

COMMENTS RECEIVED DURING THE STAGE OF PUBLIC
CONSULTATION ON THE DRAFT TECHNICAL GUIDE ON
CURRENCY DERIVATIVES USED AS A MEANS OF PAYMENT NOT
CONSIDERED TO BE A FINANCIAL INSTRUMENT

23 September 2020

On 27 July 2020, the Spanish National Securities Market Commission (CNMV) submitted for public consultation a draft Technical Guide in relation to the provisions of Article 10(1)(b) of Delegated Regulation (EU) 2017/565 of 25 April, which completes Directive 2014/65/EU of the European Parliament and of the Council, which establishes that derivative contracts related to currencies that are means of payment and meet certain requirements are not considered to be financial instruments.

The deadline for submitting comments ended on **18 September 2020**.

Below are the links both to the document made available for public consultation and to the comments received in relation to it, except for those submitted by persons who have requested that their comments remain confidential:

A.- Documents put out for public consultation:

[Draft Technical Guide on currency derivatives used as a means of payment not considered to be a financial instrument.](#)

B.- Comments received (in alphabetical order):

1. [AEB – The Spanish Banking Association](#)
2. [CECA – The Spanish Confederation of Savings Banks](#)
3. [The CNMV's Advisory Committee](#)
4. [The law firm Gabeiras y Asociados](#)

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