HDT Completion Guidelines

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# Purpose

With onset of the Energy Efficient Mortgage Label a milestone in data collection specifically on energy efficient data in commercial and real estate mortgages has been reached and the Harmonised Disclosure Template (HDT) acts as the main practical tool to produce consistent and comparable datasets both within and across jurisdictions. Knowing the challenge that even with a common template the various data fields can be populated in various ways the EEM Label decided to provide these practical guidelines for further information on how to effectively compile the HTT. The guidelines are undergoing continuous revisions in order to address questions and clarifications received from the lending institutions in order to ensure the highest possible clarity and user-friendliness.

# General guidelines

1. Every program has one separate EEM HDT. Lending institutions with more than one sustainable mortgage program have to present as many separate EEM HDTs as the number of programs.
2. All cells that include “[For completion]” and “[Mark as ND if not relevant]” needs to be completed.
3. The "[For completion]" or "[Mark as ND if not relevant]" cells could be filled with:
   1. Numbers: Please insert the appropriate data
   2. Letters: Please insert either No Data (ND)
      1. ND1: Please complete the cell with ND1 when the information is not applicable for the jurisdiction
      2. ND2: Please complete the cell with ND2 when the information is not relevant for the Lending institution
      3. ND3: Please complete the cell with ND3 when the information is not available at the present time
4. Please note that the percentage cells will be automatically completed by the spreadsheet.
5. The wording of the tabs are not to be changed.
6. Should you make references to external documents or cells in this document, please insert the hyperlink.
7. Various fields as well as the amount of rows and columns are blocked in order to guarantee the uniformity of the HDT architecture which enables to run automated reporting programs. In order to guarantee this uniformity the Secretariat will not provide 'unprotected' HDTs to the lending institutions
8. Since the loan bucket size of the loan size information (Tab. A1. EEM General Mortgage Assets - section 1.10 and 1.15, Tab. B1 EEM Sust. Mortgage Assets section 13) as well as the EPC information (Tab. A1. EEM General Mortgage Assets - section 23; Tab. B1 EEM Sust Mortgage Assets section 23) are decided at national level.
9. Since the regional breakdown denomination (Tab. A1 EEM Mortgage Assets - section 1.5., Tab B1 EEM Sust. Mortgage Assets - section 2.5) is decided at national level, please follow the agreed dispositions.
10. For any further questions on how to complete the HDT please consult in the following order:
    1. the EEM HDT Completion Guideline
    2. the relevant National Coordinator
    3. the EEM Label Secretariat

# Tab Specific Guidelines

Here you find guidelines for specific locations in the different tabs of the HDT in order to prevent providing misleading information.

## Introduction

1. Reporting Date: date in which the HDT has been published
2. Cut-off Date: date the figures refer to. The last date of a quarter needs to be the last calendar day. For example Friday 29 March 2019 was the last working day of Q1 2019, but here we would like to see as cut-off date 31 March 2019 even if it falls on a Sunday.

## A1. EEM General Mortgage Assets

### 1.4. Breakdown by Geography

In this section besides the breakdown by country at the same time also the breakdown between residential and commercial loans is provided.

TWO POSSIBLE APPROACHES can be used:

Approach A:

The breakdown is provided separately for residential loans and commercial loans, thus reaching 100% in both columns.

Approach B:

The breakdown is provided for both types of loans together, thus 100% is reached by adding the breakdowns in both columns.

### 1.5. Breakdown by regions of main country of origin

In order to provide a more consistent comparison of the location of the mortgage assets of the same jurisdictions, the EEM Label presents the list of regions to be used for report. The list here below has been taken on from the jurisdictions using HTT of the Covered Bond Label:

1. Austria:
   1. Wien
   2. Niederösterreich
   3. Oberösterreich
   4. Salzburg
   5. Tirol
   6. Steiermark
   7. Kärnten
   8. Burgenland
   9. Vorarlberg
2. Belgium:
   1. Antwerpen
   2. Vlaams-Brabant
   3. Oost-Vlaanderen
   4. Brussels
   5. West-Vlaanderen
   6. Limburg
   7. Liège
   8. Hainaut
   9. Brabant Wallon
   10. Namur
   11. Luxembourg
3. Canada:
   1. Alberta
   2. British Columbia
   3. Manitoba
   4. New Brunswick
   5. Newfoundland and Labrador
   6. Northwest Territories
   7. Nova Scotia
   8. Nunavut
   9. Ontario
   10. Prince Edward Island
   11. Quebec
   12. Saskatchewan
   13. Yukon
4. Denmark:
   1. Hovedstaden
   2. Sjælland
   3. Syddanmark
   4. Midtjylland
   5. Nordjylland
5. Estonia:
   1. Tallin
   2. Other Estonia
6. Finland:
   1. Aland Islands
   2. Central Finland
   3. Central Ostrobothnia
   4. Etela-Savo
   5. Kainuu
   6. Kanta-Hame
   7. Kymenlaakso
   8. Lapland
   9. North Karelia
   10. North Ostrobothnia
   11. Ostrobothnia
   12. Paijat-Hame
   13. Pirkanmaa
   14. Pohjois-Savo
   15. Satakunta
   16. South Karelia
   17. South Ostrobothnia
   18. Uusimaa
   19. Varsinais-Suomi
7. France:
   1. Auvergne-Rhône-Alpes
   2. Bourgogne-Franche-Comté
   3. Bretagne
   4. Centre-Val-de-Loire
   5. Grand-Est
   6. Corse
   7. Outremer
   8. Occitanie
   9. Normandie
   10. Ile-de-France
   11. Nouvelle-Aquitaine
   12. Hauts-de-France
   13. Pays-de-la-Loire
   14. Provence-Alpes-Côte-d'Azur
8. Germany:
   1. Baden-Württemberg
   2. Bavaria
   3. Berlin
   4. Brandenburg
   5. Bremen
   6. Hamburg
   7. Hesse
   8. Mecklenburg-Western Pomerania
   9. Lower Saxony
   10. North Rhine-Westphalia
   11. Rhineland-Palatinate
   12. Saarland
   13. Saxony
   14. Saxony-Anhalt
   15. Schleswig-Holstein
   16. Thuringia
9. Greece:
   1. Aegean Islands
   2. Attica
   3. Central Greece
   4. Creta
   5. Epirus
   6. Ionian Islands
   7. Macedonia
   8. Peloponnese
   9. Thessaloniki
   10. Thessaly
   11. Thrace
10. Ireland:
    1. Carlow
    2. Cavan
    3. Clare
    4. Cork
    5. Donegal
    6. Dublin
    7. Galway
    8. Kerry
    9. Kildare
    10. Kilkenny
    11. Laois
    12. Leitrim
    13. Limerick
    14. Longford
    15. Louth
    16. Mayo
    17. Meath
    18. Monaghan
    19. Offaly
    20. Roscommon
    21. Sligo
    22. Tipperary
    23. Waterford
    24. Westmeath
    25. Wexford
    26. Wicklow
11. Italy:
    1. Abruzzo
    2. Basilicata
    3. Calabria
    4. Campania
    5. Emilia Romagna
    6. Friuli Venezia Giulia
    7. Lazio
    8. Liguria
    9. Lombardia
    10. Marche
    11. Molise
    12. Piemonte
    13. Puglia
    14. Sardegna
    15. Sicilia
    16. Toscana
    17. Trentino Alto Adige
    18. Umbria
    19. Valle d'Aosta
    20. Veneto
12. Netherlands:
    1. Brabant
    2. Drenthe
    3. Flevoland
    4. Friesland
    5. Gelderland
    6. Groningen
    7. Limburg
    8. Noord-Holland
    9. Overijssel
    10. Utrecht
    11. Zeeland
    12. Zuid-Holland
13. Norway:
    1. Akershus
    2. Aust-Agder
    3. Buskerud
    4. Finmark
    5. Hedmark
    6. Hordaland
    7. Møre og Romsdal
    8. Nordland
    9. Oppland
    10. Oslo
    11. Østfold
    12. Rogaland
    13. Sogn og Fjordane
    14. Svalbard
    15. Telemark
    16. Troms
    17. Trøndelag
    18. Vest-Agder
    19. Vestfold
14. Poland:
    1. Dolnośląskie
    2. Kujawsko-Pomorskie
    3. Lubelskie
    4. Lubuskie
    5. Łódzkie
    6. Małopolskie
    7. Mazowieckie
    8. Opolskie
    9. Podkarpackie
    10. Podlaskie
    11. Pomorskie
    12. Śląskie
    13. Świętokrzyskie
    14. Warmińsko-Mazurskie
    15. Wielkopolskie
    16. Zachodniopomorskie
15. Portugal:
    1. North
    2. Center
    3. Lisbon
    4. Alentejo
    5. Algarve
    6. Madeira
    7. Azores
16. Republic of Korea (South):
    1. Busan
    2. North Chungcheong
    3. South Chungcheong
    4. Daejeon
    5. Daegu
    6. Gangwon
    7. Gwangju
    8. Gyeonggi
    9. North Gyeongsang
    10. South Gyeongsang
    11. Incheon
    12. Jeju
    13. North Jeolla
    14. South Jeolla
    15. Sejong
    16. Seoul
    17. Ulsan
17. Singapore:
    1. Core Central Region (CCR)
    2. Rest of Central Region (RCR)
    3. Outside Central Region (OCR)
18. Slovakia:
    1. Bratislavský kraj
    2. Trnavský kraj
    3. Nitrianský kraj
    4. Trenčianský kraj
    5. Žilinský kraj
    6. Banskobystrický kraj
    7. Košický kraj
    8. Prešovský kraj
19. Spain:
    1. Andalusia
    2. Aragon
    3. Asturias
    4. Balearic Islands
    5. Basque Country
    6. Canary Islands
    7. Cantabria
    8. Castile La Mancha
    9. Castile León
    10. Catalonia
    11. Ceuta
    12. Extremadura
    13. Galicia
    14. La Rioja
    15. Madrid
    16. Melilla
    17. Murcia
    18. Navarra
    19. Valencia
20. Sweden:
    1. Greater Stockholm
    2. Greater Gothenburg
    3. Greater Malmoe
    4. South Sweden
    5. West Sweden
    6. North Sweden
    7. East Sweden
21. United Kingdom [still to be decided]:
    1. East Anglia
    2. East Midlands
    3. London
    4. North
    5. North West
    6. Northern Ireland
    7. South East
    8. Scotland
    9. South West
    10. Wales
    11. West Midlands
    12. Yorkshire and Humberside

### 1.6. Breakdown by Interest Rate

Please refer to section 1.4. Breakdown by geography

### 1.7. Breakdown by Repayment Type

Please refer to section 1.4. Breakdown by geography

### 1.8. Loan Seasoning

Please refer to section 1.4. Breakdown by geography

### 1.A - 10. Loan Size information and 1.B – 15. Loan Size information

Here below the bucket breakdown list for the loan size information in the different jurisdictions which are linked to their respective domestic currency. National coordinators are invited to ensure that lending institutions use the agreed breakdown for the loan size information as well as the same style of presentation. The breakdown proposed here below has been taken from the HTT of the Covered Bond Label.

| **Country** | **Residential loans** | **Commercial loans** |
| --- | --- | --- |
| Austria | < 100.000 100.000 - 300.000 300.000 - 500.000 500.000 - 1.000.000 1.000.000 - 5.000.000 > 5.000.000 | < 100.000 100.000 - 300.000 300.000 - 500.000 500.000 - 1.000.000 1.000.000 - 5.000.000 > 5.000.000 |
| Belgium | <=100K >100K and <=200K >200K and <=300K >300K and <=400K >400K | Not present |
| Canada | 99,999 and below 100,000 - 199,999 200,000 - 299,999 300,000 - 399,999 400,000 - 499,999 500,000 - 599,999 600,000 - 699,999 700,000 - 799,999 800,000 - 899,999 900,000 - 999,999 1,000,000 and above | Not present |
| Denmark | DKK 0 - 2m  DKK 2 - 5m  DKK 5 - 20m  DKK 20 - 50m  DKK 50 - 100m  > DKK 100m | DKK 0 - 2m DKK 2 - 5m DKK 5 - 20m DKK 20 - 50m DKK 50 - 100m > DKK 100m |
| Estonia | <=10,000.00  >10,000.00 <=20,000.00  >20,000.00 <=30,000.00  >30,000.00 <=40,000.00  >40,000.00 <=50,000.00  >50,000.00 <=60,000.00  >60,000.00 <=70,000.00  >70,000.00 <=80,000.00  >80,000.00 <=90,000.00  >90,000.00 <=100,000.00  >100,000.00 <=110,000.00  >110,000.00 <=120,000.00  >120,000.00 <=130,000.00  >130,000.00 <=140,000.00  >140,000.00 <=150,000.00  >150,000.00 <=160,000.00  >160,000.00 <=170,000.00  >170,000.00 <=180,000.00  >180,000.00 <=190,000.00  >190,000.00 <=200,000.00  >200,000.00 <=210,000.00  >210,000.00 <=220,000.00  >220,000.00 | Not present |
| Finland | 0 - 0,025000 0,025001 - 0,050000 0,050001 - 0,100000 0,100001 - 0,150000 0,150001 - 0,200 000 0,200001 - 0,250000 0,250001 - 0,300000 0,300001 - | Not present |
| France | <=200.000,00 >200.000,00 <=400.000,00 >400.000,00 <=600.000,00 >600.000,00 <=800.000,00 >800.000,00 <=1.000.000,00 1,000,000.00 > | <=200.000,00 >200.000,00 <=400.000,00 >400.000,00 <=600.000,00 >600.000,00 <=800.000,00 >800.000,00 <=1.000.000,00 1,000,000.00 > |
| Germany | up to 300,000 Euros more than 300,000 Euros up to 1 mn. Euros more than 1 mn. Euros up to 10 mn. Euros more than 10 mn. Euros | up to 300,000 Euros more than 300,000 Euros up to 1 mn. Euros more than 1 mn. Euros up to 10 mn. Euros more than 10 mn. Euros |
| Greece | up to 37,500 Euros More than 37,500 Euros up to 75,000 Euros More than 75,000 Euros up to 100,000 Euros More than 100,000 Euros up to 150,000 Euros More than 150,000 Euros | Not present |
| Ireland | 0-5k 5k-10k 10k-25k 25k-50k 50k-75k 75k-100k 100k-150k 150k-200k 200k-250k 250k-300k 300k-350k 350k-400k 400k-450k 450k-500k 500k-600k 600k-700k 700k-800k 800k-900k 900k-1m 1m + | Not present |
| Italy | 0 (included) – 10k 10k (Included) – 25k 25k ( Included ) – 50k 50k ( Included ) – 75k  75k (Included) – 100k  100k (Included) – 150k 150k (Included) – 200k 200k (Included) – 300k   Over 300k (Included) | 0 (included) – 10k 10k (Included) – 25k  25k ( Included ) – 50k 50k ( Included ) – 75k  75k (Included) – 100k  100k (Included) – 150k 150k (Included) – 200k 200k (Included) – 300k   Over 300k (Included) |
| Netherlands | <=25.000,00 >25.000,00 <=50.000,00 >50.000,00 <=75.000,00 >75.000,00 <=100.000,00 >100.000,00 <=150.000,00 >150.000,00 <=200.000,00 >200.000,00 <=250.000,00 >250.000,00 <=300.000,00 >300.000,00 <=350.000,00 >350.000,00 <=400.000,00 >400.000,00 <=450.000,00 >450.000,00 <=500.000,00 >500.000,00 <=550.000,00 >550.000,00 <=600.000,00 >600.000,00 <=650.000,00 >650.000,00 <=700.000,00 >700.000,00 <=750.000,00 >750.000,00 <=800.000,00 >800.000,00 <=850.000,00 >850.000,00 <=900.000,00 >900.000,00 <=950.000,00 >950.000,00 <=1.000.000,00 >1.000.000,00 | Not present |
| Norway | Private individuals  ≤ 1  > 1 ≤ 2  > 2 ≤ 3  > 3 ≤ 4  > 4 ≤ 5  > 5  Housing cooperatives  ≤ 5  > 5 ≤ 10  > 10 ≤ 20  > 20 ≤ 50  > 50 ≤ 100  > 100 | Not present |
| Poland | ≤ PLN 250,000 (PLN 250,000 - PLN 500,000] (PLN 500,000 - PLN 1,000,000] > PLN 1,000,000 | Not present |
| Portugal | 0 - EUR 10.000 10.000 - EUR 20.000  20.000 - EUR 30.000 30.000 - EUR 40.000 40.000 - EUR 50.000 50.000 - EUR 60.000 60.000 - EUR 70.000 70.000 - EUR 80.000 80.000 - EUR 90.000 90.000 - EUR 100.000 100.000 - EUR 200.000 > EUR 200.000 | Not present |
| Republic of Korea (South) | 0-50 50-100 100-150 150-200 200-250 250-300 300-350 350-400 400+ | Not present |
| Singapore | ≤ SGD 500,000 > SGD 500,000 - ≤ SGD 1,000,000 > SGD 1,000,000 - ≤ SGD 1,500,000 > SGD 1,500,000 - ≤ SGD 2,000,000 > SGD 2,000,000 - ≤ SGD 2,500,000 > SGD 2,500,000 - ≤ SGD 3,000,000 > SGD 3,000,000 - ≤ SGD 3,500,000 > SGD 3,500,000 - ≤ SGD 4,000,000 > SGD 4,000,000 | Not present |
| Spain | of which up to 100,000 euros  of which more than 100,000 euros up to 200,000 euros  of which more than 200,000 euros up to 300,000 euros  of which more than 300,000 euros up to 500,000 euros  of which more than 500,000 euros up to 1mn euros  of which more than 1mn euros | of which up to 100,000 euros  of which more than 100,000 euros up to 200,000 euros  of which more than 200,000 euros up to 300,000 euros  of which more than 300,000 euros up to 500,000 euros  of which more than 500,000 euros up to 1mn euros  of which more than 1mn euros |
| Slovakia | |  | | --- | | <0-0,025> | | (0,025-0,050> | | (0,050-0,075> | | (0,075-0,100> | | (0,100-0,125> | | (0,125-0,150> | | Not present |
| Sweden | ->0 - <=0,25 >0,25 - <=0,50 >0,50 - <=0,75 >0,75 - <=1,00 >1,00 - <=2,00 >2,00 - <=3,00 >3,00 - <=4,00 >4,00 - <=5 >5 - <=10 >10 - <=20 >20 | -1.00 1.00-2.50 2.50-5.00 5.00-10.00 10.00-25.00 25.00-50.00 50.00-100.00 100.00-.250.00 250.00- |
| United Kingdom | >=5,000 and <10,000 >=10,000 and <25,000 >=25,000 and <50,000 >=50,000 and <75,000 >=75,000 and <100,000 >=100,000 and <150,000 >=150,000 and <200,000 >=200,000 and <250,000 >=250,000 and <300,000 >=300,000 and <350,000 >=350,000 and <400,000 >=400,000 and <450,000 >=450,000 and <500,000 >=500,000 and <600,000 >=600,000 and <700,000 >=700,000 and <800,000 >=800,000 and <900,000 >=900,000 and <1,000,000 | Not present |

### Sustainable data section (1.A. Residential mortgages 15.- 19. And 1.B. Commercial mortgages 24.-27.)

The information related to energy efficiency is provided for total mortgages outstanding and for the number of dwellings in each category (not number of loans as in the other categories). The new section inserted in Tab A1. EEM General Mortgage Assets focuses on the entire mortgage pool, while the Tab. B1. EEM Sust. Mortgage Assets M data focuses only on the subset of mortgages which are linked to an EEM labelled product.

#### Section 15. EPC information of the financed RRE – Section 24. EPC information of the financed CRE

The exact bucket breakdown is defined at country level.

[country specific breakdowns to be inserted here]

#### Section 16. Average energy use intensity (kWh/m2) (for RRE) – Section 25 Average energy use intensity (kWh/m2) (for CRE)

The exact bucket breakdown is defined at country level.

[country specific breakdowns to be inserted here]

#### Section 17. Property Age Structure (for RRE) – Section 26. CRE Age Structure

Here the lending institution is invited to provide information on the age of the property against which the mortgage loans are pledged. For this section the focus is on the original year of construction of the building. This section is understood to be the aggregate of the EeDaPP Master Template – Tab. Property – Field Code FB36. *“Indicate the year when the property was originally built (YYYY format). In the case of a conversion of a building into flats, the date of conversion should be supplied. If no data available refer to Taxonomy for inputs.”* The information provided here is slightly different with respect to that in section 19. New Residential dwelling.

#### Section 18. Dwelling type

Type of dwelling construction, which is different from the information requested in section 13. Breakdown by type as here the focus is on the type of construction which is financed, while in section 13 the focus is on the purpose of the acquired RRE.

#### Section 19. New Residential property – Section 27. New Commercial Property

Here the focus is on reporting if the property is new or an existing dwelling. The definition of “new” is left to the national jurisdictions (eg. Different VAT treatment at the time of acquisition, etc.).

Practical examples in order to encode the data for in section 17 and 19:

1. A building built in 1920 but converted into residential units in 2019:
   1. Section 17 - Property age: 2006 and later
   2. Section 19 – New Residential Property: “New property or existing property” (depending on the national jurisdiction – e.g. In Belgium on such a property the buyer would need to pay VAT as it is considered a new construction and as such it would be considered a “new property”)
2. An apartment building from 1950 which has never been renovated:
   1. Section 17 – Property age: 1945-1960
   2. Section 19 – New Residential Property: “Existing property”

## B1. EEM Sustainable Mortgage Assets

This section focuses exclusively on the subset of mortgage loans which are part of a labelled EEM product.

### Section 1. Share of EEMI-eligible loans in the total mortgage program

Loans issued through an EEM labelled product with respect to the total mortgage portfolio of the lending institution. The exact eligibility criteria are laid out by the specific labelled product which can be further highlighted in the C.EEM Harmonised Glossary.

#### Section 1.2 EEMI eligible loan flow

This section is necessary to track the new issuance of EEM labelled mortgages in order to assess the volume issuance fee (VIF) due for the labelled product. As a recap the VIF charges EUR 1 every EUR 1,000,000 of EEM labelled mortgages issued the previous year.