

DATA FROM 2020



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1. About this document

This environmental statement provides all relevant stakeholders and other interested parties with information concerning the environmental performance and activities of the European Banking Authority (EBA) in 2020 (reporting year from 1 January 2020 to 31 December 2020).

This document has been drafted in accordance with the Eco-Management and Audit Scheme (EMAS) Regulation¹ in its latest applicable version [(EU) $2017/1505^2$ and (EU) $2018/2026^3$], also considering the sectoral reference document for the public administration sector [Commission Decision (EU) 2019/61]⁴.

Annex I provides the validation of the EMAS auditor.

As per its environmental management system (EMS), the EBA will publish an environmental statement on an annual basis and will make it available on its website.

2. About the EBA

2.1 Mission and tasks

2.1.1 Mission

The EBA is an independent EU authority which works to ensure effective and consistent prudential regulation and supervision across the European banking sector. Its overall objectives are to maintain financial stability in the EU and to safeguard the integrity, efficiency, and orderly functioning of the banking sector.

The EBA was established on 1 January 2011 as part of the European System of Financial Supervision (ESFS). As a specialised EU agency, it works alongside the main EU institutions and Member States providing them with evidence-based advice to help shape informed policies and laws at the EU and national level.

¹ Consolidated text: 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; <u>EUR-Lex - 02009R1221-</u>20190109 - EN - EUR-Lex (europa.eu)

² Commission Regulation (EU) 2017/1505 of 28 August 2017 amending Annexes I, II and III to Regulation (EC) No 1221/2009 of the European Parliament and of the Council on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS); C/2017/5792 <u>EUR-Lex - 32017R1505 - EN - EUR-Lex (europa.eu)</u>

³ Commission Regulation (EU) 2018/2026 of 19 December 2018 amending Annex IV to Regulation (EC) No 1221/2009 of the European Parliament and of the Council on the voluntary participation by organisations in a Community ecomanagement and audit scheme (EMAS); C/2018/4429; <u>EUR-Lex - 32018R2026 - EN - EUR-Lex (europa.eu)</u>

⁴ Commission Decision (EU) 2019/61 of 19 December 2018 on the sectoral reference document on best environmental management practices, sector environmental performance indicators and benchmarks of excellence for the public administration sector under Regulation (EC) No 1221/2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS); C/2018/4424; <u>EUR-Lex - 32019D0061 - EN - EUR-Lex (europa.eu</u>)

2.1.2 Tasks and products

The main task of the EBA is to contribute, through the adoption of **binding Regulatory and Implementing Technical Standards (RTS and ITS) and Guidelines**, to the creation of the **European Single Rulebook in banking**. The Single Rulebook aims at providing a single set of harmonised prudential rules for financial institutions throughout the EU, helping to create a level playing field and providing high level of protection to depositors, investors and consumers.

The Authority also plays an important role in promoting the convergence of supervisory practices to ensure the harmonised application of prudential rules. Finally, the EBA is mandated to assess risks and vulnerabilities in the EU banking sector through regular risk assessment reports and pan-European stress tests.

Other tasks set out in the EBA's mandate include:

- investigating alleged incorrect or insufficient application of EU law by national authorities
- taking decisions directed at individual competent authorities or financial institutions in emergency situations
- mediating to resolve disagreements between competent authorities in cross-border situations
- acting as an independent advisory body to the European Parliament, the Council or the Commission
- taking a leading role in promoting transparency, simplicity and fairness in the market for consumer financial products or services across the internal market.

To perform these tasks, the EBA produces regulatory and non-regulatory documents, including **Binding Technical Standards, Guidelines, Recommendations, Opinions and ad-hoc or regular reports**.

The Binding Technical Standards **are legal acts** that specify aspects of an EU legislative text (Directive or Regulation) and aim at ensuring consistent harmonisation in specific areas. The EBA develops draft RTS and ITS which, once endorsed and adopted by the European Commission, are directly applicable in all Member States.

The EBA has received several mandates to assess how to include Environmental, Social and Governance (ESG) risks in the three pillars of the banking prudential framework. This is because it is increasingly being recognised that through their core business activities, i.e. their lending and investment activities, banks and investment firms may be impacted by such risks. Notably, environmental factors such as climate change and environmental degradation, and the associated need to transition towards an environmentally sustainable economy, will lead to changes in the real economy that will in turn impact the financial sector through new risks and opportunities, which may translate into economic and prudential risks. The EBA is, accordingly, mandated to develop a regulatory and supervisory framework that aims to at ensuring the resilience of financial institutions in light of these risks.

2.2 Teams and location

Since mid-2019, following the withdrawal of the United Kingdom from the European Union, the EBA's premises are in the Paris-La Défense area.



The Agency rents four floors in the Tour Europlaza building, which holds the following certifications covering the sustainable management of the building:

- HQE Batiment tertiaries en exploitation, HQE 'Exceptionnel' gestion durable / HQE Commercial Building in Exploitation, rated 'Exceptional' for sustainable management, valid until December 2023;

- HQE Batiment tertiaries en exploitation, HQE 'Tres Bon' bâtiment durable / HQE Commercial Building in Exploitation, rated 'Very Good' for sustainable building, valid until December 2023;

- BREEAM In-Use International, rated "Very Good" for asset performance and management performance, valid until December 2021.

Nevertheless, the most recent energy performance diagnosis (*Diagnostic de performance énergétique*), which was conducted

in 2013, rates the building at level F for energy consumption and D for greenhouse gas emissions.

In 2020, the EBA employed 215 staff (figure at 31 December 2020), plus consultants and trainees. The environmental management system applies equally to all.

There was a teleworking policy in place before the pandemic hit, but as of 12 March 2020 until the end of the year, staff members were fully teleworking.

2.3 Scope of the EBA's environmental management system

Considering that the latest EBA Regulation⁵ states that the EBA shall act, in its field, 'taking into account sustainable business models and the integration of environmental, social and governance-related factors' [Art. 1(3)] and that the EBA may have the following environmental impacts:

- direct and indirect;
- positive or negative; and
- has at least an influence in all its activities and products;

the scope of the EMAS registration at the EBA covers all EBA's activities and products.

In particular, it covers operational activities in Paris as well as core business activities and products carried out with a view to maintaining financial stability in the EU and safeguarding the integrity, efficiency and orderly functioning of the European banking sector.

⁵ Consolidated text: Regulation (EU) No 1093/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Banking Authority), amending Decision No 716/2009/EC and repealing Commission Decision 2009/78/EC; <u>EUR-Lex - 02010R1093-20210626 - EN - EUR-Lex (europa.eu)</u>

Description of the
 Environmental Management
 System

3.1 EMAS at the EBA

The Eco-Management and Audit Scheme⁶ (EMAS), approved by the European Parliament and Council, is the European voluntary system designed for organisations wishing to evaluate, manage and improve their environmental performance. As sustainability is a growing concern for European citizens and industries, the EMAS provides a structured framework to integrate environmental



concerns into the management and day-to-day operations of any organisation.

With the Commission developing its **Green Deal** and pursuing its **sustainable finance action plan**, it became obvious in 2019 that the EBA should take into consideration its responsibilities and ensure its own environmental impacts were managed. This gave birth to the EMAS project, which aiming at the EMAS registration at the end of 2021. Designed as the first step of a 'lifelong' continuous improvement of the EBA's impacts – positive or negative, it was communicated as

'Sustainability and beyond'. The lasting EMAS registration will ensure that the EBA will continuously lower its environmental footprint.

This is therefore the first environmental statement produced by the EBA.

3.2 Context and purpose of the EBA's environmental management system

The EBA works with a wide range of stakeholders: from its staff to local contractors, from National Competent Authorities and Banking Stakeholder Group to European institutions. Four of them have a key influence on the Environmental Management System, the direction it should take and the progress it should make.

Stakeholder(s)	Needs and expectations of the stakeholder(s)	Needs and expectations of the EBA regarding the stakeholder
European Commission	Integrate environmental, social and governance (ESG) factors and take into account sustainable business models, within the mandate given by the Regulation	Provide means to integrate ESG factors into the EBA's activities, and specifically to implement a sustainable finance action plan

⁶ EMAS – Environment - European Commission (europa.eu)

Board of Supervisors and Management Board	Comply with the EBA's mandate and Regulation, in due time respecting a proportionality principle	MB: support the EMAS registration
Building manager	Regularly communicate the 'private' energy consumption Participate in environmental performance improvement actions	Support legal compliance in environmental matters; be responsive Hold annual discussions on the environmental performance improvement action plan
Staff	 Give priority to the following environmental aspects 1. Reducing (business) trips 2. Segregating waste Improving heating, ventilation and air conditioning 	Maintain discipline in applying environmental best practices Propose improvement actions or ideas

Following a PESTEL (political, economic, social, technological, environmental and legal) analysis and a SWOT (strengths, weaknesses, opportunities and threats) analysis at the beginning of 2020, which involved staff via interviews and a survey, the following risks and opportunities were identified:

Risks	Opportunities
Sustainable finance is a horizontal task for the EBA, with only 1 position opened. This may be insufficient considering the scope of integration of ESG factors covered in the Regulation and in the SF action plan. Led by Banking Markets, Innovation and Products (BMIP), with links to all other departments and with delivery depending on all teams.	Mandate on sustainable finance and the integration of environmental, social and governance factors (ESG) into the EBA's activities is clearly mentioned in the new EBA regulation, covering its whole scope, with positive impacts on long-term financial stability.
The lack of sustainability-related data poses a risk with regard to being able to conduct sound risk- based analysis on sustainable finance.	Various mandates are extended to the EBA by the Commission in the field of sustainable finance, which allows the EBA to equip institutions and supervisors with the guidance and data needed to effectively manage ESG risks, thereby safeguarding the resilience of financial institutions and the EU banking sector as a whole.
The building owner may at some point be in a position where 'environmental investment is required for the building, while the returns are for the tenants': risk of reaching a status quo.	
 Covid-19 pandemic: Possible push-back from lobbies on ESG factors Or greater focus from policymakers on social aspects (rather than environmental) 	 Covid-19 pandemic: Less travel (commuting, private, business) More teleconferencing and videoconferencing Greater focus on sustainable finance

Difficulties to measure impacts and collect "right" environmental performance KPIs with most of the	Less impact due to limited presence on the EBA's premises
staff teleworking.	

3.3 Governance of the environmental management system

To implement and maintain an efficient environmental management system, the EBA adopted the following structure:



This structure allows everyone to be involved, which was important for us from the beginning of the implementation of the EMAS.

In the long run as sustainability becomes our way of life, colleagues in management roles and Green Team members will be key in terms of realigning our management system.

To ensure good awareness, work started on developing a communication strategy on "Sustainability and beyond" in 2020. Its outcomes will be shared in the 2021 environmental statement.

Any improvement proposal, request or complaint regarding the environmental performance of the Agency or its environmental management system are sent to <u>emas@eba.europa.eu</u> (internal) or <u>info@eba.europa.eu (external)</u> – the latter is a dedicated e-mail address for requesting information of any type from the EBA. The communications team will then ensure proper distribution and follow-up by the most appropriate team in the Agency.

3.4 Key steps in the implementation and maintenance of the EMAS

Once the context analysis and the initial assessment were conducted, with the support of the Green Team and other staff members we invited all staff to participate in an online World Café. This workshop aimed at:

- 1. sharing the findings of the Initial Environmental Review
- 2. presenting the main topics tackled in the EBA Environmental Policy (travel, waste, energy, procurement and environmental, social and governance factors)

3. collecting, in a dynamic way, staff ideas for improvement actions.

The ideas gathered were incorporated into the Environmental Action Plan.

In parallel, the Environmental Policy and objectives were presented to and approved by the Steering Committee. Implementation of the measures proposed could therefore start.

Structuring roles and responsibilities, developing best practices and a communication strategy and setting up appropriate metrics were the next steps to ensure changes were actually implemented. Training, for both management and all staff, was proposed to ensure smooth participation. 2021 will conclude the first EMAS cycle by means of the internal monitoring, audit and finally management review.

4. Environmental Policy and

objectives

4.1 Environmental Policy

The EBA adopted its first environmental policy in July 2020. The current applicable version was adopted in December 2021. It takes into account the findings from the initial environmental review (carried out in April 2020) as well as relevant changes in the general context of the organisation. It serves as a guide for setting annual or multi-annual objectives in the area of environmental management. The Environmental Policy constitutes the Annex II.

4.2 Objectives

Based on the Environmental Policy and significant environmental aspects, the following objectives were set in 2020 in the Single Programming Document 2022 (baseline 2019):

Environmental	aspects	2022 objectives (baseline 2019)
Travel		 Reduce the travel of the EBA's staff by 50% (km and CO₂e) Offer efficient distance participation for visitors (with a reduction of meetings held at EBA premises by 50%)
Waste	2	Optimise waste segregation options to achieve at least 70% recycling
Core business		All staff aware of the EBA's mandates on environmental matters

Energy	4	Reduce energy consumption by 10% Reduce indirect energy consumption
Procurement	\sim	Environmental impact is considered for 100% of contracts procured by the EBA

The baseline in 2019 was set based on data collected for the second half of the year as the EBA moved to and became operational in Paris from June 2019 onwards.

5. Environmental aspects and

impacts

5.1 Methodology

Aspects are elements of the activity that have or may have an impact on the environment. Identification of aspects was carried out through site visits, document analysis and interviews with staff.

To evaluate the significance of an aspect, we use sets of different criteria depending on whether the aspect is:

- direct or not
- normal or malfunctioning (abnormal, emergency).

For each aspect, each of the following criteria were rated:

- the nature of negative impacts, and whether the aspect has beneficial impacts By default, as the EBA does not have the capacity to conduct a detailed analysis of 'upstream' impacts, the assumption is that indirect aspects impact all areas of the environment.
- the frequency (normal)/probability (abnormal) of the environmental aspect
- the level of control (direct) or influence (indirect) of the environmental aspect
- the opinion of staff based on a survey conducted at the EBA

It was important to consider the opinion of staff as a parameter to ensure involvement in the EMS.

- the evaluation of material flows/share of CO₂ footprint – for measurable aspects only.

To reflect the EBA's commitment to prevent pollution, the criticality of aspects is calculated by the following formula: criticality = (frequency or probability) x (control/influence) x (opinion) x (flow) x (number of impacts) x 2 if a positive impact.

To ensure a proper allocation of resources in accordance with the need for improvement, **the top 8 critical environmental aspects** are considered to be significant. These aspects will be the focus of the EMS. However, this does not mean that no action can be planned for any other aspects if such measures are easy and impactful.

5.2 Significant environmental aspects

Environmental aspect(s)	Stakeholder(s)	Rank
Extra cooling for IT equipment: energy consumption, water consumption	Yxime SE3M	1
Heating of premises: energy consumption	Yxime /Vinci staff	2
Travelling for business: air and CO2 emissions from teams' assignments via transport, water consumption, waste generation, energy consumption etc, including hotel stays	MB – staff AMEX	3
Cooling of premises: energy consumption	Yxime/Vinci staff	4
Integration of ESG risks (and more precisely, risks stemming from environmental factors and especially climate change; physical or transition) into risk management and supervision	Commission BOS – staff JRC/UNEP- FI/Platform on SF	5
Key metrics and Technical standards to implement disclosure requirements regarding ESG risks (included in Capital Requirements Regulation) – linked to non-financial reporting and taxonomy	Commission BOS staff	5
Transportation of visitors: air and CO2 emissions for visitors travelling to Paris	Visitors IT	5
Providing safe and reliable options for remote participation in meetings and training sessions and teleworking (indirect energy and material consumption by participants)	Visitors	8
Scenario analysis (dedicated climate change stress test with the main objective of identifying banks' vulnerabilities to climate-related risks – physical or transition; longer term)	Commission - BOS staff	8
Cleaning of the premises	Elior	8
EBA's procurement procedures Integration of environmental specifications, selection or award criteria	Staff Court of Auditors	8

Two additional aspects, though not ranked as a priority, are considered significant because they raise legal and compliance issues and are associated with high staff expectations:

Environmental aspect(s)	Stakeholder(s)	Rank
Waste generation & segregation: plastic and cans, paper, non- dangerous industrial waste (including ground coffee and food waste), glass	Le Cadet Staff	13
Waste generation: paper & confidential paper, ink toner for printers, batteries from remote controls; out-of-order IT equipment	Staff (Operations, IT)	16

Though detailed, these aspects merge into the 5 'families' of aspects of the environmental policy.

6. Actions and performance

The following information relates to the EBA's performance, showing what little history we have and comparing it to the objectives set.

Note: even though 2020 marked our first full year in the Paris building, it was also a year characterised by intense teleworking. It should therefore not be used as a reference year. And comparisons with it should be drawn carefully to ensure that the pandemic has no impact. In 2019, the EBA was not in Paris for the full year. A comparison with the building in London would not have made sense. Therefore, to be able to compare year-on-year performance, estimates have been made based on the 6 or 7 months of 2019 for which data was available. All hypotheses are explained in Annex III.

6.1 Travel

As a European agency, the EBA needs to travel and to host its European and international stakeholders. This makes travel the number one source of greenhouse gas (GHG) emissions.



The following graph presents the evolution of GHG emissions due to travel on the part of visitors, staff on missions and staff commuting:

Staff at the EBA were subject to a travel ban for three-quarters of the year in 2020, which led to big cuts in the distance travelled and associated GHG emissions, which were down by 88%.

Even though this was not a business decision, 2020 proved that the Agency can deliver on its mandate even with a lot less travel, with all staff equipped and trained to hold online meeting/conferences (as per the benchmark proposed by the sectoral reference document for the public administration sector). This underpins the assumption that once the pandemic is over the Agency could still deliver on its mandate even with a substantial reduction in travel. That said, much will also depend on the behaviour of other stakeholders and organisations.

There is no quantified benchmark for GHG emissions for transport in the sectoral reference document for the public administration sector.

TravelMeasures implementedAnalysis of travel with a view to setting sound objectives for staff travel and
meetings & events organised by the Agency
All staff equipped to be able to work efficiently remotely
Awareness of transport impacts, including for commuting and personal
mobility (home country, micro trips while teleworking)Set-up of best practices for missions:
Brussels, Strasbourg: train only
Frankfurt: train when an option taking less than 4 hours is available (several a
day)
Other: plane only if distance is above 800 km return.
Missions Office provides a link to public transport website to plan transfers
from station/airport to meeting location
"Green" accommodation is also indicated, if available

6.1.1 Measures implemented

6.1.2 Performance indicators

(i) Staff on missions





In 2019, missions covered a distance of over 80 times around the globe! This fell to less than 7 times in 2020. This drastic drop is shown in the graphs above in terms of both distances and GHG emissions.



Looking at travel for missions, on a month-by-month basis, we can see that 2020 (2.5 months) was already on an excellent trend compared to 2019 (12 months), with a drop of 58% of GHG emissions due to.



Nevertheless, analysing the 'carbon intensity' of missions outside Paris year-on-year – which corresponds to the CO2e per kilometre travelled, as shown in the graph on the left – proved that this rose by 10% between 2019 and 2020. This should be a focus of attention, and best practices for missions aim to avoid transfers from train to plane.

The benchmark of excellence indicated in the sectoral reference document for the public administration sector states that 'a carbon budget is implemented for all business travel'. So far, we have a target for both kilometres and CO_{2e} emissions that is reflected in our annual budget for 2021 (divided by 2 compared to 2019).

(ii) Travel by visitors

Objective: to offer efficient distance participation for visitors (with a reduction of meetings held on the EBA's premises by 50%)

To ensure we minimise the impact of visitor travel, we count the number of visitors coming to meetings in Paris. In this respect as well from an environmental perspective 2020 stands out as a benchmark of excellence year.



The graph represents the number of visitors to Paris (half-year 2019, full-year 2020). As no meetings were organised after the beginning of the Covid crisis in March 2020, the drop is 60% (and 88% in associated GHG emissions). Had 2020 been a normal year, that first quarter shows us that a real effort to reach our target in 2022 was already under way.

The next step, once things are back to normal, is to continue better digitalising meetings and training courses to offer quality while reducing the associated GHG impact.

(iii) Staff commuting

Even though day-to-day commuting has a much lower impact on the climate in relative terms, it is an important factor in terms of improving the air quality of the region.

After a first survey in 2020 regarding commuting habits in 2019, we found that 1.1% of staff came by car, with 89.6% using public transportation and 9.3% walking or cycling to work.

While the benchmark for excellence from the sectoral reference document for the public administration sector refers to 'tools for promoting sustainable commuting for employees are implemented and promoted', we decided that we did not need specific tools as commuting is already conducted in a very responsible manner by the EBA's staff.

A mobility survey analysing these practices will be conducted again in 2021. Commuters may be reluctant to use public transport due to Covid-related risks, and actions may have to be identified to mitigate a potential shift towards more polluting means of transport.

Note: 'home country' commuting, though inevitable given that we are a multinational organisation which, by nature, needs to have a fair balance of countries of origin, is excluded from the scope of this analysis. In the first survey conducted in 2020, staff were informed about the distances and impacts (GHG). However, these are employees' personal choices regarding whether to travel or not, at the frequency that suits them, and it is not for the employer to set objectives on that matter, nor to ask for regular data in view of the need to respect privacy. The employer's communications on business travel and its impacts should, however, play an important role in the awareness of staff as citizens, also with regard to their personal behaviour.

6.1.3 Next steps

Travels	Next steps
	Continue to digitalise and do it better
To mon 1	 Tools for quality distance participation for visitors
	 Develop hybrid meetings to limit in-person participation
	Establish procedures for sustainable meetings and sustainable missions
	Establish a post-pandemic teleworking policy

6.2 Energy

6.2.1 Measures implemented

Energy	Measures implemented
%	Building: Prepared a new electricity contract with 100% renewable energy via certificates of origin Communicated better with building manager to ensure heating and cooling are adapted to the Agency's specific public holidays and operating hours Best practices for heating/cooling communicated to staff



Indirect:

Awareness of staff regarding 'invisible' indirect energy consumption by electronic devices and solutions (manufacturing, networks and data centres) Best practices for IT use

6.2.2 Performance indicators

(i) Energy in the building

Objective: to reduce energy consumption by 10%

The EBA uses three sources of energy:

- Heat, from La Défense heat network. Its distribution is the building manager's responsibility.
- Cold, from La Défense iced water network; again, this is the building management's responsibility.
- Electricity:
 - Partly to operate common areas (building's reception, elevators, ...); this is the building's management responsibility.
 - Partly directly via the Agency's own contract for use on its floors, which may entail lighting and safety equipment (doors etc.), computers, printers and all other IT meeting devices, as well as 2 specific uses: extra heating and extra cooling in IT rooms.



Energy use at the EBA



The Agency's directly managed electricity consumption represents between 62 and 63% of the total electricity consumption in both years. This consumption dropped 11% between 2020 and 2019 which seemed low given that most staff were not present for two-thirds of the year.

Analysis revealed that the consumption was closely correlated to the outside temperature and found that although the EBA thought the heating was shut off, the heating was automatically reset each morning, leading to a higher consumption than expected. New best practices for Corporate Support have since been developed and checked.

There is no benchmark for buildings' energy consumption in the sectoral reference document for public administration sector, especially with reference to rented buildings.

(ii) Indirect energy consumptions: IT

Objective: to reduce indirect energy consumption

To achieve its mission, the EBA uses a large IT estate, composed of large databases, networking equipment and computing power. This estate is managed by a third-party provider, in a quasi-private Cloud regime. Even though it is not directly operated by the Agency, the EBA needs to be mindful of its environmental impact when procuring and using such computing services.

The environmental impact of IT systems is growing each year as the demand for more storage, computing and processing power increases. This demand, though transparent for the end user, leads to many environmental impacts:

- soil, air and water pollution and resource depletion at the stage of manufacturing (from mining to hardware/network building)
- energy consumption with the associated GHG emissions while in use (devices, networks and data centres)
- and finally, pollution again at the end of life for all hardware.

The EBA's goal is therefore to evaluate and reduce its environmental impact through its procurement process, its approach towards the adoption of public cloud services and, potentially, an enterprise BYOD (bring your own device) strategy.

Acquiring the services of a mature service provider that is committed to assessable and measurable long-term sustainability is one of the key priorities for our organisation.

(iii) Indirect energy consumptions: teleworking

The EBA is aware that teleworking means that some of the consumption is diverted from the EBA's building to staff members' place of work when teleworking, especially during the initial stages of the pandemic in 2020.

Measuring the environmental impact of this rare event is difficult. Still, as the new ways of working will become the norm, the EBA aims to promote its green good practices for its remote working staff members, while at the same time respecting their privacy.

6.2.3 Next steps

Energy	Next steps
%	Building: Sign a green electricity contract. With a new maintenance contractor, take full advantage of the BMS (building management system) that can provide 'live' data on consumption and reports to be able to analyse consumption in detail and react faster. There should be a focus on our extra cooling of IT rooms, which not only consume energy, but also water.
	Discuss with the building manager alignment with 2030 objectives set by French regulations ('Décret Tertiaire'). Indirect: Include, where relevant, energy performance in procurement procedures. Implement the cloud strategy including energy metrics. Develop a digital workplace strategy (assessing, for example, the feasibility of a BYOD strategy to limit the upstream impact of IT devices).

6.3 Waste

6.3.1 Measures implemented

Waste	Measures implemented
🔁 🏛	Waste electrical and electronic equipment (WEEE) and derived special waste (toners) were still stored in 2020 as there is no contract for waste management that is not taken care of by the building management. A new contract was drafted in 2020 to collect and recycle this waste.
د ک	Communication with the cleaning company ensuring that segregation rules are maintained after the return to the office. Raising awareness among staff on waste prevention and segregation.

6.3.2 Performance indicators

As the building is HQE[®] certified, it has its own waste disposal centre, where specialist staff of the waste contractor weigh waste coming from each tenant and check waste segregation, correcting it as needed.

The building offers a solution for WEEE and some specific waste with a RECYLUM/ECOSYSTEM collection point, which unfortunately does not allow tracing by tenant, quantities, or what happens to the waste. From our arrival in 2019 and throughout 2020, we decided not to use this service. We stored the waste (not dangerous) until a waste provider could, with all necessary guarantees and paper trail, collect, possibly re-use and recycle this waste. The following quantities only represent the waste eliminated.

	2019 FY		2020			
QUANTITIES	kg	kg/FTE	kg/m²	kg	kg/FTE	kg/m²
PAPER	1 917	7,8	0,4	483	1,9	0,1
CARDBOARD	1 479	6,0	0,3	464	1,9	0,1
METAL (canettes)	12	0,0	0,0	7	0,0	0,0
PLASTIC (bouteilles PET)	60	0,2	0,0	46	0,2	0,0
GLASS	1 677	6,8	0,3	1 028	4,1	0,2
GENERAL	4 022	16,3	0,8	2 708	10,8	0,5
TOTAL	9 166	37	2	4 736	19	1
Progress	-	-	-	-48%	-49%	-48%
RECYCLING	kg	%	Progress	kg	%	Progress
RECYCLED	5 144,57	56%	-	2 028,00	43%	-24%
BURNT FOR ENERGY	4 021,71	44%	-	2 708,00	57%	30%

The benchmark of excellence in the sectoral reference document for the public administration sector indicates that waste should be lower than 200 kg/full- time equivalent employee/year. The EBA is already well below that benchmark.

No waste is landfilled. This is aligned with the benchmark of excellence from the same source, and this will continue.

Our focus will be on maximising recycling, which will happen through better choices at the purchasing stage and reducing the overall unsorted waste.



Objective: to optimise waste segregation options to reach at least 70% recycling

The drop in the share of recycled waste comes from:

- more non-recyclable waste (masks etc.) linked to the pandemic;

- less control in the waste disposal centre, leading to more mixed waste being sent to the general bin. We understand that the waste disposal centre's staff's health came first at the time of the pandemic

Though regrettable, that performance will not be a lasting situation as the EBA's teams and its cleaning contractor are aware of segregating rules and the waste disposal centre is now back to normal operations.

6.3.3 Next steps

Waste	Next steps
🖸 前	Reduce production through procurement. Eliminate individual bins, install new bins and recycling points throughout the premises Raise awareness about waste segregation, collection and recycling Discussions with RIE (canteen) to join their contract on bio waste

6.4 Procurement

6.4.1 Measures implemented

Procurement	Measures implemented
\sim	 Integration of Green Public Procurement (GPP) principles and criteria into the EBA's procurement process through: market analysis before launching most procurement procedures (always when procurement is above the publication threshold, currently EUR 139k) where the EBA asks itself if the purchase is needed, if it has an environmental impact, if the EBA can influence it and, if so, look for the most environmentally friendly option the use of GPP criteria to define what needs to be procured when GPP can be used data collection about the environmental impact and the use of GPP criteria in the procurement plan and in the procurement agreements list

6.4.2 Performance indicators



This objective was set in 2020 and Procurement has been considering now the environmental impact in each procurement procedure.

This is an important step to fulfil our Environmental Policy objectives. The EBA therefore considers the environmental impact of services and supplies, from their inclusion in the Procurement Plan to the design of

contracts, and we are aiming to reduce this impact. In 2020, the share of contracts procured by the EBA where the environmental impact was considered was 86%. The intention is to apply this to all contracts. Whenever the EBA concludes that a contract will have an environmental impact and has the capacity to reverse, reduce or somehow influence this impact, it will take measures and choose the greenest option.

6.4.3 Next steps

Procurement	Next steps
\sim	EBA will continue using GPP and buying the option that provides the best environmental performance. Offering training to the contract managers who prepare technical specifications and manage contracts will lead to more improvements.
	The introduction of a verification system for low-value purchases (below EUR 15k) to check they are sustainable could be introduced. For consultancy services, for instance, a consultant's travel should be avoided to the largest extent possible.

6.5 Core business

6.5.1 Measures implemented

Core business	Measures implemented
	Introduction of sustainability considerations into the guidelines on loan origination and monitoring published in May 2020. In these guidelines, the EBA sets out a requirement for institutions to consider ESG factors, environmentally sustainable lending and associated risks in their credit policies and procedures.
	Discussion paper on ESG risk management and supervision published in November 2020, providing a comprehensive proposal on how ESG factors and risks could be included in the regulatory and supervisory framework for credit institutions and investment firms.
	Initiation of a pilot sensitivity analysis on climate risk, with a sample of volunteer banks (29 EU banks from 10 countries). Designed as a learning exercise for both the EBA and participating banks, focusing only on transition risk. Its main objectives were (i) to explore data and methodological challenges relating to climate risk assessment, (ii) assess banks' readiness to apply the EU green taxonomy for classifying their own exposures and (iii) to lay the groundwork for embedding climate risk in the stress-testing framework in the coming years.
	Work on ESG disclosures, including a consultation paper to address disclosure obligations under the Sustainable Finance Disclosure Regulation (SFDR) and a reply to the consultation on the review of the Non-Financial Reporting Directive (NFRD).
	One extra FTE was hired to work on the ESG-related mandates in October 2020.

6.5.2 Performance indicators

Objective: all staff are aware of the EBA's mandates on environmental matters

This was a key point in the survey of staff conducted at the beginning of 2020: not all staff were aware of the Agency's mandates regarding the integration of ESG risks into its work.

Though much work has been done, including internal training, there has not been a new survey in 2020 to measure if this objective was met.

6.5.3 Next steps

Core business	Next steps
	In the first half of 2021, the EBA will publish a comprehensive report based on the findings of the pilot exercise, which will provide a broader analysis on the (financial) sustainability of banks' own business models and investment strategies. In particular, the report will include the results from the application of the EU green taxonomy by banks to their exposures, along with a sensitivity analysis on risk parameters to quantify the impact on banks' balance sheets resulting from the Network for Greening the Financial System (NGFS) scenarios.
	Establish a strategy on the integration of ESG factors into the EBA's policy work and impact assessments and establish guidelines to support it.
	Publication of the final report on the joint European supervisory authorities' (ESAs) regulatory technical standards (RTS) regarding ESG disclosure for financial market participants under the SFDR.
	Publication of a consultation paper and final report on the joint ESAs' RTS on taxonomy-related product disclosures for financial market participants under the Taxonomy Regulation and the SFDR.
	Publication of a consultation paper and final report on the ITS for pillar 3 ESG disclosure requirements
	A final report will be published on the incorporation of ESG into risk management and supervision, following on from the discussion paper on the same topic which was published in 2020.

6.6 GHG emissions

The GHG emissions are calculated using *Bilan Carbone*[®]. Scope 1 and 2 emissions are fully reported. Scope 3 is based on Interinstitutional Group on Environmental Management (GIME) recommendations, where data are available. The recommendations include:

- Travel: business travel, home-office commuting and visitors' travel
- Inputs: paper, glass, food
- Assets: IT equipment and furniture
- Direct waste





Total greenhouse gas emissions: 750 tCO₂eq

Total greenhouse gas emissions per full time equivalent employee: ~3 tCO₂eq/FTE

Travel of visitors, missions, and energy (from the building) are the "top 3" sources of emissions. Actions taken or to be taken have been set out in the previous chapters of this statement.

As shown in the graph to the left, which depicts the evolution of GHG emissions between 2019 and 2020, we can see that most of the progress came from reduced travel.

This is an important learning for the future of the Agency's environmental performance.

6.7 Other core and sector-specific performance indicators

Though not priority aspects, the Agency measures and follows other types of consumption that are the source of environmental impacts to ensure they remain under control.

6.7.1 Water consumption

There is no objective on water consumption in our management system; indeed, out of all water consumption, the share that is directly managed by the EBA (drinking, sanitary, kitchenettes, catering, cleaning water) represents only 28% of the total consumption. Therefore, it is the building manager who has the power to make impactful changes.



We have developed best practices for staff.

The work scheduled on closer management of the extra cooling of IT rooms will have an impact on water consumption.

We believe these actions can move the EBA closer to the benchmark of excellence stated in the sectoral reference document for the public administration sector, which is 6.4 m³/employee/year.

6.7.2 Paper



As shown in the 'paper consumption' graph above, the EBA was already below the benchmark of excellence level as per the sectoral reference document for public administration sector thanks to its badge-to-print printers and best practices. 2020 shows progress compared to 2019 thanks to intense teleworking.

Analysing the type of paper bought in 2019 (through a framework contract) allowed us to identify room for improvement in the supply choices. A best practice that we have now introduced is to choose 100% eco-labelled paper, which do, as shown in the above 'paper purchase' graph.

The EBA will continue to follow those indicators to ensure best practices do not slip.

6.7.3 Biodiversity

As the EBA rents only four floors of an entire tower, it has little direct impact on biodiversity. The building has gardens and green spaces that are managed as per the HQE[®] certification of the building, limiting inputs and choosing the best available techniques to limit the impact on the environment.

6.7.4 Air emissions

The EBA has no combustion on-site nor vehicle fleet, so there are no direct emissions to the air. Emissions due to our travels are followed through the GHG report from our travel agency. We target

to reduce travels altogether, the root cause of other pollutants (like SO2, NOX, PM...), so we consider that these other air emissions will improve in the same proportion.

7. Legal and other

environmental requirements

As a tenant, and given the equipment it uses, the EBA does not need any specific environmental permit pursuant to the EU or French regulations.

The Agency is bound by the relevant regulations and the European legal framework. As a European agency, it regularly reports on its environmental management in its governance documents, as well as on its environmental performance via this statement.

Most of the environmental requirements come from French regulations (the vast majority of which stem from European directives or regulations). Given the importance of the building's performance in relation to the EBA's current and future impact on the environment, lease requests, especially its "annexe environnementale" are considered binding. The biggest focus for the years to come will be on the energy efficiency front as the French regulations have set as a target of –40% energy consumption for 2030 (baseline no later than 2010) for all tertiary buildings.

All relevant environmental requirements are therefore integrated into the online legal compliance register (*En-Veille*) platform, which provides for:

- annual analysis of compliance with environmental legislation by an external provider
- quarterly flash update on any new regulations
- daily monitoring of applicable legal obligations

Should action be needed to correct or prevent non-compliance, it will be integrated into the Environmental Action Plan and followed through until completion.

Annex I: Environmental verifier's declaration on verification and

validation activities

The Verifier Organisation CORE-Umweltgutachter GmbH with EMAS environmental verifier registration number (DE-V-0308), accredited or licensed for the scope 66.11z - administration on financial markets - declares to have verified whether the site or the whole organisation as indicated in the environmental statement of the organisation

European Banking Authority:

Postal adress:	Dhysical address			
Tour Europlaza 20 Avenue André Prothin CS 30154 92927 Paris La Défense CEDEX	Tour Europlaza 20 Avenue André Prothin			
				92400 Courbevoie
				France
	France	Trance		

with registration number (if available) meet all requirements of 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) in the version of Regulation (EC) No 2018-2026.

By signing this declaration, we declare that:

- the verification and validation has been carried out in full compliance with the requirements of Regulation (EC) No 1221/2009,
- the outcome of the verification and validation confirms that there is no evidence of noncompliance with applicable legal requirements relating to the environment,
- the data and information of the environmental statement of the organisation reflect a reliable, credible and correct image of all the organisations activities, within the scope mentioned in the environmental statement.

This document is not equivalent to EMAS registration. EMAS registration can only be granted by a Competent Body under Regulation (EC) No 1221/2009. This document shall not be used as a standalone piece of public communication.

Done at Waiblingen on 30/03/2022

Ulrike Jaeger (DE-V-0371)

Raphael Artischewski, CEO (DE-V-0005)

c/o CORE Umweltgutachter GmbH (DE-V-0308), Endersbacher Str. 57, D-71334 Waiblingen, Germany

Annex II: Environmental Policy

ENVIRONMENTAL 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. Therefore, we have decided to structure this approach by focusing on the environment and by implementing the European standard for environmental management: 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. The policy is intended to serve as a guide to setting annual or multi-annual objectives in this area.

The EBA has a clear mandate regarding the integration of environmental, social and governance (ESG) factors into its regulatory and supervisory activities. This is in line with its missions to establish a single set of harmonised rules for financial institutions throughout the EU, and to promote convergence of supervisory practices. We therefore consider it our responsibility to take account of environmental impacts in all our activities.

We hereby:

- Affirm our commitment to obtaining and 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 developing knowledge, finding technical solutions and adjusting our organisation and behaviours, focusing on the following:
 - o Minimising our impact on greenhouse gas emissions, with a special focus on travel
 - $\circ~$ Building a strong relation with our landlord to improve our energy consumption performance
 - o Improving our waste production, segregation and recycling as expected by our staff
 - Maximising the use of electronic solutions and green public procurement to limit our material impact
 - 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 2019 action plan on sustainable finance and additional mandates received from the European Commission 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 Executive Director hereby approves this policy and ensures that adequate resources are made available to implement it. The Executive Director, with the support of all managers, actively communicates on the importance of good environmental management in contributing to our overall performance.

Annex III: Methodological assumptions

The EBA started implementing its environmental management system in early 2020, while it had moved to Paris as recently as June 2019.

Therefore, to be able to analyse performance year-on-year, assumptions were made. These assumptions are explained in this chapter.

Changes in emission factors or the scope of the *Bilan Carbone*[®] are also explained in this section.

1. Energy

Origin of the data	2019/2020 comparison:			
Building management for	As 2019 was not a full year, the following			
o Steam	calculations were conducted to evaluate the			
 Iced water 	consumption:			
 Electricity of shared spaces of 	\circ From the building: based on the			
the building	building's actual annual consumption,			
We have confidence in the data	split by the area rented			
because the building is HQE [®] for its	\circ For electricity: data available (7			
operations and hence the data are	months), extended to 12 months			
verified.	Carbon footprint:			
Hypothesis: the EBA's consumption is	 No change in scope 			
calculated based on its share of the	\circ Emission factor: this was used rather			
rented space.	than the 'designated producer' ENGIE,			
	which cannot ensure we used the			
CS from the electricity supplier's report on	French mix as ADEME recommends. To			
annual consumption based on bills.	compare 2020 with 2019, 2019 was			
	recalculated according to this emission			
	factor.			

2. Non-energy

Origin of the data	2019/2020 comparison:		
CS: refills of refrigerant fluids (by maintenance	Carbon footprint:		
service provider) => none	 No change in scope 		
	\circ In 2019 we used the average annual		
	leak rates and the refrigerant types as		
	there was no maintenance contract		
	 Emission factors: unchanged. 		

3. Inputs

Origin of the data	2019/2020 comparison:		
Glass	Quantities collected for 2019 were for 6 months.		
Glass bottles purchased, collected by Corporate	They are multiplied by 2 to compare on a full-		
Support	year basis.		
Hypothesis: same weight per unit in			
2019 and 2020: 350 g.	Carbon footprint:		
	 No change in scope 		
	 Emission factor unchanged 		

Paper	Quantities collected for 2019 were for 6 months.
Paper purchased, collected by CS	They are multiplied by 2 to compare on a full-
	year basis.
	,
	Carbon <u>footprint:</u>
	 Minor change in scope: weight of paper
	for annual report not collected (it was
	less than 30 kg in 2019)
	 Emission factor unchanged
Food and beverages	Quantities collected for 2019 were for 6 months.
Meals for meetings, from CS	They are multiplied by 2 to compare on a full-
\circ Total meals (hot meal or sandwiches),	year basis.
with a 5% rate for vegetarian options	
Coffee, from purchases collected by CS	Carbon footprint:
Tap water	 No change in scope
• From building's management report,	 Emission factor unchanged
EBA's share being identified through its	_
share of rented space (this covers	
shared spaces and RIE).	
\circ From building's report on individual	
consumption based on monthly meter	
readings by their teams.	
Assets	Carbon footprint:
Accounting, from assets database	 Changes in scope: no change
0.	\circ 2019 emissions multiplied by 2 (all
	purchases were collected but only half
	of emissions were reported)
	• Emission factors: identical, except for
	new phones that have a higher emission
	factor (x2).

4. Waste

Origin of the data	2019/2020 comparison:
Annual report produced by CS based on PAPREC	Quantities collected for 2019 were for 6 months.
data (weight assigned to the EBA by its agent on	They are multiplied by 2 to compare full-year.
floor 1)	
	Carbon footprint:
The dangerous or specific waste not collected by	 No change in scope
the building is not yet given to another waste	 Emission factors: the Bilan Carbone[®]
contractor and is stored. This will have an impact	table (8.4) evolved in the categories of
on waste production in 2021, when the contract	waste and the splitting between
will enter into force.	recycling emissions and end-of-life
	emissions that are now included
	systematically.

5. Freight

Origin of the data	2019/2020 comparison:
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Interviews with	the	caterer	and	waste	Carbon footprint:
collection report.					 Excluded from scope in 2020
					 2019: the main sources were from waste
					collection and food delivery from the
					caterer but represented less than 1% of
					the total footprint, with small distances
					involved.

6. Mobility

Origin of the data	2019/2020 comparison:
Missions	2019 trips were collected for 3 months only (due
Travel agencies' reports for distances, means	to the change of travel agency from October 2019
of transport and number of trips.	onwards). Therefore, to be able to compare year-
	on-year, 2019 results were multiplied by 4.
	<u>Carbon footprint:</u>
	 No change in scope
	 Evolution of mission factors, no significant
	impact
Visitor travel	2019 visitors were collected for 6 months only.
From registrations to meetings reported by CS.	Therefore, to be able to compare year-on-year,
Only country of origin is collected at	2019 results were multiplied by 4.
registration; therefore we used the following	
hypothesis:	Carbon footprint:
• Visitors come from the capital of their	 No change in scope
country, except Germany, where half	\circ Emission factors: split by distances for
of visitors come from Frankfurt.	planes to be a little more precise.
 Means of transport: 	
 Less than 400 km: train 	
\circ More than 400 km: plane,	
except for Germany, where	
half of visitors from Frankfurt	
come by train.	



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