

**MEMO# 28990**

May 18, 2015

# **Response to European Commission Green Paper on "Building a Capital Markets Union"**

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TO: EQUITY MARKETS ADVISORY COMMITTEE No. 9-15  
FIXED-INCOME ADVISORY COMMITTEE No. 13-15  
ICI GLOBAL CAPITAL MARKETS UNION TASK FORCE  
ICI GLOBAL REGULATED FUNDS COMMITTEE No. 19-15  
ICI GLOBAL RETIREMENT SAVINGS COMMITTEE  
ICI GLOBAL TAX COMMITTEE No. 15-15  
ICI GLOBAL STEERING COMMITTEE No. 10-15  
ICI GLOBAL TRADING & MARKETS COMMITTEE No. 22-15  
INTERNATIONAL COMMITTEE No. 23-15  
INTERNATIONAL OPERATIONS ADVISORY COMMITTEE No. 12-15 RE: RESPONSE TO  
EUROPEAN COMMISSION GREEN PAPER ON "BUILDING A CAPITAL MARKETS UNION"

On 13 May, ICI Global submitted a response to the European Commission's Green Paper on "Building a Capital Markets Union". [\[1\]](#) A copy of the submission is attached. The submission takes account of member feedback and comments on the draft submission. [\[2\]](#)

The submission urges the Commission to prioritise a small number of high impact initiatives under the CMU on which realistic, achievable progress can be made, for which the necessary political momentum exists, and to which the Commission can commit sufficient resource. Furthermore, such initiatives should seek to enhance the coherence of EU capital markets regulation, collectively support stronger retail investor engagement with the capital markets, promote the liquidity and depth of the capital markets, and incentivise investment by reducing fragmentation and regulatory barriers. The development of a pan-European private placement market, the creation of a framework for high-quality securitisations, and the strengthening of the internal market in pension provision, are cited as important and potentially high impact initiatives by ICI Global.

The submission provides recommendations in several other areas covered by the Green Paper including:

- Actions to support the development of private placement markets (Question 4);

- Measures to promote greater liquidity in corporate bonds markets (Question 6);
- Steps to reduce the setup and cross-border marketing costs of UCITS (Question 11);
- Steps to develop a pan-European retirement savings market (Question 13);
- Policy measures to increase retail investment, including cross-border retail participation in funds (Questions 17, 19 and 20);
- Actions to enhance third country access and EU competitiveness (Questions 21 and 22);
- Measures concerning cross-border collateral flow, insolvency laws and taxation (Questions 27, 29 and 30);

The Commission will hold a public hearing on the Capital Markets Union initiative on 8 June 2015 [3], following which an action plan will be published later in 2015.

Giles Swan  
Director of Global Funds Policy - ICI Global

## [Attachment](#)

### **endnotes**

[1] See Memo 28743, Re: European Commission Green Paper – Building a Capital Markets Union, dated 18 February 2015, available from <http://www.iciglobal.org/portal/site/ICI/menuitem.9ad35c6866c5fcca09ce3110b52001ca/?vgnextoid=f58294f85748b410VgnVCM1000001c0210acRCRD&vgnextchannel=4d1b1e9fd9c3b410VgnVCM1000001c0210acRCR>

[2] Memo 28950, Re: Draft ICI Global Comment Letter – EU Capital Markets Union – Member Input Requested By Friday 8 May 2015, available from <http://www.iciglobal.org/portal/site/ICI/menuitem.9ad35c6866c5fcca09ce3110b52001ca/?vgnextoid=1a10a6c6a0c0d410VgnVCM1000001c0210acRCRD&vgnextchannel=4d1b1e9fd9c3b410VgnVCM1000001c0210acRCRD&vgnextfmt=global>

[3] [http://ec.europa.eu/finance/events/2015/0608-cmu-hearing/index\\_en.htm](http://ec.europa.eu/finance/events/2015/0608-cmu-hearing/index_en.htm)