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Consultation Paper on changes to ITS on supervisory reporting: Module on ESG reporting

Fields marked with * are mandatory.

Introduction

The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions detailed below.
Comments are most helpful if they:

- respond to the question stated; indicate the specific point to which a comment relates;
- are supported by a clear rationale;
- provide evidence to support the views expressed/ rationale proposed; and
- provide alternative regulatory options for consideration by the EBA.

Important note to users:
All the fields marked (*) are mandatory. In case a question is not relevant for you, please answer with "Non-Applicable" or "NA". Please note that the maximum length of the answers to any single question is technically limited by the tool to 5000 characters.
All contributions received will be published following the close of the consultation, unless you request otherwise by ticking the relevant box in the form below. Please note that a request to access a confidential response may be submitted in accordance with the EBA''s rules on public access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response is reviewable by the EBA's Board of Appeal and the European Ombudsman.

Personal data protection:
The protection of individuals with regard to the processing of personal data by the EBA is based on Regulation (EU) 2018/1725. Further information on the processing of the personal data is available in the Data Protection Notice.

Should you encounter issues with submitting your responses, please contact us by email at *eba.consultation@eba.europa.eu* no later than 48 hours before the deadline of the consultation period.

Please provide your responses by **10 July 2026 close of business**. Late responses will not be considered

Many thanks for your cooperation and support!

Who is responding

* Name of the organisation

Clearstream

* Contact name

Hannah Schneider

* Contact email

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* Disclose comments

- (•) Yes
- ( ) No

Questions for consultation

Proportionality and scope of institutions

* **Question 1.** Do you have any comments on the comprehensive approach proposed for large institutions?

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* **Question 2.** Do you have any comments on the simplified approach proposed to Other listed institutions and large subsidiaries?

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* **Question 3.** Do you agree that large subsidiaries should report ESG risk exposures using the simplified reporting approach, in line with the proportionality principles applied to other institutions and similarly as in the Pillar 3 framework?

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*** Question 4.** Do you have any views on the reduced and essential set of information applicable to SNCI and Other non-listed institutions?

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*** Question 5.** Do you have any views on the proportionality approach proposed?

The proportionality approach as proposed to date essentially differentiates on the basis of an institution's size and takes only very limited account of the different business models of institutions. However, with regard to ESG risks – in particular transition and physical risks – the business model is a key factor in determining the extent of these risks. Institutions which, for example, operate as an ICSDs and do not engage in any lending or financing business, neither with retail clients nor with companies in the real economy, and whose banking book exposures relate almost exclusively to the financial sector and result from their securities settlement activities, exhibit virtually no transition and physical risks in sectors affected by or contributing to climate change. Nevertheless, for the few exposures to companies outside the financial sector – which often arise from business relationships with suppliers and services providers (e.g. prepaid expenses) – the relevant ESG data must be obtained and reported, even if they play no role whatsoever in risk management of these institutions and do not provide meaningful information on the institution's risk profile. Therefore, the proportionality approach should be extended to include a threshold referring to the ratio of banking book exposures in the economic sectors that highly contribute to climate change to the total banking book. Institutions with such an ESG-banking book ratio below a certain threshold (e.g. 5%) should be exempted from reporting the ESG templates.

*** Question 6.** Are the proposed materiality thresholds for geographical breakdowns sufficient to provide meaningful reporting without imposing undue reporting burden?

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*** Question 7.** Is or are there any element(s) of this proposal for new and amended reporting requirements that you expect to trigger a particularly high, or in your view disproportionate, effort or cost of compliance? If yes, please:

- specify which element(s) of the proposal trigger(s) that particularly high cost of compliance,
- explain the nature/source of the cost (i.e. explain what makes it costly to comply with this particular element of the proposal) and specify whether the cost arises as part of the implementation, or as part of the on-going compliance with the reporting requirements,
- offer suggestions on alternative ways to achieve the same/a similar result with lower cost of compliance for you.

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D 01.00 – Climate Change Transition Risk: Credit quality of exposures by sector, emissions and residual maturity

*** Question 8.** Do you have any views on the additional information included for supervisory reporting purposes in template D 01.00?

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* **Question 9.** The EBA is assessing the introduction of data points requesting RWA in Templates D 01.00 and D 05.00 to enable national authorities to calculate potential Systemic Risk Buffer (SyRB) in case of systemic risks. What are your views on the inclusion of this information, both from an operational and from a macroprudential perspective? Do you foresee significant operational challenges related to the inclusion of this information? What alternative approaches would you suggest?

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D 01.02 – Climate Change Transition Risk: Credit quality of exposures by sector, emissions and residual maturity

* **Question 10.** Do you have any views on the proposed template D 01.02?

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D 01.01 – Simplified ESG Information (for SNCIs and other non-listed institutions)

* **Question 11.** Do you have any views on the proposed Template D 01.01?

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D 02.00 – Climate Change Transition Risk: Loans collateralised by immovable property

* **Question 12.** Do you have any views on the proposed Template D 02.00?

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* **Question 13.** Do you have any comments on the inclusion of information on covered bonds?

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* **Question 14.** Do you have any comments on the new column for EPC estimates?

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* **Question 15.** To what degree do institutions consider assessing transitions in the energy performance of collateral (e.g., EPC label or energy performance score categories) to be relevant for evaluating the evolution

of transition risk exposures and enhancing transparency on improvements in energy efficiency of CRE and RRE portfolios? Please indicate how such transitions are currently monitored for both existing collateral and newly originated loans.

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* **Question 16.** To what degree do institutions consider that adding the same information on LTV buckets by EPC label and energy performance score categories for RRE exposures as for CRE exposures would facilitate identification of risk concentrations, improve comparability across portfolios, and support more effective prudential assessment?

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D 03.00 – Indicators of potential transition risk: Emission Intensity by Sector

* **Question 17.** Do you have any views on the proposed Template D 03.00?

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D 04.00 – Obligor-level environment-related corporate exposures

* **Question 18.** Do you agree with the proposed sectoral scope for D 04.00?

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* **Question 19.** For the purpose of obligor-level information requested in this template, do you agree that output-denominated emission intensity is more comparable and informative compared to revenue-based emission intensity? Please justify your view.

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* **Question 20.** Do you have any views on the list of sectors proposed for this template?

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* **Question 21.** Do you have views on whether the absolute 10 Mn EUR threshold could be replaced by a relative threshold (e.g: obligors representing above x % of total NFC exposures)?

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* **Question 22.** Do you have views on how to define the threshold in addition to the EUR 10 million exposure threshold (e.g: total number of obligors to be reported per institution or other Tier 1 capital-based relative threshold)?

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Question 23. Do you have any other comments on Template D04.00?

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D 05.00 – Climate change physical Risk: Exposures subject to physical risk

* **Question 24.** Do you have any views on the additional information included in D05.00 for supervisory reporting purposes?

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* **Question 25.** What would be the most appropriate way to assess the extent to which exposures are ("adequately") insured against relevant hazards? In particular, would the inclusion of a single column indicating the percentage of insured exposures be sufficient? How to deal with potential State insurance schemes?

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* **Question 26.** What information can credit institutions provide regarding the insurance coverage of their exposures? In particular, please indicate whether institutions can report: (i) the existence of active and up-to-date insurance coverage for a given exposure; (ii) the insured amount as a percentage of the exposure; (iii) the types of hazards covered by the insurance policy; (iv) whether the insurance is held by the institution or by the borrower; (v) whether reporting should be limited to real estate-related exposures or may also include non-real estate exposures; and (vi) any other relevant information (please specify).

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* **Question 27.** To better monitor the risk and losses stemming from physical impacts. Do you agree to include information on exposures highly and moderately exposed to physical risk?

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* **Question 28.** Do you have alternative proposals to reflect the vulnerability of institutions' portfolio and the potential damage that physical hazards could cause them?

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* **Question 29.** Do you have any views on whether additional information on expected losses, (excluding insurance) and reflecting the accurate vulnerability, including damage functions, would be useful?

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D 05.01 – Climate change physical risk: Exposures subject to physical risk (simplified)

* **Question 30.** Do you have any views on the proposed Template D 05.01(simplified)?

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D 10.00 – Exposures Contributing to Sustainability Objectives

* **Question 31.** Do you have any views on the proposed Template D 10.00?

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D 11.00 – Exposures to Environmental Risks (Beyond Climate)

* **Question 32.** Do you have any views on the proposed Template D 11.00?

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* **Question 33.** Do you have any views on the materiality threshold introduced in this template?

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Contact

Contact Form