



Content:

Sustainable Finance

1. [Intensive FinDatEx ESG work is culminating with a public consultation](#)
2. [ESMA has published its Sustainable Finance Roadmap 2022-2024](#)

Financial Market Regulation

3. [Central clearing framework and pension scheme arrangements exemption](#)
4. [PensionsEurope answered the EBA consultation about EMIR rules on Initial Margin Model Validation](#)

Accounting

5. [PensionsEurope answered the IFRS consultation on developing disclosure requirements and proposed amendments to IFRS 13 and IAS 19](#)

Personal pensions and consumer issues

6. [EIOPA survey on PEPP](#)
7. [The Commission and OECD-INFE publish a joint framework for adults to improve individuals' financial skills](#)
8. [ESAs first joint conference on financial education and literacy](#)
9. [PensionsEurope answers to the Call for evidence on the European Commission mandate regarding the PRIIPs Regulation](#)
10. [EIOPA publishes 2021 Consumer Trends Report](#)

Events and initiatives

11. [European Retirement Week](#)

1 Intensive FinDatEx ESG work is culminating with a public consultation

On 4 February 2022, [FinDatEx](#) launched a [public consultation](#) on a new European ESG Template (EET) and an update of the European MiFID Template (EMT), and the consultation is open for feedback until 25 February. After taking into consideration the feedback received by stakeholders, FinDatEx intends to make the EET v1.0 and the EMT v4.0 available to the public by mid-March to allow for technical implementation and coding. Delivery of the EET by product manufacturers should begin on 1 June 2022, and the EMT v4.0 should be used as of 1 August 2022. In line with the usual FinDatEx policy, both templates will be free-of-charge and intellectual property rights.

In view of the extensive current and upcoming regulation on EU level requiring the exchange of ESG-related data between the manufacturer and distributor of financial products, in April 2021 FinDatEx decided to create a dedicated working group and introduce a stand-alone data exchange template. After intensive work, the group is now proposing the EET v1.0 and offers market participants the possibility to comment on the near-final draft before adoption.

The EET is a cross-sectoral template comprising the views of the pensions, insurance, banking, asset management, and structured product industries. The EET v1.0 contains a high number of data fields focusing on the implementation of the SFDR level 1 and RTS, as well as the delegated acts complementing MiFID II and IDD with regard to the introduction of the concept of clients' sustainability preferences. Content and structure of the template have been intensively discussed and were subject to numerous feedback rounds. They reflect the current regulatory situation and market needs.

2 ESMA has published its Sustainable Finance Roadmap 2022-2024

On 10 February 2022, ESMA has published its [Sustainable Finance Roadmap 2022-2024](#). Building on ESMA's 2020 Strategy on Sustainable Finance, the Roadmap sets out ESMA's deliverables on sustainable finance and how they will be implemented over the next three years. The Roadmap will serve as a practical tool to ensure that ESMA delivers on the wide array of sustainable finance tasks across several sectors in a coordinated way.

ESMA identifies three priorities for its sustainable finance work:

- I. Tackling greenwashing and promoting transparency**
- II. Building National Competent Authorities (NCAs) and ESMA's capacities in the sustainable finance field**
- III. Monitoring, assessing and analysing ESG markets and risks**

Next steps

ESMA will address its three priorities with a comprehensive list of actions across the following sectors: investment management, investment services, issuers' disclosure and governance, benchmarks, credit and ESG ratings, trading and post-trading and financial innovation. Several of these actions will also contribute to fulfilling the European Commission's 2021 Renewed Sustainable Finance Strategy. ESMA will shortly launch a call for stakeholder candidates to join a new Consultative Working Group supporting ESMA's Coordination Network on Sustainability.

3 Central clearing framework and pension scheme arrangements exemption

On 8 February 2022, the European Commission launched a [consultation](#) on the review of the central clearing framework in the EU and a [call for evidence](#). Both explore the ways to improve the attractiveness of EU CCPs, to reduce the exposure to systemic non-EU CCPs, and to enhance the supervision of EU CCPs. On 8 February, the Commission also [adopted](#) a decision to extend equivalence for UK Central Counterparties (CCPs) until 30 June 2025.

The European Commission [delegated regulation](#) (of 6 May 2021) extended Pension Scheme Arrangements' (PSAs) exemption from clearing obligation until 18 June 2022. It is possible to further extend the exemption by 1 year maximum through a Commission delegated act, while the aim of the Regulation remains central clearing for pension scheme arrangements. We agree with the recent ESMA [advice](#) (of 25 January 2022) to the Commission that an extension of PSAs' exemption from clearing obligation until 19 June 2023 is still needed to have enough time to find the solution for liquidity risks. The key challenge for PSAs is the need to post variation margin in cash in case of market stress when they may be required by CCPs to post significant amounts of variation margin.

4 PensionsEurope answered the EBA consultation about EMIR rules on Initial Margin Model Validation

On 4 February 2022, PensionsEurope provided an answer to the EBA consultation about its draft Regulatory Technical Standards (RTS) on Initial Margin Model Validation (IMMV) under the European Markets Infrastructure Regulation (EMIR) EMIR rules on Initial Margin Model Validation.

It is PensionsEurope's opinion that the suggested RTS regarding the adoption and governance of IM models will introduce new heavy and unjustified burdens on a vast number of counterparties. While we recognize the intent to provide a less burdensome adoption and governance regime for counterparties included under section 3 of the proposed RTS, we believe that the proposed requirements overshoot what's necessary in order to curb risks to the financial system arising from IM calculations. We therefore suggest removing the article 2, 2. option or, at least, to provide clearer and more objective criteria for requiring section 3 compliance from counterparties above the EUR 50 billion threshold.

5 PensionsEurope answered the IFRS consultation on developing disclosure requirements and proposed amendments to IFRS 13 and IAS 19

On 10 January 2022, PensionsEurope provided an answer to the IFRS consultation regarding the developing disclosure requirements and proposed amendments to IFRS 13 and IAS 19.

PensionsEurope believes that the disclosures with regards to pension plans are already very comprehensive in current annual financial statements, e.g., reconciliations, cash-flow information, sensitivity analysis, disaggregation of information for different defined benefit plans per country etc. Most of the information disclosed in the notes covers already the proposed disclosure objectives. For this reason, it is unclear, how the new concept should better meet the users' needs. In the proposal, there is only one overall disclosure objective for short-term benefits, defined contribution plans, other long-term employee benefits and termination benefits. Therefore, it is unclear which disclosures are expected by the IASB for these benefits in comparison to the current disclosure practice. Moreover,

PensionsEurope believes that some of the proposed non-mandatory items of information are not useful, e.g., expected return on plan assets ('eroa'), expected future contributions and alternative actuarial assumptions due to judgement reasons.

For this reason, it is unclear, how the new concept should better meet the users' needs. Furthermore, PensionsEurope believes that any structured disclosure process needs checklists to decide which information will not be provided due to materiality reasons. Therefore, a checklist approach has its advantages.

6 EIOPA survey on PEPP

On 27 January 2022, EIOPA launched a [public survey on potential offering of PEPP](#), with the aim of understanding its potential market take-up.

This is the second survey conducted by EIOPA on this matter. The first was launched in March 2021. Similar to last time, the new survey asks respondents if they are considering launching a PEPP and if they are not or are undecided, why or what would need to change. If respondents indicate they are considering offering a PEPP, the survey asks about the timeframe for doing so.

The survey is open until 28 February 2022.

7 The Commission and OECD-INFE publish a joint framework for adults to improve individuals' financial skills

On 11 January 2022 the European Commission and the OECD's International Network on Financial Education published the joint EU/OECD-INFE financial competence framework for adults, following on from measures announced in Action 7 of the 2020 capital markets union action plan.

This framework aims to improve individuals' financial skills so that they can make sound decisions regarding their personal finances. It will support the development of public policies, financial literacy programmes and educational materials by Member States, educational institutions and industry. It will also support the exchange of good practices by policy makers and stakeholders in the EU.

The framework is structured into 4 main content areas: money and transactions, planning and managing finances, risks and reward, and financial landscape. Each of these content areas is further divided into topics and subtopics and each competence, is considered under three dimensions: awareness/knowledge/ understanding, skills/behaviour, and confidence/motivation/attitudes. In addition, the framework considers some cross-cutting dimensions, e.g., digital financial competences and sustainable finance competences.

Topic 2.6 is focused on retirement. There are several other areas of relevance, such as the topics 2.3 "saving", 2.4 "investing", and 2.5 "Longer term planning and asset building".

As for the next steps, the framework will be disseminated to Member States and stakeholders to facilitate its uptake, including through targeted exchanges in 2022. The objective is to support the use of the framework in concrete policies, tools and educational materials, and to offer a platform for policy makers and stakeholders to exchange good practices and lessons learnt when taking up the framework.

In addition, the EC and OECD, in cooperation with Member States, will start working on the financial competence framework for children and youth (individuals under 18), which is expected to be finished by 2023.

8 ESAs first joint conference on financial education and literacy

The European Supervisory Authorities (ESAs) – EBA, EIOPA and ESMA, held their first joint high-level conference on financial education and literacy on 1 and 2 February 2022. The conference gathered more than 300 participants, including high-level government representatives as well as experts from public authorities, academia, NGOs, consumer associations and the industry to raise awareness of this important topic. It also offered a forum to share ideas and best practices and to gather input from all the stakeholders on how to tackle future challenges. PensionsEurope participated.

Moreover, on 31 January 2022 the three ESAs published a Joint ESAs thematic repository on financial education and digitalization initiatives of NCAs, with a specific focus on cybersecurity, scams, and fraud. The thematic repository will be used to prepare a joint ESAs thematic report on financial education to be published later this year.

9 PensionsEurope answers to the Call for evidence on the European Commission mandate regarding the PRIIPs Regulation

On 16 December 2021, [PensionsEurope answered](#) to the Call for evidence on the European Commission mandate regarding the Regulation (EU) No 1286/2014 on key information documents for packaged retail and insurance-based investment products (PRIIPs), which was investigating among stakeholders whether PRIIPs should be extended (among others) to pension products.

In our answer, we explained to the European Supervisory Authorities (ESAs) that the current exemption for pension products should be retained in the scope of the PRIIPs Regulation. The PRIIPs Regulation and related Regulatory Technical Standards (RTS) are designed for retail investment products, which have a different investment time-horizon (often short-term) and characteristics than pension products. Pension products have different and very specific objectives and are subject to different regulatory and fiscal treatments at the national level. Such specificities, and in particular their long-term nature, means that careful consideration is needed and that it is not possible to simply directly import PRIIPs approaches. When compared to investment products, pension products are designed for very different holding periods and exhibit very different risk and reward characteristics. Comparing the riskiness of a designated pension product to a PRIIPs product would be very misleading for consumers. We note that in the context of the development of the PEPP Regulation and its delegated acts, the Commission and EIOPA have considered whether PRIIPs KID would have been good for PEPPs and reached the conclusion that it was not and that it was better to develop a separate regulatory framework and a specific disclosure document (PEPP KID) more fit for the purpose. The PEPP methodology, therefore, would constitute a better starting point for providing information on pension products. As the shapes and forms of pension products vary considerably between countries, we think that forcing pension products into the scope of the PRIIPs Regulation would result in misleading information for consumers. Because of this heterogeneity, we also question whether a meaningful comparison would be technically possible.

10 EIOPA publishes 2021 Consumer Trends Report

On 24 January 2022, EIOPA published the [2021 Consumer Trends Report](#). The report covers both insurance and pension sectors, identifying market developments, trends, and (new) risks for consumers and members/beneficiaries.

The second chapter of the report focuses on pensions and distinguishes between IORPs and Personal Pension Products (PPPs). After having shortly described the market developments and issues, the report also includes two specific topic areas, respectively on sustainability in the pension sector and the impact of COVID-19. The two final sub-chapters (2.3 and 2.4) are dedicated to the complaints filed and to NCAs' supervisory activities.

11 European Retirement Week

Together with 10 other European associations¹, PensionsEurope organised the first edition of European Retirement Week (29 November 2021 – 3 December 2021), an initiative with the common purpose of debating the future of pensions in Europe and raising citizens' awareness of the need to save for retirement. The European Retirement Week kicked off with launch event on 29 November, featuring a keynote speech by Mairead McGuinness, European Commissioner for Financial Services, Financial Stability and the Capital Markets Union. Throughout this week, the participating associations organised various events, including a range of presentations and panel discussions spotlighting different aspects of Europe's retirement saving challenge and possible solutions. PensionsEurope organised its own event *Investing in the Future* on 1 December 2021, during which we had an in-depth discussion on pension opportunities and the challenges and trends for 2021 and beyond and we discussed the monitoring of pension adequacy through the EU initiatives on Pension Tracking Services and Dashboard. You can watch the event on [our website](#) or on your [YouTube-channel](#).

In 2022, the European Retirement Week will be organised 28 November 2022 – 2 December 2022.

¹ Participating associations include AGE Platform Europe, BETTER FINANCE, BEUC – The European Consumer Association, Cross Border Benefits Alliance - Europe (CBBA-Europe), ETS Project Consortium, European Association of Paritarian Institutions (AEIP), the European Banking Federation (EBF), EFAMA, the Federation of European Securities Exchanges (FESE), Insurance Europe, PensionsEurope.