective and faster manner, while ensuring a level-playing field?

- ○ Yes
- ● No
- ○ Don't know / no opinion / not relevant

Question 89. Beyond prudential regulation, do you consider that the EU should:

1. **take further action to mobilise banks to finance the transition?**
2. **manage climate-related and environmental risks?**

- ○ Yes, option 1. or option 2. or both options
- ○ No
- ● Don't know / no opinion / not relevant

Question 90. Beyond the possible general measures referred to in section 1.6, would more specific actions related to banks' governance foster the integration, the measurement and mitigation of sustainability risks and impacts into banks' activities?

- ○ Yes
- ● No
- ○ Don't know / no opinion / not relevant

Asset managers

Traditionally, the integration of material sustainability factors in portfolios, with respect to both their selection and management, has considered only their impact on the financial position and future earning capacity of a portfolio's holdings (i.e., the 'outside-in' or 'financial materiality' perspective). However, asset managers should take into account also the impact of a portfolio on society and the environment (i.e., the 'inside-out' or 'environmental/social materiality' perspective). This so-called "double materiality" perspective lies at the heart of the Disclosure Regulation, which makes it clear that a significant part of the financial services market must consider also their adverse impacts on sustainability (i.e. negative externalities).

Question 91. Do you see merits in adapting rules on fiduciary duties, best interests of investors/the prudent person rule, risk management and internal structures and processes in sectorial rules to directly require them to consider and integrate adverse impacts of investment decisions on sustainability (negative externalities)?

- (x) Yes
- ( ) No
- ( ) Don't know / no opinion / not relevant

Question 91.1 If yes, what solution would you propose?

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

In principle we support this, but we also acknowledge that in the current situation where data of the adverse impacts is not widely available from the investee companies, fulfilling this objective is very challenging. We need to create first solutions for reliable data, and after that asset managers can integrate it into their fiduciary duty considerations.

Pension providers

Pension providers' long-term liabilities make them an important source of sustainable finance. They have an inherently long-term approach, as the beneficiaries of retirement schemes expect income streams over several decades. Compared with other institutions, pension providers' long-term investment policies also make their assets potentially more exposed to long-term risks. Thus far, the issues of sustainability reporting and ESG integration by EU pension providers have been taken up in the areas of institutions for occupational retirement provision (IORPs) ("Pillar II" - covered at EU level by the IORP II Directive) and private voluntary plans for personal pensions ("Pillar III" – covered at EU level by the PEPP Regulation) already in 2016 and 2017 respectively. The Commission will review the IORP II Directive by January 2023 and report on its implementation and effectiveness.

However, according to a stress test on IORPs run by EIOPA in 2019 and assessing for the first time the integration of ESG factors in IORPs' risk management and investment allocation, only about 30% of IORPs in the EU have a strategy in place to manage ESG-related risks to their investments. Moreover, while most IORPs claimed to have taken appropriate steps to identify ESG risks to their investments, only 19% assess the impact of ESG factors on investments' risks and returns[3]. Lastly, the study provided a preliminary quantitative analysis of the investment portfolio (with almost 4 trillion Euros of assets under management, the EEA's Institutions for Occupational Retirement Provision (IORPs) sector is an important actor on financial markets.) which would indicate significant exposures of the IORPs in the sample to business sectors prone to high greenhouse gas emissions.

In 2017, the Commission established a High level group of experts on pensions to provide policy advice on matters related to supplementary pensions. In its report, the group recommended that the EU, its Member States and the social partners further clarify how pension providers can take into account the impact of ESG factors on investment decisions and develop cost-effective tools and methodologies to assess the vulnerability of EU pension providers to long-term environmental and social sustainability risks. The group also pointed out that, in the case of IORPs which are collective schemes, it might be challenging to make investment decisions reconciling possibly diverging views of individual members and beneficiaries on ESG investment. Moreover, in 2019, EIOPA issued an opinion on the supervision of the management of ESG risks faced by IORPs.

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[3] The analysis shows that the preparedness of pension schemes to integrate sustainability factors is widely dispersed and seems correlated to how advanced national frameworks were. IORP II directive sets minimum harmonisation and was expected to be transposed in national law by January 2019 (and hence could not necessarily be expected to be implemented by end-2018 for the EIOPA survey for the 2019 stress test).

Question 92. Should the EU explore options to improve ESG integration and reporting above and beyond what is currently required by the regulatory framework for pension providers?

- Yes
- No
- Don't know / no opinion / not relevant

Question 93. More generally, how can pension providers contribute to the achievement of the EU's climate and environmental goals in a more proactive way, also in the interest of their own sustained long-term performance? How can the EU facilitate the participation of pension providers to such transition?

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 94. In view of the planned review of the IORP II Directive in 2023, should the EU further improve the integration of members' and beneficiaries' ESG preferences in the investment strategies and the management and governance of IORPs?

Yes
No
Don’t know / no opinion / not relevant

3.3 Credit rating agencies

Regulation 1060/2009 requires credit rating agencies (CRAs) to take into account all factors that are ‘material’ for the probability of default of the issuer or financial instrument when issuing or changing a credit rating or rating outlook. This covers also ESG factors. According to ESMA’s advice on credit rating sustainability issues and disclosure requirements, the extent to which ESG factors are being considered can vary significantly across asset classes, based on each CRA’s methodology.

Following the 2018 Action Plan on Financing Sustainable Growth, in response to concerns about the extent to which ESG factors were considered by CRAs, ESMA adopted guidelines on disclosure requirements for credit ratings and rating outlooks. ESMA’s Guidelines on these disclosure requirements will become applicable as of April 2020. Pursuant to the guidelines, CRAs should report in which cases ESG factors are key drivers behind the change to the credit rating or rating outlook. Consequently, the current landscape will change in the coming months. The Commission services intend to report on the progress regarding disclosure of ESG considerations by CRAs in 2021.

Question 95. How would you assess the transparency of the integration of ESG factors into credit ratings by CRAs?

1 - Not transparent at all
2 - Rather not transparent
3 - Neutral
4 - Rather transparent
5 - Very transparent
Don’t know / no opinion / not relevant

Question 95.1 If necessary, please explain your answer to question 95:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Not very transparent. It is clearly increasingly important and emphasized and will continue to grow in importance, yet it is not completely clear how it is integrated (especially social and environmental aspects). This varies notably among CRAs, e.g. S&P has a section where they go into depth about how ESG is integrated in credit rating processes, but Moody’s integration process is quite unclear.

Question 96. How would you assess the effectiveness of the integration of ESG factors into credit ratings by CRAs?

1 - Not effective at all

- 2 - Rather not effective
- (x) 3 - Neutral
- 4 - Rather effective
- 5 - Very effective
- Don't know / no opinion / not relevant

Question 96.1 If necessary, please explain your answer to question 96:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Question 97. Beyond the guidelines, in your opinion, should the EU take further actions in this area?

- Yes
- (x) No
- Don't know / no opinion / not relevant

3.4. Natural capital accounting or "environmental footprint"

Internal tools, such as the practice of natural capital accounting, can help inform companies' decision-making based on the impact of their activities on sustainability factors. **Natural capital accounting or "environmental footprinting"** has the potential to feed into business performance management and decision-making by explicitly mapping out impacts (i.e. the company's environmental footprint across its value chain) and dependencies on natural capital resources and by placing a monetary value on them. In order to ensure appropriate management of environmental risks and mitigation opportunities, and reduce related transaction costs, the Commission will support businesses and other stakeholders in developing standardised **natural capital accounting** practices within the EU and internationally.

Question 100. Are there any specific existing initiatives (e.g. private, public or other) you suggest the Commission should consider when supporting more businesses and other stakeholders in implementing standardised natural capital accounting/environmental footprinting practices within the EU and internationally?

- Yes
- No
- Don't know / no opinion / not relevant

3.5. Improving resilience to adverse climate and environmental impacts

(Please note that the Commission is also preparing an upgraded EU Adaptation Strategy. A dedicated public consultation will be launched soon).

Climate-related loss and physical risk data

Investors and asset owners, be they businesses, citizens or public authorities, can better navigate and manage the increased adverse impacts of a changing climate when given access to decision-relevant data. Although many non-life insurance undertakings have built up significant knowledge, most other financial institutions and economic actors have a limited understanding of (increasing) climate-related physical risks.

A wider-spread and more precise understanding of current losses arising from climate- and weather-related events is hence crucial to assess macro-economic impacts, which determine investment environments. It could also be helpful to better calibrate and customise climate-related physical risk models needed to inform investment decisions going forward, to unlock public and private adaptation and resilience investments and to enhance the resilience of the EU's economy and society to the unavoidable impacts of climate change.

Question 99. In your opinion, should the European Commission take action to enhance the availability, usability and comparability of climate-related loss and physical risk data across the EU?

- (●) Yes
- ( ) No
- ( ) Don't know / no opinion / not relevant

Question 99.1 If yes, for which of the following type of data should the European Commission take action to enhance its availability, usability and comparability across the EU?

Please select as many options as you like.

- [ ] Loss data
- [x] Physical risk data

Please specify why you think the European Commission should take action to enhance the availability, usability and comparability of climate-related physical risk data across the EU?

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

EU should, first of all, standardize climate-related and physical risk-related ESG data disclosure by companies. The EU should consider how existing and publicly reported data could be made more accessible to wider audience and users. Possible future data sharing efforts should build primarily on what is already reported. New reporting proposals need to be based on need for it and be considered only after it has been checked that this data isn't already available somewhere.

There is rarely too much good comparable data on climate-related losses and physical risks. Physical risk data would help analyze the impact of stranded assets across the EU – given that such data may be politically sensitive, the European Commission could take stronger action to enhance its availability. As to the climate-related losses, transparent and comparable data would allow different countries to learn from each other and analyze how to avoid climate-related losses.

Financial management of physical risk

According to a report by the European Environmental Agency, during the period of 1980-2017, 65% of direct economic losses from climate disasters were not covered by insurance in EU and EFTA countries, with wide discrepancies between Member States, hazards and types of policyholders. The availability and affordability of natural catastrophe financial risk management tools differs widely across the EU, also due to different choices and cultural preferences with regards to ex-ante and ex-post financial management in case of disasters. While the financial industry (and in particular the insurance sector) can play a leading role in managing the financial risk arising from adverse climate impacts by absorbing losses and promoting resilience, EIOPA has warned that insurability is likely to become an increasing concern. Measures to maintain and broaden risk transfer mechanisms might hence require (potentially temporary) public policy solutions.

Furthermore, the ongoing COVID-19 outbreak is highlighting the growing risk arising from pandemics in particular, which will become more frequent with the reduction of biodiversity and wildlife habitat. UNEP's Frontiers 2016 Report on Emerging Issues of Environment Concern shows that such diseases can threaten economic development.

In this context, social and catastrophe bonds could play a crucial role: the former to orient use of proceeds towards the health system (e.g. IFFIM first vaccine bond issued in 2006), and the latter to broaden the financing options that are available to insurers when it comes to catastrophe reinsurance. Such instruments would help mobilise the broadest possible range of private finance alongside public budgets to contribute to the resilience of the EU's health and economic systems, via prevention and reinsurance.

Question 100. Is there a role for the EU to promote more equal access to climate-related financial risk management mechanisms for businesses and citizens across the EU?

- (selected) Yes
- No
- Don't know / no opinion / not relevant

Question 100.1 If yes, please indicate the degree to which you believe the following actions could be helpful:

	1 (not at all helpful)	2 (rather not helpful)	3 (neutral)	4 (rather helpful)	5 (very helpful)	N. A.

Financial support to the development of more accurate climate physical risk models	○	○	○	○	○	○
Raise awareness about climate physical risk.	○	○	○	◉	○	○
Promote ex-ante “build back better” requirements to improve future resilience of the affected regions and or /sectors after a natural catastrophe.	○	○	○	○	○	○
Facilitate public-private partnerships to expand affordable and comprehensive related insurance coverage.	○	○	○	○	○	○
Reform EU post disaster financial support.	○	○	○	○	○	○
Support the development of alternative financial products (e.g. catastrophe bonds) offering protection/hedging against financial losses stemming from climate- or environment-related events.	○	○	○	○	○	○
Advise Member States on their national natural disaster insurance and post disaster compensation and reconstruction frameworks.	○	○	○	○	○	○
Regulate by setting minimum performance features for national climate-related disaster financial management schemes.	○	○	○	○	○	○
Create a European climate-related disaster risk transfer mechanism.	○	○	○	○	○	○
Other	○	○	○	○	○	○

Please explain why you think it would be useful for the EU to raise awareness about climate physical risk:

2000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

We do not see a problem in accessibility to climate-related financial risk management. We do of course support any awareness raising and sharing of best practices in this field.

Question 101. Specifically with regards to the insurability of climate-related risks, do you see a role for the EU in this area?

- ○ Yes
- ● No
- ○ Don't know / no opinion / not relevant

Question 102. In your view, should investors and / or credit institutions, when they provide financing, be required to carry out an assessment of the potential long-term environmental and climate risks on the project, economic activity, or other assets?

- ● Yes
- ○ No
- ○ Don't know / no opinion / not relevant

Question 102.1 what action should the EU take?

Please list a maximum of 3 actions:

2000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Yes, however we don't see the need for any new regulatory obligations now, but further standardization and guidance in specific areas may be useful. There needs to be a usable tool such that the process won't be too burdensome for institutions. As discussed under question 99, a public and comparable database in Europe for climate-related loss and physical risks could be a good starting point. The EU could require investors to use the database in analyzing the long-term environmental and climate risks for invested projects.

Additional information

Should you wish to provide additional information (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) here.

Please be aware that such additional information will not be considered if the questionnaire is left completely empty.

The maximum file size is 1 MB.
You can upload several files.
Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

0753e43d-9835-4f84-82df-da3f967d3e32/FFI_consultation_response_attachment.pdf

Useful links

More on this consultation (https://ec.europa.eu/info/publications/finance-consultations-2020-sustainable-finance-strategy_en)

Consultation document (https://ec.europa.eu/info/files/2020-sustainable-finance-strategy-consultation-document_

More on sustainable finance (https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance_en)

Specific privacy statement (https://ec.europa.eu/info/files/2020-sustainable-finance-strategy-specific-privacy-statement_en)

More on the Transparency register (http://ec.europa.eu/transparencyregister/public/homePage.do?locale=en)

Contact

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8.7.2020

Kamppi Elina

Attachment to Finance Finland's (FFI) response to the European Commission's consultation on the renewed sustainable finance strategy

We would like to make the following specifications to our responses:

Question 75: Do you consider that the investment protection framework has an impact on decisions to engage in cross-border sustainable investment?

FFI's response: Investment protection has a **significant impact** (e.g. influence on scale or type of investment).

Justification: Investment protection has a **significant impact** on decision to engage in any investment and, also, to cross-border sustainable investment. As we have seen in Capital Markets union in MiFID II, IDD and PRIIPS regulations after 2018 the level of investor protection is too high now.

Because of recent years' decisions on investor protection, clients are now experiencing information overload due to the various transparency requirements, e.g. ex-ante and ex-post cost reporting, information on services and products, the various policies and questionnaires provided to clients and other forms of reporting, which is making them withdraw from capital markets. Clients explain that they are not able to assess the relevant risks, investment opportunities and costs to enter and remain in capital markets due to information overload. The complexity of this information is making things worse to clients and adding more complexity. Therefore, more investor protection in cross-border sustainable investments would mean less investments.

Simplification of both transparency and reporting requirements relating to all investor protection regulation is thus important in improving investor protection. This can be done through convergence with other legislation, and deregulation of certain requirements depending on the client or product type, also relating to cross-border sustainable investments.

Question 82: In particular, do you think that existing actions need to be complemented by the development of a taxonomy for economic activities that are most exposed to the transition due to their current negative environmental impacts (the so-called "brown taxonomy") at EU level, in line with the review clause of the political agreement on the Taxonomy Regulation?

FFI's response: Do not know

Justification: FFI members see both merits and problems in the creation of a brown taxonomy. We would like to highlight that in any case its development should not lead to arbitrary new prudential rules, or 'brown penalizing factor'. We need to rely on EBA's work in identifying the relation between assets' financial risk and their exposure to climate risks.

Those of our members who oppose the idea of a brown taxonomy see it as guiding our attention and political efforts to wrong side of things. We should keep sustainable finance an incentive-based system and focus on where money is needed. Brown taxonomy would easily end up with a difficult political process, which would result, due to strong national interests, to such a watered-down compromise that it wouldn't offer any real new information to the market. Also, financial sector legislation should not be used as a tool and replacement for difficult political decisions that ought to be made elsewhere, meaning that if some economic activities are wanted out of the market, there are more direct policy tools available to get to that result instead of using the finance sector as proxy.

In support for the brown taxonomy, we can say that it could first and foremost be used to create transparency. Harmonization of relevant indicators and data points would facilitate systematic and efficient data sharing and reporting by the companies and likewise support the development of data collection and analysis by the financial sector. We note an increasing supervisory expectation that firms identify sustainability risks and are able to report and manage these risks. It could be facilitated by a common definition, "brown" taxonomy, of those activities most exposed to transition risks. A brown taxonomy could also support firms' activities in terms of business selection, product selection, pricing and return considerations, internal risk management and other commercial considerations.

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