

FISMA/14134 - SFDR

Meeting date and place

Meeting held on 30/06/2022 10:00 SPA2

Participating organisation(s) representative(s)

[REDACTED]	BVI Bundesverband Investment und Asset Management e.V.	Contact, Requester
[REDACTED]	BVI Bundesverband Investment und Asset Management e.V.	Participant
[REDACTED]	BVI Bundesverband Investment und Asset Management e.V.	Participant
[REDACTED]	BVI Bundesverband Investment und Asset Management e.V.	Participant
[REDACTED]	BVI Bundesverband Investment und Asset Management e.V.	Participant
[REDACTED]	BVI Bundesverband Investment und Asset Management e.V.	Participant
[REDACTED]	BVI Bundesverband Investment und Asset Management e.V.	Participant

Main issues discussed

In the first part of the meeting, BVI emphasised the need for EU-wide harmonised minimum standards for ESG strategies, especially under Article 8 SFDR; mentioned low Taxonomy alignment even for an ESG-Strategy portfolio applying minimum exclusions criteria, which shows substantially better sustainability features than a non-ESG-Strategy portfolio, therefore, the EU taxonomy alone cannot be interpreted as a measure of the sustainable qualities of an ESG-Strategy portfolio (the main reason for low Taxonomy alignment is the current narrow framework of the Taxonomy, which focuses only on climate considerations, without addressing other key environmental and social dimensions of sustainability); and noted the unclarity on how to calculate sustainable investments under SFDR (entity or activity level) and implications for investment advice.

Regarding the above, BVI provided suggestions that might, in their opinion, address the concerns raised such as distinguish ESG strategies according to the investors underlying idea that could be clearly communicated to investors, more flexibility for products offered exclusively to professional investors, or the targeted review of the ESG disclosure rules and concepts.

In the second part of the meeting, BVI talked about the AIFMD/UCITS review, in particular some of the changes introduced by the Council. They expressed concerns on the new reporting mechanism for risk and portfolio management functions delegated to third-parties (with a risk of duplication in the case of notifications done via the existing reporting schemes) as well as on the proposed rules for benchmark administration for funds.

Directorate or unit

FISMA.C.4

Internal participants

[REDACTED]	FISMA C/4	[REDACTED]	Participant, Requested for
[REDACTED]	FISMA C/4	[REDACTED]	Participant
[REDACTED]	FISMA C/4	[REDACTED]	Participant
[REDACTED]	FISMA C/4	[REDACTED]	Notetaker, Participant
[REDACTED]	FISMA C/4	[REDACTED]	Notetaker, Participant

[REDACTED]

[REDACTED]

Validator and validation date
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