

## COMMENT LETTER

January 27, 2023

# ICI Global Comment Letter to Japan FSA Consultation on Supervisory Guidelines for ESG Funds

ICI Global submitted the attached response to a consultation from Japan Financial Services Agency (FSA) on proposed partial amendments to the comprehensive supervisory guidelines for financial business operators regarding ESG Investment Trusts. The proposed revisions seek to provide regulatory guidance on the disclosures and conduct of ESG Investment Trusts.

ICI Global welcomes the FSA's principles-based approach, in particular, the recognition of the importance of interoperability with other global counterparts when developing the disclosure requirements for ESG Investment Trusts.

Our letter encourages continued open dialogue between the FSA and ICI Global and its members during the implementation phase of the revised supervisory guidelines. The letter also recommends the FSA generally deem compliance with the FSA disclosure requirements in cases in which a foreign ESG fund meets the relevant ESG disclosure requirements of its home jurisdiction. Finally, the letter seeks clarifications on the scope of coverage, disclosure requirements, and due diligence on ESG ratings and data providers.

Read more in the [comment letter](#).