



ENGAGE Project Coordinator

Walther-von-Cronberg-Platz 2 60594

Frankfurt am Main

Germany

Wednesday, 12 November 2025

European Commission – DG ENER

Response submitted via [online form](#)

Subject: Public consultation on a delegated act establishing a portfolio framework to encourage financial institutions to increase lending volumes for energy performance renovations

To whom it may concern,

The ENGAGE for ESG initiative¹ welcomes the European Commission (EC) Public Consultation on a delegated act establishing a portfolio framework to encourage financial institutions to increase lending volumes for energy performance renovations and would like to contribute to it from its standpoint as a consortium of expert entities in the area of sustainable finance, data templates implementation and reporting, and sustainable lending.

- European DataWarehouse GmbH (EDW) is an ESMA-designated Securitisation Repository and a Eurosystem repository for ABS, pools of additional credit claims.
- Hypoport B.V. (HYP) is a specialist IT company, developer of software solutions for the financial sector.
- Università Ca' Foscari (UNIVE) is a pioneer university in sustainable finance programmes and research.
- Unión de Créditos Inmobiliarios, S.A., Establecimiento Financiero de Crédito (UCI) is a specialist entity in sustainable financing for mortgages and loans in the Spanish and Portuguese markets.
- Nationale-Nederlanden Bank N.V. (NN Bank) is an innovative sustainable mortgage loan originator in the Dutch market.

¹ More information about ENGAGE for ESG can be found at <https://engage4esg.eurodw.eu/>.



- Dexai s.r.l. (DEXAI) is a consultancy company expert in compliance of new technologies with legal and ethical standards.

The ENGAGE Consortium would like to contribute to the Consultation, in particular, with regards to questions 12-25.

Description of the ENGAGE for ESG initiative

ENGAGE for ESG is an initiative co-funded by the European Union and launched by the six institutions from across Europe mentioned above (the “**ENGAGE Consortium**”) with the purpose of creating a standardised and harmonised disclosure framework for mortgages and renovation loans that contributes to the activation of energy efficiency investments for the residential building stock. The initiative is also contributing to the goals of the Renovation Wave and supporting the implementation of the Energy Performance of Buildings Directive recast (recast EPBD).

Since its inception in November 2022, the initiative has been focusing on developing standardised disclosure templates for mortgage and home renovation loans (ENGAGE Templates) in line with Regulation (EU) 2020/852 (the “**Taxonomy Regulation**”) and Commission Delegated Regulation (EU) 2021/2139 (the “**Climate Delegated Act**”) to facilitate the sustainability reporting for financial institutions and improve transparency vis-à-vis investors. In fact, the ENGAGE Consortium is enhancing existing loan disclosure frameworks based on the technical standards on disclosure requirements under the Securitisation Regulation (the “**ESMA Templates**”) through a flexible system of add-on templates for various regulatory standards. These add-ons are market-designed and built upon the principles of transparency, data availability and governance.

The [ENGAGE Templates version 1.2](#) were released in September 2025 and include the data elements that allow financial institutions to disclose the alignment of their mortgages and home renovation loans with EU Taxonomy requirements.

The ENGAGE Templates have been operationalised through a dedicated IT infrastructure, the ENGAGE Portal. ENGAGE Portal users are now able to evaluate ESG criteria and to use the infrastructure as a secure data room for sustainable disclosures, starting with the required disclosures to check the EU Taxonomy- alignment.

Two European lenders, Unión de Créditos Inmobiliarios, S.A. and Nationale-Nederlanden Bank N.V. have been submitting data to the ENGAGE Portal according to the ENGAGE Templates for Netherlands, Spain and Portugal. Onesto, a Belgian social lender, has recently joined the initiative as an ENGAGE Portal user.

Market participants have positively welcomed the ENGAGE Templates and Portal, in particular, with regards to the conversion of the regulatory requirements of the EU Taxonomy into concrete data fields.



The ENGAGE for ESG initiative has consolidated its position in the market and aims to become a widespread industry standard in 2025. By way of example, the ENGAGE Templates were showcased as a best practice by Climate Strategy & Partners in their report *Mortgage Portfolio Standards: The EPBD Delegated Act process can synchronise regulatory developments, climate initiatives, and EU technologies to offer a window into the future*².

In November 2024 the Hellenic Financial Stability Fund (HFSF) published its *Sustainability Report 2023*. In the report³, the HFSF supports the ENGAGE for ESG initiative and urges Greek banks to join the initiative to support the increase of sustainable finance and promote better monitoring and measurement for banks' lending portfolios.

In May 2025 the Spanish Intellectual Property Register recognised the originality of the ENGAGE Templates, confirming their status as an original and protected intellectual creation⁴.

Response to the Consultation

12. What primary data sources does your institution use to gather information on building renovation projects?

The ENGAGE Consortium and, in particular, the ENGAGE Portal, collects the data on building renovation projects directly from the lending institutions completing the ENGAGE Templates.

13. How do you measure and verify the energy savings or improvements (including comfort, affordability) made through the financed energy renovation?

The data fields related to the post-renovation energy savings or improvements in the ENGAGE Templates are the Primary Energy Demand (PED) of the building pre- and post-renovation.

The ENGAGE Templates and Portal allow lending institutions to decide the means they want to use to measure and verify the post- renovation energy savings or improvements, because the liability regarding the data provided by the lending institution remains with the reporting entity.

² Report available at https://www.climatestrategy.es/en/informe_29.php

³ Report available at <https://hfsf.gr/en/hfsfs-esg-sustainability-report/>

⁴ Press release available at <https://engage4esg.eurowd.eu/the-spanish-intellectual-property-register-recognises-the-originality-of-the-engage-templates/>



14. How do you ensure that the data collected is accurate and reliable?

The lending institutions completing the ENGAGE Templates are solely liable for the data submitted through the ENGAGE Templates and Portal.

Regardless the above, the ENGAGE Portal conducts multiple data quality checks related to the interfield inconsistency, usual date, no-data and count zero checks. For more information, please visit https://forms.office.com/pages/responsepage.aspx?id=fzr-tOddJ02AZh1XKKGz6r1YjDt6vs9BsEPIbc_1OndUNThQM0FVQVZJMDfCSVVJQk1OVUMzUk0yNC4u&route=shorturl and access the ENGAGE Templates Guiding Documentation. The no-data system is based on the EU Securitisation Regulation and the ESMA underlying exposure templates.

In addition, while the ENGAGE Templates allow estimated information for certain data fields, the disclosure of whether the reported value is official or estimated is mandatory for transparency purposes.

15. To what extent does your institution need to further process the collected energy consumption data before it can be used for product design and pricing, or for decisions on product portfolio allocations and refinancing strategy?

Not applicable to ENGAGE for ESG.

16. Which challenges does your institution face in terms of data availability?

According to the experience gained from the two ENGAGE pilot exercises with UCI and NN Bank, the availability of data meeting the requirements of sections 7.7 and 7.1 of Annex I of the Climate Delegated Act does not pose a problem for newly generated mortgages. However, the required data is not generally available for legacy loans. This means a significant challenge, especially, because the energy consumption of older buildings is usually more inefficient than the energy performance of newer buildings.

Throughout the duration of the ENGAGE for ESG initiative and the several exchanges held with multiple lending institutions, the ENGAGE Consortium also ascertained that one of the challenges lending institutions are facing is the unavailability of digitalised data in a machine-readable format that can be easily extracted and arranged in a systematic way through the ENGAGE Templates.

The lack of the open access availability of the energy information on public databases related to the EPC and other metrics is another major obstacle that has not been fully addressed so far.



17. How do you handle missing data, inconsistencies or discrepancies, and what strategies would you recommend to improve data consistency and accuracy?

The ENGAGE data quality framework intends to set out the necessary verification procedures to assess the completeness, the consistency and the timeliness of the information provided by lending institutions through the ENGAGE Templates before generating reports for either the reporting lending institutions or any third parties such as investors or competent authorities.

This is managed through a set of interfield inconsistency, usual date, no-data and count zero checks. For more information, please visit https://forms.office.com/pages/responsepage.aspx?id=fzr-tOddJ02AZh1XKKGz6r1YjDt6vs9BsEPIbc_1OndUNThQM0FVQVZJMDfCSVVJQk1OVUMzUk0yNC4u&route=shorturl and access the ENGAGE Templates Guiding Documentation.

18. In your view, how can public authorities improve the risk-return profile of all types of energy renovation projects (for residential and non-residential buildings), making them more attractive to private investors (lenders and the refinancing market)?

In the ENGAGE Consortium's experience, the establishment of firm and consistent ESG disclosure requirements across the various reporting regimes is necessary to achieve the EU sustainability objectives. In this regard, the centralisation of all disclosure requirements into the ENGAGE "one-size-fits-all" Templates could facilitate the disclosure obligations from financial institutions.

Furthermore, the review of capital requirements for credit institutions could help promote investments in energy renovation projects.

Other incentives, particularly at fiscal level, need to be promoted for homeowners, for example, deducting the renovation expenses of buildings from the annual tax returns.

21. In your view, does the current legislative framework, including the EU taxonomy and the Energy Performance of Buildings Directive, provide adequate and appropriate criteria to define and qualify the scope of lending for energy renovation (for strategic planning, marketing or reporting purposes, etc.)?

The ENGAGE Consortium, specifically, the pilot institutions members of the initiative, have flagged certain difficulties when it comes to the application of the Taxonomy-alignment criteria for home renovation loans, e.g., issues to identify major renovations or to determine the PED reduction. As an example, the Taxonomy criteria could clearly establish the number of EPC label degrees that the renovation activity should improve, or require the adoption of certain specific energy efficiency measures. In this context, the European Investment Bank has developed a specific tool, i.e., the Group Green Checker, which includes a section



for comprehensive renovations, designed to calculate if a specific home renovation loan reduces the PED by 30% and hence can be deemed to be defined as "EIB green" and eligible for EIB funding. The ENGAGE Templates include a specific section that will allow lenders and banks to verify the PED reduction.

22. Which EU-level initiatives could in your view support the provisions of financing for energy renovations (e.g. action plan to be adopted by financial institutions, criteria for potential energy renovation labels, initiatives under the European Affordable Housing Plan, other)?

The EU is dedicating significant resources to the achievement of the EU sustainability objectives through the various grant programmes, including the LIFE programme.

In this regard, the collaboration amongst the various existing initiatives is necessary to ensure an efficient use of the resources assigned and to avoid duplications in the generated results.

The ENGAGE for ESG initiative, in cooperation with the European Energy Efficiency Financing Coalition and other relevant EU-funded projects, can strongly support the provisions of financing for energy renovations.

23. In your view, how could financial institutions and financial intermediaries be supported to increase their clients' awareness of existing energy performance requirements, the benefits of energy renovations, climate risks and the technical assistance and information tools available?

Financial institutions and financial intermediaries could be supported in this regard through various means, namely:

1. Through the adoption of simple and standard ESG reporting requirements;
2. Through the establishment of one-stop-shops.

24. What in your view can be done to make it easier for financial institutions to target worst-performing buildings specifically?

The availability and accessibility of building energy performance data in a centralised tool such as the EU Building Stock Observatory, and at a sufficiently granular level is pivotal to allow financial institutions to perform the required analysis and assessment to target worst-performing buildings.

This measure should be accompanied by the appropriate regulatory incentives for both homeowners and lending institutions to undertake the renovation works and to grant "green" renovation loans, respectively.



25. What in your view can be done to make it easier for vulnerable building owners to access appropriate financing for energy renovation?

The role of one-stop-shops is critical to ensure that information about the available financing schemes and aids is widely spread, especially, amongst the most vulnerable homeowners.

The ENGAGE Consortium is particularly concerned about energy poverty given that large percentage of the population do not have the means to warm up or cool down their dwellings.

We remain at the European Commission's disposal to further elaborate on measures to increase lending for renovations.

Yours faithfully,

DocuSigned by:
Marco Angheben
25AE6E185CB54AD...

Marco Angheben

ENGAGE for ESG Coordinator, on behalf of The ENGAGE Consortium

EUROPEAN
DATAWAREHOUSE

 **HYPOPORT**

 **Università
Ca'Foscari
Venezia**

woonnu

UCI


DEXAI
ARTIFICIAL ETHICS

