

## COMMENT LETTER

February 23, 2023

# ICI Global Response to ESMA Consultation Paper on Guidelines on Funds' Names Using ESG or Sustainability-Related Terms

ICI Global appreciates the opportunity to provide feedback on the European Securities and Markets Authority (ESMA) Consultation Paper on guidelines on funds' names using ESG or sustainability-related terms ("Consultation Paper"). ICI Global carries out the international work of the Investment Company Institute, the leading association representing regulated investment funds. With total assets of \$35.7 trillion, ICI's membership includes mutual funds, exchange-traded funds (ETFs), closed-end funds, and unit investment trusts (UITs) in the United States, and UCITS and similar funds offered to investors in Europe, Asia and other jurisdictions. ICI's mission is to strengthen the foundation of the asset management industry for the ultimate benefit of the long-term individual investor. ICI Global members invest on behalf of millions of retail investors around the world choosing funds to save for retirement, education, and other important financial goals, and therefore have a significant interest in regulatory requirements for funds that incorporate environmental, social, and governance (ESG) considerations into the investment process.

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