

**MEMO# 32009**

October 14, 2019

## **For Review: Draft Positions on Regulatory Technical Standards (RTS) for EU Disclosure Regulation**

[32009]

October 14, 2019 TO: ESG Task Force

ICI Global Regulated Funds Committee RE: For Review: Draft Positions on Regulatory Technical Standards (RTS) for EU Disclosure Regulation

Attached for your review is a draft list of high-level positions on the work that the European Securities and Markets Authority (ESMA) is doing to develop Regulatory Technical Standards (RTS) for the Disclosure Regulation—a key piece of legislation in the European Union’s Sustainable Finance Action Plan.<sup>[1]</sup> Please note this is the same draft that we circulated via email last week.

We would greatly appreciate if you could send us any thoughts or feedback by the end of this week (close of business on **Friday, 18 October**).

We would like to finalize a set of positions on the Disclosure RTS in time for a meeting with ESMA later this month. ESMA is keen to hear your feedback, and that discussion should give us more insight into how their thinking is developing and how we can best target our continuing engagement in advance of the official consultation that we are expecting in Q1 2020. Please reach out with any questions or if you would like to discuss.

Linda M. French  
Assistant Chief Counsel, ICI Global

[Attachment](#)

**endnotes**

<sup>[1]</sup> For a detailed summary of the Disclosure Regulation’s RTS provisions, see ICI Global Memorandum No. 31988, *available at* <https://www.iciglobal.org/iciglobal/pubs/memos/memo31988>.

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