

**EUROPEAN DATAWAREHOUSE GMBH**

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**European Commission**

Directorate-General for Financial Stability, Financial Services and Capital Markets Union  
Units C1 and B1  
European Commission  
1049 Bruxelles/Brussel  
Belgium

**Subject: EDW Response to European Commission's Targeted Consultation on Establishment on a European Single Access Point (ESAP) for financial and non-financial information publicly disclosed by companies**

**About the European DataWarehouse GmbH**

Founded in 2012 as part of the implementation of the European Central Bank ABS Loan Level Initiative, the European DataWarehouse (EDW) is the first central data repository in Europe for collecting, validating and making available for download detailed, standardised and asset class specific loan-level data (LLD) for Asset-Backed Securities (ABS) transactions. Developed, owned and operated by the market, EDW helps to facilitate risk assessment and to improve transparency standards for European ABS deals.

EDW currently hosts loan-level data and relevant documentation for over 1,600 ABS transactions and private portfolios belonging to a wide variety of different financial institutions across Europe. Originators, issuers, sponsors and servicers upload ABS exposure and relevant documentation to EDW, while data users including investors, data vendors, rating agencies and public institutions use EDW data for monitoring and risk assessment purposes.

EDW has applied for registration with ESMA to provide securitisation repository services under the Securitisation Regulation (EU) 2017/2402. In the meantime, EDW assists the originators, sponsors and Securitisation Special Purpose Entities (SSPE) to fulfil the regulatory reporting obligations by providing a website compliant with the requirements set out in Article 7(2) of this regulation. As part of the disclosure requirements under the Securitisation Regulation, information on the environmental performance of the assets are also expected to be disclosed where the underlying

exposures are residential loans, auto loans and leases as well as consumer loans. EDW is already collecting this information following the entry into force of the new disclosure technical standards.

Additionally, EDW participates at the Energy Efficient Mortgages Initiative (EEMI), a market-led initiative, funded via the European Commission's Horizon 2020 Programme. The aim of the EEMI is to deliver a standardised European framework and data collection architecture for energy efficient mortgages. EDW was a key member of the Energy efficient Data Protocol and Portal (EeDaPP)<sup>1</sup> consortium. The objective of the EeDaPP project was to design and deliver a market data protocol for the collection of energy efficient mortgage data through a standardised template which will be made accessible via the design of a common data portal.

EDW welcomes the EC Consultation on Establishment on a European Single Access Point (ESAP) for financial and non-financial information publicly disclosed by companies. EDW has provided the responses in the online questionnaire.

European DataWarehouse (EDW) is monitoring closely the regulatory developments and participates actively by providing its feedback to the various public consultations. EDW is very supportive of the European Commission's proposal for the development of an EU-wide platform (European Single Access Point) that would provide investors with seamless access to financial and sustainability-related company information.

In EDW's view, this common publicly accessible data space for companies' ESG information, combining data reported under different regulatory reporting requirements such as the Non-Financial Reporting Directive (NFRD) and other ESG related reporting requirements (Sustainable Finance Disclosure Regulation SFDR etc.) should be built on the following key principles:

- **Centralisation** – all ESG documentation (ESG ratings, EU taxonomy, financial and non-financial information) should be collected into one European centralised database for all European companies. A centralised platform solution will facilitate the access and eventually the use of the information.
- **Proportionality** – the concept of proportionality should aim to strike the right balance between the costs and benefits of such disclosures especially for smaller companies.
- **Comparability** – a centralised repository facilitates the comparison of ESG information across data submissions and sectors.
- **Data harmonisation and standardisation** – the ESG data and documentation should be based on a reporting framework. Such framework should include minimum reporting standards such as reporting templates with taxonomies and KPIs like in the EU taxonomy.

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<sup>1</sup> For more information on EeDaPP, please refer to the following link: <https://eedapp.energyefficientmortgages.eu/>

- **Data digitisation** - The use of a structured machine-readable format is a necessity and consistent with other regulatory disclosure obligations, especially with respect to financial data reporting. The digitisation of the information would allow the enhancement of the non-financial information with other public corporate information.
- **Data validation and integrity** - the information submitted should be subject to upfront checks to make sure that the information reported is complete, timely and correct.

EDW remains at the disposition of the EC in case of any queries related to its response.

Yours sincerely,



Dr. Christian Thun

Chief Executive Officer, European DataWarehouse