

EUROPEAN DATAWAREHOUSE GMBH

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EUROPEAN COMMISSION

Committee on open data and the re-use of public sector information
Directorate-General for Communications Networks, Content and Technology
1049 Bruxelles/Brussel
Belgium

Subject: Draft Implementing Regulation laying down a list of specific high-value datasets and the arrangements for their publication and re-use

Dear Madam, Dear Sir,

European DataWarehouse GmbH (EDW) hereby advocates for the making of sustainable and green datasets open access in a machine-readable format through application processing interfaces (APIs) and bulk download.

EDW was founded in 2012 as part of the implementation of the European Central Bank (ECB) ABS Loan Level Initiative to restore investors' and supervisors' confidence in European securitisation markets following the financial market crisis. 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 has been involved over the last few years in a number of sustainable finance initiatives like the Energy Efficiency Protocol and Portal¹ under Horizon 2020 with the EMF-ECBC and is a founding member of the Energy Efficiency Mortgage Hub in the Netherlands². EDW is also a member and coordinator of a sustainability-related project that has been favourably evaluated under the European Commission LIFE-2021-CET call for proposals.

¹ <https://cordis.europa.eu/project/id/784979>

² <https://energyefficientmortgages.nl/>

EDW is a designated securitisation repository by ESMA under Regulation (EU) 2017/2402 (hereinafter, the “**Securitisation Regulation**”), as well as a repository for the Eurosystem ABS and pools of additional credit claims (PACC) collateral framework across the Eurozone.

In its remit as an ESMA designated securitisation repository, EDW has detected that the energy performance certificate (EPC) related fields of the disclosure technical standards under the Securitisation Regulation are usually not completed given the general lack of availability of EPC information in electronic format.

The unavailability of EPC information constitutes, in our view, an obstacle for the achievement of the European Green Deal goals. From the financial sector perspective, this is because the lack of sustainable-related information on products stalls the promotion of financial incentives for the Renovation Wave.

In this context, Article 2 (10) of Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information (the “**Open Data Directive**”) defines the term “High-value datasets” as

documents the re-use of which is associated with important benefits for society, the environment and the economy, in particular because of their suitability for the creation of value-added services, applications and new, high-quality and decent jobs, and of the number of potential beneficiaries of the value-added services and applications based on those datasets.

The Draft Implementing Regulation object of the present consultation establishes the list of high-value datasets and the means through which these should be made available, i.e., in machine-readable formats via APIs and, where applicable, ready for bulk download.

EDW considers that EPC data should be included as a high-value dataset according to the definition of the Open Data Directive, since:

1. The availability of EPC information would have important benefits for the environment, namely, facilitating the improvement of the energy efficiency of EU building stock³.
2. In this sense, the availability of EPC information in a machine-readable format via APIs and ready for bulk upload and download would enable the effective implementation and usage of value-added services already tested by EDW, i.e., the matching of loan-level data with EPC data⁴. This matching helps the disclosure of the energy performance information of the

³ Buildings are currently consuming 40% of the EU's energy and almost 75% of the building stock is energy inefficient.

⁴ EDW has tested the matching of loan-level data with EPC data in countries and regions with EPC public databases (e.g., Lombardy region, Italy) to obtain the EPC information of mortgaged real estate properties.

underlying assets of loans and would therefore have a positive impact on the development of the EU sustainable finance strategy, boosting the Renovation Wave.

3. The availability open access of EPC information would be beneficial not only for the achievement of the European Green Deal objectives, but also, for the different participants in financial markets, such as:
 - Borrowers, who would benefit from more favourable financing terms and conditions for the acquisition of energy efficient dwellings or the restoration of existing buildings that do not meet the minimum criteria for living or renting according to the revision of the Energy Performance for Building Directive.
 - Loan officers, who could expand their product offering towards more sustainable products, for example, offering loans for the restoration or improvement of the emissions for specific dwellings.

With regard to Article 4(4) of the Draft Implementing Regulation and the involvement of personal data in the publication open access and reuse of EPC information, EDW believes that the existence of appropriate data protection safeguards for the processing of the relevant personal data (e.g., pseudonymisation tools) to ensure the protection of individuals strongly eases the lawfulness of the open access publication of EPC data.

In terms of the content of the EPC dataset, EDW recommends that it is consistent with the EPC content prescribed by the revised Energy Performance of Buildings Directive.

EDW remains at the disposition of the European Commission for any queries related to this letter.

Yours faithfully,



Christian Thun
Chief Executive Officer

European DataWarehouse GmbH

Cc: Marco Angheben, Head of Business Development and Regulatory Affairs, European DataWarehouse GmbH