



ENGAGE Project Coordinator

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Thursday, 2 April 2026

European Commission – DG ENER

Response submitted via [online form](#)

Subject: Call for Evidence for an Impact Assessment for an Affordable Housing Act

To whom it may concern,

The ENGAGE for ESG initiative¹ welcomes the European Commission (EC) call for evidence for an impact assessment for an Affordable Housing Act and would like to contribute to it from its standpoint as a consortium of expert entities in the promotion of energy efficiency investments:

- 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.eurowd.eu/>.



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

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 since 2023. Onesto, FIDEO Gestion, and Domivest have recently joined the initiative as ENGAGE Portal users.

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.

In the area of energy poverty and affordable housing, ENGAGE for ESG is mostly concerned by:

- **Pillar I, Action 3 of the European Affordable Housing Plan, i.e., Combining affordability, sustainability and quality in housing, and is confident that it can contribute to the objectives of the Plan through the ENGAGE Templates and Portal; and**
- **Pillar II, Action 1 of the European Affordable Housing Plan, i.e., Mobilising additional public and private investment.**

The ENGAGE for ESG initiative, thanks to its setup as a centralised platform connecting the financial markets industry and the residential real estate sector, is uniquely positioned to play a critical role in the materialisation of the European Union sustainability and housing affordability objectives.

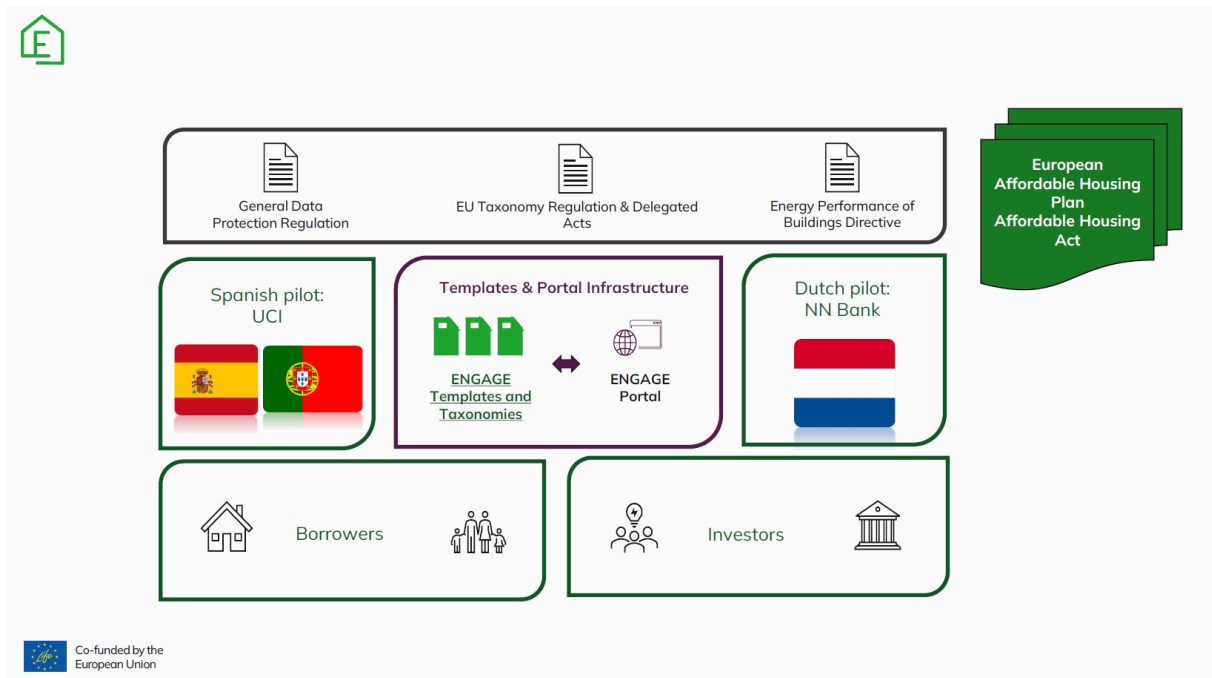
² Report available at https://www.climatestrategy.es/en/informe_29.php

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

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



The ENGAGE concept is reflected in the graphic below:



- Two main pillars:
 - A **disclosure template** for residential real estate data;
 - A **portal** to assess EU Taxonomy alignment and data quality.
- Two European jurisdictions participating as pilots:
 - Unión de Créditos Inmobiliarios for **Spain and Portugal**;
 - Nationale-Nederlanden for **Netherlands**.

New institutions from different EU Member States have recently joined the ENGAGE ecosystem, namely: Onesto (**Belgium**), FIDEO Gestion (**France**) and Domivest (**Netherlands**).

- Key regulations governing the concept:
 - The **EU Taxonomy Regulation** and its delegated acts, in particular, the Climate Delegated Act and the Disclosures Delegated Act;
 - The **Energy Performance of Buildings Directive**;
 - The **General Data Protection Regulation**.



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