

Question ID	2022_6532
Status	Final Q&A
Legal act	Regulation (EU) No 575/2013 (CRR)
Topic	Transparency and Pillar 3
Article	449a
Paragraph	-
Subparagraph	-
COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations	Not applicable
Article/Paragraph	Not applicable
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Disclose name of institution / entity	Yes
Name of institution / submitter	Dutch Banking Association
Country of incorporation / residence	The Netherlands
Type of submitter	Industry association
Subject matter	Template 2 - Row 5 subset
Question	Template 2 of Annex XXXIX to the Final draft implementing technical standards on prudential disclosures on ESG risks in accordance with 449a CRR - Is row 5 a sub-set of rows 2/3/4?
Background on the question	From the wording of the ITS it looks like the total Gross carrying amount should be split into row 2/3/4 (RRE/CRE/REPOSSED).
Final answer	As explained in the Annex XL - Instructions for disclosure of ESG risks to the Final draft implementing technical standards on prudential disclosures on ESG risks in accordance with Article 449a CRR, Template 2 will show the gross carrying amount of loans collateralised with commercial and residential immovable property and of repossessed real estate collaterals, including information on the level of energy efficiency of the collaterals

	<p>measured in terms of kWh/m² energy consumption.</p> <p>In 'columns b' to 'g' institutions shall disclose the gross carrying amount of exposures by energy efficiency buckets based on the specific energy consumption of the collateral in kWh/m², as indicated in the EPC label of the collateral or estimated by institutions in the absence of the EPC label. In rows 5 and 10 of the template it should be indicated the extent to which this data is estimated and not based on EPC labels.</p> <p>Row 5 is a subset of rows 2/3/4, as it should include the portion of the gross carrying amount of loans whose collaterals' level of efficiency is estimated (without EPC label).</p>
Link	https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2022_6532

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