

ESG in the insurance sector - Key milestones

Last updated in July 2025



Key: ● Submission date (draft) 🕒 Adoption date (last amendments) 📅 Application date (last amendments)

			2019	2020	2021	2022	2023	2024	2025	2026	2027
PRODUCT GOVERNANCE SUITABILITY	IDD	Commission Delegated Regulation (EU) 2017/2358 of 21 September 2017 with regard to product oversight and governance requirements for insurance undertakings and insurance distributors			🕒 21 Apr 2021			📅 2 Aug 2022			
		Commission Delegated Regulation (EU) 2017/2359 with regard to information requirements and conduct of business rules applicable to the distribution of insurance-based investment products			🕒 21 Apr 2021			📅 2 Aug 2022			
		EIOPA Guidance on the integration of sustainability preferences in the suitability assessment under IDD						🕒 20 July 2022			
RISK MANAGEMENT	Solvency II	Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance (as amended)						🕒 27 Nov 2024		📅 31 Jan 2027	
		Commission Delegated Regulation (EU) 2015/35 supplementing Directive 2009/138/EC (as amended)			🕒 21 Apr 2021		📅 2 Aug 2022				
		EIOPA Opinion on the supervision of the use of climate change risk scenarios in the Own Risk and Solvency Assessment ("ORSA")			🕒 19 Apr 2021						
		EIOPA Application guidance on climate change materiality assessments and climate change scenarios in ORSA					🕒 2 Aug 2022				
		Joint ESAs Guidelines on integrating ESG risks in supervisory stress tests							🕒 27 Jun 2025		
	CAA	CAA Information Notice 23/2 on climate change risk scenarios in ORSA					🕒 24 Jan 2023				
		CAA Information Notice 23/9 on the follow-up of the implementation of climate change risk scenarios in ORSA						🕒 10 Oct 2023			
DIVERSITY		Directive (EU) 2022/2381 on improving the gender balance among directors of listed companies and related measures					🕒 23 Nov 2022		📅 28 Dec 2024		
		Bill of Law 8519 implementing Directive (EU) 2022/2381 on improving the gender balance among directors of listed companies and related measures							● 28 Mar 2025		
		Directive (EU) 2023/970 to strengthen the application of the principle of equal pay for equal work or work of equal value between men and women through pay transparency and enforcement mechanisms					🕒 10 May 2023		📅 7 Jun 2026		
		Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance (as amended) 30 Jan 2027						🕒 27 Nov 2024		📅 30 Jan 2027	
		CAA Circular Letter 22/15 regarding the the board of directors of insurance and reinsurance companies					📅 26 Jul 2022				
		EIOPA Consultation on guidelines regarding the notion of diversity for the selection of the members of the administrative, management or supervisory body						📅 4 Dec 2024			
DISCLOSURE	Solvency II	Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance (as amended)						🕒 27 Nov 2024		📅 31 Jan 2027	
	SFDR	Regulation (EU) 2019/2088 - SFDR		🕒 27 Nov 2019	📅 10 Mar 2021						
		Commission Delegated Regulation (EU) 2022/1288 - Content and presentation of information				🕒 6 Apr 2022	📅 1 Jan 2023				
		Commission Delegated Regulation (EU) 2023/363 - Disclosures in pre-contractual documents and periodic reports				🕒 31 Oct 2022	📅 20 Feb 2023				
		ESAs Joint Annual Report on the extent of voluntary disclosure of principal adverse impacts under SFDR							🕒 30 Oct 2024		
		ESAs Final Report on RTS financial disclosure under SFDR						🕒 4 Dec 2023			
		ESAs Consolidated Questions and Answers on the SFDR and the SFDR Delegated Regulation							📅 25 July 2024		
		European Commission Call for evidence on the revision of SFDR							🕒 2 May 2025		
		CAA Information Notice 24/9 on the study of the involvement of life insurance companies in the area of sustainability						🕒 2 July 2024			
	Taxonomy	Regulation (EU) 2020/852 - Taxonomy		🕒 18 Jun 2020							
		Commission Delegated Regulation (EU) 2021/2139 - Technical screening criteria (Climate Delegated Act)			🕒 4 Jun 2021						
		Commission Delegated Regulation (EU) 2021/2178 - Content and presentation of information to be disclosed (Disclosures Delegated Act)			🕒 6 July 2021						
						📅 1 Jan 2022	Disclosure of proportion of assets exposed to taxonomy eligible / ineligible activities (art. 8)				
								📅 1 Jan 2024	Disclosure of full KPIs on taxonomy alignment (art. 8)		
		Commission Delegated Regulation (EU) 2022/1214 - Nuclear and Gas Regulation (Complementary Climate Delegated Act)			🕒 9 Mar 2022	📅 1 Jan 2023					
		Delegated Regulation (EU) 2023/2486 of 27 June 2023 (Environmental Delegated Act)					🕒 27 Jun 23'	📅 1 Jan 2024			
		Draft Delegated Act amending the Taxonomy Disclosures Delegated Act, Taxonomy Climate Delegated Act, Taxonomy Environmental Delegated Act (Omnibus I)							● 26 Feb 2025		
	CSRD	Directive (EU) 2022/2464 - Corporate Sustainability Reporting Directive (CSRD)				🕒 14 Dec 2022			📅 2025 → 2028 → 2029		
		Directive (EU) 2025/794 of the European Parliament and of the Council of 14 April 2025 amending Directives (EU) 2022/2464 and (EU) 2024/1760 as regards the dates from which Member States are to apply certain corporate sustainability reporting and due diligence requirements (Stop the Clock) (Omnibus I)						🕒 14 Apr 25'	📅 31 Dec 2025		
		Bill of Law 8370 on the implementation of CSRD							● Submitted 29 Mar 2024	● Updated 6 May 2025	
		Commission Delegated Regulation (EU) 2023/2772 on sustainability reporting standards					🕒 31 July 2023		📅 1 Jan 2024		
		Proposal for a Directive of the European Parliament and of the Council amending Directives 2006/43/EC, 2013/34/EU, (EU) 2022/2464 and (EU) 2024/1760 as regards certain corporate sustainability reporting and due diligence requirements (Omnibus I)						🕒 26 Feb 2025			
	Greenwashing	EIOPA Final Report and Opinion on Greenwashing						🕒 31 May 2024			
DUE DILIGENCE	CSDDD	Directive (EU) 2024/1760 - Corporate sustainability due diligence (CSDDD)					🕒 13 June 2024			📅 26 July 2026	
		Directive (EU) 2025/794 of the European Parliament and of the Council of 14 April 2025 amending Directives (EU) 2022/2464 and (EU) 2024/1760 as regards the dates from which Member States are to apply certain corporate sustainability reporting and due diligence requirements (Stop the Clock) (Omnibus I)						🕒 14 Apr 25'	📅 31 Dec 2025		
		Proposal for a Directive of the European Parliament and of the Council amending Directives 2006/43/EC, 2013/34/EU, (EU) 2022/2464 and (EU) 2024/1760 as regards certain corporate sustainability reporting and due diligence requirements (Omnibus I)						🕒 26 Feb 2025			
GENERAL	CAA	CAA Information Notice 24/4 regarding regulatory challenges linked to sustainable finance						🕒 2 July 2024			