
ESG data and metrics

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Background

Directive (EU) 2022/2464 - **Corporate Sustainability Reporting Directive (CSRD)** → extending the scope of Non-Financial Reporting Directive (NFRD). Currently under review due to Omnibus

Regulation (EU) 2019/2088 - **Sustainable Finance Disclosure Regulation (SFDR)** → sustainability disclosure obligations for manufacturers of financial products and financial advisers toward end-investors. Joint Committee RTS on ESG disclosure standards for financial market participants.

EU Taxonomy Regulation → establishes a common classification system of environmentally sustainable economic activities at EU level. Currently under review due to Omnibus

Pillar 3 disclosures framework → mandates to the EBA to develop a harmonised set of standards for ESG information disclosures

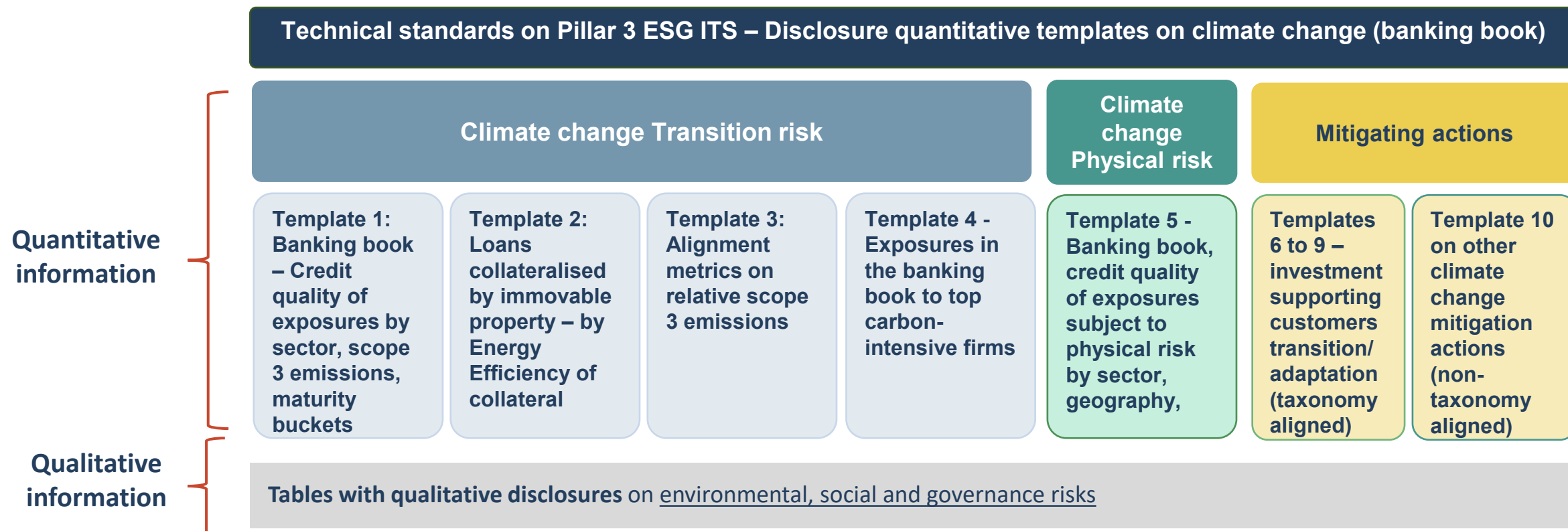
ITS on Pillar 3 Disclosures – applicable from Dec. 2022



- ✓ Pillar 3 information provides a good way of accessing risk-relevant information to all type of stakeholders, who should be able to compare across institutions and exercise market discipline
- ✓ To provide enough information to allow users to have a comprehensive view of the risk profile of the institution and understand how climate and other ESG-related risks may exacerbate other traditional prudential risks in their balance sheet, notably credit risk, but also market, liquidity risk or operational/legal/reputational risk

Data to inform policy development and foster market discipline as a tool to assess risks, includes those linked to moving towards a more sustainable economy...

ITS on Pillar 3 disclosures on ESG risks



- *ITS currently under review, following the CRR3 mandate to extend the scope to all institutions, considering proportionality and simplification aspects. Consultation Paper published in May 2025. Interim guidance is provided on what to do while revision is finalised.*

ITS on Pillar 3 disclosures on ESG risks

Template 1: Banking book – Credit quality of exposures by sector, scope 3 emissions, maturity buckets

- ✓ Information on the **gross carrying amount** of loans and advances, debt securities and equity instruments provided to NFC, classified by NACE sector, inc
- ✓ Information on NFC that **highly contribute to climate change** (including breakdown also to exposures towards fossil fuel)
- ✓ **Credit quality of exposures**, related impairments and provisions
- ✓ Information on GHG **emissions** (scope 1,2,3)
- ✓ Information on **residual maturity of exposures**

Template 4 - Exposures in the banking book to top carbon-intensive firms

- ✓ Institutions' **exposures towards the top 20 carbon-intensive** companies in the world (highest GHG volumes)
- ✓ **Granular data**

Template 2: Loans collateralised by immovable property – by Energy Efficiency of collateral

- ✓ **Gross carrying amount of loans collateralised** with immovable property and of repossessed real estate collateral
- ✓ Breakdowns by:
 - EPC label of the collateral
 - Energy consumption ranges
 - EPC label estimations when EPC is not available

Template 5 - Banking book, credit quality of exposures subject to physical risk by sector, geography

- ✓ Banking book exposures towards NFC on loans collateralised with immovable property and on repossessed real estate collateral that are exposed to chronic and acute climate-related hazards
- ✓ Breakdowns by geography and economic activity – NACE
- ✓ Information on maturity buckets

Template 3: Alignment metrics on relative scope 3 emissions

- ✓ **Gross carrying amount** of exposures towards the sectors of the counterparty (IEA and NACE sectors mapping)
- ✓ Institutions must disclose information by relevant sector and alignment metric, using relative GHG emissions, and estimate the distance from the current value of the **alignment metric to the 2030 projection** according to the proposed scenario

ITS on Pillar 3 disclosures on ESG risks

Template 6: Summary of GAR KPIs

- ✓ Summary of GAR and its % coverage of total assets breaking down by data flows and stock
- ✓ In line with the Commission Delegated Regulation under Article 8

Template 9 - Mitigating actions: BTAR

- ✓ Information on the level of alignment of exposures towards NFC not subject to NFRD disclosure obligation
- ✓ Breakdown by assets for the BTAR computation

Template 7 - Mitigating actions: Assets for the calculation of GAR

- ✓ Data for the calculation of the GAR
- ✓ Information on loans and advances, debt securities and equity instruments in the banking book
- ✓ Breakdown of exposures towards sectors covered by the Taxonomy Regulation
- ✓ Breakdown of those exposures that are environmentally sustainable: CCM and CCA

Template 10 - Other climate change mitigating actions that are not covered in the EU Taxonomy

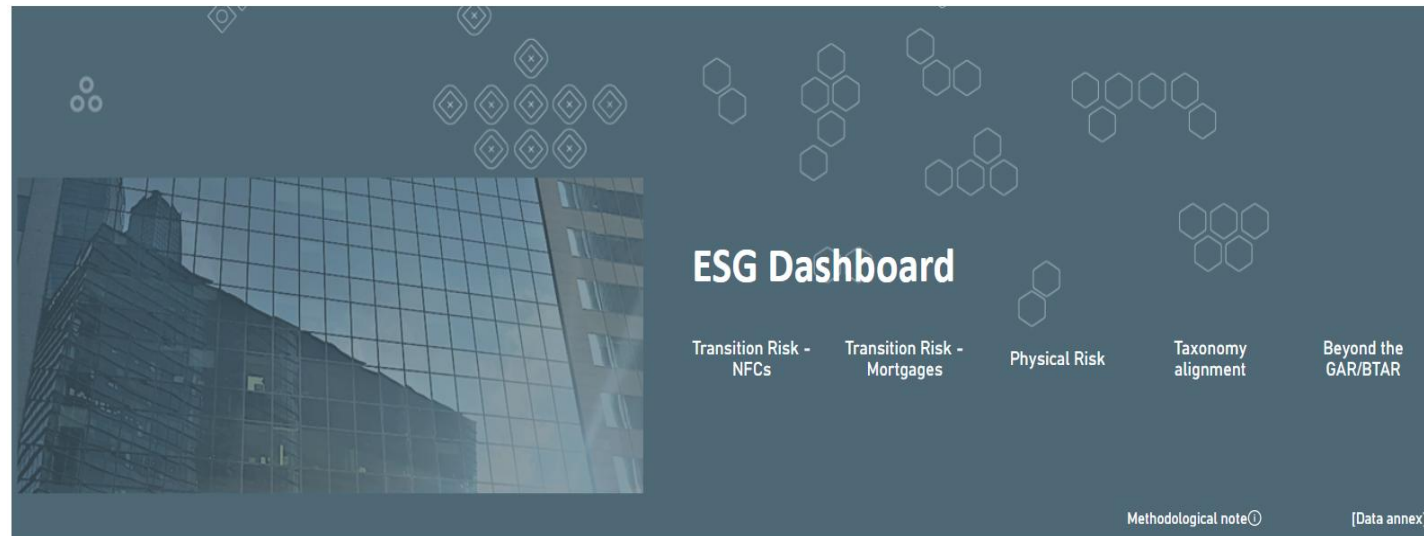
- ✓ Information on other actions put in place by the institution to mitigate climate-change-related risks, by supporting counterparties in the mitigation/adaptation process, beyond those included in the GAR

Template 8 - GAR (%)

- ✓ GAR of the institution, including a breakdown by environmental objective and counterparty
- ✓ Information on the % of their total assets covered

The EBA ESG dashboard

- On April 25th the EBA published the ESG Risk Monitoring Framework
- The ESG risk dashboard contains key indicators on climate-related risk **for large and listed institutions** in the European Union (EU)
- The ESG risk dashboard is **based on data published by banks as part of Pillar 3 ESG disclosures**, which is collected via an ad-hoc collection. It will be updated twice a year.
- Current available data as of:
 - 12/2023
 - 06/2024



Disclaimer

Charts in the tool are based on data disclosed by banks on environmental, social and governance (ESG) risks in line with Commission Implementing Regulation (EU) 2021/637^[1], reported to the EBA through its ad hoc data collection, and which have passed basic quality assurance checks. Institutions have only recently started to collect and disclose this data. While data quality and consistency are expected to improve over time, at this stage, certain data points remain incomplete for some institutions.

Further, the number of institutions disclosing data varies substantially across countries as well as for specific indicators. The limited sample may affect the meaningfulness of aggregate nominal figures.

Given that data is disclosed at the highest level of consolidation, data from subsidiaries is reflected in the figures of the home country of the banking group, even if some of the activities are carried out in other countries. Finally, the aggregated figures are by nature subject to certain simplifications and may not reflect all relevant specificities. Therefore, caution is warranted when analysing and drawing conclusions from the data presented.

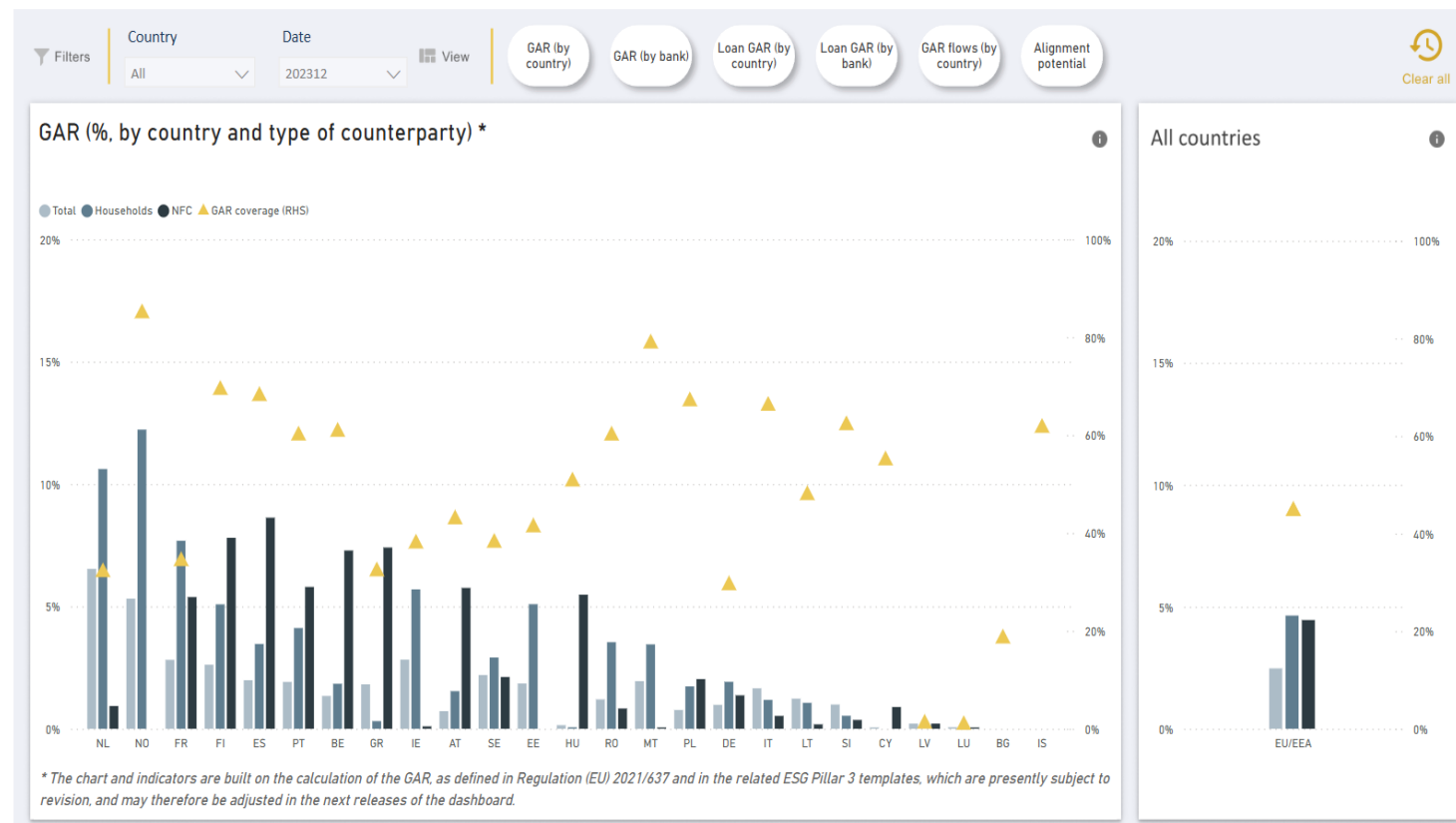
Abbreviations: BTAR – Banking Book Taxonomy Alignment Ratio; CC – Climate change; EE – Energy efficiency; EP – Energy performance; GAR – Green Asset Ratio; HH – Household; NFC – Non- financial corporate

^[1] Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 amending the implementing technical standards laid down in Implementing Regulation (EU) 2021/637 as regards the disclosure of environmental, social and governance risks.

The EBA ESG dashboard

- Indicators based on P3 disclosure data on climate-related aspects.
- Focus on a few, key, straight-forward indicators:
 - ✓ exposure to transition and physical risk;
 - ✓ taxonomy alignment;
 - ✓ financing of sustainable activities within and beyond the taxonomy criteria.

Taxonomy alignment



The EBA ESG dashboard: Key ESG data available from the Pillar 3 ITS

Transition risk - NFCs	Share of exposures to NFCs in sectors highly contributing to climate change
	Share of exposures to NFCs in sectors highly contributing to CC (by sector)
	Share of exposures to top 20 carbon-intensive NFCs
	Share of exposures to top 20 carbon-intensive NFCs - dispersion across banks (by region)
	Maturities across different NFC exposures
	Difference in non-performing exposure shares for NFCs in sectors highly contributing to CC vs. NFCs in other sectors

Transition risk – Mortgages	Share of mortgage exposures to different EE buckets (by kWh/m2)
	Mortgage exposure by EE bucket (residential and commercial) versus share of estimated EE in each bucket

Physical risk	Share of exposures sensitive to physical risk – Total (by bank)
	Share of exposures sensitive to physical risk – Total (dispersion across banks, by region)
	Share of exposures sensitive to physical risk (maturities)

Taxonomy alignment	GAR stocks, by country
	Total GAR stocks, by bank
	Total loan GAR stocks (by bank)
	GAR flows, by country
	Potential of assets for future taxonomy alignment

Beyond GAR/BTAR	Beyond the GAR/BTAR
	Share of assets funding climate related activities beyond the GAR/BTAR - Loans and bonds

- Developments of **further risk indicators** based on the data, regular updates, monitoring of trends.

- Data quality expected to improve over time: **improved data availability** from clients, public databases and data providers, **progress in data management** (increasing skills, knowledge and better measurement tools, formalisation of internal processes) and **development of climate strategies**.

- **Transition risk:** Substantial exposure to corporates in sectors highly contributing to climate change.

- **Physical risk:** Average exposures in areas subject to elevated physical risk lower but also less comparable.

- **Mortgage lending:** Around half of loans secured by immovable property are in the two highest performing buckets of energy efficiency (though extensive use of estimations and proxies on energy efficiency).

- **GAR:** Taxonomy-aligned shares of EU banking books remain low, with significant potential for increases over time (based on taxonomy-eligible exposures).

- **Beyond the GAR:** Green portfolios extend beyond the GAR through exposures to climate change mitigating activities defined by standards other than EU Taxonomy.

Thank you!



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