

MEMO# 32955

December 1, 2020

EU ESG: Draft Response to ESMA Consultation on Taxonomy Reporting for NFRD Entities (Including Asset Managers)

[32955]

December 1, 2020 TO: ESG Task Force

EU ESG Disclosure Regulation Working Group

ICI Global Regulated Funds Committee RE: EU ESG: Draft Response to ESMA Consultation on Taxonomy Reporting for NFRD Entities (Including Asset Managers)

Attached for your review is our draft response to ESMA's recent consultation[\[1\]](#) on draft advice to the European Commission on how issuers within scope of the Non-Financial Reporting Directive (NFRD) will report against the EU Taxonomy (as per Article 8 of the Taxonomy Regulation).[\[2\]](#) Issuer disclosure of Taxonomy alignment is important because asset managers will need this information to meet the upcoming requirement (per Articles 5 and 6 of the Taxonomy Regulation) to disclose Taxonomy alignment of investments for ESG funds—*i.e.*, Sustainable Finance Disclosure Regulation (SFDR) Article 8 and 9 financial products.

Please do not hesitate to reach out if you have any questions or would like to discuss. We have included explanatory notes in the draft consultation response, and we previously circulated a more detailed summary of the consultation.[\[3\]](#)

Please provide any comments by this Thursday, noon ET. Apologies for the short turn, but this consultation has a very short timeline, and the deadline to respond is this Friday, 4 December 2020.

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[Attachment](#)

endnotes

[1] The consultation is *available at* https://www.esma.europa.eu/sites/default/files/library/esma30-379-325_consultation_paper_-_draft_advice_to_ec_under_article_8_of_the_taxonomy_regulation.pdf.

[2] See Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (Taxonomy Regulation), *available at* <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32020R0852&from=EN>.

[3] See ICI Memorandum No. 32934, *available at* <https://www.iciglobal.org/iciglobal/pubs/memos/memo32934>.

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