ABI response to the EBA public consultation on proposed amendments to the European Commission's Implementing Regulation on Pillar 3 disclosures under the CRR3

August 22, 2025

POSITION PAPER

Part 1: Scope of institutions, proportionality and simplification measures

Question 1: Do you have any comments on the proposed set of information for Large institutions?

ABI believes the frequency should be adjusted to annual disclosure for all templates, similarly to the frequency suggested in the voluntary ESG Pillar 3 disclosure framework recently published by the Basel Committee. Semi-annual disclosure of EU Taxonomy (EUT) templates requires a significant effort from disclosure companies while providing limited insights, among others also because that EU Taxonomy KPIs of counterparties are only available on an annual basis (emissions, EPC...); targets are set on annual basis.

Furthermore, ABI have noted that under article 433a of CRR 3, large non-listed institutions are expected to publish ESG disclosures annually. Yet, in the EBA consultation, a semi-annual frequency is proposed for these institutions, which represents a tightening of the framework.

If the EBA does not adopt this general approach, ABI believes that, at the very least, the frequency for large non-listed institutions should be revised back to annually to ensure consistency with CRR 3. It seems essential to remain aligned with CRR 3 to avoid unnecessary complexity and reporting burden for these institutions.

In case annual frequency is granted for all institutions, it should be clarified when publishing the final draft ITS that June 2026 disclosure is not required.

Question 2: Do you have any comments on the simplified set of information for Other listed institutions and Large subsidiaries?

A simplified set of disclosure for Large subsidiaries and Other listed institutions is welcomed and in line with the aim to reduce overall disclosure burden for entities in scope. However, consistency with reporting requirements of large institutions is essential to ensure comparability between the disclosure of the subsidiary and its parent.

ABI would appreciate clarification that the "proportionate approach" disclosed on annual basis also applies to large, listed subsidiaries.

Question 3: Do you have any comments on the essential set of information proposed for SNCI and other non-listed institutions?

The consultation refers to the "Omnibus" (which will enter into force for SNCI banks on 31/12/2028), but does not mention the ESG Risk Management Guidelines, which will only become legally binding for SNCIs from 11/01/2027. However, the disclosure proposed in this consultation (which also includes requirements regarding the scenarios used, as well as social and governance risks) will become binding with reference date 31/12/2026. Alignment of these dates with those of the ESG Risk guidelines (ITS entry into force from January 2027) should be warranted, in order to ensure consistency in the treatment of social and governance topics).

Question 4: 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?

Materiality approach of some templates would raise operational challenges. This is the case for instance for the template 3 as the shift into a "materiality" approach for the selection of sectors is not neutral and could complexify the comparison among institutions. The materiality approach will require extensive assessment and proper governance around such assessment. While in theory changing a reporting frequency might seem simple, in practice the simple change of reporting frequency due to materiality assessment requires mobilization of workforce, update of processes (to move from yearly to semi-annual), update of the governance, etc.

Based on the content of the templates and the reporting experience of the past years, a semi-annual reporting of these templates has limited to no additional value: Template 3 alignment metrics are usually updated on an annual basis, disclosure on semi-annual basis does not provide additional or new information (as also mentioned in article 29 of the consultation paper).

Also, should the link to the Regulation 2021/2178 (EUT Art 8) remain, it requires yearly reporting. As a result, semi-annual disclosures in Pillar 3 ESG would not be aligned with EUT article 8 requirements, nor the aim to reduce reporting burden for companies in scope.

Semi-annual reporting of EUT templates requires a significant effort from disclosure companies while providing limited insights due among others to the fact that EUT KPIs of counterparties are only available on an annual basis.

ABI therefore suggests adjusting the reporting requirement of all templates (including Templates 1, 2, 4 and 5) to an annual disclosure frequency without any conditions. Based on the nature of these templates, such frequency would be sufficient for the users of the information, similarly to the frequency suggested in the voluntary ESG Pillar 3 disclosure framework recently published by the Basel Committee.

Part 2; Transitional provisions introduced in the ITS and interim guidance until the finalization of the ITS

Question 5: Do you have any comments on the transitional provisions and on the overall content of section 3.5 of the consultation paper?

ABI appreciates the inclusion of the transitional provisions to adapt to the revised ESG disclosure requirements, particularly the suspension of Green Asset Ratio (GAR) and EU Taxonomy-related disclosures in Templates 6-10 until the end of 2026. However, the European Commission allows financial companies to no longer report detailed taxonomy information and KPIs until 31 December 2027, until the Commission reviews in detail the Taxonomy disclosure rules and technical screening criteria. The EBA should thus align the suspension deadline for taxonomy templates with the Taxonomy DA, until 31 December 2027.

ABI also welcomes the proposal allowing bank’s Large subsidiaries to refrain from standalone disclosures for GAR and alignment metrics. This is particularly helpful for large banks, managing sustainable finance and net zero targets at a group level

ABI also would like to make the following more specific comments:

Given that EU Taxonomy alignment inputs are still required in Templates 1 and 4 (column ‘of which environmentally sustainable CCM’), ABI kindly requests the EBA to confirm that these columns are also covered by the transitional provisions. In this context, ABI would like to request the full deletion of Taxonomy-related data requirements from Pillar 3 disclosures — specifically the CCM columns in Templates 1, 4, in order to avoid unintended consequences, such as misalignment, confusion, or unnecessary reporting burdens during the transition period.

ABI also assumes that no ESG ad hoc XBRL submissions for Templates 6–10 will be required as long as the suspension will be in force.

Part 3: Review of the qualitative and quantitative information on ESG

Question 6: Do you have any comments on the proposed amendments to Table 1 and Table 3

N/A

Question 7: Do you have any further suggestions on Table 1A?

ABI recommends that the amendments proposed be implemented in the other regulatory reporting exercises which share the similar sector breakdown.

Question 8: Do you have any comments on the proposed additions and deletions to the sector breakdown?

Given the effort required to fully implement the proposed amendment (including at the IT level) ABI suggests that the granularity of the NACE used remains as it is today. Any increase in the granularity of the NACE would not be consistent with the simplification perspective; on the contrary, it would burden the process in terms of effort. ABI also proposes that the openness of the financed emissions should remain unchanged, thus without the integration of details for scope 1 and scope 2 consistent with the simplification perspective.

If this is not feasible, as a second-best option ABI would suggest providing a grace period within which institutions can continue to disclose the template using NACE 2.0.

Question 9: Do you have any views with regards to the update of the templates to NACE 2.1?

N/A

Question 10: 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?

Please consider that due to the difficulties in finding proper data ABI suggests that NACE K63 in Template 1 should be removed. This choice would grant coherence and accountability of the data shown without risks of unverifiable or incomplete data.

Question 11: Do you have any comments on the inclusion of row "Coverage of portfolio with use of proxies (according to PCAF)"?

ABI would not include the row "Coverage of portfolio with use of proxies (according to PCAF)" because as already specified in the text it is a duplicate of the column "GHG emissions: gross carrying amount percentage of the portfolio derived from company-specific reporting".

Question 12: Do you have any further comments on Template 1?

A materiality threshold based on Gross Carrying Amount (GCA) can be applied to identify the NACE sectors most relevant to the bank's business -namely, those for which Net-Zero Banking Alliance (NZBA) targets have been set. Financed emissions would be disclosed in the template exclusively for the sectors selected through this materiality-based approach.

Taxonomy

- In column c, institutions are required to state the share of their exposures that can be classified as environmentally sustainable according to the

Taxonomy Regulation. Aa a significant portion of institutions required to report under Template 1 is not expected to be subject to the Taxonomy Regulation any longer (post-Omnibus), ABI suggests that the template and accompanying guidance clarify that this column is only to be filled in if the institution is subject to the Taxonomy Regulation. This would align with EBA's approach in Templates 6-10.

- In addition, Column C in Template 1 and 4 should not be required during the GAR disclosure requirements suspension until end-2026 for large entities.

Question 13: Do you have any comments or alternative suggestions on Template 1A for SNCIs and other institutions that are not listed, regarding the sector breakdown?

N/A

Question 14: Do you have any additional suggestions how to adjust Template 1A for SNCIs and other institutions that are not listed?

N/A

Question 15: Do you have any further comments on Template 1A?

The instructions included in the consultation specify:

"2. Institutions shall include in the narrative accompanying the template, explanations on the information disclosed and the changes compared to previous disclosure periods, as well as any implications that those exposures may have in terms of credit, market, operational, reputational and liquidity risks for the institutions."

Since this is qualitative information, such descriptions could already be included in Table 1A and not be requested in this section as well.

In the methodological note regarding the columns "of exposures sensitive to the physical effects of climate change", instructions require to describe the methodology used. It is stated that banks "may" use public sources to identify the geographic areas sensitive to climate events. But if each bank uses different scenarios, time horizons and different scoring systems (providing an appropriate description in the template) such disclosure risks leading to data that are not very comparable between the different banks.

Question 16: Should Template 2 in addition include separate information on EPC labels estimated and about the share of EPC labels that can be estimated?

ABI does not recommend introducing a requirement to disclose EPC labels under Pillar 3, due to the lack of reliable and standardised data. At present, there are no harmonised criteria for EPC label disclosures, making it extremely difficult to ensure the reliability, comparability, and usefulness of the information provided — particularly across different jurisdictions. Moreover, ABI notes that the Basel Committee does not mandate EPC label disclosure but rather encourages the provision of information on energy efficiency in general.

In light of this, ABI suggests removing the EPC label disclosure requirements (columns H–N). If this is not feasible, as a second-best option ABI recommends leaving the template *as is*, without introducing additional transparency requirements.

Question 17: 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?

According to ABI point of view, rows 2, 3, and 4 and 7, 8 and 9 for the EP score should continue to include actual and estimated information since the only estimated exposure will be easily retrievable through the new proposed column g1 “Of which level of energy performance (EP score in kWh/m^2 of collateral) estimated”.

Question 18: Do you have any comments on the inclusion of information on covered bonds?

Following a materiality-based approach, the line “of which: part of a cover pool of covered bonds” in Template 2 could instead be reflected as part of the qualitative disclosures accompanying the templates.

ABI would seek clarification on whether the clustering of sectors by NACE code has to be intended as tentative or strict. If restrictive, this could lead to a misalignment between what is communicated in Pillar III and what is used by entities in the Net Zero context.

The disclosures on ESG risks associated with covered bonds should be included in the regulatory and disclosure framework for covered bonds and not under Pillar 3 ESG. ABI suggests removing it, i.e. removing rows 1.1 and 6.1 from this Template 2.

Question 19: Do you have any comments on the breakdown included in columns b to g on the levels of energy performance?

ABI would appreciate confirmation that when al collaterals have measured or estimated EP Score, 0 should be disclosed in column G2.

Question 20: Do you have any further comments on Template 2?

Regarding the proposal to move the column (p) "*Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated*" closer to the columns for the EP score and the addition of new column (g2) "*Without EP score in kWh/m² of collateral (neither measured nor estimated)*" it might be useful to consider that in Template 2: "*Banking book - Climate change transition risk: Loans collateralized by immovable property - Energy efficiency of the collateral*" of Short-Term Exercise (STE) is requested to disclose the amount of exposures "*without EP score kWh/m²*" and the percentage of "*level of energy efficiency (EP score in kWh/m² of collateral) estimated*". ABI suggests aligning the two metrics between Pillar 3 and STE disclosure with the aim of simplifying the reporting process.

Where EPC certificate does not have energy efficiency, the requirement in Template 2 is to estimate the EPC score. Therefore, ABI would find it helpful to have more guidance and a consistent methodology for estimating energy efficiency.

Question 21: Do you have any comments on Template 3?

Some additional comments or requests for improvements below:

- Additional target: value of the intensity metric/ year/ PiT Distance (if the institution has defined an additional target beyond 2030) should remain optional

- It is recommended to align the headline of column (d) with columns (f) and (g), amending the former to read "Value of GHG intensity metric" instead of "Value of intensity metric."

- A question arises since PiT distance is described as distance to additional target, and in particular if it means that PiT distance has been generally reviewed and considered as distance from target instead of scenario (column of the current Template 3 table "Distance to IEA NZE2050 in %")

- Regarding column (l), it seems appropriate to specify if the modality to calculate the PiT Distance is aligned with column (i) and (h), and, therefore, according to IEA NZE2050.

$$Distance = \frac{\text{Metric at reference year} - (\text{IEA scenario metric in } 2030)}{(\text{IEA scenario metric in } 2030)} * 100$$

  However, this methodology presents criticalities because it returns values are difficult to interpret. Clarification on this calculation would therefore be desirable, also in light of the new fields required by the template. It should also be specified whether the reference scenarios for distance calculation must necessarily refer to those of the IEA or whether NGFS scenarios can also be referred to.

- ABI agrees on yearly update of template being in line with CSRD; however, the value of the template disclosure should be evaluated as same information are already published for CSRD needs

- In line with Net Zero disclosures, in column metric, it would be important to allow the disclosure in physical intensity or alternatively in absolute financed emissions, being the latter used for some sectors by many banks (e.g. Oil&Gas)

- For info related to exposure, ABI suggests giving the possibility to describe what has been considered for target setting (e.g. on balance sheet lending, investments, ...) instead of requiring the mandatory use of GCA as metric and the mandatory inclusion of debt and equity instruments

- ABI requests that the additional columns e) and f) relating to the baseline year be left optional, as their inclusion would imply additional effort in terms of metrics calculation.

- In the event that the bank decides to compile the additional columns requiring calculations relating to the baseline year, clarification is requested whether the "baseline year" (columns e) and f)) to be taken as a reference is equal to the first publication date of Template 3 by the bank or, alternatively, is to be intended as the baseline year of the target at 2030 (i.e. the year the target at 2030 was set).

- Confirmation is requested that the information in columns e) and f) must remain unchanged during the various publications of the information to the public, as this is the starting point from which the bank started to monitor the achievement of the emission reduction target set by the institution.

ABI agrees on the point of making the template annual.

Question 22: Do you have any comments with the proposals on Template 4 and the instructions?

This template requires disclosure of the top 20 carbon-emitting companies in the world. However, exposures to financed emissions (which would here include exposures to specific "top" carbon-emitting companies financed by the institution) do not directly correlate to an institution's credit risk and therefore are not relevant for Pillar 3 purposes. ABI recommends this template to be removed. If removal is not considered feasible, it is important that the EBA define a single, consistent source for identifying the top 20 polluters in order to ensure comparability across institutions.

For a banking group, it is complex and impractical to obtain consistent information from each individual legal entity, particularly those located outside national borders. Furthermore, the requirement to map each production facility of every company to which the bank is exposed — down to the regional level — would entail significantly higher operational costs. Constructing and maintaining such a detailed database would be disproportionately burdensome. ABI therefore proposes retaining the reporting requirement at the country level. The request to disaggregate exposures at the regional level appears misaligned with the broader regulatory objective of simplification.

It is unclear what physical risk distribution should be for the single legal entity in particular if it has to be assigned to single production plants or to HQs. ABI would like to highlight that implementation of the more detailed breakdown would require extensive databases containing information on corporate production sites. Currently, the available coverage relies on external data providers, which do not guarantee the reliability of the information.

Question 23: 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?

In ABI’s view additional information is not needed.

The cost-benefit for any additional breakdown is not justified. ABI suggests removing this template or at least reducing its frequency to annual.

Question 24: Do you have any further comments on Template 4?

Breaking down the exposure to the top 20 polluters by economic activity appears to offer limited added value, as this information is largely already available and can be inferred from Template 1. Including such a breakdown may lead to redundancy without significantly improving the overall insight provided.

Question 25: 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?

From ABI perspective the proposal using NUTS level 3 breakdown for Large institutions might not be reasonable since for extended portfolios the requirement to make disclosure of the first 10 NUTS-3 might cover a percentage of the bank portfolio that is not material. In light of this, the benefits of implementing the proposed amendment would not justify the huge effort required by the bank.

It is also not clear what should the physical risk distribution be for a legal entity (whether based on each single production plants or to HQs).

For a banking group, it is complex and impractical to obtain consistent information from each individual legal entity, particularly those located outside national borders. Furthermore, the requirement to map each production facility of every company to which the bank is exposed — down to the regional level — would entail significantly higher operational costs. In order to implement the more detailed breakdown, extensive databases containing information on corporate production sites would be needed. Currently, the available coverage relies on external data providers, which do not guarantee the reliability of the information. Constructing and maintaining such a detailed database would be disproportionately burdensome. ABI therefore proposes retaining the reporting requirement at the country level. The request to disaggregate exposures at the regional level appears misaligned with the broader regulatory objective of simplification.

Question 26: Do you have any comments on the instructions for the accompanying narrative and on whether they are comprehensive and clear?

N/A

Question 27: Do you have any further comments on Template 5 and on its simplified version Template 5A?

ABI would not modify the NACE exposed in both Templates 1 and 5, with exception for the materiality threshold in T1.

According to the amendments proposed in Template 1, the sector "I - Accommodation and Food Service Activities" should be included under the section "other sector" since this sector is no longer considered to be part of sectors that highly contribute to climate change. Vice versa, if sector "K – Telecommunication, computer programming, consulting, computing infrastructure and other information service activities" within Template 5 is not included in "other sector", the same approach should be adopted in Template 1, including this sector among those that "highly contribute to climate change".

The comments provided on the Template 5/5A are based on the premise that Pillar 3 Reporting is intended to give a transparent representation of the risks to which banks are exposed and to enable meaningful comparisons of risk levels across institutions. A key condition for achieving this objective is that the reported data accurately reflect the actual underlying risk exposure, are easy to understand, and are truly comparable (i.e., produced according to consistent criteria and methodologies across all entities) [EBA/CP/2025/07; p. 71]. EBA should elaborate precise and coherent guidance for populating the template. In specific:

- It seems appropriate to elaborate materiality thresholds to define which exposure should be considered "subject to physical risk". To this end, a common Pillar 3 criterion for determining materiality should be explicitly set (e.g., for NFCs: physical risk economic impact/shareholders' equity; delta PD due to physical risk; etc.; for real estate: % impact of physical risk on property fair value; delta LGD due to physical risk; etc.). Without consistent criteria across financial institutions, comparison of template data is not possible, and its interpretation may be misleading. For instance, institutions that set very low thresholds might appear more exposed to physical risk than others that use higher thresholds, regardless of the actual level of physical risk exposure (however measured) of the underlying.
- It should be specified which time horizon is to be considered when assessing the materiality of physical risk impacts. Different choices of reference climate scenarios or time horizons can significantly affect the representation of data in Pillar 3 Template 5, determining which exposures are included or excluded.
- It should be stated the reference climate scenario to be used for estimating the materiality of physical risk impacts.

It is suggested to provide only one version of the template, without the geographical breakdown duplications currently foreseen for Large Institutions and Other Listed Institutions. With regard to real estate exposures, assets are indeed exposed to physical risks depending on their geographic location. The degree of exposure of a property to a given physical hazard depends on its exact geographic coordinates and can vary significantly even across short distances. For this reason, a breakdown by NUTS 2 or NUTS 3 would not provide a consistent representation of the underlying risk. A more coherent (though simplified) geographical representation could instead be based on the allocation of properties/exposures across physical risk areas, using classifications developed by public agencies that measure territorial risk and differentiate by hazard type (e.g., P1, P2, P3, etc.).
Similarly, the exposures to non-financial corporates, the geographic breakdown raises two key issues:

- Technical issue (minor): this concerns the difficulty and arbitrariness of assigning an NFC to a specific NUTS in cases (typically involving significant exposures) of large companies with production sites and operations spread across wide national and international areas. In such cases, the legal address cannot be considered a valid option, as it is only weakly correlated with the company’s actual underlying physical risk.
- Methodological issue (major): geographic location of a company’s facilities (even when limited to a specific NUTS 3 area) is subject to the

same concerns raised for real estate and only allows for identifying direct physical risk impacts (e.g., physical damage to production facilities from extreme weather events). However, this provides no insight into indirect impacts from physical risks – such as those affecting the supply chain or critical infrastructure on which the company's production and commercial operations depend. These indirect impacts are often more significant than direct ones and are unrelated to the geographic location of the company’s production sites.

In conclusion, classifying these exposures on a geographical basis — both for real estate and NFCs — would impose unnecessary additional costs on financial institutions, without enhancing the quality of public disclosure. On the contrary, it would risk making the reporting more complex and potentially misleading.

Question 28: 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?

ABI requests the EBA to reconsider the inclusion of the GAR and Banking Book Taxonomy Alignment Ratio (BTAR) within the Pillar 3 disclosures and permanently remove Taxonomy-related data requirements from Pillar 3 disclosures in order to avoid unintended consequences.

Being developed as a sustainability alignment metric rather than a measure of financial or prudential risk, GAR is not a risk-based KPI and the Templates 6, 7 & 8 are a duplication of CSRD disclosures. In accordance with article 24 of the consultation paper, disclosure requirements already established in other applicable Union law is to be avoided, however disclosing Templates 6, 7 & 8 with P3 would duplicate information that is already required to be disclosed under CSRD and not aligned with the aim to reduce reporting burden.

P3 ESG disclosure is focused on providing risk information on ESG exposures however the Templates 6, 7 & 8 disclose on financial information and do not include any risk information.

The purpose of the Templates 6, 7 & 8 is therefore not aligned with P3 ESG disclosure. In line with Omnibus simplification efforts and the principle to disclose the information only once, the GAR should be only reported in the CSRD sustainability disclosures under Article 8 DDA.

With respect to the voluntary BTAR disclosure in Template 9, ABI believes that this ratio will offer little decision making and market relevance.

Should the EBA decide to retain the GAR templates within the Pillar 3 framework, only Templates 6-8 should be included and clarification should be provided that the scope of alignment with CSRD sustainability disclosures is limited to on-balance sheet exposures as per the current ITS (the consultation wording suggests full alignment with the EU Taxonomy templates, which might be interpreted as including off-balance sheet items, such as financial guarantees and AuM). A more explicit wording that a cross reference to what is already published for taxonomy regulation purpose might be done, as it is not clear whether banks have to “copy/paste” for P3 uses the EUT GAR template or a simple narrative explaining where to find the GAR template is sufficient.

Question 29: Do you have any comments on the proposal related the BTAR and to keep it voluntary?

While article 82 of the consultation paper states that BTAR information continues to be disclosed on a voluntary basis, the ITS was adjusted and now use the term “shall” instead of “may choose”.

The draft ITS should be adjusted to reflect the voluntary nature of the BTAR.

Consistency of the BTAR with the GAR templates is essential. While a first wave of amendments to EUT reporting expected to be finalized within Q2/Q3 2025 are already reflected in the draft ITS, a second wave of amendments is expected as a systematic and thorough review of the EUT article 8 disclosures by the EC is planned (timeline unknown). At this stage, it is unclear how the second wave of amendments will be reflected in the ITS to ensure consistence between the updated GAR and the BTAR. If such consistency cannot be achieved, it should be envisaged to delete the BTAR template.

In line with the Omnibus (draft delegated regulation amending Commission Delegated Regulation (EU) 2021/2178) proposal for EUT art 8 reporting, BTAR should explore the option of reporting on partial alignment.

ABI therefore proposes to:

- Amend draft ITS to ensure that BTAR disclosures remain voluntary.
- Ensure that the latest upcoming GAR adjustments (timing unknown for the 2nd wave of adjustments) are correctly reflected in the BTAR template to ensure consistency. If such If such consistency cannot be achieved, it should be envisaged to delete the BTAR template.

Question 30: Do you have any comments regarding the adjustments to template 10?

ABI appreciates that starting from June 2025 and for subsequent publications up to the reference date of 12/31/2026, the publication of Template 10 is suspended.

Although there are some targeted improvements on Template 10 particularly regarding the first two columns, ABI recommends the following enhancements for more clarity and consistency:

- To increase implementation efficiency and comparability between banks, ABI recommends that the EBA includes specific instructions per row. In particular, for "renovation loans", ABI recommends aligning the definition with that of "building renovations" as outlined in the Social Climate Fund (Regulation EU).

- ABI seeks clarification on the instruments which should be included in Template 10 under the rows referring to equity exposures and on how an equity exposure can be classified as a "green exposure".

- The revised ITS introduced "Of which: small and medium sized enterprises" breakdown under loans and advances to non-financial corporations within Template 10. Such a breakdown is not part of the GAR and BTAR templates. To ensure simplification, as well as alignment between different templates, ABI recommends removing this breakdown

- According to EBA Q&A 2023_6878, general purpose financing to pure-play companies can be reported under Template 10. ABI suggests that this clarification to be explicitly included in the revised ITS. In addition, to ensure consistent interpretation and application, a definition of pure player would be welcome.

- As Template 10 focuses on assets contributing to sustainability and transition finance, it would be helpful to clarify whether and how financing provided to companies with credible transition plans that are on track to meet their targets should be reported within this template. This would contribute to the consistency of treatment and comparability in this matter. Please refer to "transition finance" definition which touches upon this matter, on Commission Recommendation (EU) 2023/1425 of 27 June 2023 on facilitating finance for the transition to a sustainable economy.

Question 31: Do you have any further comments on the Consultation Paper Pillar 3 disclosures requirements on ESG risk?

N/A

Question 32: Are the new template EU SB 1 and the related instructions clear to the respondents? If no, please motivate your response.

It is not clear whether the aggregate exposure should include only the Regulatory perimeter (including material counterparties with exposure higher than 0.25% of Tier 1 Capital, which are subject to limits) or the Overall perimeter.

Clarification would also be needed on whether banks should report the exposures to investment funds according to the underlying view (i.e. considering the look-through approach) or as aggregate.

Question 33: 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?

N/A

Question 34: Are the amended template EU CR 10.5 and the related instructions clear to the respondents? If no, please motivate your response.

ABI would seek confirmation that non-listed SNCIs are not required to complete this template.

As regards equity, the template includes only the "total" row. ABI would seek confirmation that no breakdown should be provided (as per the non-specified "categories" mentioned in the instructions).

Question 35: 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?

N/A

Question 36: Do the respondents consider that the "mapping tool" appropriately reflects the mapping of the quantitative disclosure templates with supervisory reporting templates? (The "mapping tool" is not part of the draft ITS but it is provided as an accompanying document to support institutions when populating the quantitative disclosure template).

In several parts of the paragraph on SNCIs, there is exclusive reference to "Listed SNCIs" and to "other institutions" regarding Templates CQ1, CQ3, CR1, and CQ7. ABI would welcome confirmation that non-listed SNCIs are exempted from the disclosure requirement.

The same starting reference date as for Pillar 3 should be envisaged to ensure entities are not required to maintain two different NACE classifications depending on the purpose of the data.

While the reporting consultation paper has not yet been published, it is not fully clear (considering the publication of the EBA Reporting framework 4.3) whether the starting date could be later than 31/12/2026, therefore misaligned with the P3 disclosure.