

Question ID	2024_6973
Status	Final Q&A
Legal act	Regulation (EU) No 575/2013 (CRR)
Topic	Transparency and Pillar 3
Article	449a
Paragraph	
Subparagraph	
COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations	Regulation (EU) 2022/2453 - ITS on ESG disclosures
Article/Paragraph	Annex I and Annex II
Type of submitter	Competent authority
Date of submission	18/01/2024
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Subject matter	Sum of breakdowns in Template 1 (financed emissions)
Question	Should the sum of NACE sub-sectors for GHG financed emissions in columns i and j of Template 1 be equal to the total GHG financed emissions for that NACE sector?
Background on the question	In Template 1, it is expected that the gross carrying amounts disclosed for each NACE sub-sector sum up to the total of the NACE sector. However, disclosed estimates on GHG financed emissions for NACE sub-sectors might not always add up to the disclosed total NACE sector due to immateriality or data availability. For example, an institution discloses estimates of the GHG financed emissions for sector "D35.11 - Production of electricity", but does not disclose the figure for the parent sector "D35.1 Electric power generation, transmission and distribution" or the NACE sector "D - Electricity, gas, steam and air conditioning supply". Should the institution disclose the estimates for all NACE levels so that the figures in the disclosure template sum up to the respective totals (i.e. in this example, disclose the value for D35.11 also in D35.1 and consequently in D), or as how the estimates data is actually available (i.e. only for D35.11, and leave other fields empty)?

Final answer	<p>Institutions should disclose GHG financed emissions estimates as actually available. In the example provided, the institution should only disclose the value for D35.1.1 if no other data is available below the relative NACE sector 'D - Electricity, gas, steam and air conditioning supply'. The latter, should be the sum of the sub sectors below: in the example, emissions of NACE sector 'D - Electricity, gas, steam and air conditioning supply' should be equal to the sum of the values reported under "D35.1"; "D35.2" and "D35.3". However, if only "D35.1.1" were available, "D35.1" and NACE sector 'D - Electricity, gas, steam and air conditioning supply' should be composed of only the value under "D35.1.1".</p>
Answer prepared by	Answer prepared by the EBA.
Note to Q&A	
Link	https://www.eba.europa.eu/single-rule-book-qa/qna/view/publicId/2024_6973

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