

## Comments on EC European Single Access Point proposal

Our reference:	ECO-LTI-22-032	Date:	29-03-2022
Referring to:	<a href="#">ESAP proposal</a>		
Related documents:	<a href="#">ECO-LTI-21-147</a>		
Contact person:	Philippe Angelis, Guillaume Morauw	E-mail:	Angelis@insuranceeurope.eu, Morauw@insuranceeurope.eu
Pages:	2	Transparency Register ID no.:	33213703459-54

The European insurance industry welcomes the European Commission's proposal establishing a European Single Access Point (ESAP). It will allow insurers, Europe's largest institutional investors, to access robust, comparable and reliable financial and ESG data in an electronic machine-readable format, steer their investment portfolios more effectively towards sustainability objectives and comply with their disclosure requirements.

The insurance industry supports the fact that:

- ESMA must establish the ESAP by 31 December 2024.
- The ESAP does not create new reporting requirements and includes ESG data relating to the Corporate Sustainability Reporting Directive (CSRD), Sustainable Finance Disclosures Regulation (SFDR) and Taxonomy Regulation (TR).
- The proposal respects the "file only once principle" to avoid redundant reporting channels.

However, Insurance Europe stresses the following:

- Free or low fee to access ESAP. Access for users such as insurers who need the ESAP data to make sustainable investment decisions and comply with regulatory reporting requirements should be free. If deemed necessary for the rapid development of a well-functioning, reliable and user-friendly platform, insurers could support a small fee to access and use the ESAP but it is important to distinguish between different categories of ESAP users. The fee should be significantly lower than for data providers using data as part of their business model. It might be relevant to allow differentiated access to stakeholders from outside the EU.
- The EC should develop an implementation roadmap specifying a phased approach with ESG data needed under the CSRD, SFDR and TR available in phase 1. Financial, prudential and other types of information could be incorporated in later phases to avoid delay in establishing the ESAP. Alignment of the entry into force of new disclosure obligations with the timing of data availability through the ESAP is crucial.
- Strong governance, stakeholder and expert input is key to the successful development of ESAP. Insurers support the establishment of an advisory steering board, composed of users, preparers, national and European competent authorities, to advise ESMA on the set-up and running of the ESAP.
- Voluntary data submission from non-EU companies should be possible so that EU companies with investments outside the EU can fulfil their reporting obligations. Further clarity is needed (including on the relevant equivalence mechanism) to encourage voluntary reporting.



- Data format and ITS: technical specifications on data formatting should be made rapidly available so that entities can carry out the relevant IT developments and be ready to comply with the ESAP requirements.
- Inclusion of certain product information in the scope is premature.
  - An assessment should be made, when the review of the packaged retail and insurance-based investment products (PRIIPs) framework is finalised, to determine whether the revised PRIIPs key information document (KID) is fit for purpose and whether the information should be included in the ESAP. As it stands, the current PRIIPs KID does not fairly reflect the specific features of insurance-based investment products. It applies to products that have no investment objectives and for which the KID is not suited.
  - There is currently no practical experience with the pan-European personal pension product (PEPP) KID and therefore no confirmation that it would work as intended and deliver information that is correct and meaningful.
  - The ESAP should not duplicate manufacturers' compliance efforts and delay the marketing of new products. Overlap with other initiatives (EIOPA's PEPP register for example) should be avoided.
  - Art. 7 of the TR should be excluded from the ESAP's scope as it requires adding a statement to pre-contractual and periodic documents of financial products not subject to Art. 8-9 of the SFDR. It is not a stand-alone document, there is no obligation to publish this information online.

Insurance Europe is the European insurance and reinsurance federation. Through its 36 member bodies — the national insurance associations — it represents all types and sizes of insurance and reinsurance undertakings. Insurance Europe, which is based in Brussels, represents undertakings that account for around 95% of total European premium income. Insurance makes a major contribution to Europe's economic growth and development. European insurers pay out over €1 000bn annually — or €2.8bn a day — in claims, directly employ over 900 000 people and invest over €10.6trn in the economy.