Thematic Review on Climate and Environmental Risks 2022

Final Results

2 November 2022
Climate change and environmental degradation affect banks through physical risks (e.g. extreme weather events) and transition risks (e.g. rising carbon price).

ECB Banking Supervision works to ensure that banks detect, manage, and disclose risks properly, including those from climate change.

Over time, banks become more resilient to climate and transition shocks, which contributes to the safety and soundness of the banking sector.
ECB supervisory agenda on climate and environmental risks

2020
• ECB sets out supervisory expectations on climate and environmental risks.

2021
• Banks conduct self-assessment of practices and draw up action plans.

2022
• Thematic review of banks’ capabilities to steer their climate and environmental risk strategies and risk profiles (expectations 1-10).
• Stress test to assess banks’ climate stress testing capabilities (expectation 11).
Organisation of the thematic review

**Objectives**
1. Deep-dive into banks’ ability to manage climate and environmental risks
2. Assess how sound, effective and comprehensive banks’ practices are
3. Foster banks’ alignment with supervisory expectations

**Set-up**
- **4 core modules**: materiality assessment, strategy, governance, risk management
- **3 risk-specific modules**: credit risk, market risk, operational risk

**Sample**
186 banks (107 significant banks and 79 less significant banks)
Overall developments

Banks have overall improved their capabilities since 2021.

However, banks still need more sophisticated methodologies and granular information.

Most banks have devised at least basic practices but half of them have failed to implement them effectively.

Banks continue to significantly underestimate risks. 96% have blind spots in identifying them.

Summary of thematic review findings

Maturity of practices across areas of supervisory expectations (bank-by-bank)

(percentages of areas of supervisory expectations by institution)

Source: Supervisory assessment of 107 significant institutions’ responses to the 2022 thematic review on climate-related and environmental risks.
Materiality assessment: 80% of banks reported to be materially exposed to climate risks, up from 50% in 2021.

Strategy: Many banks have taken steps to understand how climate risks impact their business models, but their strategies do not yet address all risks comprehensively.

Governance: Banks have improved their organisational structures. However, they are still in the early stages of tackling climate risks in a granular, bank-wide and comprehensive manner.

Risk management: Almost all banks use at least basic quantification methods to measure climate risks, but only 25% have advanced methods.
Example 1: Data-driven due diligence of clients

- Some banks have embedded climate and environmental risks into their due diligence and lending policies.

- Assessments may include, among other things:
  - Exclusion criteria, e.g. for companies that rely on coal for more than 25% of their energy mix.
  - A client-level risk assessment based on data such as emissions or geographical location data.

Example 2: Using scenarios for target-setting

- Some banks use transition planning tools to enhance the longer-term resilience of their business models.

- They use forward-looking and science-based decarbonisation scenarios to define interim targets showing how their portfolios have to evolve over time, often with the aim to gradually reduce financed emissions.
ECB sets deadlines for banks to deal with climate risks

All significant banks received feedback letters with an average of 25 shortcomings.

The ECB has set institution-specific deadlines for achieving full alignment with its expectations by the end of 2024, including the following milestones:

**By March 2023**
Adequately categorise climate and environmental risks and conduct a full assessment of their impact on bank’s activities

**By the end of 2023**
Include climate and environmental risks in governance, strategy and risk management

**By the end of 2024**
Meet all remaining supervisory expectations, including on capital adequacy and stress testing
Findings on climate and environmental risks feed into supervisory review and evaluation process (SREP)

The ECB imposed binding qualitative requirements on more than 30 banks in its ongoing 2022 SREP to address severe weaknesses.

For a small number of banks, the outcome of the 2022 supervisory exercises on climate and environmental risks had an impact on their SREP scores. These, in turn, impact their Pillar 2 capital requirements.