

Respuestas al cuestionario de consulta

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Note: the ranking will be the following when needed: 1= not at all, 2= to a limited extent, 3= to some extent, 4= to a large extent, 5= to a very large extent

1. Section I: Current requirements of the SFDR

Question 1.1 : The SFDR seeks to strengthen transparency through sustainability-related disclosures in the financial services sector to support the EU's shift to a sustainable, climate neutral economy. In your view, **is this broad objective of the regulation still relevant?**

1	2	3	4	5	Don't know
			x		

Question 1. 2: Do you think the SFDR disclosure **framework is effective in achieving the following specific objectives** (included in its [Explanatory Memorandum](#) and mentioned in its recitals?)

	1	2	3	4	5	Don't know
Increasing transparency towards end investors with regard to the integration of sustainability risks					x	
Increasing transparency towards end investors with regard to the consideration of adverse sustainability impacts					x	
Strengthening protection of end investors and making it easier for them to benefit from and compare among a wide range of financial products and services, including those with sustainability claims			x			
Channelling capital towards investments considered sustainable , including transitional investments ('investments considered sustainable' should be understood in a broad sense, not limited to the definition of sustainable investment set out in Article 2(17) of SFDR)		x				
Ensuring that ESG considerations are integrated into the investment and advisory process in a consistent manner across the different financial services sectors		x				
Ensuring that remuneration policies of financial market participants and financial advisors are consistent with the integration of sustainability risks and, where relevant, sustainable investment targets and designed to contribute to long-term sustainable growth				x		

Question 1.3: Do you agree that opting for a disclosure framework at EU level was more effective and efficient in seeking to achieve the objectives mentioned in Question 1.2 than if national measures had been taken at Member State level?

1	2	3	4	5	Don't know
				x	

Question 1.4: Do you agree with the following statement?

	1	2	3	4	5	Don't know
The costs of disclosure under the SFDR framework are proportionate to the benefits it generates (informing end investors, channelling capital towards sustainable investments)	x					

Question 1.5: To what extent do you agree with the following statements?

	1	2	3	4	5	Don't know
The SFDR has raised awareness in the financial services sector of the potential negative impacts that investment decisions can have on the environment and/or people					x	
Financial market participants have changed the way they make investment decisions and design products since they have been required to disclose sustainability risks and adverse impacts at entity and product level under the SFDR.					x	
The SFDR has had indirect positive effects by increasing pressure on investee companies to act in a more sustainable manner			x			

Question 1.6: To what extent do you agree or disagree with the following statements?

	1	2	3	4	5	Don't know
Some disclosures required by the SFDR are not sufficiently useful to investors					x	
Some legal requirements and concepts in the SFDR, such as ' sustainable investment ', are not sufficiently clear					x	
The SFDR is not used as a disclosure framework as intended, but as a				x		

labelling and marketing tool (in particular Articles 8 and 9)						
Data gaps make it challenging for market participants to disclose fully in line with the legal requirements under the SFDR					X	
Re-use of data for disclosures is hampered by a lack of a common machine-readable format that presents data in a way that makes it easy to extract					X	
There are other deficiencies with the SFDR rules (please specify in text box following question 1.7)					X	

Question 1.7: To what extent do you agree or disagree with the following statements?

	1	2	3	4	5	Don't know
The issues raised in question 1.6 create legal uncertainty for financial market participants and financial advisers					X	
The issues raised in question 1.6 create reputational risks for financial market participants and financial advisers					X	
The issues raised in question 1.6 do not allow distributors to have a sufficient or robust enough knowledge of the sustainability profile of the products they distribute			X			
The issues raised in question 1.6 create a risk of greenwashing and mis-selling			X			
The issues raised in question 1.6 prevent capital from being allocated to sustainable investments as effectively as it could be				X		
The current framework does not effectively capture investments in transition assets				X		
The current framework does not effectively support a robust enough use of shareholder engagement as a means to support the transition				X		
Others						

[About the consultation process:](#)

The review clause in the Regulation provided for the Commission to assess its implementation by 30 December 2022 at the latest, considering in particular two specific aspects: (i) the

reference to the average number of employees; and (ii) whether its functioning is invalidated by the lack of data or their poor quality. The consultation undertaken by the Commission with the attached questionnaire goes far beyond the scope foreseen by the Regulation itself, without sufficient arguments having been provided.

The aim of the new regulation should be limited to improving the existing framework and, in particular, simplifying it so that investors can make better use of it.

The announcement of the SFDR review may put a brake on innovation in sustainability financing (the ultimate objective of the Regulation) until a stable and definitive regulatory framework is in place, as well as sufficient data to comply with the reporting obligations deriving from it.

About how SFDR works in practice:

The SFDR Regulation entered into force on 10 March 2021, and is supported by regulatory technical standards (RTS), subsequently developed by the European Supervisory Authorities. However, both the RTS and the other supporting documents developed subsequently, with successive clarifications in the form of "questions and answers", have not been sufficient to provide a homogeneous interpretation of the reporting requirements. Important aspects of the regulations have had to be interpreted by market participants in a context of uncertainty and, therefore, legal uncertainty.

Legal uncertainty has increased reputational risks for financial market participants and called into question the credibility of the European sustainable finance framework itself.

It can be argued that, while SFDR has been effective in increasing transparency towards investors with regard to the integration of sustainability risks and consideration of adverse impacts, it has hardly improved investors' understanding of such risks and impacts.

About the cost of SFDR implementation:

The implementation of SFDR significantly increased the regulatory compliance costs incurred by financial market participants without an equivalent benefit to investors. The cost of disclosure under SFDR has turned out not to be commensurate with the information benefits received by investors or the channelling of capital into sustainable investments. Therefore, we would like to highlight that the implementation of new changes has a high economic cost, requiring considerable investment of resources as well as costly IT adaptations. Moreover, the costs incurred by manufacturers and marketers tend to increase the price of financial products which may result in a disincentive for such products/ may discourage acquisition by retail investors.

Thus, the SFDR review should avoid unjustified or disproportionate new costs and risks, in line with the Better Regulation Guidelines that inform the European Commission's rule-making process.

We welcome the Commission's reflections, which highlight the need to review and improve certain aspects of the Regulation. However, only two years after its entry into force, we believe that a cost-benefit analysis should be carried out, taking into account the advantages and disadvantages of any new implementation or development, as this could lead to greater uncertainty in the market and confusion for investors.

In short, we believe that any future modifications should be analysed in detail to avoid (i) adding an extra layer of complexity to the current framework, (ii) making implementation more difficult for market participants, (iii) causing customer fatigue with new information/requirements in a short period of time and (iv) generating an increase in manufacturing and distribution costs that could eventually result in higher prices for financial products.

Therefore, any future changes should be carefully considered and embody a more user-friendly/investor-centric approach, especially for retail investors. To that end, it may be

necessary to (i) rationalize disclosure requirements and (ii) simplify documentation to enhance understandability.

1.1. Disclosures of principal adverse impacts (PAIs)

There are several disclosures concerning **PAIs in the SFDR**. As a general rule, the SFDR requires financial market participants who consider PAIs to disclose them at entity level on their website. It also includes a mandatory requirement for financial market participants to provide such disclosures when they have more than 500 employees (Article 4). The Delegated Regulation³ of the SFDR includes a list of these PAI indicators. These entity level PAI indicators are divided into three tables in the Delegated Regulation. Indicators listed in table 1 are mandatory for all participants, and indicators in tables 2 and 3 are subject to a materiality assessment by the financial market participant (at least one indicator from table 2 and one from table 3 must be included in every PAI statement).

Second, the SFDR requires financial market participants who consider PAIs at entity level to indicate in the pre-contractual documentation whether their financial products consider PAIs (Article 7) and to report the impacts in the corresponding periodic disclosures (Article 11). When reporting these impacts, financial market participants may rely on the PAI indicators defined at entity level in the Delegated Regulation.

Finally, in accordance with the empowerment given in Article 2a of SFDR, the Delegated Regulation requires that the do no significant harm (DNSH) assessment of the sustainable investment definition is carried out by taking into account the PAI indicators defined at entity level in Annex I of the Delegated Regulation.

Question 1.8: To what extent do you agree with the following statements about **entity level disclosures**?

	1	2	3	4	5	Don't know
I find it appropriate that certain indicators are always considered material (i.e. "principal") to the financial market participant for its entity level disclosures, while having other indicators subject to a materiality assessment by the financial market participant (approach taken in Annex I of the SFDR Delegated Regulation)				x		
I would find it appropriate that all indicators are always considered material (i.e. "principal") to the financial market participant for its entity level disclosures.	x					
I would find it appropriate that all indicators are always subject to a materiality assessment by the financial market participant for its entity level disclosures.			x			

Question 1.8.1: When following the approach described in the first statement of question 1.8 above, do you agree that the areas covered by the **current indicators listed in table 1 of the Delegated Regulation are the right ones to be considered material in all cases?**

1	2	3	4	5	Don't know
X					

Question 1.9: To what extent do you agree with the following statements about product level disclosures?

	1	2	3	4	5	Don't know
The requirement to 'take account of' PAI indicators listed in Annex I of the Delegated Regulation for the DNSH assessment, does not create methodological challenges.		X				
In the context of product disclosures for the do no significant harm (DNSH) assessment, it is clear how materiality of principal adverse impact (PAI) indicators listed in Annex I of the Delegated Regulation should be applied		X				
The possibility to consider the PAI indicators listed in Annex I of the Delegated Regulation for product level disclosures of Article 7 do not create methodological challenges.		X				
It is clear how the disclosure requirements of Article 7 as regards principal adverse impacts interact with the requirement to disclose information according to Article 8 when the product promotes environmental and/or social characteristics and with the requirement to disclose information according to Article 9 when the product has sustainable investment as its objective.	X					

Questions 1.10, 1.10.1 and 1.11 are intended for financial market participants and financial advisors subject to the SFDR.

1.2. The cost of disclosures under the SFDR today

The following two questions aim to assess the costs of the SFDR disclosure requirements distinguishing between one-off and recurring costs. One-off costs are incurred only once to implement a new reporting requirement, e.g. getting familiarised with the legal act and the associated regulatory or implementing technical standards, setting-up data collection

processes or adjusting IT-systems. Recurring costs occur repeatedly every year once the new reporting is in place, e.g. costs of annual data collection and report preparation. In the specific case of precontractual disclosures for example, there are one-off costs to set up the process of publishing precontractual disclosures when a new product is launched, and recurring annual costs to repeat the process of publishing pre-contractual disclosures each time a new product is launched (depends on the number of products launched on average each year). These two questions apply both to entity and product level disclosures.

Question 1.10: Could you provide estimates of the one-off and recurring annual costs associated with complying with the SFDR disclosure requirements (EUR)? Please split these estimates between internal costs incurred by the financial market participant and any external services contracted to assist in complying with the requirements (services from third-party data providers, advisory services ...). If such a breakdown is not possible, please provide the total figures

EUR	Estimated one off costs	Estimated recurring annual costs	Don't know
Internal costs			
Thereof personnel costs			
Thereof IT costs			
External costs			
Thereof data providers			
Thereof advisory services			
Total costs of SFDR disclosure requirements			

Question 1.10.1: Could you split the total costs between product level and entity level Disclosures?

%	Product level disclosures	Entity-level disclosures	Don't know
Estimated percentage of costs			

If you wish to provide more details:

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Question 1.11: In order to have a better understanding of internal costs, could you provide an estimate of how many full-time-equivalents (FTEs - FTEs - 1 FTE corresponds to 1 employee working full-time the whole year) are involved in preparing SFDR disclosures?

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Could you provide a split between:

%	Retrieving the data	Analysing the data	Reporting SFDR disclosures	Other	Don't know

Estimated percentage					
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1.3. Data and estimates

Financial market participants' and financial advisers' ability to fulfil their ESG transparency requirements depends in part on other disclosure requirements under the EU framework. In particular, they will rely to a significant extent on the Corporate Sustainability Reporting Directive (CSRD). However, entities are not reporting yet under those new disclosure requirements, or they may not be within the scope of the CSRD. Besides, even when data is already available today, it may not always be of good quality.

*Question, 1.12: Are you **facing difficulties in obtaining good-quality data**?*

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
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*Question 1.12.1 : If so, do you **struggle to find information** about the following elements?*

	1	2	3	4	5	Don't know
The entity level principal adverse impacts					<input checked="" type="checkbox"/>	
The proportion of taxonomy-aligned investments (product level)					<input checked="" type="checkbox"/>	
The contribution to an environmental or social objective, element of the definition of ' sustainable investment ' (product level)				<input checked="" type="checkbox"/>		
The product's principal adverse impacts, including when assessed in the context of the ' do no significant harm ' test which requires the consideration of PAI entity level indicators listed in Annex I of the Delegated Regulation and is an element of the definition of 'sustainable investment' (product level)			<input checked="" type="checkbox"/>			
The good governance practices of investee companies (product level)			<input checked="" type="checkbox"/>			
Other						

*Question 1.12.2: Is the **SFDR sufficiently flexible to allow for the use of estimates**?*

1	2	3	4	5	Don't know
<input checked="" type="checkbox"/>					

*Question 1.12.3: Is it clear **what kind of estimates are allowed by the SFDR**?*

1	2	3	4	5	Don't know
X					

Question 1.12.4: If you use estimates, what kind of estimates do you use to fill the data gap?

	Entity level PAI	Taxonomy aligned investments (product level)	Sustianble investments (product level)	Other
The entity level principal adverse impacts				
The proportion of taxonomy-aligned investments (product level)				
The contribution to an environmental or social objective , element of the definition of 'sustainable investment' (product level)				
The product's principal adverse impacts , including when assessed in the context of the 'do no significant harm' test which requires the consideration of PAI entity level indicators listed in Annex I of the Delegated Regulation and is an element of the definition of 'sustainable investment' (product level)				

Question 1.12.5: Do you engage with investee companies to encourage reporting of the missing data?

1	2	3	4	5	Don't know

Question 1.13: Have you increased your offer of financial products that make sustainability claims since the disclosure requirements of Articles 8 and 9 of the SFDR began to apply (i.e. since 2021, have you been offering more products that you categorise as Articles 8 and 9 than those you offered before the regulation was in place and for which you also claimed a certain sustainability performance)?

1	2	3	4	5	Don't know
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Question 1.13.1: Please specify how the share of financial products making sustainability claims has evolved in the past years. (Please express it as a percentage of the total financial products you offered each year.)

2020	2021	2022	2023

Question 1. 13.2: If you *have increased your offering of financial products making sustainability claims*, in your view, has any of the following factors influenced this increase?

	1	2	3	4	5	Don't know
SFDR requirements						
Retail investor interest						
Professional investor interest						
Market competitiveness						
Other factors						

If other, please specify:

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2. Section II: Interaction with other sustainable finance legislation

The SFDR interacts with other parts of the EU's sustainable finance framework. Questions in this section will therefore seek respondents' views about the current interactions, as well as potential inconsistencies or misalignments that might exist between the SFDR and other sustainable finance legislation. There is a need to assess the potential implications for other sustainable finance legal acts if the SFDR legal framework was changed in the future. Questions as regards these potential implications are included in section 4 of this questionnaire, when consulting on the potential establishment of a categorisation system for products, and they do not prejudice future positions that might be taken by the Commission.

The SFDR mainly interacts with the following legislation and their related delegated and implementing acts:

- the Taxonomy Regulation
- the Benchmarks Regulation
- the Corporate Sustainability Reporting Directive (CSRD)
- the Markets in Financial Instruments Directive (MiFID 2) and the Insurance Distribution Directive (IDD)

- the Regulation on Packaged Retail Investment and Insurance Products (PRIIPs)

*Question 2.1 : The [Commission recently adopted a FAQ](#) clarifying that investments in **Taxonomy-aligned 'environmentally sustainable' economic activities can automatically qualify as 'sustainable investments' in those activities under the SFDR**. To what extent do you agree that this FAQ offers sufficient clarity to market participants on how to treat Taxonomy-aligned investment in the SFDR product level disclosures?*

1	2	3	4	5	Don't know
			x		

Question 2.2: To what extent do you agree or disagree with the following statements?

	1	2	3	4	5	Don't know
The questions & answers published by the Commission in April 2023 specifying that the SFDR deems products passively tracking CTB and PAB to be making 'sustainable investments' as defined in the SFDR provide sufficient clarity to market participants			x			
The approach to DNSH and good governance in the SFDR is consistent with the environmental, social and governance exclusions under the PAB/CTB			x			
The ESG information provided by benchmark administrators is sufficient and is aligned with the information required by the SFDR for products tracking or referencing these benchmarks		x				

Question 2.3: To what extent do you agree or disagree with the following statements?

	1	2	3	4	5	Don't know
The SFDR disclosures are consistent with the CSRD requirements, in particular with the European Sustainability Reporting Standards			x			

There is room to streamline the entity level disclosure requirements of the SFDR and the CSRD				x		
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Question 2.4: To what extent do you agree that the product disclosures required in the SFDR and its Delegated Regulation (e.g. the proportion of sustainable investments or taxonomy aligned investments, or information about principal adverse impacts) are efficiently useful and comparable to allow distributors to determine whether a product can fit investors' sustainability preferences under MiFID2 and the IDD?

1	2	3	4	5	Don't know
	x				

Question 2.5: MIFID and IDD require financial advisors to take into account sustainability preferences of clients when providing certain services to them. Do you believe that, on top of this behavioural obligation, the following disclosure requirements for financial advisors of the SFDR are useful?

	1	2	3	4	5	Don't know
Article 3, entity level disclosures about the integration of sustainability risks policies in investment or insurance advice		x				
Article 4, entity level disclosures about consideration of principal adverse impacts		x				
Article 5, entity level disclosures about remuneration policies in relation to the integration of sustainability risks		x				
Article 6, product level pre-contractual disclosures about the integration of sustainability risks in investment or insurance advice			x			
Article 12, requirement to keep information disclosed according to Articles 3 and 5 up to date			x			

Question 2.6: Have the requirements on distributors to consider sustainability preferences of clients impacted the quality and consistency of disclosures made under SFDR?

Yes:
No:

Don't know: X

Question 2.6.1: If so, how?

Please clarify your replies to questions in section 2 as necessary:

There is a lot of information available currently in the market. Nonetheless, retail clients struggle to understand it.

We recognize the effort made to correlate reporting requirements between different regulations (e.g. SFDR with CSRD). However, we consider that a priority aspect is to ensure that environmental and social indicators relevant to the SFDR, the EU Climate Benchmarks Regulation and delegated acts for climate benchmarks, Pillar 3 disclosures and other investor information regulations are disclosed by in-scope companies on a mandatory basis.

The transparency framework established in the SFDR by subject actors should be in line with the transparency requirements in other regulations. The coexistence of different sustainability reporting regulations can lead to the creation of double reporting, which creates an administrative barrier for the different actors and, at the same time, is detrimental to clearer information for the market with different information formats at different levels (entity and products).

Double reporting can lead to duplication, contradictions, and confusion of information.

The review of SFDR provides nevertheless a good opportunity to rectify some inconsistencies affecting the current sustainable finance framework and/or consider the possibility of revisiting other regulatory pieces (different from SFDR) to ensure all of them are duly aligned.

In relation to the above, among other observations regarding current sustainable finance framework, the following should be considered:

CSRD

- On 31 July 2023 the European Commission adopted the European Sustainability Reporting Standards (ESRS) which are applicable to all companies subject to CSRD.
- Finally, the Commission adopted ESRS 1 and ESRS 2 as mandatory standards, while the remaining standards are subject to sustainability assessment on a case-by-case basis. In addition, explanations of whether an aspect is not considered material are also voluntary. This has implications for the financial sector and investors, as investors will not be able to access certain information, such as climate-related data, if the company in question considers it to be non-material.
- A cross-reference would be necessary in the framework of the CSRD disclosure of financial market participants, to the extent that they already provide such information under SFDR at the entity level. Besides, the European Commission may consider whether entity-level PAI disclosures should be removed from the SFDR considering that:
 - all entities mandatorily subject to PAI disclosures under art 4 SFDR are under the scope of CSRD.
 - SFDR could focus on product level information, which is the primary concern of investors.

MIFID and IDD

- As regards the interaction of SFDR with MiFID, it is worth reiterating the problems arising from the lack of alignment of the information provided under SFDR and that required from investors under Green MiFID (which, moreover, is overly complex for retail investors). Furthermore, the ESG concepts employed by MiFID II and IDD (taxonomy alignment, sustainable investments and PAI)

contrast dramatically with the market reality, where there is (i) a low percentage of taxonomy alignment within the economy, (ii) doubts as regards what a sustainable investment is or should be, as well as (iii) use of a limited number of PAI (due to data gaps, etc).

The confusion for retail investors may be further exacerbated by the proposed amendment of PRIIPs in the context of the European Retail Investment Strategy (RIS), which should take into account this revision of SFDR.

Therefore, sustainability preferences under MiFID and IDD should be recalibrated to better fit in the sustainable finance framework, facilitate finance for the green transition and be align with investors' ESG related needs.

- Given that MiFID and IDD already impose an obligation on financial advisors to take into account clients' sustainability preferences, we believe that the disclosure at both entity and product level required under Articles 3, 4, 5, 6 and 12 of the SFDR is no longer useful and should be reconsidered.

EU Taxonomy

- In relation to environmental taxonomy, article 2.17 of the SFDR, which defines what constitutes sustainable investing, can be confusing. An alignment between taxonomy and SFDR allows for clarification of what can be considered as a "sustainable investment", since, at present, the Regulation does not include a detailed definition of what is to be considered as such, nor binding thresholds. However, this is an additional complexity given that the taxonomy is a very demanding framework, as well as a "living" framework, open to new activities and to continuous revision of its technical selection criteria. The need for flexibility will therefore need to be borne in mind.
- In the case of social aspects, the taxonomy framework is still to be determined, which results in an imbalance in the number of funds addressing the social dimension as compared to the environmental dimension.

A disclosure framework at EU level

- EU rules are crucial to ensure a harmonized and standardized approach towards sustainability across all member states. It should create a level playing field for products operating within the EU, ensuring that investors have consistent and comparable information regardless of the Member State where these are manufactured or distributed.
- Specific national marketing rules often require the inclusion of specific information in prospectuses or KIDs. This practice has inadvertently created barriers for cross-border sale of products. These products often find themselves in a position where they need to provide supplementary information to their prospectuses for different countries, leading to inconsistencies and potential confusion for investors. Also from a marketing perspective, a harmonized comprehensive set of marketing rules is needed.

3. Section III: Potential changes to disclosure requirements for financial markets participants

3.1. Entity level disclosures

The SFDR contains entity level disclosure requirements for financial market participants and financial advisers. They shall disclose on their **website their policies on the integration of sustainability risks in their investment decision-making process or their investment or insurance advice** (Article 3). In addition, they shall disclose whether, and if so, how, they **consider the principal adverse impacts of their investment decisions on sustainability factors**. For financial market participants with 500 or more employees, the disclosure of a due diligence statement, including information of adverse impacts, is mandatory (Article 4). In addition, financial market participants and financial advisers shall disclose **how their remuneration policies are consistent with the integration of sustainability risks** (Article 5).

Question 3.1.1: Are these disclosures useful?

	1	2	3	4	5	Don't know
Article 3			x			
Article 4			x			
Article 5			x			

Please elaborate:

It would be necessary to find an appropriate balance between comparability and flexibility of the information to be reported to ensure that such information makes sense to the investor receiving it and, in particular, to retailers.

We believe it is useful to have access to comparable information in the area of transparency for sustainability preferences. In this regard, entity level disclosure requirements are a positive tool to avoid potential greenwashing effects. Nonetheless, there is still room for improvement, as some of these disclosures might not be relevant for investors when it comes to the cost-efficiency of processing such information.

Question 3.1.2: Among the specific entity level principal adverse impact indicators required by the Delegated Regulation of the SFDR adopted pursuant to Article 4 (tables 1, 2 and 3 of Annex I), **which indicators do you find the most (and least) useful?**

To name a few (this is a not exhaustive list):

Most useful: Exposure to companies active in the fossil fuel sector; GHG intensity of investee companies and Carbon footprint.

Least useful: greenhouse gas emissions; water; waste and biodiversity.

Question 3.1.3: In this context, is the SFDR the right place to include entity level disclosures?

1	2	3	4	5	Don't know
			x		

Question 3.1.4: To what extent is there room for streamlining sustainability-related entity level requirements across different pieces of legislation?

1	2	3	4	5	Don't know
				x	

Please explain your replies to questions in section 3.1 as necessary

We consider it necessary to simplify disclosure requirements, addressing the most urgent and relevant issues. Retail customers find it difficult to understand all the information available in the market due to the complexity of the disclosures. In addition, it should be noted that sustainability information is currently reported separately from the other documentation that financial products must provide to the markets. An integrated report would provide investors with a holistic view, simplify reporting and reduce costs for the entities subject to these obligations.

Another issue that we consider relevant to highlight is the challenge for institutions to access reliable data, especially outside the EU, as well as the methodological problems faced by institutions in relation to the PAI indicators for the principle of no significant harm to the environment (DNSH), due to lack of data and the use of estimates.

It is also necessary to reflect on the requirements for the consideration of PIAs and, in particular, on what this information provides when provided at entity level, as it can be very difficult to understand for retailers and contradictory to the information provided at product level, which is (a priori) the most relevant for the investor.

3.2. Product level disclosures

The SFDR includes product level disclosure requirements (Articles 6, 7, 8, 9, 10 and 11) that mainly concern risk and adverse impact related information, as well as information about the sustainability performance of a given financial product. The regulation determines which information should be included in precontractual and periodic documentation and on websites. The SFDR was designed as a disclosure regime, but is being used as a labelling scheme, suggesting that there might be a demand for establishing sustainability product categories. Before assessing whether there might be merit in setting up such product categories in Section 4, Section 3 includes questions analysing the need for possible changes to disclosures, as well as any potential link between product categories and disclosures. The need to ask about potential links between disclosures and sustainability product categories is the reason why this section contains some references to 'products making sustainability claims'. However, this does not pre-empt in any way a decision about how a potential categorisation system and an updated disclosure regime would interact if these were established. The Commission services are openly consulting on all these issues to further assess potential ways forward as regards the SFDR.

The Commission services would therefore like to collect feedback on what transparency requirements stakeholders consider useful and necessary. We would also like to know respondents' views on whether and how these transparency requirements should link to different potential categories of products.

The general principle of the SFDR is that products that make sustainability claims need to disclose information to back up those claims and combat greenwashing. This could be viewed as placing additional burden on products that factor in sustainability considerations. This is why, in the following questions, the Commission services ask respondents about the usefulness of uniform disclosure requirements for products across the board, regardless of related sustainability claims, departing from the general philosophy of the SFDR as regards product disclosures. Providing proportionate information on the sustainability profile of a product which does not make sustainability claims could make it easier for some investors to understand products' sustainability performance, as they would get information also about products that are not designed to achieve any sustainability-related outcome. This section also contains questions exploring whether it could be useful to require financial market participants who make sustainability claims about certain products to disclose additional information (i.e. in case a categorisation system is introduced in the EU framework, the need to require additional information about products that would fall under a category).

Question 3.2.1: Standardised product disclosures - Should the EU impose **uniform disclosure requirements for all financial products offered in the EU, regardless of their sustainability-related claims or any other consideration?**

1	2	3	4	5	Don't know
		X			

Question 3.2.1. a): If the EU was to impose uniform disclosure requirements for all financial products offered in the EU, should disclosures on a limited number of principal adverse impact indicators **be required for all financial products offered in the EU? Please, specify which ones:**

It would depend on the specificities and features of each product. Disclosures' criteria should be harmonised at the EU level but disclosures should be based on the pertinence and features of each product.

The main goal of standardised product disclosures should be to provide retail investors with clear, accessible and meaningful information that helps them make informed decisions. In that respect, it is important that the chosen approach serves this core objective ensuring that the essence of ESG products is accurately communicated and not misunderstood or oversimplified with uniform disclosure requirements.

Question 3.2.1 b): Please see a list of examples of disclosures that could also be required about **all financial products for transparency purposes. In your view, should these disclosures be mandatory, and/or should any other information be required about **all** financial products for transparency purposes?**

	1	2	3	4	5	Don't know

Taxonomy related disclosures						X
Engagement strategy						X
Exclusions						X
Info about how ESG related information is used in the investment process						X
Other information				X		

Question 3.2.2: **Standardised product disclosures** - Would uniform disclosure requirements for some financial products be a more appropriate approach, regardless of their sustainability-related claims (e.g. products whose assets under management, or equivalent, would exceed a certain threshold to be defined, products intended solely for retail investors...)? Please note that next question 3.2.3 asks specifically about the need for disclosures in cases of products making sustainability claims.

1	2	3	4	5	Don't know
					X

Question 3.2.2 a): If the EU was to impose uniform disclosure requirements for some financial products, **what would be the criterion/criteria that would trigger the reporting obligations?**

It would depend on the specificities and features of each product. Disclosures' criteria should be harmonised at the EU level but disclosures should be based on the pertinence and features of each product.

The main goal of standardised product disclosures should be to provide retail investors with clear, accessible and meaningful information that helps them make informed decisions. In that respect, it is important that the chosen approach serves this core objective ensuring that the essence of ESG products is accurately communicated and not misunderstood or oversimplified with uniform disclosure requirements.

Question 3.2.2. b): If the EU was to impose uniform disclosure requirements for some financial products, **should a limited number of principal adverse impact indicators be required?**

1	2	3	4	5	Don't know
					X

Question 3.2.2. c): Please see a list of examples of disclosures that could also be required about the group of financial products that would be subject to standardised disclosure obligations for transparency purposes (in line with your answer to Q 3.2.2 above). In your

view, should these disclosures be mandatory, and/or should any other information be required about that group of financial products?

	1	2	3	4	5	Don't know
Taxonomy related disclosures						x
Engagement strategy						x
Exclusions						x
Info about how ESG related information is used in the investment process						x
Other information						x

Question 3.2.3: If requirements were imposed as per question 3.2.1 and/or 3.2.2, should there be some **additional disclosure requirements when a product makes a sustainability claim?**

1	2	3	4	5	Don't know
	x				

Question 3.2.4: In general, is it appropriate to have product related information spread across these three places, i.e. in **precontractual disclosures, in periodic documentation and on websites?**

1	2	3	4	5	Don't know
			x		

Question 3.2.5: More specifically, **is the current breakdown** of information between **precontractual, periodic documentation and website disclosures appropriate and user friendly?**

1	2	3	4	5	Don't know
	x				

Please explain as necessary your replies to question 3.2.4 and 3.2.5:

We consider it necessary to simplify the information requirements, addressing the most urgent and relevant aspects. Retail customers find it difficult to understand all the information available in the market given the complexity of the disclosures.

Question 3.2.6: To what extent do you agree with the following statements?

	1	2	3	4	5	Don't know
It is useful that product disclosures under SFDR are publicly available (e.g. because they have the potential to bring wider societal benefits)				x		
Confidentiality aspects need to be taken into account when specifying the information that should be made available to the public under the SFDR						x
Sustainability information about financial products should be made available to potential investors , investors or the public according to rules in sectoral legislation (e.g.: UCITS, AIFM, IORPs directives); the SFDR should not impose rules in this regard						x

Please, explain your reply:

Question 3.2.7: To what extent do you agree with the following statements?

	1	2	3	4	5	Don't know
The same sustainability disclosure topics and the exact same level of granularity of sustainability information (i.e. same number of datapoints) should be required in all types of precontractual documentation to allow for comparability		x				
The same sustainability disclosure topics should be required in all types of precontractual documentation to allow for comparability		x				

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Question 3.2.8: Do you believe that **sustainability related disclosure requirements at product level should be independent from any entity level disclosure requirements**, (i.e. product disclosures should not be conditional on entity disclosures, and vice-versa)?

Yes:

No:

Don't know: X

We think there should not be a duplication but a minimum interopreability between entity-level and product-level disclosures, taking into account the specificities of each product, while respecting the hierarchy of entity-products.

Question 3.2.9: Do you think that some **product-level disclosures should be expressed on a scale** (e.g. if the disclosure results for similar products were put on a scale, in which decile would the product fall)?

Yes:

No:

Don't know: X

Question 3.2.9.1: If so, how should those scales be established and which information should be expressed on a scale?

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Question 3.2.10: If you are a professional investor, where do you obtain the sustainability information you find relevant?

	1	2	3	4	5	Don't know
From direct enquiries to market participants						
Via SFDR disclosures provided by market participants						

Question 3.2.11: If you are a professional investor, do you find the SFDR requirements have improved the quality of information and transparency provided by financial market participants about the sustainability features of the products they offer?

1	2	3	4	5	Don't know

Question 3.2.12: To what extent do you agree or disagree with the following statements?

	1	2	3	4	5	Don't know
Article 2(2) of the SFDR Delegated Regulation already requires financial market participants to make disclosures under the SFDR in a searchable electronic format , unless otherwise required by sectoral legislation. This is sufficient to ensure accessibility and usability of the disclosed information.					x	
It would be useful for all product information disclosed under the SFDR to be machine-readable , searchable and ready for digital use. It would be useful for some of the product information disclosed under the SFDR to be machine-readable and ready for digital use.					x	
It would be useful to prescribe a specific machine-readable format for all (or some parts) of the reporting under the SFDR (e.g. iXBRL).					x	
It would be useful to make all product information disclosed under the SFDR available in the upcoming European Single Access Point as soon as possible.					x	
Entity and product disclosures on websites should be interactive and offer a layered approach enabling investors to access additional information easily on demand.					x	
It would be useful that a potential regulatory attempt to digitalise sustainability disclosures by financial market participants building on the European ESG Template (EET) which has been developed by the financial industry to facilitate the exchange of data between financial market participants and stakeholders regarding sustainability disclosures.		x				

Question 3.2.13: Do you think the *costs of introducing a machine-readable format for the disclosed information would be proportionate to the benefits it would entail?*

1	2	3	4	5	Don't know
	X				

Question 3.2.14: To what extent do you agree with the following statement? "When *determining what disclosures should be required at product level it should be taken into account: ...*"

	1	2	3	4	5	Don't know
Whether the product is a wrapper offering choices between underlying investment options like a Multi-Option Product						X
Whether some of the underlying investments are outside the EU						X
Whether some of the underlying investments are in an emerging economy						X
Whether some of the underlying investments are in SMEs						X
Whether the underlying investments are in certain economic activities or in companies active in certain sectors						X
Other considerations as regards the type of product or underlying investments						X

4. Section IV: potential establishment of a categorisation systemn for financial products

4.1. Potential options

The fact that Articles 8 and 9 of the SFDR are being used as de facto product labels, together with the proliferation of national ESG/sustainability labels, suggests that there is a market demand for such tools in order to communicate the ESG/sustainability performance of

financial products. However, there are persistent concerns that the current market use of the SFDR as a labelling scheme might lead to risks of greenwashing (the Commission services seek respondents' views on this in section 1). This is partly because the existing concepts and definitions in the regulation were not conceived for that purpose. Instead, the intention behind them was to encompass as wide a range of products as possible, so that any sustainability claims had to be substantiated. In addition, a proliferation of national labels risks fragmenting the European market and thereby undermining the development of the [capital markets union](#).

Question 4.1.1: To what extent do you agree with the following statements?

	1	2	3	4	5	Don't know
Sustainability product categories regulated at EU level would facilitate retail investor understanding of products' sustainability-related strategies and objectives				x		
Sustainability product categories regulated at EU level would facilitate professional investor understanding of products' sustainability-related strategies and objectives			x			
Sustainability product categories regulated at EU level are necessary to combat greenwashing					x	
Sustainability product categories regulated at EU level are necessary to avoid fragmenting the capital markets union .					x	
Sustainability product categories regulated at EU level are necessary to have efficient distribution systems based on investors' sustainability preferences.					x	
There is no need for product categories. Pure disclosure requirements of sustainability information are sufficient.	x					

Question 4.1.2: If a categorisation system was established, how do you think categories should be designed?

	1	2	3	4	5	Don't know
Approach 1: Splitting categories in a different way than according to existing concepts					x	

used in Articles 8 and 9 , for example, focusing on the type of investment strategy of the product (promise of positive contribution to certain sustainability objectives, transition, etc.) based on criteria that do not necessarily relate to those existing concepts						
Approach 2: Converting Articles 8 and 9 into formal product categories , and clarifying and adding criteria to underpin the existing concepts of environmental/social characteristics, sustainable investment, do no significant harm, etc.	x					

Please, explain your answers:

The purpose of SFDR was not to create a categorisation of products. However, the definition in Articles 8 and 9 has been used as a labelling system in practice.

It is necessary to create a framework that is understandable by all investors, differentiating between the information needs of institutional and retail investors. The development of a categorisation system needs to be further refined by adding a broader classification system with clear minimum criteria.

There is a strong need to avoid fragmentation in product categorisation. Developments are currently underway in several jurisdictions, for example in the United States and the United Kingdom. Even within the European Union itself, there are initiatives by some Member States to pursue a separate classification system for financial products, so that possible alignments should be explored to avoid fragmentation of the market and further confusion in marketing that would generate distrust on the part of investors in the schemes.

In the event that a labelling system is chosen, it should be based on common rules for all EU member states, avoiding any kind of national proposals that could fragment the market.

We believe that it will be useful for investors to be aware of the different strategies used by financial products. Alignment with taxonomy corresponds to an ESG alignment strategy, which should be differentiated from other strategies, such as cases where certain activities are excluded.

We value positively the reflection that the Commission is carrying out and that shows the need to review and improve some aspects of the Regulation. However, only two years after its entry into force, we believe that a cost-benefit analysis should be carried out, taking into account the advantages and disadvantages of any new implementation or development, as this may generate greater uncertainty in the market and confusion for investors.

In short, we believe that any future modifications should be analyzed in detail to avoid (i) adding an extra layer of complexity to the current framework, (ii) making implementation more difficult for market participants, (iii) causing customer fatigue with new information/requirements in a short period of time and (iv) generating an increase in manufacturing and distribution costs that could eventually result in higher prices for financial products.

Moreover, we understand that, to establish conceptually easy-to-understand product categories for investors, it is necessary to conduct practical tests with actual distribution channels and consumers, that should

be done before finalizing any categorisation system. Such testing should serve to ensure that categories are not only theoretically sound but also workable in practice.

On a separate point, if categories were to be established on the basis of e.g. what the product is seeking to achieve on ESG aspects, it is our understanding that:

-the EC should follow an asset-neutral approach

-a way should be found "not to reinvent the wheel", so that implementation efforts so far done by the financial industry to comply with current SFDR can be seized in the future.

4.1.1. If a categorisation system was established according to approach 1 of question 4.1.2

Question 4.1.3: To what extent do you agree that, under approach 1, if a sustainability disclosure framework is maintained in parallel to a categorisation system, **the current distinction between Articles 8 and 9 should disappear from that disclosure framework?**

1	2	3	4	5	Don't know

Question 4.1.4: To what extent would you find the following categories of sustainability products useful?

	1	2	3	4	5	Don't know
A - Products investing in assets that specifically strive to offer targeted, measurable solutions to sustainability related problems that affect people and/or the planet, e.g. investments in firms generating and distributing renewable energy, or in companies building social housing or regenerating urban areas.					x	
B - Products aiming to meet credible sustainability standards or adhering to a specific sustainability-related theme, e.g. investments in companies with evidence of solid waste and water management, or strong representation of women in decision-making.					x	

C - Products that exclude activities and/or investees involved in activities with negative effects on people and/or the planet			x			
D - Products with a transition focus aiming to bring measurable improvements to the sustainability profile of the assets they invest in, e.g. investments in economic activities becoming taxonomy-aligned or in transitional economic activities that are taxonomy aligned, investments in companies, economic activities or portfolios with credible targets and/or plans to decarbonise, improve workers' rights, reduce environmental impacts.					x	
Other						

Do you think there are other possible categories?

These replies are applicable provided that the proposed approach intends to simplify the current system but not to add additional layers of complexity.

We believe that it will be useful for investors to be aware of the different strategies used by financial products. Alignment with taxonomy corresponds to an ESG alignment strategy, which should be differentiated from other strategies, such as cases where certain activities are excluded.

The development of this categorization system requires greater precision, adding a broader classification system, with clear minimum criteria.

- We value positively the reflection that the Commission is carrying out and that shows the need to review and improve some aspects of the Regulation. However, only two years after its entry into force, we believe that a cost-benefit analysis should be carried out, taking into account the advantages and disadvantages of any new implementation or development, as this may generate greater uncertainty in the market and confusion for investors. In short, we believe that any future modifications should be analyzed in detail to avoid (i) adding an extra layer of complexity to the current framework, (ii) making implementation more difficult for market participants, (iii) causing customer fatigue with new information/requirements in a short period of time and (iv) generating an increase in manufacturing and distribution costs that could eventually result in higher prices for financial products.

Question 4.1.5: To what extent do you think it is useful to distinguish between sustainability product category A and B described above?

Rank between 1 to 5:

Question 4.1.6: Do you see merits in distinguishing between products *with a social and environmental focus*?

1	2	3	4	5	Don't know
x					

Question 4.1.7: How many sustainability *product categories in total do you think there should be*?

1	2	3	4	5	More than 5	Don't know
			x			

Question 4.1.8: Do you think product *categories should be mutually exclusive, i.e. financial market participants should choose only one category to which the product belongs to in cases where the product meets the criteria of several categories (independently from subsequent potential verification or supervision of the claim)*?

Yes:

No:

There is another possible approach (please elaborate):

Don't know:

Question 4.1.9: If a categorisation system was established that builds on new criteria and not on the existing concepts embedded in Articles 8 and 9, is there is a need for measures to support the transition to this new regime?

1	2	3	4	5	Don't know
				x	

We believe that a cost-benefit analysis should be carried out, taking into account the advantages and disadvantages of any new implementation or development, as this may generate greater uncertainty in the market and confusion for investors.

We would like to highlight that the implementation of changes has a high economic cost, requiring considerable investment of resources as well as costly IT adaptations.

Question 4.1.10: What should be the minimum criteria to be met in order for a financial product to fall under the different product categories? Could these minimum criteria consist of:

For product of category A of question 4.1.4

	1	2	3	4	5	Don't know

Taxonomy alignment					X	
Engagement strategies		X				
Exclusions			X			
Pre-defined, measurable, positive environmental, social or governance-related outcome					X	
Other						

Please, specify:

The reply to the taxonomy question should be assessed provided the taxonomy regime is finalised at the EU level and applicable.

For product category B of question 4.1.4:

	1	2	3	4	5	Don't know
Taxonomy alignment					X	
Engagement strategies		X				
Exclusions			X			
Pre-defined, measurable, positive environmental, social or governance-related outcome					X	
Other						

Please, specify:

For product category C of question 4.1.4

	1	2	3	4	5	Don't know
Taxonomy alignment			X			

Engagement strategies			x			
Exclusions				x		
Pre-defined, measurable, positive environmental, social or governance-related outcome		x				
Other						

Please, specify:

--

For product category D of question 4.1.4:

	1	2	3	4	5	Don't know
Taxonomy alignment		x				
Engagement strategies					x	
Exclusions			x			
Pre-defined, measurable, positive environmental, social or governance-related outcome					x	
Other						

Please, specify:

--

Question 4.1.11: Should criteria focus to any extent on the processes implemented by the product manufacturer to demonstrate how sustainability considerations can constrain investment choices (for instance, a minimum year-on-year improvement of chosen key performance indicators (KPIs), or a minimum exclusion rate of the investable universe)?

	1	2	3	4	5	Don't know
Category A of question 4.1.4	x					
Category B of question 4.1.4	x					

Category C of question 4.1.4	x					
Category D of question 4.1.4	x					

Question 4.1.11 a): If so, what process criteria would you deem most relevant to demonstrate the stringency of the strategy implemented?

Any disclosures in this regard should be voluntary and not create additional and unnecessary complexity to retail clients.

4.1.2. If a categorisation system was established according to approach 2 of question 4.1.2

Question 4.1.12: If a categorisation system was established based on **existing Articles 8 and 9**, are the following concepts of the SFDR fit for that purpose?

	1	2	3	4	5	Don't know
The current concept of 'environmental and/or social characteristics'						
The current concept of 'sustainable investment'						
The current element of 'contribution to an environmental or social objective' of the sustainable investment concept						
The current element 'do no significant harm' of the sustainable investment concept, and its link with the entity level principal adverse impact indicators listed in tables 1, 2 and 3 of Annex I of the Delegated Regulation						
The current element of 'investee companies' good governance practices' of the sustainable investment concept						

Question 4.1.12 a): If you consider that the elements listed in question 4.1.12 are not fit for purpose, how would you further specify the different elements of the 'sustainable investment' concept, what should be the minimum criteria required for each of them?

contribution to an environmental or social objective', element of the sustainable investment concept	
'do no significant harm', element of the sustainable investment concept	
'investee companies' good governance practices', element of the sustainable investment concept	

Question 4.1.12 b): Should the good governance concept be adapted to include investments in government bonds?

Yes (what minimum criteria should be required then?):

No:

Don't know:

Question 4.1.12 c): Should the good governance concept be adapted to include investments in real estate investments?

Yes (what minimum criteria should be required then?):

No:

Don't know:

Question 4.1.13: How would you further specify what promotion of 'environmental/social characteristics' means, what should be the minimum criteria required for such characteristics and what should be the trigger for a product to be considered as promoting those characteristics?

--

Question 4.1.14: Do you think that a minimum proportion of investments in taxonomy aligned activities shall be required as a criterion to:

	Yes	No	Don't know
...fall under the potential new product category of Article 8?			
...fall under the potential new product category of Article 9?			

If yes, what should be the minimum proportion for article 8 and/or for article 9:

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Question 4.1.15: Apart from the need to promote environmental/social characteristics and to invest in companies that follow good governance practices for Article 8 products and the need to have sustainable investments as an objective for Article 9 products, should any other criterion be considered for a product to fall under one of the categories?

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4.2. General questions about the potential establishment of sustainability products categories

Question 4.2.1: In addition to these criteria, and to other possible cross-cutting/horizontal disclosure requirements on financial products, should there be some additional disclosure requirements when a product falls within a specific sustainability product category? This question presents clear links with question 3.2.3 in section 3.

1	2	3	4	5	Don't know
		X			

Question 4.2.1 a): Please see a list of examples of disclosures that could be required when a product falls within a specific sustainability product category. Should this information be required when a product falls within a specific sustainability product category, and/or should any other information be required about those products?

	1	2	3	4	5	Don't know
Taxonomy alignment			X			
Engagement strategies			X			
Exclusions			X			
Information about how the criteria required to fall within a specific sustainability product category have been met			X			
Other information						

--

Question 4.2.2: If a product categorisation system was set up, what governance system should be created?

	1	2	3	4	5	Don't know
Third-party verification of categories should be mandatory (i.e. assurance engagements to verify the alignment of candidate products with a sustainability product category and assurance engagements to monitor on-going compliance with the product category criteria)			X			
Market participants should be able to use this categorisation system based on a self-declaration by the product manufacturer supervised by national competent authorities			X			
Other						

Please, explain:

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Question 4.2.3: If a categorisation system was established, to what extent do you agree with the following statement? "When determining the criteria for product categories it should be taken into account: ..."

	1	2	3	4	5	Don't know
Whether the product is a wrapper offering choices between underlying investment options like a Multi-Option Product			X			
Whether the underlying investments are outside the EU				X		
Whether the underlying investments are in an emerging economy				X		
Whether the underlying investments are in SMEs			X			
Whether the underlying investments are in certain economic activities				X		

Other considerations						
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4.3. Consequences of the establishment of a sustainability products categorisation system

As highlighted in Section 2, any potential changes to the current disclosure regime and the creation of a categorisation system would need to take into account the interactions between the SFDR and other sustainable finance legislation. The following questions address these interactions for different legal acts, in such a scenario of regulatory changes in the arena of financial product disclosures and categorisation.

Question 4.3.1: The objective of the PRIIPs KID is to provide short and simple information to retail investors. Do you think that if a product categorisation system was established under the SFDR, the category that a particular product falls in should be included in the PRIIPs KID?

- Yes X
- No
- Don't know

Question 4.3.2: If new ESG Benchmarks were developed at EU level (in addition to the existing Paris-aligned benchmarks (PAB) and climate transition benchmarks (CTB), how should their criteria interact with a new product categorisation system?

	1	2	3	4	5	Don't know
The criteria set for the ESG benchmarks and the criteria defined for sustainability product categories should be closely aligned				X		
Other (please explain if so)						

Question 4.3.3: Do you think that products passively tracking a PAB or a CTB should automatically be deemed to satisfy the criteria of a future sustainability product category?

- Yes
- No
- Don't know X

Question 4.3.4: To what extent do you agree that, if a categorisation system is established, sustainability preferences under MiFID 2/IDD should refer to those possible sustainability product categories?

1	2	3	4	5	Don't know
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					X
--	--	--	--	--	---

4.4. Marketing communications and product names

Question 4.4.1: Do you agree that the SFDR is the appropriate legal instrument to deal with the accuracy and fairness of marketing communications and the use of sustainability related names for financial products?

Yes X
 No
 Don't know

Question 4.4.2: To what extent do you agree with the following statements?

	1	2	3	4	5	Don't know
The introduction of product categories should be accompanied by specific rules on how market participants must label and communicate on their products				X		
The use of terms such as 'sustainable', 'ESG', 'SDG', 'green', 'responsible', 'net zero' should be prohibited for products that do not fall under at least one of the product categories defined above, as appropriate. Certain terms should be linked to a specific product category and should be reserved for the respective category.			X			
Certain terms should be linked to a specific product category and should be reserved for the respective category.				X		

Question 4.4.3: Would naming and marketing communication rules be sufficient to avoid misleading communications from products that do not fall under a product sustainability category?

1	2	3	4	5	Don't know
			X		

Please explain your replies to questions 4.4.1, 4.4.2 and 4.4.3:

