

Position Paper

of the German Insurance Association (GDV)
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on the EU Call for Evidence – European climate resilience and risk management – integrated framework

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1. Introduction

The German insurance industry welcomes the European Commission's initiative to strengthen the EU's climate resilience and enhance risk management in the EU. Targeted climate adaptation is essential to protect our livelihoods and maintain insurability. This requires a clear legal framework. The present position paper is based on the guidelines of the EU Adaptation Strategy 2021, the outcomes of the European Commission's Climate Resilience Dialogue, and the German Insurance Association's (GDV) proposals on prevention and climate change adaptation.

It acknowledges that not all of the proposed measures fall within the EU's exclusive regulatory competence. Accordingly, the recommendations are classified under the categories of 'exclusive competence', 'shared competence' and 'supporting competence'.

2. Objectives of the German insurance industry

Our objective is to shape the European framework for climate risk management in such a way that prevention, risk transparency, nature-based solutions, and resilient infrastructure are at the top of the agenda. The insurance industry sees its role not only in claims settlement, but also as a strategic partner in the development and implementation of adaptation strategies.

3. Recommendations for action

3.1 Exclusive competence of the EU

- Establishment of a European public natural hazard portal, based on the Austrian PPP natural hazard portal HORA, <http://hora.gv.at>: A central, easily accessible database to support administration and industry in risk assessment, planning, prevention, and crisis management. At the same time, it raises public risk awareness.
- Support for national PPP mechanisms to promote prevention and climate change adaptation, to maintain insurability in the face of unabated climate change, and to stabilise financial and insurance markets in the event of an extreme catastrophic loss.
- Financial support for prevention and adaptation measures through funding programmes.

3.2 Shared competence between the EU and Member States

- Legal construction bans in flood-prone areas (HQ 100 and HQ frequent) and integration of corresponding requirements into EU environmental directives, adaptation strategies, and climate laws.
- Mandatory risk assessments for buildings regarding climate change and extreme weather events (for new construction and fundamental renovation).
- Introduction of an EU-wide natural hazard certificate for buildings as a minimum standard in consumer protection.
- Uniform EU-wide modelling and mapping of natural hazards.
- Integration of 'resilience by design' into eligibility criteria for EU-funded infrastructure projects.
- Promotion of nature-based solutions such as river floodplain restoration and coastal protection measures.
- Promotion of green infrastructure measures such as rainwater retention and infiltration areas (soil de-sealing).
- Promotion, coordination, and harmonisation of early warning systems, especially for cross-border risks.

3.3 Supporting competence of the EU

- Implementation of EU-wide awareness campaigns on climate risks and prevention measures.
- Development of networks for knowledge transfer.
- Development of digital tools and apps for individual risk assessment and scenario planning.
- Provision of consistent climate data.
- Adaptation of best practices and guidelines for technical prevention measures to the realities of accelerating climate change.
- Financial support for pilot projects on municipal climate adaptation.
- Promotion of training programmes for professionals in construction, urban planning, and disaster management.
- Promotion of research, e.g. on nature-based solutions, early warning systems, and resilient urban planning.
- Support for the integration of adaptation obligations into national legislation.

4. Concluding Remarks

The German insurance industry is convinced that a clearly structured action plan, aligned with the division of competences between the EU and Member States, will enhance the effectiveness of climate resilience policy. Coordinated action across areas of exclusive, shared, and supporting competence makes it possible to harness synergies while safeguarding national scope for action. The German

insurance industry also stands ready to actively contribute its expertise and international network to the planned EU initiative.

Based on the EU Adaptation Strategy 2021 and the outcomes of the Climate Resilience Dialogue, we advocate a holistic, forward-looking framework for prevention and adaptation to climate impacts. This will not only protect lives and property, but also strengthens Europe's economic stability and competitiveness.

Berlin, 2 September 2025