

Question ID	2023_6677
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	Regulation (EU) 2022/2453 - ITS on ESG disclosures
Article/Paragraph	n.a.
Date of submission	03/01/2023
Published as Final Q&A	10/03/2023
Disclose name of institution / entity	No
Type of submitter	Credit institution
Subject matter	ESG P3 - Template 1- Scope 3 financed emissions including scope 1 and 2 of the counterparty
Question	In Template 1 of the final ITS (Commission Implementing Regulation (EU) 2022/2453) in column j the "Of which Scope 3 financed emissions" should be reported. Reading Annex 2 of the Regulation, "Institutions shall disclose their scope 3 emissions" where "their" refers to "institution" - this would be the scope-3-financed emissions of the PCAF standard and therefore the total financed emissions including scope 1 /2 /3 of their (!) counterparties. Is it correct, that here only the counterparties scope-3-emissions should be reported?
Background on the question	While getting more and more involved in GHG Accounting, we have the feeling that the definition and reflexive use of "their" is not always clear in the Annex. Keep in mind, that financed scope 1/2/3-emissions of the counterparties are altogether scope-3-emissions of the institution. Therefore, we ask to have this clear here.
Final answer	According to the instructions for Template 1, included in the Annex II of the Commission Implementing Regulation (EU) 2022/2453, in column "I" institutions shall disclose their scope 3 GHG financed emissions, which are

	scope 1, 2 and 3 emissions of their counterparties. Regarding column “j” (“Of which Scope 3 financed emissions”), the first sentence of the instructions for this particular column states that: <i>Institutions shall disclose their counterparties’ scope 3 emissions associated with institutions’ lending and investment activities</i> . It means that column “j” is dedicated specifically for scope 3 emissions of the counterparties.
Link	https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2023_6677

European Banking Authority, 08/06/2023

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