

Netherlands

TRANSPARENCY

Common disclosure framework

(Dimension)

(Sub-dimension)

1. Disclosure on governance

SCORE 5/10

Reporting on climate change related governance is partially covered by the Decree Disclosure of Non-financial Information PbEU, 2014, L330“. With this Decree, the Dutch government follows the requirements of the EU Directive 2014/95/EU. Although climate change is not particularly mentioned, the decree highlights the need for disclosure on environmental matters“ which should implicitly include climate change related governance decisions.

The same degree of reporting requirement is reflected in the Dutch Corporate Governance Code, which requires a long-term view on value creation. Companies reporting under the Code have to follow a comply-or-explain approach.

2. Disclosure on strategy

SCORE 5/10

Following the EU Directive 2014/95/EU, the Decree Disclosure of Non-financial Information PbEU, 2014, L330“ requires companies to disclose non-financial information including a business model, which does not necessarily entail strategic climate change considerations.

However, companies are asked to take a long-term view“ when developing their strategy by the Dutch Corporate Governance Code (Code), Chapter 1. Climate change is not explicitly mentioned; however, non-financial information including environmental aspects should be published. This should imply climate change related information. . Companies reporting under the Code have to follow a comply-or-explain approach; hence, the disclosure on a comprehensive long-term strategy is not necessarily mandatory.

3. Disclosure on risk management

SCORE 4/10

Reporting on climate change related risk management is neither explicitly required by the Dutch Corporate Governance Code (Code) nor by any other regulation.

Requirements on risk management accountability in the Code are focused on the year after the reporting. This implicitly shifts the focus on short-term risks. However, the Code focuses on long-term value creation, which should imply accounting for (and disclosure of) climate change related risks if they become material. It remains unclear to which extent the long-term value creation will impact / interact with risk management.

4. Disclosure on metrics and targets

SCORE 5/10

The disclosure and utilization of metrics and targets to assess climate-related risks and the companies' contribution to climate change have become mandatory for the signatories of the Dutch Climate Accord (including the bank, insurance, pension fund and asset manager associations). Respective financial institutions will need to disclose their targets for reducing their carbon footprint from 201 onwards, CO₂-intensity of their lending and investments and they need to publish targets outlining a 49% emission reduction in their portfolios by 2030. Particularly the Platform Carbon Accounting Financials (PCAF) and the Terra approach are expected to be utilized in this process.

Signatories have committed to monitor progress on a yearly basis.

5. Adapt accounting standards

SCORE 3/10

No relevant regulatory source could be identified that introduces guidance on assessing climate change related impacts into Dutch GAAP.

Specific sustainability accounting standards exist and are formulated by the Royal Netherlands Institute of Register Accountants. These are however not systematically applied.

With the Platform Carbon Accounting Financials (PCAF), a carbon accounting standard is being developed in the Netherlands. This standard aims to become the internationally accepted approach on carbon accounting. Recently, PCAF published a report on how the financial sector can improve reporting on their carbon footprint and set targets to reduce their climate exposure.

7. Accounting for stranded assets risk

SCORE 0/10

Dutch GAAP does not mention stranded asset risks.

1. Investment evaluation transparency

SCORE 6/10

The Dutch government has translated the Shareholder Rights Directive II in the Dutch Civil Code Book 2 on 5 November 2019, which requires institutional investors and asset managers to draw up and publish a Shareholder Engagement Policy.

The Shareholder Engagement Policy must comply with transparency requirements on ESG considerations that include information obligations on climate change related aspects. The amendment does not specify exactly what information the policy must contain in this context and how these information should be presented / structured. The Dutch government does not intend to exceed its minimum requirements of the EU Directive.

For banks, pension funds and insurance companies there is a sectoral Internationaal Maatschappelijk Verantwoord Ondernemen/Beleggen (IMVO/IMVB) Covenant. In these covenants, each sector works out its strategy towards shared ESG-issues (incl. climate change), following the OECD guidelines. This entails measuring and reporting about impact on the environment.

2. Shareholder responsibility for governance and strategy

SCORE 5/10

The Dutch government has integrated the Shareholder Rights Directive II (SRD II) which clearly outlines the duties of asset managers, covers information on non-financial aspects of assets and introduces a medium to long term investment horizon. Climate change related financial aspects are not specifically outlined in SRD II. The Bill was passed by both chambers of parliament in 2019.

Pension: The Dutch government has implemented the Institutions for Occupational Retirement Provision (IORPs): IORP II/ Directive 2016/2341, which is effective since January 2019. IORPs will allow the taking into account of potential long-term impact of investment decisions on climate change related factors. IORP II explicitly states the reflection of climate change related aspects in multiple areas such as risk management, governance, potential member information. DNB repeatedly brings ESG issues to the attention of pension funds by issuing letters on best practices. The last letter dates from August 2018.

3. Asset manager responsibility

SCORE 7/10

The Dutch government has translated the Shareholder Rights Directive II into the Dutch Civil Code 2. Under the Directive, the duties of asset managers and non-financial aspects are clearly outlined with a medium to long-term perspective. However, it is not stipulated which time horizon should be used for non-financial aspects (longer than the investment horizon of the investor?).

Climate change related aspects are not outlined in detail. Pension: The Dutch government has implemented the Institutions for Occupational Retirement Provision (IORPs): IORP II/ Directive 2016/2341, which is effective since January 2019. IORPs will allow the taking into account of potential long-term impact of investment decisions on climate change related factors. IORP II explicitly states the reflection of climate change related aspects in multiple areas such as risk management, governance, potential member information.

4. Executive remuneration policy

SCORE 5/10

By June 2019, the translation of the Shareholder Rights Directive II into Dutch law has to be finalized, which will require companies to disclose the principles of executive remuneration and also indicate the impact climate change related performance aspects have on remuneration. It does not require that these aspects form part of the factors to be included in the remuneration. The Dutch government does not intend to exceed requirements of the Directive.

The Dutch Corporate Governance Code further stipulates that executive remuneration should be linked to long-term value creation. The criteria to determine remuneration are mostly long-term oriented.

Dutch laws set a limit on variable remuneration, i.e. bonuses, in the financial sector. Variable remuneration cannot exceed 20% of the fixed salary. In addition, guaranteed bonuses are prohibited, severance pay is limited to one-year salaries and the recovery of already paid out bonuses is mandatory in some cases.

5. Climate change related risk management

SCORE 5/10

Pension: IORP II makes climate change related risk assessment mandatory for pension funds and related products. DNB repeatedly brings ESG issues to the attention of pension funds by issuing letters on best practices. The last letter dates from August 2018.

Insurance: Solvency II is integrated in the Act on Financial Supervision. It requires insurers to consider future developments including new business plans or the possibility of catastrophic events, which might affect their financial standing. The Own Risk and Solvency Assessment (ORSA) is a new tool designed to assist with this. However, it does not outline climate change related factors explicitly.

Other assets: Currently climate change related considerations are not stipulated.

6. Customer/beneficiary centricity

SCORE 5/10

The Dutch Pension Code states that the board of trustees must ensure that the stakeholders support the choices being made regarding sustainable investment. In practice, Dutch pension funds ask their participants through questionnaires or participant council meetings for their opinion on their sustainable investment approach. This only holds for pension funds, not for banks, insurers or asset managers. Although they also hold stakeholder reviews and report on these. Currently, a law on pension funds is under review that would allow stronger stakeholder participation in writing up exclusion and sustainability policies.

There is currently no corresponding regulation on consumer / beneficiary centricity in the Act on Financial Supervision or any other relevant regulatory publication. However, with the Dutch adoption of the Shareholder Rights Directive II (to implement it by June 2019), beneficiary centricity will receive some push forward. The draft bill is currently under review by the Dutch parliament.

In 2020, Volksbank, which is currently state-owned, may adjust its governance strategy in such a way that it becomes more customer centric. The Minister of Finance announced that Volksbank might receive a governmental body consisting of stakeholders other than shareholders, or issuing voting rights to stakeholders other than shareholders.

1. Packaged Retail and Insurance-based Investment Products (PRIIPs)

SCORE 2/10

Main responsibilities for Packaged Retail and Insurance-based Investment Products (PRIIPs) lie on the EU-level and are governed by EU Regulations. The European Supervisory Authorities ESMA, EBA and EIOPA have the mandate to develop the key information document (KID) which provides PRIIP investors with information necessary by EU Regulation 1286/2014. Climate-related information are not part of the KID so far, however general risk (which should include climate risk if material) shall be published. Dutch legislation does not provide further requirements on PRIIPs.

2. Investment advisor duties

SCORE 3/10

The translation of MiFiD II into Dutch law is established through changes to the Act on Financial Supervision. As part of MiFiD II and the subsequent suitability guidelines by ESMA, requirements for investment advisors to integrate sustainability into their services should be in place soon. However, the guidance from ESMA remains vague. Dutch legislation does not exceed requirements of MiFiD II.

3. Retail fund transparency

SCORE 1/10

The Act on Financial Supervision does not require the publication of climate-related information from retail funds. However, they may fall under the PRIIP regulation from the beginning of 2020. In 2019, AFM is reviewing sustainable investment products for correctness of information in order to provide more transparency to the market.

4. Green labels/standards

SCORE 6/10

The Dutch government has set up a mechanism in the regeling groenprojecten, which allows banks to establish green funds. These green funds receive capital from Dutch citizens, which receive low interest on their investment but get a tax cut from the government. The bank sets the interest rate below market rates to fund additional green projects. The qualification for such projects is organised and provided by a strict criteria catalogue from the government. The potential scope of the resulting green label should be regarded as moderate.

SYSTEM STABILITY

Supervisory authority positioning

(Dimension)

(Sub-dimension)

1. Regulatory body's/bodies' awareness to climate risk integration

SCORE 8/10

DNB raises awareness on physical and transition risks and places sustainable finance and climate risks prominently in speeches and research. DNB chairs and is engaged in the Network for Greening the Financial System (NGFS) and has established the Sustainable Finance Platform bringing together all associations and ministries twice a year and running several working groups on specific themes like carbon foot printing and measuring climate risks. The intention to build up expertise in the field is highlighted and the opinion is promoted that regulators should include climate risks in their supervisory practice. Within the Sustainable Finance Platform, discussions on a standardised methodology for climate risk assessment have been initiated. Guidance on implementation is available via the website of DNB or AFM. AFM reports on on-going climate policies and sustainable finance initiatives and publishes thematic reviews on sustainability reporting.

Both institutions do mention the scope of risks, DNB explicitly refers to physical and transition risks with examples in its reports.

The Ministry of Finance takes an active stance towards integrating climate risks and ESG in the supervision of the financial sector. The semiannual Financial Stability Report includes climate related risks.

2. Provision of data, standard scenarios and methods

SCORE 7/10

DNB is amongst leading institutions to develop methodologies necessary for aligning Dutch financial market regulation with the Paris Agreement. A particular focus of DNB's action lies on the development of methodologies for climate stress testing. In its report "Waterproof?" (2017), DNB has conducted a climate stress test for the first time. In "Values at Risk" (2019), DNB describes climate and environmental stress to the financial sector also covering aspects such as biodiversity and water stress. In "An energy transition risk stress test for the financial system of the Netherlands" (2018), DNB investigates the potential financial stability impact of a disruptive energy transition for the financial sector of the Netherlands by conducting a stress test

In its role as president of the NGFS, Frank Elderson should translate methodological action on the level of the NGFS into practice in the Netherlands.

SYSTEM STABILITY

Regulation/Supervision of banks

(Dimension)

(Sub-dimension)

1. Supervision of bank governance/strategy reflecting climate change related risk

SCORE 7/10

DNB request financial institutions to identify implications of relevant climate scenarios (transition and physical). This implies that governance structures and strategies will need to reflect climate change related risks.

DNB has researched how to integrate climate risks into their supervisory methodology and is currently implementing their findings. Financial institutions are now obliged to identify relevant climate related risks and include transition risks in their risk assessment.

Supervision of bank governance is covered by the NVB Social Charter, Banking Code, Rules of Conduct (Banking Code“), which is applicable to all banks operating under FMSA. In the Banking Code, banks commit to implementing a long-term remuneration policy“ and a long-term focus when assessing risk. This approach could implicitly require incorporating climate change related risks into the reporting.

The Dutch Corporate Governance Code applies to the larger part of the banks under supervision of DNB. The Corporate Governance Code requires banks to take a long-term view“ when developing their governance and strategy. Climate change is not explicitly mentioned; however, non-financial information including environmental aspects should be published. This should imply climate change related information. The Code takes a comply-or-explain approach.

2. Minimum requirements for bank risk management include ESG/climate risks and a long-term perspective **SCORE 7/10**

DNB requires banks to include transition risks in their risk management. It engages with banks to provide more insight into the management of climate-related risks through a self-assessment, in the context of the ICAAP and SREP for LSIs. Details of the supervision process of risk management of climate change related risks are yet to be expected.

In the Financial Supervision Act (Wet op het financieel toezicht), risk management is a key element in the assessment of bank operation (section 3:17). Details on the risk management are outlined in in sections 23 and 24 of the Decree on Prudential Rules for Financial Undertakings (Besluit Prudentiële Regels Wft or Bpr). Climate change related risks do not form part of the risk assessment. However, it should be considered if material.

3. Banking stress tests consider climate risks and a long-term perspective **SCORE 6/10**

DNB has not performed a fully-fledged stress test on climate change related risks yet.

In 2018, a stress test on the performance of Dutch banks, insurances and pension funds was conducted concerning risks from the energy transition.

DNB seems to be looking into a full climate risk stress test for banks in the near future. In the Financial Stability Report of autumn 2018, it states that this stress test should be taken as a first step: there is as yet no standard approach to analysing the energy transition by means of stress testing.“

5. Capital requirements reflect ESG/climate risks and a long-term perspective

SCORE 4/10

There is currently neither an explicit reference to brown or green assets.

The CRR in combination with Directive 2013/36/EU does not stipulate changes to capital requirements in this respect. An appropriate long-term perspective is not encouraged and there is no specific treatment of either “green” or “brown” assets. The Directive is incorporated into the Dutch Financial Supervision Act (art. 3:111a) without exceeding the minimum requirements.

SYSTEM STABILITY

(Dimension)

Regulation/Supervision of insurance companies

(Sub-dimension)

1. Supervision of insurance governance/strategy reflecting climate change related risk

SCORE 7/10

DNB request financial institutions to identify implications of relevant climate scenarios (transition and physical). This implies that governance structures and strategies will need to reflect climate change related risks.

DNB has researched how to integrate climate risks into their supervisory methodology and is currently implementing their findings. Financial institutions are now obliged to identify relevant climate related risks and include transition risks in their risk assessment.

EIOPA Guidelines on governance systems (enforced through delegated regulation 2015/35) include the responsibility of the management for the overall risk management system that needs to reflect risk identification, measurement and monitoring at group level. In principle, this includes climate change related risks if material. There thus can be initial practice reflecting climate change risk if a comprehensive view is taken but not explicitly guided by regulation.

The Dutch Corporate Governance Code applies to the larger part of the insurance companies under supervision of DNB. The Corporate Governance Code asks insurance companies to take a “long-term view” when developing their governance and strategy. Climate change is not explicitly mentioned; however, non-financial information including environmental aspects should be published. This should imply climate change related information. The Code takes a comply-or-explain approach; hence, the disclosure on a comprehensive long-term strategy is not necessarily mandatory.

2. Minimum requirements for insurance risk management include ESG/climate risks and a long-term perspective **SCORE 7/10**

DNB requires insurance companies to include transition risks in their risk management. In doing so, DNB's 2019 action plan is coming into force. Details of the supervision process of risk management of climate change related risks are yet to be expected.

EIOPA based on Solvency II and Delegated Regulation (EU) 2015/35 takes a comprehensive risk perspective, particularly in its guidelines on the ORSA. The regulation in principle includes climate change related risks if material.

3. Insurance stress tests consider ESG/climate risks and a long-term perspective **SCORE 5/10**

A first stress test on physical risks for insurers has been conducted by DNB in 2017. In 2018, DNB ran a stress test on the energy transition with banks, pension funds and insurances.

4. Capital requirements reflect ESG/climate risks and a long-term perspective **SCORE 4/10**

Solvency II and its translation into the Dutch Financial Supervision Act take a comprehensive risk perspective that all risks have to be considered. There is no obvious distinction between green and brown assets. A long-term perspective is not encouraged.

DNB has developed the FOCUS! Methodology for the supervisory process, which does not include climate change in the risk analysis.

SYSTEM STABILITY

Regulation/Supervision of pension funds

(Dimension)

(Sub-dimension)

1. Supervision of pension fund governance/strategy reflecting climate change related risk

SCORE 7/10

DNB request financial institutions to identify implications of relevant climate scenarios (transition and physical). This implies that governance structures and strategies will need to reflect climate change related risks.

DNB has researched how to integrate climate risks into their supervisory methodology and is currently implementing their findings. Financial institutions are now obliged to identify relevant climate related risks and include transition risks in their risk assessment.

With the translation of IORP II into Dutch law, pension funds in the Netherlands are required to establish a system of governance and a strategy that appropriate for the complexity, scale and organisational structure as well as the risk to which the organisation is exposed. Risks should be documented including climate change related risks where material. A distinction between transition and physical risks is not stipulated explicitly.

The Code of the Dutch Pension Funds prescribes good governance for pension funds based on the “comply or explain principle. It explicitly includes long termism (1.1 Characteristics of a pension fund) and climate relates issues (2.7 Sustainable Investment).

2. Minimum requirements for pension fund risk management include climate risks and a long-term perspective

SCORE 8/10

Minimum requirements for risk management under IORP II, which has been implemented in the Dutch Act on Financial Supervision in January 2019 includes a triennial risk assessment by insurance companies and an integrated risk management in all processes. Inclusion of climate change related risks are explicitly requested where material.

Under IORP II, the DNB also includes an ‘Eigen Risico Beoordeling (ERB)’ (=self-assessment) in which pension funds also take into account climate risk. Furthermore, DNB stresses that climate risks are going to be integrated in the risk management.

3. Scope of supervisory review of the pension funds covers ESG/climate risks and a long-term perspective

SCORE 3/10

At present, DNB is not systematically reviewing climate change related risks. However, it has already allowed pension funds to integrate them into their risk management and is considering introducing mandatory measurements soon.

4. Pension fund stress consider climate risks and a long-term perspective
SCORE 5/10

DNB has not performed a fully-fledged stress test on climate change related risks yet.

In 2018, a stress test on the performance of Dutch banks, insurances and pension funds was conducted concerning risks from the energy transition.

DNB seems to be looking into a full climate risk stress test for banks in the near future. In the Financial Stability Report of autumn 2018, it states that this stress test should be taken as a first step: there is as yet no standard approach to analysing the energy transition by means of stress testing.“

5. Capital requirements for pension funds reflect ESG/
climate risks and a long-term perspective
SCORE 4/10

The EU has left the modelling of capital requirements for pension funds to the member states under IORP II. Currently, pension funds are not required by DNB to demonstrate specific risk impacts. However, many institutions tend to use the FIRM risk model developed by DNB.

There is currently no explicit inclusion of climate change related considerations into capital requirements - positively or negatively.

SYSTEM STABILITY

(Dimension)

Regulation/Supervision of asset managers and investment funds (Sub-dimension)

1. Supervision of asset manager’s governance/strategy reflecting climate
change related risk
SCORE 7/10

In 2019, DNB has devoted efforts to increase the level of commitment by asset managers to integrate governance, risk management and disclosure aspects of climate change. As a result, DNB request financial institutions to identify implications of relevant climate scenarios (transition and physical). This implies that governance structures and strategies will need to reflect climate change related risks.

DNB has researched how to integrate climate risks into their supervisory methodology and is currently implementing their findings. Financial institutions are now obliged to identify relevant climate related risks and include transition risks in their risk assessment.

2. Minimum requirements for asset managers risk management include
climate risks and a long-term perspective
SCORE 7/10

DNB requires asset managers to include transition risks in their risk management. In doing so, DNB’s 2019 action plan is coming into force. Details of the supervision process of risk management of climate change related risks are yet to be expected.

The integration of EU regulation on investment funds (AIF, UCITS Directives) into the Dutch Act on Financial Supervision introduces a comprehensive risk management perspective to Dutch asset fund manager. However, the introduction does not constitute an explicit reference to climate change related risks or an appropriate long-term perspective.

ENABLING ENVIRONMENT

Established and maintained common taxonomy

(Dimension)

(Sub-dimension)

1. Common green taxonomy

SCORE 4/10

For the Dutch Green Fund Scheme, the government has developed an official catalogue of criteria defining the projects eligible for the Fund. This can be viewed as an uncomprehensive taxonomy.

ENABLING ENVIRONMENT

Supporting climate change related finance with public incentives

(Dimension)

(Sub-dimension)

1. Provision of a clear transition pathway

SCORE 7/10

The Dutch Climate Agreement (Klimaatakoord) sets out a clear roadmap for the decarbonisation of the Dutch economy. Particularly, carbon-intensive sectors have committed to transition goals in line with the Dutch Paris Agreement pledge.

A key element of the Klimaatakoord forms the introduction of a carbon levy, which will apply above certain threshold levels. This should ensure that the Dutch industry complies with the Dutch climate goals. The levy will be introduced in 2021 at a starting price of 30 EUR / tCO₂e with a planned increase to 125 – 150 EUR/ tCO₂e by 2030.

2. Risk reduction support for green finance

SCORE 6/10

Grants to promote investments in energy efficient technologies and renewable energy generation are available.

The Sustainable energy investment subsidy scheme (ISDE) partly compensated for the initial investment costs of several RE devices (e.g. heat pumps, solar boilers, pellet stoves) for private households and companies.

The Stimulation of Sustainable Energy Production (SDE+) scheme should increase production of renewable energy as it compensates for the unprofitable component in renewable energy production (difference between costs and market prices).

3. Government incentives for green finance

SCORE 7/10

The Netherlands offer several tax relief products to enable investment in the environment, inter alia, Energy Investment Allowance (EIA), Arbitrary Depreciation of Environmental Investments (VAMIL) and Environmental investment credit (MIA).

A special regulation in the Netherlands is the "Regeling Verlaagd Tarief". It offers an exemption for 15 years from the energy tax on solar or wind energy. Even though the maximum mortgage amount is set at 100% of the underlying value, there is an exception for households that are also investing in energy-saving facilities when buying a house. They may borrow up to 106%.

ENABLING ENVIRONMENT

2-Degree Consistency of Public sector acting

(Dimension)

(Sub-dimension)

1. Green government investment strategy

SCORE 7/10

The government has adopted a law to establish Invest-NL, as the Netherlands' green public fund. It provides financing to the markets for projects and sectors that struggle to acquire sufficient financing from the open markets because of, inter alia, uncertain payback periods. Invest-NL has yet to become fully operational and grow in market outreach / product portfolio.

The Dutch government is currently considering to set-up a fund "in the tens of billions" for large-scale financing activities within the Dutch economy. As early discussions indicate, a key focus of this fund would lie on greening the Dutch economy. More details on the fund are to be expected in the beginning of next year.

The Sustainable Public Procurement (Maatschappelijk Verantwoord Inkopen) requires national, regional and local governmental bodies to procure sustainably. Per procurement item, relevant environmental factors are listed.

The Climate Agreement states that a strategic procurement agenda is being formulated for all government procurement. In addition, a pilot introducing a shadow price on CO2 for public procurement currently runs and by 2023 ten procurement categories need to be fully climate neutral, e.g. office furniture, clothing and ICT hardware.

There is no regulation at the national level that mandates the inclusion of climate change related risks in public investment decision-making. However, some municipalities or state-owned entities have developed their own climate related criteria and divestment goals. DNB intends to consider climate change related risks in its investment portfolio for the first time this year.

2. Government agencies issue Green Bonds

SCORE 7/10

The Dutch Ministry of Finance has issued its first green government bond on 21 May 2019. This green bond was issued at a volume of € 5.98 billion. The framework underlying the green bond issuance was the Netherlands Green Bond Framework.

3. Green public financial institution

SCORE 8/10

The government has adopted a law to establish Invest-NL, as the Netherlands' green public fund. It provides financing to the markets for projects and sectors that struggle to acquire sufficient financing from the open markets because of, inter alia, uncertain payback periods. Invest-NL has yet to become fully operational and grow in market outreach / product portfolio.

The Netherlands Development Finance Company (FMO) provides financial services primarily outside the Netherlands. Several public investment banks such as BNG and waterschapsbank provide sustainable investment opportunities to the Dutch market. RVO (Netherlands Enterprise Agency) offers subsidies and financing programmes to companies in the Netherlands.

In 2013, the Dutch government nationalised Volksbank. Since then, it has become a bank with a distinctly green character. Discussions on Volksbank's status as a public institution are ongoing.

4. Central banks disclosure on climate-related risks **SCORE 5/10**

DNB is currently pushing the sustainable finance agenda in the Netherlands. DNB signed the UN PRI in March 2019, making it the first central bank to do so. However, until now, DNB has not undertaken a climate change related risk assessment of its portfolio. Reporting on own emissions exists, i.e. buildings, travel, etc.

ENABLING ENVIRONMENT (Dimension)

Public capacity building and awareness raising on green finance (Sub-dimension)

1. Curriculae on Green finance **SCORE 5/10**

Green finance is currently not included in general curricula at universities or schools. However, the government/DNB-led platform for sustainable finance is currently developing ideas on how to implement sustainable finance in education.

Maastricht University offers a full master track in Sustainable Finance. A small number of universities already offer courses that include sustainable finance (e.g. Utrecht University, Nyenrode Business University, and Rotterdam School of Management). Nyenrode Business University is a private university.

2. Consumer education on green finance **SCORE 7/10**

The Consumentenbond helps consumers choose a sustainable and green savings product or investment product. In addition to listing the available options, it guides consumers in the available tax incentives for green savings and investment product.

Rijksoverheid provides information on green savings and investments on its website. In addition, it explains the green label for financial products 'Regeling Groenprojecten' and the corresponding tax incentives. The VBDO rank pension funds on their sustainability and recently issued a ranking specifically on climate change.

EerlijkeGeldWijzer.nl offers a ranking of banks on their climate change policies.

ENABLING ENVIRONMENT (Dimension)

Green Financial Centres (Sub-dimension)

1. Green public-private initiatives of financial centers **SCORE 6/10**

The Sustainable Finance Lab (SFL) aims to provide ideas for effective financial sector sustainability. It is an interdisciplinary network of mostly academics from various Dutch universities. The initiative receives funding from Triodos Bank and the DNB. However, the partners do not represent the majority of private actors in the financial industry.

The Sustainable Pension Investments Lab disseminates sustainability knowledge in the Dutch pension sector. SPIL consists of experts of large pension funds and pension providers in the Netherlands as well as from academia.

Another initiative by DNB is the Sustainable Finance Platform, which brings together several stakeholder from associations, authorities, ministries and academia. Its primary aim is to raise awareness for sustainable finance in working groups on, inter alia, climate risks, SDG Impact Assessment or carbon pricing.

For banks, pension funds and insurance companies there is a sectoral Internationaal Maatschappelijk Verantwoord Ondernemen/Beleggen (IMVO/IMVB) Covenant. In these covenants, each sector works out its strategy towards shared ESG-issues, amongst which climate change, following the OECD guidelines. This entails measuring and reporting about impact on the environment. These covenants were an initiative of the Ministry of Foreign Affairs.