

# Single Rulebook Q&A

<b>Question ID</b>	2022_6625
<b>Status</b>	Final Q&A
<b>Legal act</b>	Regulation (EU) No 575/2013 (CRR)
<b>Topic</b>	Transparency and Pillar 3
<b>Article</b>	449a
<b>Paragraph</b>	-
<b>Subparagraph</b>	-
<b>COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations</b>	Regulation (EU) 2022/2453 - ITS on ESG disclosures
<b>Article/Paragraph</b>	Annex 1
<b>Date of submission</b>	28/10/2022
<b>Published as Final Q&amp;A</b>	17/02/2023
<b>Disclose name of institution / entity</b>	No
<b>Type of submitter</b>	Competent authority
<b>Subject matter</b>	ITS ESG P3 - Template 2 - Column A & Totals in row 5 and 10
<b>Question</b>	<p>Two questions with regard to Template 2: <i>Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral:</i></p> <p>1) Should the columns h-p sum up with b-g and simultaneously with the column a?</p> <p>2) In which lines to report a situation in which the bank estimates the energy efficiency of collateral a housing mortgage? Should rows 5 and 10 be a sum of rows 2-4 and 7-9 respectively?</p>
<b>Background on the question</b>	We received these questions from the banks, through Polish Bank Association.
<b>Final answer</b>	<p>1) Column A in Template 2 of Annex 1 to Implementing Regulation (EU) 2022/2453 should be the sum of:</p> <p>- columns from H to N + O</p> <p>OR</p>

	<p>- columns from B to G + (O * (1 - P))</p> <p>Column P reports the percentage of the exposures without EPC label of the collateral for which the institution is providing EP estimates.</p> <p>Columns from B to G captures Energy Performance information on loans for which there is an EPC label or it is estimated. In this latest case, the carrying amount is also reported in row 5 or 10.</p> <p>In the case of exposures in non-EU countries and where there is no EPC label equivalent, institutions shall leave columns h to n blank, and disclose the information required in columns o and p and, when relevant, columns b to g with estimated data.</p> <p>2) Institutions shall disclose the gross carrying amount of exposures by energy efficiency buckets based on the specific energy consumption of the collateral in kWh/m<sup>2</sup> estimated by institutions (in the absence of the EPC label) in rows 5 and 10. Therefore rows 5 and 10 are not a sum of rows 2-4 and 7-9 respectively.</p>
<b>Link</b>	<a href="https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2022_6625">https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2022_6625</a>

European Banking Authority, 29/05/2023  
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