

DIRECTORATE GENERAL SECRETARIAT

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Request for public access to ECB documents

Dear Mr Schreiber,

As indicated in our emails on 23 April and 30 June 2020, your second application received on 22 April 2020 for access to “documents which contain the following information: (1) The amount and value of CSPP and PEPP assets and purchases linked to fossil fuel companies; (2) The amount and value of CSPP and PEPP assets and purchases linked to the companies listed on the Global Coal Exit List; and (3) The distribution of CSPP and PEPP assets and purchases by sector or activity”, is hereby addressed.

On 24 July 2020, in line with Article 7(3) of Decision ECB/2004/3¹ on public access to ECB documents and owing to the increased workload, the ECB extended the stipulated time limit for reply by 20 working days.

Identification of the requested documents and assessment of disclosure

The ECB, after having carefully examined your request in line with Decision ECB/2004/3, has identified a confidential internal database containing the separate amount and value of assets purchased by the ECB and the Eurosystem under the Corporate Sector Purchase Programme (CSPP) and Pandemic Emergency Purchase Programme (PEPP). Aggregation of the transaction-level information in this database allows to derive purchases and holdings per issuer.

On 29 June 2020, in response to your request for access to “documents which contain the separate bond value of CSPP and PEPP assets held by the ECB and the Eurosystem”, the ECB explained that the separate amount and value of CSPP and PEPP assets held by the ECB and the Eurosystem cannot be provided since disclosure would undermine the interests protected under the second indent of Article 4(1)(a) (“the protection

¹ Decision ECB/2004/3 of 4 March 2004 on public access to European Central Bank documents (OJ L 80, 18.3.2004, p. 42)

of public interest as regards the financial, monetary or economic policy of the Union or a Member State) of that Decision. For further details, please see the ECB's reply dated 29 June 2020 to your first request from 22 April 2020. The detailed arguments justifying such non-disclosure, as presented in the ECB's reply dated 29 June 2020 herewith enclosed, remain valid and are equally applicable to the current case.

Taking into account the points made above, we would like to clarify the following:

In relation to point (1) of your request, *"the amount and value of CSPP and PEPP assets and purchases linked to fossil fuel companies"*, the ECB publishes every six months on its [website](#) the sectoral breakdown of CSPP holdings as percentage of all holdings, contrasting it also to the same breakdown of the CSPP-eligible corporate bond universe. Issuers are grouped according to an internal classification per economic sector. The companies active in the oil and gas sector are among others classified into "Energy and Basic Resources" (see e.g. figures for Q1 2020, where holdings classified under "Energy and Basic Resources" account for 7% of CSPP holdings and closely match a 7% share of the same sector in the CSPP-eligible corporate bond universe)². Moreover, at the end of each week the ECB publishes on its [website](#) the list of corporate bonds held under the CSPP and PEPP, including the National Central Bank (NCB) holding the bonds, the bonds' ISIN, the name of the company issuing the bond, the maturity date, and coupon rate. The bond issuers in this list should be helpful for mapping the "fossil fuel companies". However, the separate amount and value of CSPP and PEPP assets held by the ECB and the Eurosystem, or the publication of aggregate holdings by issuer, cannot be provided since disclosure would undermine the interests protected under the second indent of Article 4(1)(a) (*"the protection of public interest as regards the financial, monetary or economic policy of the Union or a Member State"*) of that Decision. For further details, please see the ECB's reply dated 29 June 2020 to your first request from 22 April 2020. The detailed arguments justifying such non-disclosure as presented in the ECB's reply dated 29 June 2020 remain valid and are equally applicable to the current case.

In relation to point (2) of your request, *"the amount and value of CSPP and PEPP assets and purchases linked to the companies listed on the Global Coal Exit List"*, as indicated above the ECB publishes on its website the list of corporate bonds held under the CSPP and PEPP which includes the bonds issuer and can be helpful for comparing the list with parts of the Global Coal Exit List. However, as stated above, the separate amount and value held in the individual bonds, or the publication of aggregate holdings by issuer, cannot be provided since disclosure would undermine the interests protected under the second indent of Article 4(1)(a) (*"the protection of public interest as regards the financial, monetary or economic policy of the Union or a Member State"*) of that Decision.

In relation to point (3) of your request, *"the distribution of CSPP and PEPP assets and purchases by sector or activity"*, as described above a breakdown of the CSPP portfolio by economic sector (according to the classification used by the ECB: utilities, infrastructure and transportation, automotive and parts, telecommunication, real state, energy and basic resources, construction and materials, technology, beverages, health care and life science, chemicals, food, insurance, and other sectors), rating and country of

² Please see more information in the CSPP section of the Asset Purchase Programmes (APP) website of the ECB: <https://www.ecb.europa.eu/mopo/implement/omt/html/index.en.html>

risk is published by the ECB in its [website](#) every six months. The last update was published on 6 May 2020 and depicts the composition of the CSPP portfolio and the CSPP-eligible universe as of end of Q1 2020.

Other remarks

The Eurosystem recognises the major challenge posed by climate change and the need for a timely mitigation of its impacts and stands ready to play its role in line with its competences and mandate. In relation to your remark that, *“in January, the ECB launched the review of its monetary policy strategy. Due to the Covid crisis, the review was postponed and should be conducted by mid-2021. While evaluating the effectiveness and potential side effects of the monetary policy, the review is expected to integrate climate in the ECB's operations. To do so, detailed information needs to be provided regarding the climate impact of the ECB's operations, especially of the CSPP and new PEPP. However, the ECB discloses the corporate bonds it holds under the CSPP and the PEPP and the total value of its purchases under these programs but gives no information regarding their environmental or climate impact. Some basic information could be easily disclosed by the ECB: the amount and value of CSPP and PEPP assets and purchases linked to fossil fuel companies and coal companies listed on the Global Coal Exit List, the distribution of CSPP and PEPP assets and purchases by sector or activity”*, we would like to refer you to the “other remarks” section of the ECB's reply dated 29 June 2020 to your first request from 22 April 2020 providing you with further information on the eligibility criteria for the APP and PEPP and the environmental impact of the CSPP and PEPP.

Finally, we would like to thank you again for your input on this topic and recall, as you also observe, that the ECB's ongoing strategy review will provide an opportunity to further examine how considerations related to environmental sustainability could be better reflected in the monetary policy framework.

Final remarks

For the sake of good order, we would like to inform you that, as regards the identified document Article 7(2) of Decision ECB/2004/3 provides that *“in the event of total or partial refusal, the applicant may, within 20 working days of receiving the ECB's reply, make a confirmatory application asking the ECB's Executive Board to reconsider its position”*.

Yours sincerely,

[signed]

Petra Senkovic
Director General Secretariat

[signed]

Margarita Louiza Karydi
Head of the Compliance and Governance Division