

**CONFIDENTIAL**

European Commission  
DG FISMA  
Unit A1 - Policy definition and coordination  
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**EDW RESPONSE TO THE EUROPEAN COMMISSION'S (EC) TARGETED CONSULTATION ON  
THE FUNCTIONING OF THE EU SECURITISATION FRAMEWORK****About the European DataWarehouse**

Founded in 2012 as part of the implementation of the European Central Bank ABS Loan-Level Initiative, the European DataWarehouse GmbH (EDW) is the first central data repository in Europe for collecting, validating, and disseminating detailed, standardised and asset class specific loan-level data (LLD) for Asset-Backed Securities (ABS) transactions. Developed, owned, and operated as a utility by the market, EDW helps to facilitate risk assessment and to improve transparency for European securitisations. EDW is a Eurosystem designated repository. Since 23 June 2021 EDW is registered as a Securitisation Repository (SR) under the Securitisation Regulation (EU) 2017/2402 (SECR) authorised and supervised by ESMA.

EDW currently hosts loan-level data and relevant documentation for over 1,800 securitisations and private portfolios belonging to a wide variety of different financial institutions across Europe. Reporting entities upload the underlying exposure information and relevant documentation to EDW, while data users including investors, rating agencies, the relevant supervisory authorities, regulators, and other market participants use EDW data for monitoring and risk assessment purposes.

As an ESMA registered SR under the SECR, EDW monitors closely the regulatory developments in securitisation and provides its input to all the relevant public and private consultations. Due to the technical and data-driven nature of its business, EDW focuses also on the regulatory developments in the area of sustainable finance as well as Non-Performing Loans (NPL), contributing further to the relevant work of the EC.

With respect to ESG disclosures under the SECR, information on the environmental performance of the assets is 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.

EDW participates in several initiatives in the area of sustainable finance. One of those initiatives is 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) 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. The collection of the energy efficiency information is currently done through the reporting entities (originators, sponsors and SSPEs) that from time to time use the dedicated EDW software solution called "Giuditta" matching the property information with the specific energy performance certificate (EPC) class and the EPC provider from the various EPC registers.

Additionally, EDW is currently working on a research project with the Joint Research Centre (JRC) of the European Commission as well as the University of Cagliari in Italy on modelling the ESG risk exposures in European banks. The aim of this project is to develop and test a first-generation matrix able to capture the overall ESG risks exposures of the European banks both at micro and macro level. An ESG survey is currently underway, and the results will be published later in 2021.

EDW welcomes the European Commission's (EC) targeted consultation on the functioning of the EU securitisation framework. The responses to this questionnaire express the views of the SR. The consultation covers a broad range of issues but not all are relevant from a SR perspective.

Therefore, EDW has mainly focused on the following topics: private securitisations (Section 2), disclosure of information on environmental performance and sustainability (Section 6) and responded to some questions with respect to due diligence (Section 3) as well as the jurisdictional scope (Section 4).

EDW considers most of the potential areas of improvement suggested in the consultation as important to create incentives for both cash and synthetic securitisations to ensure the well-functioning of the securitisation market in order to provide further funding to the real economy and in particular consumers and small and medium enterprises. In the last years, the EU public securitisation market has decreased substantially while private securitisations have only partly provided a funding or risk transfer tool for originators, sponsors and SSPEs.

### **Private Securitisations**

EDW's Securitisation Repository solution is also designed to additionally support the secure reporting of private ABS and ABCP across jurisdictions and making these securitisations available to the relevant National Central Banks (NCBs) as well as National Competent Authorities (NCAs) enabling them to perform ongoing financial stability review, monitoring and due diligence functions in an orderly manner. More specifically, EDW is working with the NCBs as well as NCAs in generating customised reports to monitor securitisations and is also working with reporting entities by performing dedicated data quality checks on the relevant templates. EDW stands ready to potentially implement the three European Supervisory Authorities (ESAs) recommendations as per the Joint Committee's report pursuant to Article 44 of the SECR<sup>1</sup> published in May 2021, in case these are included in the revision of the SECR.

### **ESG / Sustainable Finance**

From a sustainable finance perspective, EDW notices that the availability of environmental performance information such as the EPC is not harmonised across Europe. EDW would welcome clarifications around the accessibility of such information across the various databases from a

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<sup>1</sup> ESAs Joint Committee report on the implementation and well-functioning of the SECR  
[https://www.esma.europa.eu/sites/default/files/library/jc\\_2021\\_31\\_jc\\_report\\_on\\_the\\_implementation\\_and\\_functioning\\_of\\_the\\_securitisation\\_regulation\\_1.pdf](https://www.esma.europa.eu/sites/default/files/library/jc_2021_31_jc_report_on_the_implementation_and_functioning_of_the_securitisation_regulation_1.pdf)

General Data Protection Regulation perspective, as reporting entities are experiencing difficulties to obtain such data.

EDW notes that the ESMA Q&A document plays a very important role in creating a level playing field in the interpretation of certain critical fields, providing further guidance to the market as well as promoting supervisory convergence. Lastly, EDW continues to invest substantial time and resources in assisting clients to compile the data in order to comply with their reporting obligations.

We remain at the disposition of the EC for any queries related to our responses to this questionnaire as part of the targeted consultation on the functioning of the EU securitisation framework.

Kind regards,



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