19.08.2025

**EBA consultation on amended disclosure requirements for ESG risks, equity exposures and aggregate exposure to shadow banking entities**

**Comments of the Austrian Banking Industry**

*Q1.* Do you have any comments on the proposed set of information for Large institutions?

We welcome the alignment between the Article 8 disclosure and the disclosure of templates 7 and 8. Additionally, the option to disclose the BTAR on a voluntary basis is appreciated.

Furthermore, we would like to note that, in accordance with Article 449a(3) CRR III, templates for the disclosure of ESG risks must not request information not mentioned in Article 430(1)(h) CRR III.

*Q2. Do you have any comments on the simplified set of information for Other listed institutions and Large subsidiaries?*

In Template 1 the disclosure requirement

*(c) Current investment activities and (future) investment targets towards environmental objectives and EU Taxonomy-aligned activities*

for Other listed and Large subsidiaries should be deleted.

Otherwise, for those institutions that are out of scope of the Taxonomy Regulation a taxonomy conformity assessment obligation would be implemented via the backdoor.

*Q3. Do you have any comments on the simplified set of information proposed for SNCI and other non-listed institutions?*

In general, we support the reduced disclosure requirements for SNCI and that the proportionality principle was respected in this regard.

Ensuring that SNCIs are not overburdened by disclosure requirements is essential to preserve the competitiveness of locally active banks while still upholding transparency and achieving market discipline.

That said, however, the question arises on the articulation and aim of the disclosure formats for SNCIs, especially in the absence of the reporting framework. It is one of the basic principles of the Basel IV regime that small and non-complex banks should be (completely) exempted from Pillar 3 disclosure requirements. In this vein, pursuant to Recital 53 CRR III EBA shall publish the disclosures of small and non-complex institutions, based on the information reported by those institutions to competent authorities and should thus significantly reduce the administrative burden to which small and non-complex institutions are subject.

Moreover, according to Article 434(4) CRR III states that the EBA shall publish the disclosures of SNCIs on its website, based on the information reported by those institutions to the competent authorities in accordance with Article 430 CRR.

This aspect should be clarified.

*Q4. Do you have any comments on the proposed approach based on materiality principle to reduce the frequency (from semi-annual to annual) of specific templates (qualitative, template 3, and templates 6-10) for large listed institutions?*

We believe that the frequency reduction is an appropriate step in terms of burden reduction. Particularly, the qualitative information is very apt for yearly submissions as it is highly unlikely to witness unexpected massive changes in strategy and controls over the course of 6-months submissions. The same reasoning applies to the templates in question (3, 6-10).

*Q5. Do you have any comments on the transitional provisions and on the overall content of section 3.5 of the consultation paper?*

We support the proposed approach to suspend the disclosure obligations for the Green Asset Ratio (GAR) and Taxonomy Regulation templates (6 to 10) for large, listed institutions until the end of 2026.

We support the proposed transitional provision for large non-listed institutions, other institutions, SNCIs and large subsidiaries to apply the ITS proposed in this Consultation Paper from the reference date of 31 December 2026 onwards. Until that reference date, the disclosure obligations introduced by CRR III on ESG-related risks under the EBA Pillar 3 ITS should not apply to those entities. The same grace period should likewise cover the new disclosures on the aggregate exposure to shadow banking entities and amendments on equity exposures, for all institutions.

*Q6. Do you have any comments on the proposed amendments to Table 1 and Table 3?*

*Q7. Do you have any further suggestions on Table 1A?*

NA

*Q8. Do you have any comments on the proposed additions and deletions to the sector breakdown?*

NA

*Q9. Do you have any views with regards to the update of the templates to NACE 2.1?*

NA

*Q10. Do you have any views with regards to NACE code K – Telecommunication, computer programming, consulting, computing infrastructure and other information service activities, and in particular K 63 - Computing infrastructure, data processing, hosting and other information service activities, whether these sectors should be rather allocated in the template under section Exposures towards sectors that highly contribute to climate change?*

NA

*Q11. Do you have any comments on the inclusion of row “Coverage of portfolio with use of proxies (according to PCAF)”?*

NA

*Q12. Do you have any further comments on Template 1?*

Point (c)

*“Of which environmentally sustainable (CCM)”*

should be deleted, as otherwise institutions that will not be subject to the Taxonomy Regulation would be subject to a sort of taxonomy audit obligation. If a deletion shouldn’t be possible, an explanation should be provided stating that these institutions only need to prepare reports based on the key performance indicators (KPIs) disclosed by their counterparties. Alternatively, it could be defined that the frequency of this particular column is aligned with the frequency of Taxonomy disclosure (namely, Templates 6-8).

*Q13. Do you have any comments or alternative suggestions on Template 1A for SNCIs and other institutions that are not listed, regarding the sector breakdown?*

NA

*Q14. Do you have any additional suggestions how to adjust Template 1A for SNCIs and other institutions that are not listed?*

NA

*Q15. Do you have any further comments on Template 1A?*

NA

*Q16. Should Template 2 in addition include separate information on EPC labels estimated and about the share of EPC labels that can be estimated?*

NA

*Q17. Should rows 2, 3 and 4 and 7, 8 and 9 for the EP score continue to include estimates or should it only include actual information on energy consumption, akin to the same rows for EPC labels?*

NA

*Q18. Do you have any comments on the inclusion of information on covered bonds?*

NA

*Q19. Do you have any comments on the breakdown included in columns b to g on the levels of energy performance?*

NA

*Q20. Do you have any further comments on Template 2?*

NA

*Q21. Do you have any comments on Template 3?*

NA

*Q22. Do you have any comments with the proposals on Template 4 and the instructions?*

NA

*Q23. Do you have any views on whether this template could be improved with some more granular information in the rows, by requesting e.g. split by sector of counterparty or other?*

NA

*Q24. Do you have any further comments on Template 4?*

NA

*Q25. Do you have any comments on the proposal using NUTS level 3 breakdown for Large institutions and NUTS level 2 for Other listed institutions and Large subsidiaries? Would NUTS level 2 breakdown be sufficient for Large institutions as well?*

NA

*Q26. Do you have any comments on the instructions for the accompanying narrative and on whether they are comprehensive and clear?*

NA

*Q27. Do you have any further comments on Template 5 and on its simplified version Template 5A?*

NA

*Q28. Do you have any comments on the proposal to fully align templates on the GAR, that is, templates 7 and 8, with those under the Taxonomy delegated act by replacing the templates with a direct cross reference to the delegated act?*

NA

*Q29. Do you have any comments on the proposal related the BTAR and to keep it voluntary?*

NA

*Q30. Do you have any comments regarding the adjustments to template 10?*

NA

*Q31. Do you have any further comments on the Consultation Paper Pillar 3 disclosures requirements on ESG risk?*

NA

*Q32. Are the new template EU SB 1 and the related instructions clear to the respondents? If no, please motivate your response.*

NA

*Q33. Do the respondents agree that the new template EU SB 1 and the related instructions fit the purpose and meet the requirements set out in the underlying regulation?*

NA

*Q34. Are the amended template EU CR 10.5 and the related instructions clear to the respondents? If no, please motivate your response*.

NA

*Q35. Do the respondents agree that the amended template EU CR 10.5 and the related instructions fit the purpose and meet the requirements set out in the underlying regulation?*

NA

*Q36. Do the respondents consider that the “mapping tool” appropriately reflects the mapping of the quantitative disclosure templates with supervisory reporting templates?*

NA