
ENVIRONMENTAL POLICY

EBA OD 11

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Document information

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Change history and approval

Version	Date	Summary of changes	Reviewers	Approval
1	25/09/2025	First version	<i>Corporate Support</i> <i>Legal and Compliance</i>	[SIGNED]

Purpose

The EBA has been EMAS-registered since 2022 (reg. no. FR-000098).

EMAS Regulation¹ stipulates that *top management shall establish, implement and maintain an environmental policy that, within the defined scope of its environmental management system:*

(a) is appropriate to the purpose and context of the organisation, including the nature, scale and environmental impacts of its activities, products and services;

(b) provides a framework for setting environmental objectives;

(c) includes a commitment to the protection of the environment, including prevention of pollution and other specific commitment(s) relevant to the context of the organisation;

(d) includes a commitment to fulfil its compliance obligations;

(e) includes a commitment to continual improvement of the environmental management system to enhance environmental performance.

Moreover, according to the EMAS User Guide², *in the event of significant changes to the environmental management system, the environmental policy should be adapted.*

EMAS regulation also requires that *top management shall appoint a specific top management representative(s) who, irrespective of other responsibilities, shall have defined roles, responsibilities and authority in order to ensure an environmental management system in compliance with this Regulation and to report to top management on the performance of the environmental management system.*

Therefore, following the update of context of organisation (PESTEL analysis, mapping of stakeholders, revision of environmental aspects), performed in 4Q2024-1Q2025, it was adequate to also revise the EBA's environmental policy (Decision EBA/DC/2021/420) to ensure that it remains fit for purpose.

This new version reflects important developments since the adoption of the previous version, in December 2021, and is aligned with current environmental practices, new legal obligations and commitments taken by the EBA. Specifically, with the achievement of EMAS registration and the renewal of EMAS and ISO 14001: 2015 certificates in 2025, it is advisable to move to the next stage of compliance monitoring mode. Therefore, the function of EMAS coordination and the EMAS registration process was assigned to the portfolio of Legal & Compliance Unit.

¹ [CL2009R1221EN0040010.0001.3bi cp 1..1](#), Annex II, A.5.2 Environmental Policy

² [EMAS User's Guide - European Commission](#), Step 2, point 2.1, page 49

The main lines of this revision were discussed and agreed upon in the meeting between the EBA Executive Director (ED) and EMAS Committee on 30 June 2025.

Finally, the framework and actions described herein are underpinned by Regulation (EU) No 1093/2010 of the European Parliament and of the Council, in particular Article 1(3) and Article 29(1)(f), which encourage the integration of sustainability considerations into the Authority's operations.

Scope

This environmental policy is applicable to all the EBA's activities and products. The scope of EMAS covers operational activities in Paris as well as core business activities and products, carried out with a view to maintain financial stability in the EU and to safeguard the integrity, efficiency and orderly functioning of the European banking sector.

EMAS Regulation stipulates that *the organisation shall externally communicate information relevant to the environmental management system³, and the environmental policy shall be maintained as documented information, be communicated within the organisation, and be available to interested parties⁴*. Thus, the document forms part of the publicly available environmental statement and is published separately on the EBA website.⁵

Definitions

Environmental Policy	Means the overall intentions and direction of an organisation relating to its environmental performance as formally expressed by top management including compliance with all applicable legal requirements relating to the environment and also a commitment to continuous improvement of environmental performance. It provides a framework for action and for the setting of environmental objectives and targets ⁶ .
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³ [CL2009R1221EN0040010.0001.3bi_cp 1..1](#), Annex II, A.7.4.3 External communication

⁴ [CL2009R1221EN0040010.0001.3bi_cp 1..1](#), Annex II, A.5.2 Environmental Policy

⁵ [Sustainable EBA | European Banking Authority](#)

⁶ [Regulation \(EC\) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community eco-management and audit scheme \(EMAS\), repealing Regulation \(EC\) No 761/2001 and Commission Decisions 2001/681/EC and 2006/193/EC, Article 2](#)

Policy

ENVIRONMENTAL POLICY AT THE EUROPEAN BANKING AUTHORITY (EBA)

The EBA has an important role in supporting the European banking sector towards the objectives of transitioning to a more sustainable economy and mitigating risks stemming from climate change and broader environmental, social and governance factors.

The EBA is committed to continuously improving its environmental performance and reducing its carbon footprint. To this end, the Authority implements the Eco-Management and Audit Scheme (EMAS).

This environmental policy is applicable to all the EBA's activities and products. The scope of EMAS covers operational activities in Paris as well as core business activities and products, carried out with a view to maintain financial stability in the EU and to safeguard the integrity, efficiency and orderly functioning of the European banking sector.

We hereby:

- Affirm our commitment to maintaining EMAS registration, taking responsibility for the prevention of environmental damage and continuous improvement of our environmental performance
- Undertake to ensure compliance with all applicable local and European Union environmental regulations
- Commit to
 - Building capacity by strengthening knowledge, identifying technical solutions and adapting organisational structures and behaviours
 - Reducing our greenhouse gas emissions, with a special focus on travel and energy
 - Limiting our material impact through the implementation of circular economy practices, the use of electronic solutions, and green public procurement
 - Implementing environmental, social and governance (ESG) considerations in our policy making, risk assessment and supervisory convergence work in line with the EBA's tasks, the EBA's 2022 roadmap on sustainable finance and additional mandates received since that time
- Commit to setting up key environmental indicators with concrete objectives to demonstrate the efficiency of our environmental management system

- Stress that our improvement efforts are underpinned by our team spirit and management's engagement.

Our annual public environmental statement transparently reflects on our progress on these commitments.

The environmental policy is also implemented and its objectives achieved through the dedicated policies annexed to this document.

Responsibilities

According to the EMAS User Guide⁷, *the environmental policy is a framework for action and for setting strategic environmental objectives and targets. It needs to be clear and must address the top priorities under which specific objectives and targets can be further defined.*

In the environmental policy, top management sets out a set out a vision of how it sees itself tackle environmental protection. This should be done early in the implementation process, but not before completion of the environmental review, which forms the basis of the policy. Top management must ensure that this environmental policy is also implemented and applied in the organisation.

The environmental policy is the central guideline for the further development of EMAS and is published in the environmental statement. It forms the framework for the definition of environment-related goals, targets (individual objectives) and measures and should fit with the corporate culture.

The environmental policy could be integrated into existing corporate guidelines or the organisation's corporate policy. In addition, it should be communicated to everyone working for or on behalf of the organisation and be available to interested parties (by direct handout, internet, intranet, notice board, briefing, etc.).

In the event of significant changes, the environmental policy should be adapted. It is important that the full environmental statement, including any updates, is kept fully accessible and updated by the EMAS organisation.

The Executive Director, with the support of all managers, actively communicates on the importance of good environmental management and ensures adequate resources are made available to implement it.

Following the transfer of EMAS coordination function to the Legal and Compliance Unit, a new management representative should be appointed to ensure an environmental management system in compliance with the EMAS regulation and to report on the performance of the environmental management system at the EBA.

⁷ [EMAS User's Guide - European Commission](#), Step 2, point 2.1

Jonathan Overett Somnier, Head of the Legal and Compliance Unit, is hereby appointed as management representative and environmental coordinator of the EBA.

References

- (1) The European Union is committed to making Europe the first climate neutral continent by 2050.
- (2) The European Climate Law⁸ set a target for 2030 of reducing net greenhouse gas emissions by at least 55% compared to levels in 1990.
- (3) French Tertiary Decree aims to reduce the final energy consumption of tertiary buildings in France by 40% by 2030, 50% by 2040 and 60% by 2050⁹.
- (4) The European Court of Auditors¹⁰ calls all EU agencies to prepare up-to-date corporate plans to improve their climate neutrality and energy efficiency.
- (5) The EBA adopted EUAN Charter on the reduction of greenhouse gas emissions and responsible environmental management¹¹ and it endeavours to take all reasonable measures in achieving climate neutrality within the scope of its activities and resources.
- (6) The EBA adopted a circular economy policy¹² to reduce its material impact, extend product life cycles, minimise waste, and promote responsible procurement and disposal across its activities.

Review and revision

The environmental policy will be reviewed and updated whenever relevant, particularly in the event of significant changes to the environmental management system.

⁸ OJ L 243, 9.7.2021, p. 1–17

⁹ [Éco Énergie Tertiaire \(EET\) | Ministères Aménagement du territoire Transition écologique](#)

¹⁰ European Court of Auditors (2023), [Annual report on EU Agencies for the financial year 2022](#)

¹¹ [EBA DC 568- Decision on adoption of EUAN Charter reduction of greenhouse gas emissions-signed-ts.pdf](#)

¹² [EBA DC 494 - Decision on Circular economy policy-signed-ts.pdf](#)

Annexes

Annex 1: Adoption of the EU Agencies Network Charter on the reduction of greenhouse gas emissions and responsible environmental management

The EBA endeavours to take all reasonable measures in achieving climate neutrality within the scope of its activities and resources and adopts the EU Agencies Network Charter on the reduction of greenhouse gas emissions and responsible environmental management.

EU Agencies Network Charter on the reduction of greenhouse gas emissions and responsible environmental management

The EU Agencies Network is committed to promoting sustainability and responsible environmental management within the Agencies and Joint Undertakings (JUs) it represents. The Network recognises its responsibility for making a positive contribution to sustainable development and to lead by example in the transition towards a more sustainable economy in line with the goals of the EU Green Deal¹³¹⁴ and the objectives set by the European Commission¹⁶ and the European Parliament.

The EUAN members commit to:

1. Taking the necessary steps towards achieving climate neutrality by 2030,
2. Engage and proactively act towards reducing their negative impact on the environment, through continuously improving their environmental performance,
3. Set, implement, and monitor an environmental policy, objectives, and targets,
4. Promote the careful use of resources in their day-to-day operations,
5. Systematically measure their greenhouse gas (GHG) emissions,
6. Prioritise actions to reduce emissions, with a special focus on travel-related emissions,
7. Maximise the use of sustainable electronic solutions and green public procurement to limit their material impact,
8. Ensure compliance with applicable environmental regulations and sustainability reporting,

¹³ [How do the EU institutions and bodies calculate, reduce and offset their greenhouse gas emissions?](#)

¹⁴ [The European Parliament carbon footprint - Towards carbon neutrality](#)

¹⁵ [Feasibility and scoping study for the commission to become climate neutral by 2030 - Publications Office of the EU](#)

¹⁶ [People first – Greening the European Commission - European Commission](#)

9. Continually raise staff awareness and encourage the implementation and exchange of environmental best practices,
10. Secure adequate resources for the implementation of the provisions of this Charter,
11. Compensate their remaining unavoidable GHG emissions through certified carbon removal schemes, once common EU standards for certification of high-quality carbon removal standards are in place.

This Charter is thus a commitment to achieve climate neutrality among the EU Agencies Network by 2030, in line with the EU's aim of making Europe the first climate neutral continent by 2050.

Annex 2: Adoption of the circular economy policy at the European Banking Authority

CIRCULAR ECONOMY POLICY AT THE EUROPEAN BANKING AUTHORITY

The European Banking Authority (EBA) recognises its responsibility for making a positive contribution to sustainable development as a long-term goal. The adoption of the circular economy policy is one of the measures towards the achievement of this goal.

This circular economy policy is applicable to all of the EBA's activities and serves as a guide to setting annual or multi-annual objectives in this area.

In line with the European Commission's new Circular Economy Action Plan to achieve fully circular economy by 2050, we hereby commit to:

- Minimise purchases of physical items so as to limit our material impact
- Buy to keep:
 - Opt for high quality products with low environmental and social impact over their entire life cycle
 - Enhance the use of green public procurement and green criteria throughout our tenders and contracts
 - Prioritise the purchase of sustainable and eco-labelled products
 - Reduce the use of single-use items
 - Lease whenever possible
- Maximise the life cycle of products (maintain, repair, reuse):
 - Seek longer contractual guarantees and maintenance programmes (e.g. for the availability of replacement parts and the possibility of repairs)
 - Optimize multipurpose re-use of equipment and furniture across its useful lifecycle (e.g. BYOD strategies)
 - Use recycled, reusable, and recyclable materials with low carbon footprint whenever possible
- Minimise the generation of waste:
 - Reduce waste production
 - Improve waste segregation

- Increase recycling
- Dispose of items in an environmentally friendly manner (decommission, donation, upcycle)
- Introduce and promote environmental best practices.



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