

Question ID	2022_6564
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	Article 18a (2)(f) Final draft implementing technical standards on prudential disclosures on ESG risks in accordance with Article 449a CRR
Date of submission	17/08/2022
Published as Final Q&A	25/11/2022
Disclose name of institution / entity	No
Type of submitter	Competent authority
Subject matter	Clarification on summing columns in Template 10 "Other climate change mitigating actions that are not covered in the EU Taxonomy"
Question	We ask for clarification whether 'columns d' and 'e' in Template 10 (respectively 'Type of risk mitigated (Climate change transition risk) ' and 'Type of risk mitigated (Climate change physical risk) ') should add up to 'column c' ('Gross carrying amount (million EUR) ')?
Background on the question	This issue has been reported to us by banks as one of the implementation problems. The Instructions do not provide clear guidance on summing the columns. Therefore, it needs further clarification whether the purpose of 'column c' ('Gross carrying amount (million EUR)') is to present the whole value of the respective portfolios or only the value referring to other climate change mitigating actions that are not covered in the Taxonomy. In addition, the instructions for 'columns d' and 'e' may indicate their qualitative nature - this should be confirmed as well.
Final answer	'Columns d' and 'e' in Template 10 - Other climate change mitigating actions that are not covered in the EU Taxonomy of Annex XXXIX to the Final draft implementing technical standards on prudential disclosures on ESG risks in

	<p>accordance with Article 449a CRR should report qualitative information (risk type), thus they should not add up to 'column c', which should report the gross carrying amount (quantitative data).</p> <p>'Column c' should include the gross carrying amount of the exposures of the institutions that are not EU taxonomy aligned but that still support counterparties in the transition and adaptation process for the objectives of climate change mitigation and climate change adaptation.</p>
Link	https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2022_6564

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