International Capital Market Association (ICMA) response to European Commission Savings and Investment Union (SIU) Implementation Targeted Consultation on the EU Capital Markets Integration [1]

June 2025

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Introduction

A. General Remarks

ICMA welcomes and supports the current momentum and political drive to create a Savings and Investments Union (SIU) in Europe. The integration of EU Capital Markets is a key element for strengthening European competitiveness. Market participants are also aware of the size of the challenge, the amount of work required, and the large stakeholder community involved.

The EC targeted consultation, in the form of an online questionnaire of almost 100 pages and published on 15 April 2025[2] with responses due on 10 July 2025, highlighted that not all questions may be relevant to all stakeholders, and invited respondents to reply only to those questions that are most relevant to them.

Consequently, this ICMA response focuses on questions as they pertain specifically to European bond markets. It has been prepared following a comprehensive consultation process within the permitted consultation timeframe, involving multiple stakeholder groups from the buy-side, sell-side and financial market infrastructures with varying interests and perspectives. While every effort has been made to ensure a representative and balanced synthesis of views, the nature of such engagements means that the positions reflected may be more prominently informed by those stakeholders who were able to contribute actively and substantively to the process within the limited timeline.

It should be noted that this document represents a summary of key inputs at this stage and does not purport to be an exhaustive or definitive account of all possible perspectives. A fully balanced and conclusive assessment would necessitate further in-depth analysis, including broader engagement and consideration of additional viewpoints, that may not have been fully captured in the present exercise.

ICMA specific remarks

ICMA provided a contribution to the EU Savings and Investment Union Call for Evidence (EU SIU CfE) on 7 March 2025[3] and a summary to the EU SIU Strategy Paper form 19 March 2025[4]. We emphasised therein the importance of bond markets to deliver on the EU's SIU agenda and would like to make reference to the points highlighted, especially with regards to chapter III on market infrastructure and chapter IV on supervision.

As mentioned in that context related to EU market integration, fixed income products are intrinsically quite different to other financial instruments, such as equities, and so is the underlying structure of bond markets. Unlike equities, where there are usually one or possibly two classes of share per issuer, issuers will tend to issue multiple bonds over a period of time (this could range from tens to hundreds of issues). All these bonds will have different characteristics depending on the issuer's funding needs (including different maturities, currencies, early redemption features, and different ranking in the capital structure). Furthermore, due to their largely buy-to-hold nature, individual bonds rarely trade as frequently in the secondary market as equities.

It is therefore important to take a differentiated approach for fixed income related public policies and other financial instruments.

2 https://finance.ec.europa.eu/regulation-and-supervision/consultations-0/targeted-consultation-integration-eu- capital-markets-2025_en
3 ICMA-response-from 7 March 2025 to the EC-Savings-and-Investment-Union-SIU-Call-for-Evidence-from-3-February-2025-March-2025.pdf
4 ICMA-summary-EC-SIU-19-March-2025.pdf

B. ICMA summary response

B.1 Simplification

- ICMA has emphasised the importance of applying the principle of proportionality more meaningfully across EU financial regulation. Current "one-size-fits-all" frameworks risk disproportionately burdening smaller or less complex institutions. For instance, ICMA highlights that excessive regulatory complexity and compliance burdens have deterred smaller firms from market participation, especially in the capital markets and sustainable finance space.
- We emphasise that the principle of proportionality, as set out in Article 5 TEU, is often misapplied in practice. Larger firms face the full weight of regulation regardless of the nature of their activities, while smaller ones benefit from lighter rules. We argue that regulation should be based on the type of activity—such as wholesale versus retail—not the size of the institution.
- ICMA supports the "Less is More" approach. The report highlights the increasing delegation of normative power from the EU co-legislators to the European Commission and ESAs has led to a complex and burdensome regulatory environment. The proliferation of technical standards and soft law has increased costs and legal uncertainty. ICMA proposes limiting the use of Level 2 and 3 measures, making Level 1 legislation clearer and more self-sufficient, factoring competitiveness and simplification into legislative frameworks, and strengthening transparency and oversight in the rulemaking process.
- Regulations would allow for greater convergence by avoiding national transpositions through Directives. Directives lead to 27 national transpositions, which inevitably lead to 27 different texts within Member States (also inadvertently), which then are locally implemented, interpreted and enforced by local National Competent Authorities. Conversely, Regulations would allow for the same single legal text in the EU Single Market, that would ease convergent local interpretations and local enforcements. In addition, such an actual EU integrated legislation through the use of Regulations instead of Directives is an obvious pre-requisite if the EU aims to achieve actually integrated EU supervision.
- Any review of whether these frameworks should remain as Directives or be converted into Regulations, should prioritise reducing national gold-plating of Directives. The current national gold-plating not only increases costs but also creates complexity and inefficiency, as firms are unable to implement consistent operational processes and product standards across the EU. Furthermore, inconsistencies arise not just from Level 1 legislation, but also from divergent national interpretations of Level 2 RTS and Level 3 Guidelines. ICMA recommends that priority should be given to ensure that the drafting of the text can be applied consistently across member states.
- While Directives can lead to unintended fragmentation in EU capital markets (eg. divergent reporting templates), converting existing Level 1 Directives into Regulations is not advisable as a default option due to the associated high cost and burden. Instead, for future initiatives, the European Commission should carefully assess the choice of legislative instrument—balancing the need for harmonisation with respect for local specificities—based on the specific objectives and challenges at hand.
- ICMA repeatedly calls for a reduction in duplicative and overlapping regulatory obligations. For example, both MiFID and asset management regulations impose suitability, disclosure, and product governance rules, which can create confusion and inefficiencies. ICMA supports aligning these regimes and clarifying their respective scopes.

B.2 Trading

- While many of the questions in the trading section appear to be specifically focused on equity market structure, ICMA would point to the critical importance of differentiating between bond and equity market structures and liquidity dynamics, which are fundamentally different. EU policy makers and regulators need to take extreme care not to applying the same assumptions regarding these two distinct markets or to transpose equity-based regulations onto non-equities. This has previously been the case with MiFIR/D. It is imperative that EU regulation does not take a "one-size-fits-all" approach to market structure.
- ICMA is primarily concerned with EU bond (including repo) market structure and is keen to point out that here there are not the same challenges related to potential market fragmentation or barriers to entry. On the contrary, the secondary market for bonds in the EU functions well, with good and improving levels of transparency, efficient price formation, a largely wholesale investor base, and competition among liquidity providers. This is largely the result of the non-exchange-based nature of bond markets, the central role of principal market-makers, the ongoing electronification and automation of the market, as well as an integrated, competitive, and highly innovative landscape for trading venues and different trading protocols. The bond markets are also characterised by the presence of a small number of pan-European and competing MTFs established and supervised by a few NCAs. This contributes to a consistent application of relevant rules, unlike the equity market, where national specificities exist among different exchanges.

B.3 Post-trading

- While the trading landscape for the EU bond market is largely efficient, frictionless, and integrated, the same cannot be said for the EU's post-trade ecosystem. The identified Giovannini barriers remain the principal sources of fragmentation and inefficiencies in the EU bond market.
- ICMA is closely involved in the ongoing preparations for the EU move to T+1. While T+1 in itself will not help to achieve a deeper and more integrated market, an extensive list of concrete recommendations are being developed by the EU T+1 governance, which, once implemented, will be a significant step towards a deeper and more integrated EU market. The Commission is already involved in the T+1 governance and should support the work wherever needed.
- In this context, ICMA would also point to the important ongoing work of the AMI-SeCo and its Securities Group (SEG) who have focused extensively on existing post-trade barriers in the EU and proposals to further remove those barriers. While the SEG report is not yet final it will be available in due course and should be a key reference point for the European Commission when it comes to suggestions and ideas for building a more integrated EU capital market and removing remaining barriers.
- ICMA's infrastructure members had varying views on market infrastructure integration.

B.4 Horizontal barriers to trading and post-trading

- Rather than rank each EPTF barriers, we would refer the Commission to the upcoming AMI-SeCo SEG report which picks up the previous EPTF analysis and provides a comprehensive updated picture, including a long list of related recommendations for further action, including a number of key issues that will have to be addressed at the political level.
- The narrow limits (representing a fraction of average daily traded volumes in fixed income securities on electronic trading venues, or daily issuance volumes of debt securities, for example), limited lifespan and uncertain outcome of the EU's DLT Pilot Regime disincentivise market participants from investing resources and impede the development of commercially viable business cases. ICMA members recommend adopting a flexible approach to setting limits in line with market demand, subject to a periodic review to make adjustments and in consultation with the industry. Adjustments of volume thresholds are deemed a high priority, in addition to clarity on the EU DLT Pilot Regime's duration, and further harmonisation of the EU's legal and regulatory framework to enable the use of new technologies such as DLT without the need for temporary exemptions and a DLT-specific framework.

- ICMA members recommend (i) making targeted amendments of the DLT Pilot Regime to ensure it is fit for purpose, and (ii) amending permanently relevant provisions in MiFID II/R and CSDR, for example, as opposed to temporary exemptions. In conjunction with a revision of thresholds in ICMA's response to Q23). This will enable market participants to develop, test and commercialise DLT-based services to foster the development of liquid secondary markets for DLT-based debt securities. The target end state is a regulatory framework which is agnostic to the underlying technology used (whether DLT, cloud, or others).
- From an operational perspective, a key initiative to promote interoperability and facilitate automation of issuance, trading, settlement and distribution both of traditional debt securities as well as DLT-based securities is ICMA's Bond Data Taxonomy (BDT). In essence, the BDT provides a common language in a machine-readable format of the key economic terms of a debt security irrespective of its form and the underlying technology. It also includes a DLT extension, which helps capture and transmit relevant DLT-related information of a debt security, such as the DLT platform operator and its LEI.
- As highlighted in joint industry responses to the BCBS second consultation on the Prudential Treatment of Crypto-asset Exposures (September 2022) and subsequent, related BCBS consultations and letters, co-signed by ICMA, we believe it is important that the BCBS promotes a risk-based approach to prudential treatment of DLT-based debt securities, which are subject to the BCBS prudential standard for crypto-assets.

B.5 Asset management and funds

- From ICMA's asset management perspective the key focus was on securitisation.
- From a policy rationale perspective, the UCITS 10% acquisition limit for debt securities in a single issuing body was not designed with securitisations in mind as the limit was imposed two years before the first securitisation occurred in Europe. This rule dates back to the mid-1980s, and its aim is to prevent UCITS funds from exerting control over a "single issuing body". However, concerns about undue investor influence over a securitisation issuer are irrelevant as securitisation vehicles are dedicated pass-through entities that typically only issue securities to the market one time and do not have a broader corporate strategy for an investor to exert influence over. Clearly, the 10% threshold was meant to apply to corporate issuers, and the rule's rationale does not make sense for securitisation vehicles. The current UCITS framework is internationally regarded for its sound risk management standards, and concentration limits have a significant role to play in that regard. However, some ICMA members would support changing the threshold as the threshold was not intended for securitisations.
- However, members also have strong concerns that changing the application of the threshold in Article 56(2)(b) of the UCITS Directive could lead to the wider re-opening of the UCITS Directive framework, which could be a long process and could result in other unnecessary and unwanted changes. For that reason, we highlight two options which do not require a wider re-opening of the UCITS Directive. Option 1 is to introduce a targeted amendment to Article 56 excluding securitisations from the 10% limit via amendments to the EU Securitisation Regulation (Regulation (EU) 2017/2402). Option 2 is clarifying via a Level 3 Q&A that the reference to "single issuing body" in Article 56 does not include securitisations, thus excluding securitisations from the acquisition limit in Article 56.

B.6 Supervision

- From asset management perspective, ICMA considers it critical to preserve and build on the existing supervisory framework, which allows to benefit from the competences currently offered in the various National Competent Authorities. Asset managers, investment funds, and ultimately the end investors, greatly benefit from the deep, specialised expertise that local NCAs have fostered thanks to their experience in authorising and regulating a diversity of funds. This expertise within the various local NCAs, and the relationships that have been built between the supervisors and the regulated firms, enables greater oversight of complex financial products and risk management practices. These various local supervisory competences are ultimately best-positioned to identify and address any risks related to market stability and investor protection. We further consider that improving coordination through data sharing while preserving existing NCA expertise is key to enhancing supervisory outcomes.

I. Part I

1. Simplification and burden reduction

The focus of this targeted consultation is to remove barriers to enhance the integration of the EU capital markets and to support their modernisation. By doing so, it will contribute to simplify the framework of EU capital markets and support the Commission's initiative to make Europe faster and simpler. This section seeks stakeholders' view on general questions regarding simplification and burden reduction of the EU regulatory framework in the trade, post-trade and asset management and funds sectors. Respondents are asked to provide concrete examples to support answers provided, and, where possible, quantitative and qualitative information.

Part I Section 1 question 1

Is there a need for greater proportionality in the EU regulatory framework related to the trade, post- trade, asset management and funds sectors?
Please choose from 1 (strongly agree) to 5 (strongly disagree) or 'no opinion'.
If yes, please explain and provide suggestion on what form it should take.

1	2	3	4	5	No opinion
x					

ICMA response

On the principle of proportionality

ICMA has emphasised the importance of applying the **principle of proportionality** more meaningfully across EU financial regulation. Current "one-size-fits-all" frameworks risk disproportionately burdening smaller or less complex institutions. For instance, ICMA highlights that excessive regulatory complexity and compliance burdens have deterred smaller firms from market participation, especially in the capital markets and sustainable finance space.

Proportionality could take the form of streamlined reporting for smaller market participants, simplified licensing procedures, and thresholds or waivers for SMEs, drawing on lessons from existing proportional regimes such as MiFID II's SME growth markets.

From an ICMA asset management point of view, proportionality can be considered in several different ways when applying regulation. One of the most important approaches, which is frequently absent in much of the current regulatory framework, is the ability to develop and access technology platforms to comply with regulatory obligations. A group of companies may often use the same IT platform to meet regulatory requirements across multiple jurisdictions. If the group ensures robust operational resilience under DORA, regulators could take a more proportionate approach by recognising the efficiencies of integrated systems, without requiring full human resources in every jurisdiction, as long as the group can demonstrate efficient and timely compliance to NCAs.

We emphasise that the principle of proportionality, as set out in Article 5 TEU, is often misapplied in practice. Larger firms face the full weight of regulation regardless of the nature of their activities, while smaller ones benefit from lighter rules. We argue that regulation should be based on the type of activity—such as wholesale versus retail—not the size of the institution.

On Market Activities and Rulemaking – "Less is More"
ICMA supports the "Less is More" approach. The report highlights the increasing delegation of normative power from the EU co-legislators to the European Commission and ESAs has led to a complex and burdensome regulatory environment. The proliferation of technical standards and soft law has increased costs and legal uncertainty.

ICMA proposes:

- Limiting the use of Level 2 and 3 measures;
- Making Level 1 legislation clearer and more self-sufficient;
- Factoring in competitiveness and simplifying the framework;
- And strengthening transparency and oversight in the rulemaking process.

At the same time, ensuring regulatory stability for legislations working well and making some products successful and well recognised should be in the forefront of the priorities of EU policy makers. There should be proportionality also in the re-opening of certain legislations, only major dysfunction should result in the revision of L1 texts.

One specific area where we would see significant scope for simplifying and reducing the burden for the industry is transaction reporting. In particular, ICMA has been very focused over the past years on the EU SFTR reporting regime, having led the industry's implementation effort in relation to the reporting of repo transactions. Since the go-live in 2020, we have been working closely with reporting firms to identify reporting issues and agreeing on best practice solutions wherever feasible. Despite significant industry efforts, many challenges within the SFTR regime remain that can only be addressed through regulatory change. The current SFTR framework is significantly more detailed and complex than equivalent regimes in other major jurisdictions, placing a disproportionate compliance burden on firms. We believe that simplifying the rules and reducing reporting complexity can be achieved without compromising the quality or granularity of data available to regulators. Instead, greater clarity and simplification would likely enhance data consistency and usefulness. ICMA has submitted detailed proposals to ESMA on SFTR (covering Level 1, 2 and 3 provisions) that we hope can be addressed in the upcoming legislative review which is overdue.

Part I Section 1 question 2

In particular, in relation to question 1 above, should the AIFMD threshold for sub-threshold AIFMs take into consideration for instance the market evolution and/or the cumulated inflation over the last 10-15 years? Please provide your answer by choosing from 1 (strongly agree) to 5 (strongly disagree) or 'no opinion'.

1	2	3	4	5	No opinion
		X			[this option on the online form did not allow to provide an explanation]

If you agree, please indicate what could be an appropriate fixed threshold, or whether the threshold should be set in a delegated act to allow easier adjustments based on a methodology that you are invited to outline in your response, and why.

ICMA response

ICMA cautions against reopening the thresholds question, as it would have a structural impact on existing and time-tested regulations without necessarily providing any relief.

ICMA believes that one of the prerequisites for the development of the European investment markets is regulatory stability, especially for regulations such as the UCITS Directive and the AIFMD that have proved efficient in achieving their purposes. Both UCITS Directive and AIFMD have been reviewed very recently (the amending Directive 2024/927 having been published in March 2024) following a quite extensive consultation process. As such, it is disproportionate to re-open every year key legislations that have been functioning well and for which need of review has been tested quite recently.

Also, it seems that considering additional criteria like market evolution or inflation would severely complexify the existing framework, reduce the clarity and coherence of those thresholds and create uncertainty for actors.

Part I Section 1 question 3

Would you see a need for introducing greater proportionality in the rules applying to smaller fund managers under Alternative Investment Fund Managers Directive (AIFMD),?
Please choose from 1 (strongly agree) to 5 (strongly disagree) or 'no opinion'. If you agree, please explain and provide suggestion on what form it should take, indicating if possible estimates of the resulting cost savings.

1	2	3	4	5	No opinion
		X			[this option on the online form did not allow to provide an explanation]

ICMA response

There are already some specific measures in the AIFMD for AIF below a certain threshold of AUM. These allows to have a lighter regime, notably for private equity funds and real estate funds.

Part I Section 1 question 4

Are there any barriers that could be addressed by turning (certain provisions of) the Alternative Investment Fund Managers Directive (AIFMD), Financial Collateral Directive (FCD), Markets in Financial Instruments Directive (MiFID), Undertakings for Collective Investment in Transferable Securities Directive (UCITSD), Settlement Finality Directive (SFD) into a Regulation?
Please choose from 1 (strongly agree) to 5 (strongly disagree) or 'no opinion'. If you agree, please explain which barriers and how a Regulation could remove the barrier.

1	2	3	4	5	No opinion
X					

ICMA response

Regulations would allow for greater convergence by avoiding national transpositions through Directives. Directives lead to 27 national transpositions, which inevitably lead to 27 different texts within Member States (also inadvertently), which then are locally implemented, interpreted and enforced by local National Competent Authorities. Conversely, Regulations would allow for the same single legal text in the EU Single Market, that would ease convergent local interpretations and local enforcements. In addition, such an actual EU integrated legislation through the use of Regulations instead of Directives is an obvious pre-requisite if the EU aims to achieve actually integrated EU supervision. In addition, shifting EU Directives into EU Regulations is a substantial legal undertaking. In terms of content, the AIFM and UCITS Directives have been recently revised and adopted, and the adoption of their Level 2 measures' are still in progress, ahead of their application by April 2026.

We question the feasibility of this process as the legislative process would be burdensome and not necessarily result in simplification.

- Member States would have to play a key role in the adoption of regulations instead of directives, as it leaves them less discretion in the local implementation, so the political aspiration to advance the integration of EU capital markets represents a prerequisite
- Any review of whether these frameworks should remain as directives or be converted into regulations, should prioritise reducing national gold-plating of Directives. The benefits of moving into a regulation will only be realised if local variations are eliminated.

From asset management perspective, Directives such as UCITS, AIFMD and MiFID, were originally designed to provide flexibility, allowing for differences in market conditions and conduct requirements across member states. However, over time, this flexibility has led to significant "gold-plating" by national governments and NCAs, resulting in additional compliance costs for cross-border firms, which must navigate varying rules in each jurisdiction.

Any review of whether these frameworks should remain as directives or be converted into regulations, should prioritise reducing national gold-plating of Directives. The current national gold-plating not only increases costs but also creates complexity and inefficiency, as firms are unable to implement consistent operational processes and product standards across the EU. Furthermore, inconsistencies arise not just from Level 1 legislation, but also from divergent national interpretations of Level 2 RTS and Level 3 Guidelines. ICMA recommends that priority should be given to ensure that the drafting of the text can be applied consistently across member states.

We would thus support initiatives to minimise national gold-plating, enabling industry players to adopt standardised processes EU-wide. There are a number of ways of achieving this outcome. Before deciding on whether to recast a directive as a regulation, it is important to conduct an impact assessment on whether the underlying issues persist and to weigh the benefits of a whether a single, commonly applied rule in a regulation, outweighs the cost of changing the current framework.

In the case of UCITS and AIFMD, it is likely that the assessment would conclude that certain provisions are best cast in a regulation, while others should remain in a Directive, reflecting the split observed in MiFID/MiFIR or IFD/IFR. Determining which provisions fit each category would require enhanced coordination among NCAs, common templates for authorisation, and alignment of supervisory practices. Greater supervisory integration at the EU level will also depend on harmonising the legislative framework and developing a unified approach for data reporting.

Transforming a directive into a regulation is not straightforward. For example, the UCITS Directive allows Member States certain national options – such as specific investment rules to reflect local market needs. Unless there is broad consensus to remove these options, converting a Directive into a Regulation could become a complex political process. Similarly, MiFID's flexibility on inducements reflects significant differences in distribution structures that cannot simply be resolved by adopting a regulation. Therefore, the benefits of moving into a regulation will only be realised if local variations are eliminated.

Finally, while directives can lead to unintended fragmentation in EU capital markets (eg., divergent reporting templates), converting existing Level 1 directives into regulations is not advisable as a default option due to the associated high cost and burden. Instead, for future initiatives, the European Commission should carefully assess the choice of legislative instrument—balancing the need for harmonisation with respect for local specificities—based on the specific objectives and challenges at hand.

Part I Section 1 question 5

Are there areas that would benefit from simplification in the interplay between different EU regulatory frameworks (eg between asset management framework and MiFID)?
Please choose from 1 (strongly agree) to 5 (strongly disagree) or 'no opinion'. If you agree, please explain and provide suggestions for simplification. Also if possible present estimates of the resulting cost savings.

1	2	3	4	5	No opinion
X					

ICMA response

ICMA repeatedly calls for a reduction in duplicative and overlapping regulatory obligations. For example, both MiFID and asset management regulations impose suitability, disclosure, and product governance rules, which can create confusion and inefficiencies. ICMA supports aligning these regimes and clarifying their respective scopes.

ICMA also suggests that regulatory consistency would reduce compliance costs, especially for pan-EU firms, and better support the goals of the SIU.

From an asset management perspective in particular, the specificities of that sector should be kept apart from MiFID which mainly applies to investment firms and in particular brokers.

The **overlapping product governance and oversight requirements** across MiFID, UCITS and AIFMD, add unnecessary complexity for firms that must navigate multiple, and sometimes duplicative sets of rules. This complexity is further compounded as these requirements are replicated not only at Level 1, but also through Level 2 and Level 3 measures. We encourage the co-legislators and the European Commission to pursue a more integrated and less fragmented approach to product governance. Specifically, we support efforts to ensure that compliance with product governance rules under UCITS/AIFMD management company requirements should also be recognised as meeting the corresponding MiFID product governance requirements.

These cross-legislative inconsistencies create unnecessary operational burdens and regulatory uncertainty in some cases. This is particularly true regarding rules on **product governance, suitability and appropriateness assessments, inducements, and transparency requirements**—which are covered under both MiFID II and asset management legislation but not always in a fully consistent manner.

A key example is the **product governance framework**, which applies under both MiFID II and the UCITS/AIFMD regimes but with slightly different scopes and interpretations. Asset managers often have to comply with duplicative or ambiguous requirements when acting both as manufacturers and distributors of financial products, which increases compliance costs without adding proportional value to investor protection.

Similarly, **reporting requirements** under MiFID II and the AIFMD can result in double-reporting of similar data to NCAs and ESMA (eg, on transaction reporting and investor disclosures), creating inefficiencies in both time and cost.

Some actions could be undertaken to address these issues. In priority they should focus on what can be done through modifications at Level 2 and Level 3 legislations. For instance:

1. **Create unified reporting frameworks:** Develop a single, standardised data reporting format for overlapping areas such as cost disclosures and sustainability metrics.
2. **Clarify roles in the distribution chain:** Provide clear guidance on the respective roles of asset managers vs. distributors under the product governance rules, to avoid duplicative compliance.

Harmonisation of overlapping obligations with alignment of definitions and obligations across MiFID II, AIFMD, and UCITS—particularly on product governance, target market assessments, and investor disclosure would also provide effective simplification but would require re-opening of Level 1 text, that may not be consistent with the objective of simplification in a quite efficient way.

In this context, we would also specifically highlight an existing overlap/inconsistency between MiFIR transaction reporting and SFTR reporting in respect of SFTs conducted with EU central banks. While SFTR explicitly exempts such transactions under Article 2(3), MiFIR includes these transactions in its reporting obligations under Article 2(5) of its Delegated Regulation (EU) 2017/590, creating a direct conflict. The current regulatory discrepancy creates legal ambiguity and imposes significant operational complexities, inefficiencies, and costs for market participants. Furthermore, MiFIR is structurally unsuited to capture the characteristics of SFTs, leading to inaccurate reporting outcomes that provide minimal supervisory value. We, therefore, strongly recommend that ESMA amend Article 2(5) of Delegated Regulation (EU) 2017/590 to fully and consistently exclude all SFTs from MiFIR transaction reporting.

Part I Section 1 question 6

Would the key information documents for packaged retail and insurance-based investment products (PRIIPs KID) benefit from being streamlined and simplified?
Please choose from 1 (strongly agree) to 5 (strongly disagree) or 'no opinion'. If you agree, please explain and provide suggestions for simplification. Also indicate what should be prioritised and if possible present estimates of the resulting cost savings.

1	2	3	4	5	No opinion
			x		

ICMA response

Firstly from the funds perspective:
the current **PRIIPs KID** framework is functioning adequately and is generally well understood by retail investors. While not perfect, it achieves its core goals of harmonisation and suitability. **Further simplification risks undermining clarity and comparability.**

Given the **frequent revisions** to the framework in recent years, **regulatory stability is now preferred** to avoid further disruption and cost. Any proposed changes to the KID's content or format should be justified by **robust cost-benefit analysis**, backed by **consumer testing and industry consultation**.

The **implementation costs** since 2018 have been significant, particularly after the 2023 updates. Importantly, **retail investor complaints have dropped sharply**, indicating that the KID is working effectively in practice.

Secondly from the cross-border bond (Eurobond) perspective:
ICMA is neutral on the specifics of KID content whilst its purpose continues to be flawed. See further response to Question 4.2.1 on pp.3-4 of ICMA's August 2021 response to Commission [https://www.icmagroup.org/assets/documents/Regulatory/Primary-Markets/EC-retail-CP-response-FINAL-Qs-answered-030821.pdf]

Part I Section 1 question 7

Do you have other recommendations on possible streamlining and simplification of EU law, national law or supervisory practices and going beyond cross-border provision?

ICMA response

Yes / no / no opinion

If yes, please list your recommendation and suggested solutions. Please rank them as high, medium or low priority.

ICMA response

In February 2025, ICMA published its Commentary and recommendations for the simplification of the EU Sustainable Finance legislation. [www.icmagroup.org/News/news-in-brief/icma-publishes-commentary-and-recommendations-on-the-simplification-of-eu-sustainable-finance-legislation/?utm_source=ICMA+Total+Subscribes&utm_campaign=91ed0804e1-Principles+newsletter+April+2025&utm_medium=email&utm_term=0_-74d917e8a6-68265069].

The key recommendations were to: (i) Fundamentally address the usability and other challenges of the EU Taxonomy and its implementation (which is further detailed in ICMA's paper; (ii) Refocus mandatory reporting for all organisations in scope of CSRD to essential data points and without compromising the double materiality perspective and the consistency with the ISSB standards; (iii) Streamline SFDR reporting in line with (i) the refocused data from CSRD, (ii) reporting based on ISSB and (iii) other official sector and leading market-based taxonomies, while avoiding mis-aligned sequencing between CSRD and SFDR obligations; (iv) Maintain a flexible definition of sustainable investments, as currently exists under SFDR, that allows for a wider approach to sustainability than under the EU Taxonomy alone; (v) Adjust timelines for pending legislation to allow for logical sequencing and implementation feedback while providing certainty on interim requirements or suspended enforcement notably for reporting. In March 2025, ICMA also published its new paper "A time for change in the sustainable fund market - Reflections and recommendations in a new regulatory environment" which further highlights the need for a simplified, proportionate and internationally operable regulatory framework for the ESG fund industry, notably in the context of the pending SFDR review. [www.icmagroup.org/News/news-in-brief/icma-publishes-new-paper-with-reflections-and-recommendations-for-the-sustainable-fund-market-in-a-new-regulatory-environment/]

The sequencing and timing of EU financial services legislation often create unnecessary burdens for both firms and supervisors. Better planning of implementation deadlines could significantly reduce this strain. New regulations usually require firms to build or update technology systems, a process that typically needs 12–15 months for development, testing, and rollout. Firms also need advance notice of upcoming regulations to allocate resources and budget effectively. Coordination is essential, as many firms rely on third-party vendors, and poor timing can cause bottlenecks.

A common issue is being required to implement Level 1 rules before Level 2 or 3 details are available, forcing firms to juggle overlapping projects. Improved sequencing would allow for more efficient, single-phase implementations, freeing up resources for innovation and customer service.

Given the excessive layering of rules, several improvements are recommended:

- **Engage stakeholders early** in rule design and conduct **impact assessments** focused on **EU competitiveness** before introducing new regulations.
- **Limit reliance on Level 2 and 3 instruments** (RTS, ITS, guidelines, Q&As), which have grown significantly in recent years.
- **Embed competitiveness** (both international and economic growth of the EU financial sector) into the **mandates of the ESAs**.
- Make **cost-benefit analyses mandatory and systematic**.
- **Enhance legislative oversight** by the European Commission, Parliament, and Council.
- **SFDR revision**: the framework should be simplified to make it more accessible to end investors and fully achieve its initial objective, ie re-allocation of capital to a more sustainable economy. This should be done first through the simplification of the reporting requirements with the removal of too complex and non-relevant information, coherence

& symmetry in the treatment of derivatives and by taking into consideration the CSRD MIFID preferences Taxonomy Regulation. Moreover introduction of new categories could bring simplification provided that 1) each category is presented with clear and simple principles to end investors and 2) remove gold-plating across 27 NCAs. This also means that the sustainable preferences under the MIFID and IDD are modified to be based on these categories instead of current too complex notions and SFDR scope is extended to structured products.

Part I Section 1 question 8

Does the EU trade, post-trade, asset management or funds framework apply disproportionate burdens or restrictions on the use of new technologies and innovation in these sectors?
Please choose from 1 (strongly agree) to 5 (strongly disagree) or 'no opinion'. Please explain and provide examples.

1	2	3	4	5	No opinion
				x	

ICMA response

From ICMA's asset management perspective, firms can make use of new technologies and innovation through UCITS and AIFM Directives without any burden or restriction. One example of complex rather than disproportionate burdens, relates to the implementation of the EU AI Act.

A framework that is too constraining, can impede innovation. A very good illustration is the initial ELTIF framework with too-prescriptive rules for distribution of this vehicle to retail investors and more globally for the launch of ELTIF funds. Unsurprisingly, the number of new ELTIF products was very low. Revision of the ELTIF Regulation with the adoption of ELTIF 2.0 is already seen as a great success.

Part I Section 1 question 9

Would more EU level supervision contribute to the aim of simplification and burden reduction?
Please choose from 1 (strongly agree) to 5 (strongly disagree) or 'no opinion' and explain.

1	2	3	4	5	No opinion
			x		

ICMA response

Simplification and burden reduction can be achieved by opting for Regulations instead of Directives in future, in order to reduce the additional layer of discrepancy between Member States due to national transpositions. It is therefore not an issue at the level of EU supervision but EU regulatory convergence.

If a shift to EU supervision is envisaged, a pre-requisite will be the application of same rules in all Member States, which would imply adopting EU Regulations instead of EU Directives at Level 1 in future.

Focus should be shifted to prioritising collaboration platforms between NCAs and ESMA to minimise differing supervisory approaches, especially in terms of practicality of implementation. Greater coordination and standardisation in the use of supervisory templates and reporting documents could reduce these costs considerably without modifying the essential oversight and enforcement competences of NCAs.

2. Trading

This section seeks stakeholders' feedback in the trading space on the nature of barriers to integration, modernisation and digitalisation of liquidity pools and on several issues that can be grouped into two key objectives/areas, as well as their interplay: barriers to cross-border operations in the trading space and barriers to liquidity aggregation and deepening. Respondents are asked to provide concrete examples to support answers provided, and, where possible, quantitative and qualitative information.

Please note that regulatory barriers to the operation of groups and their capacity to leverage intra-group synergies is addressed in the separate questionnaire on horizontal barriers.

2.2 Regulatory barriers to cross-border operations in the trading space

Part I Section 2 question 3

On a scale from 1 to 5 (1 being "insufficient" and 5 being "fully harmonised"), what is your assessment of the current level of harmonisation of EU rules applicable to:

	1	2	3	4	5	No opinion
Regulated markets and their operators.						X
Other trading venues and their operators.				X		
The provision of execution of orders on behalf of clients.						X
The provision of reception and transmission of orders.						X

If you replied 4 or less to any of the items in the previous question, on a scale from 1 to 5 (1 being "not needed" and 5 being "highly needed"), how necessary would you deem, for the purpose of fostering cross- border operations, an increase in the level of EU harmonisation of rules applying to:

	1	2	3	4	5	No opinion
Trading venues and their operators.		X				
The provision of execution of orders on behalf of clients.						X
The provision of reception and transmission of orders.						X

Part I Section 2 question 4

For which areas do you believe that further harmonisation would be beneficial (multiple choices possible)?

- Rules of trading venues (ie exchange rulebook);
- Approval of rules of trading venues and oversight over their implementation/changes;
- Governance of the market operator;

ICMA response

Generally, fixed income markets present a more harmonised way to trade bonds (vs equity markets for example), ***the response should therefore be closer to 5 than to 1***, but they are not yet fully harmonised.

There is a difference between a) harmonised rules (ie the rules themselves) and b) harmonised application of rules, with some improvement needed on both sides.

In regard to the bond markets, the level of harmonisation is high as a) bond markets are to a large extent wholesale markets, and b) trading venues are based in one jurisdiction using passporting rights, with key players being based in the Netherlands, sharing the same regulator. There are many reasons for restricted market access such as KYC/ ML rules, sanctions, access to third county markets etc, but these are harmonised rules/restrictions. This could be viewed in contrast equity markets consisting of wholesale and retail participation and different legal entities throughout the EU.

Currently, there are obstacles that may hinder the smooth operation of bond markets, starting with the Giovannini report and followed by others. A good example of how bond markets work well is the Eurobond market (for the purpose of the response here, meaning XS ISIN bonds) which has a concept of its own right and which represents a harmonised and coordinated approach. This market should be a good inspiration for other (local) bond markets in the EU.

The new bond market transparency regime under MiFIR (entering into force earlier this year, following MiFIR/D review), represents a good example of harmonisation of EU bond markets and demonstrates an improvement in harmonisation vs MIFID II. However, there is still some room for example for NCAs to apply the regime differently, such as for example through the supplementary deferral regime for Sovereign bond trades, which at discretion of NCAs can be opted into or not. As a result, some members states will opt in to applying the supplementary deferrals, and others will not, which will lead to a different treatment in the publication of trades of Sovereign issuers (and also, more generally, leads to a different treatment vs other Sub-bond classes such as Corporate Bonds where there is no opt-in possible).

In the case of the “open and fair access provisions”, more harmonisation is needed.

Part I Section 2 question 5

Please explain and provide concrete examples of areas where a lack of harmonisation might hamper the full harnessing of the benefits of the single market and, where relevant, differentiate between regulated markets and other trading venues (notably, multilateral trading facilities (MTFs), small and medium enterprises (SME) growth markets and organised trading facilities (OTFs)). Please provide an estimate of costs and benefits of greater harmonisation in each specific case, where possible.

ICMA response

See response to Q4.

2.3 Non-regulatory barriers (market practices) to liquidity aggregation and deepening

2.3.1 Integrating liquidity pools across the Union

Part I Section 2 question 6

Can the use of new digital technology solutions contribute to integrating liquidity pools or connecting different pools across the EU? What barriers do you face in implementing such technology-based solutions? Please explain.
Intermediaries and venues interconnections

ICMA response

In general, the use of digital technology solutions can be beneficial, and innovation is supported, but innovations might at times bring regulatory challenges. Therefore, the following rule should apply: if it is the same activity market players are undertaking, and the same risk, the same rules/regulation should apply.

Part I Section 2 question 9

Are there any barriers to the use of technology-based solutions that contribute to achieving higher levels of connection? Yes/No/don't know

ICMA response

No.

Part I Section 2 question 10

Are you aware of instances where intermediaries charge their clients higher fees for executing clients' orders on a trading venue in a Member State that is different from the Member State of the intermediary?
Please specify where any of this could also be relevant in the context of the same Member State with multiple trading venues. Please provide detail on costs incurred by intermediaries of establishing multiple connections to trading venues.

ICMA response

N/A

Part I Section 2 question 11

Are there any barriers that may limit the possibility for trading venues to offer trading in financial instruments that have been initially admitted to trading on another trading venue? Please reply differentiating by type of trading venue.

	Yes	No	No opinion
Regulated markets	X		
MTF	X		
SME Growth Markets			X

In case you responded "yes" to the previous question for any type of venue, please select one or more of the following options that would explain such situation.

ICMA response

There might be difficulties for some trading venues to trade ISINs that were admitted to trading on another venue, and not all trading venues may enjoy the same access to a particular ISIN.

Focus on ETFs

Part I Section 2 question 12

How would you rate the impact of multiple ETF listings in the EU on the attractiveness of the market in comparison to other third-country markets, from 1 (very negative) to 5 (very positive)?

1	2	3	4	5	No opinion
	X				

Part I Section 2 question 13

In your view, which of the following are the most relevant drivers for multiple listings of ETFs in the EU? Please explain. In case of legal barriers to a more integrated trading landscape for ETFs leading to necessary multiple listings, please indicate the relevant provisions and what legislative measures you would recommend to solve this issue.

ICMA response

In relation to Question 12, and in ICMA's capacity as a trade association for the international bond markets, ICMA's response focuses solely on Fixed Income ETFs, which have become an important feature of the Fixed Income trading ecosystem.

At the moment, the EU ETF market (focus on Fixed Income ETFs) is fragmented, there is not a high degree of transparency and therefore the market looks less attractive than the US ETF market. The fragmentation stems from access to multiple exchanges so that ETFs are traded in a fragmented way. There have been some efforts made towards centralising liquidity of ETFs (to one single venue) which should help improve the situation.

Fragmentation of ETF also comes from multi-listing. Multiple listing is a way for issuers to make trading in ETFs more convenient for retail investors (who otherwise bear increased costs when they own securities deposited in a non-domestic CSD).

However, multiple listings

(i) translates into operational complexity for Authorised Participants, who have to realign their positions between CSDs every day,

(ii) hampers the emergence of a lending / borrowing market in ETF shares (while this market is quite active in the US), hence

(iii) contributes to the higher level of settlement fails on ETF shares (with close to 15% of ETF transactions failing to settle on due date in average across the Union) and ultimately (iv) create frictions and increase costs for end-investors.

Means to improve the consolidation of liquidity through better interconnections

Part I Section 2 question 15

Do you believe that intermediaries could improve clients' access to liquidity across the EU by using Smart Order Routing or other similar technologies? What would be the potential costs associated with it and what are the most useful/promising technologies in your view?

ICMA response

On the fixed income side, ICMA believes that the introduction of the consolidated tape for bonds will help improve clients' view and understanding of liquidity. This will be achieved by providing high-quality data to clients at affordable prices and in a consolidated manner.

Part I Section 2 question 16

Beyond membership and execution fees, trading venues may charge connection fees. To the extent this information is available to you, could you provide figures on the amounts charged by individual trading venues or types of trading venues (eg regulated markets, MTFs, etc.)?

ICMA response

ICMA members feel that this is not a question that should be addressed to the "users" of the connection, as there is an obligation for trading venues to publish such information from their side and hence the information should be found there.

Part I Section 2 question 23

Crypto-markets have seen the emergence of a market architecture whereby retail investors have direct access to a crypto-asset trading venue. Do you see merit in allowing or promoting the direct access of retail participants to trading venues for financial instruments, without an intermediary?
Yes/No/Don't know

ICMA response

The ICMA response to this question is "No". ICMA members deem it very important that retail investors are connected to trading venues via retail brokers, and not directly, in order to benefit from necessary protection. The retail broker has to adhere to necessary rules. It is also a question of education, suitability, risk.

2.4. Ensuring fair access to market infrastructure to foster deep and liquid EU-wide markets

Part I Section 2 question 27

Have you identified other barriers in terms of fair access relating to trading infrastructure, beyond those addressed under Articles 35 and 36 of the reviewed MiFIR?

ICMA response

ICMA members think that free and open access is key to well-functioning bond markets. The access provisions in MiFIR are important in this context and should not be watered down.

2.5. Enhanced quality of execution through deeper markets

Part I Section 2 question 28

When the same financial instrument is traded on multiple execution venues, the best execution rule plays a key role. The rule seeks to protect investors, ensuring the best possible result for them, while also enhancing the efficiency of markets by channelling liquidity towards the most efficient venues. On a scale from 1 (insufficient) to 5 (completely efficient), what is your assessment of the effectiveness of the best execution rules in the EU?

ICMA response

ICMA believes that, from a bond market perspective, current best execution rules are good. However, there are no sufficient ways to enforce these, as there is no common source of "truth". The introduction of the consolidated tape should help, as more data is needed to evaluate. Rules should be enforced at the NCA level. So the combination of consolidated tape and the enforcement of rules should both help to make bond markets more efficient.

Part I Section 2 question 32

Under the current MiFIR, the speed at which core market data is disseminated by the equity consolidated tape is not regulated. On a scale from 1 (not needed) to 5 (essential), how important do you deem defining in legislation the speed at which core market data should be disseminated by the equity consolidated tape? What should be the adequate speed? Please explain.

ICMA response

ICMA's response is focused solely on bond markets and the Consolidated Tape for bonds: In this context, it is important to highlight that in contrast to equity markets, where the speed of transmission is of high interest (especially in the context of high frequency trading), it is less relevant in the context of bond markets, where data quality is of most importance, given the current fragmentation and poor quality of bond market data. Further details had been provided in the ICMA response to ESMA Consultation on CTP providers submitted in August 2024.

2.6. Building quality liquidity for EU market participants: impact of recent trends

2.6.1. Non-transparent ('dark') trading (for equity instruments)

The role of multilateral vis-à-vis bilateral trading

Part I Section 2 question 50

Based on the current legal framework, and considering developments in technology and market practices (including the development of smart order routing systems), is the dividing line between multilateral trading facilities and bilateral trading sufficiently clear?

ICMA response

In regard to bilateral vs multilateral trading, and speaking solely from a bond market perspective, ICMA would like to refer to our response to the ESMA CP on Trading Venue Perimeter (as provided in 2022).
[www.icmagroup.org/assets/ESMA-trading-venue-perimeter-consultation-ICMA-RESPONSEFORM-April-2022.pdf]

2.7. Other issues on trading

Part I Section 2 question 58

Please provide any further suggestions to improve the integration, competitiveness, simplification, and efficiency of trading in the EU. Please provide supporting evidence for any suggestions.

ICMA response

ICMA members note that this consultation and the general SIU discussion focus on issues primarily pertaining to equity markets, specifically regulated markets, with a focus on CLOB trading systems. ICMA would like to specifically highlight the importance of bond markets for the financing of corporate borrowers, not only the larger corporates but especially also medium-and small sized firms, who are seeking financing via accessing the EU bond markets, and not (only) equity markets. Well-functioning bond markets are therefore an essential tool to support the overall EU economy and growth of the EU market. The financing of companies is essential especially also in the wake of digitalisation and technological change, which require firms to undertake huge investments for the future. ICMA would like to refer to ICMA's summary of key points in relation to the SIU and capital markets, published in March 2025.

As highlighted in various other consultation responses, ICMA would like to stress that focusing purely on equity markets bears the risk of any new regulation or rules to result in unintended consequences for other asset classes or types of trading. This is something that bond markets experienced after MiFID II, and which has since been partially addressed by the recent MiFIR Review

Building on that, any potential changes to market structure rules need to consider carefully the type of asset and instruments as well as the trading operating system before a one-size-fits-all approach is proposed.

With this in mind, we would like to expand on the importance of bond markets in Europe vs equity markets and on the differences in market structure of equities and bonds. For instance, Section 1.3 (trading) on liquidity aggregation and deepening misrepresents the operational reality in fixed income markets. Concerns around liquidity concentration or fragmentation primarily pertain to equity markets. Liquidity dynamics in fixed income markets are shaped by their bespoke (bilateral) trading protocols and decentralised execution models. In contrast to equity markets, where CLOB concentrates liquidity, MTFs in the bond space rely predominantly on RFQ and other negotiated trading protocols, which facilitate (bilateral) trading between liquidity "users" and liquidity "providers" such as market makers, providing liquidity on a principal basis. These models inherently disperse liquidity and do not rely on a central matching engine or a consolidated settlement layer. We would like to emphasise the critical role market makers and liquidity providers play in bond (and repo markets), acting in a principal capacity.

Against this backdrop, it is essential for EU regulators to develop a) targeted legislation, tailored to each market's / asset class' unique characteristics and b) avoid overgeneralisation for non-equity product, as these other asset classes such as bonds, structured notes, structured finance products, and different types of derivatives, again have their own characteristics and should not be treated similarly.

In order to support liquidity in bond markets specifically and the role of market makers as highlighted above, the recent discussion and related consultations on bond market transparency and the consolidated tape have been of huge importance. As stressed by ICMA in its consultation responses to ESMA on RTS2 and CTP Providers, ICMA has always been advocating for the introduction of a consolidated tape for bonds, as a single source of data for bond markets, offered at low cost. Furthermore, it is imperative that the new MiFIR/D bond market transparency regime is well calibrated, with the aim to achieve a high degree of transparency for market participants, whilst at the same time protecting the provision of liquidity by market makers, especially in the more illiquid bond subclasses, and in the case of very large trades. Further details can be found in ICMA's response to ESMA and various joint TA statements to ESMA and the EC. Further details can be found in ICMA's feedback letter to ESMA and various joint TA statements to ESMA and the EC, where potential weaknesses of the ESMA final proposal (such as, for example, in the publication of corporate bond trades and structured finance products have been highlighted.

In regard to the timeline for bond market transparency and the consolidated tape for bonds, ICMA members would like to urge ESMA and the EC to provide a clear timeline soon, as it is important to our members to prepare on the basis of legal certainty and a clear timeline of implementation.

3. Post-trading

Issues with respect to post trading identified to date fall into three main areas:

- barriers to cross-border settlement
- barriers to the application of new technology and new market practices
- unharmonised and inefficient market practices and application of law, as well as disproportionate compliance costs.

This consultation aims to further specify the above barriers, as well as understand current market practices and costs borne by market participants, be they fees or other compliance costs. This section seeks feedback on possible measures, legislative or non-legislative, to achieve a more integrated, modern post-trading infrastructures. Respondents are asked to provide concrete examples to support answers provided, and, where possible, quantitative and qualitative information.

3.1. Barriers to cross-border settlement and other CSD services

3.1.3. Settlement services in the EU

Part I Section 3 question 23

How could settlement in T2S be further enhanced in order to build a deeper and more integrated market in the EU and facilitate cross-CSD settlement?

ICMA response

ICMA is closely involved in the ongoing preparations for the EU move to T+1. While T+1 in itself will not help to achieve a deeper and more integrated market, an extensive list of concrete recommendations are being developed by the EU T+1 governance, which, once implemented, will be a significant step towards a deeper and more integrated EU market. The Commission is already involved in the T+1 governance and should support the work wherever needed.

In this context, we would also like to refer to the important ongoing work of the AMI-SeCo and its Securities Group (SEG) who have focused extensively on existing post-trade barriers in the EU and proposals to further remove those barriers. While the SEG report is not yet final it will be available in due course and should be a key reference point for the European Commission when it comes to suggestions and ideas for building a more integrated EU capital market and removing remaining barriers.

Part I Section 3 question 24

Should links between CSDs participating in T2S no longer be required to enable settlement in T2S in any of the financial instruments available in T2S?

ICMA response

A comprehensive network of links which guarantee full interoperability are at the core of the T2S project. In our view, this should be maintained covering all financial instruments.

Part I Section 3 question 25

Are there any national market practices, laws, rules/regulations, or operational requirements which hinder the participation in T2S or cross-CSD settlement? Please provide details.

ICMA response

We would refer to the comprehensive findings and suggestions that are being compiled by the AMI-SeCo SEG in relation to remaining post-trade barriers in the EU. Many of the barriers will require a political solution. We hope that the ongoing focus on SIU can create sufficient momentum to resolve the long-standing reluctance to address these issues, including more contentious areas such as tax and securities law for instance. We urge the Commission to play a pro-active role in those difficult discussions in order to help find solutions.

Part I Section 3 question 26

What can be done to ensure progress and take-up by T2S participants of already agreed harmonised standards and market practices? (eg market standards for corporate actions, SCoRE corporate actions standards, T2S corporate action standards, other T2S harmonisation standards, other relevant global or European market standards and market practices)

ICMA response

Enforcement of the relevant T2S standards and market practices has been a long-standing question. However, we believe that this needs to be addressed and resolved directly in the relevant T2S governance groups and shouldn't require regulatory involvement.

There may be certain standards that require strict enforcement. Those need to be identified and incorporated as a legally binding provision in the EU legislative framework.

Part I Section 3 question 28

Should T2S harmonisation standards be applied more widely across the EU, in order to create a more harmonised settlement environment across the EU? If yes, which standards are most needed in the non- T2S EU settlement environment?
Yes / No / Don't know - no opinion - not applicable

ICMA response

No. While harmonisation is generally desirable, it is difficult to see how the T2S standards could apply directly beyond T2S, without appropriate representation of non-T2S markets in the relevant governance structure. That said, we also note that the ongoing work on T+1, which obviously encompasses all EU markets (including T2S) is an important opportunity to drive further standardisation and harmonisation at an EU level.

Part I Section 3 question 29

Should the costs of settlement be reduced?
If yes, please explain what could be done to reduce the costs settlement.
Yes / No / Don't know - no opinion - not applicable

ICMA response

Yes. But not by means of regulation. The key to minimising settlement fees is to ensure competition between settlement systems. Ongoing efforts to create a more competitive and integrated market, including as part of the T+1 transition, will help to achieve this. In the case of T2S, fees are set in consultation with the main stakeholders on the basis of full cost recovery. On this basis, the ECB and T2S operators should continue to strive to minimise fees for all users ensuring international competitiveness.

Part I Section 3 question 30

Should the transparency of settlement pricing and CSD services be improved (in substance and format), for example with a standard template that would facilitate comparison of prices and service offering?
[Yes/No]

ICMA response

Yes. Price transparency is key to competition. Harmonised formats, where not yet applicable, would be helpful.

Part I Section 3 question 31

Should all CSDs settling the cash leg in Euro be required to connect to T2S?
[Yes/No]

ICMA response

No. Joining T2S should remain a business decision that needs to make commercial sense, particularly for users. In particular, we note the unique role of the two ICSDs who serve a wider, global market that cannot be comprehensively covered by T2S. This should not be undermined by regulatory pressure to join T2S. That said, it is important to ensure full interoperability between T2S and non-T2S CSDs and this can be improved.

Part I Section 3 question 32

Are there difficulties in accessing settlement in foreign currencies, not only in the T2S environment? If yes, how could the settlement of transactions in foreign currency be facilitated? Please provide a quantitative assessment of the main benefits and costs of such a solution.
[Yes/No]

ICMA response

Again, we would point to the key role of intermediaries, in particular the ICSDs, when it comes to settlement in foreign currencies or cross-currency.

Part I Section 3 question 33

Is there a need for additional currencies to be settled in T2S?
[Yes/No]

ICMA response

No. Not necessarily, but only where it makes commercial sense. This is a business decision for T2S and its stakeholders.

Part I Section 3 question 34

Should T2S be able to provide other CSD services, including issuance services and asset servicing services?
[Yes/No]

ICMA response

No. Not necessarily. Again, this decision would need to make commercial sense, particularly for users. In our view, the clear priority for T2S should be to ensure that the core services operate smoothly and efficiently.

Part I Section 3 question 35

What improvements (eg organisational, operational, contractual, etc.) could be introduced to T2S to support a broader and more resilient use of it?
[Yes/No]

ICMA response

Yes. Based on the experience with a number of outages over the past years, there is scope to improve communication and decision-making processes around such incidents. However, these points have been raised and discussed within the relevant T2S governance structures which are the appropriate place to discuss these issues and draw the right conclusions in order to learn the right lessons and improve the handling of similar incidents in the future.

II. Part II

4. Horizontal barriers to trading and post-trading infrastructures

This section seeks feedback on horizontal barriers to trading and post-trading infrastructures in four main areas:

- EPTF,
- cross-border operational synergies between entities,
- issuance, and
- innovation.

Respondents are asked to provide concrete examples to support answers provided, and, where possible, quantitative and qualitative information.

4.1. EPTF barriers

Part II Section 4.1 question 1

How do you assess the continuing importance of the barriers identified by the EPTF Report and those put on EPTF Watchlist in 2017?

ICMA response

Rather than rank each EPTF barriers, we would refer the Commission to the upcoming AMI-SeCo SEG report which picks up the previous EPTF analysis and provides a comprehensive updated picture, including a long list of related recommendations for further action, including a number of key issues that will have to be addressed at the political level.

In addition, and more generally we would note that remaining post-trade barriers continue to be a major issue in Europe. Addressing those barriers will be key to a more integrated, harmonised and efficient EU capital market and will be important also to facilitate the transition to T+1.

More specifically, we would reiterate the continued importance of the EPTF watchlist barriers, which are not addressed in detail in the SEG report but which remain highly relevant. In this context we would highlight particularly WL3 (Issues regarding intraday credit) and WL4 (Insufficient collateral mobility), both of which are key focus areas in the T+1 transition work.

4.3. Issuance

Part II Section 4 question 8

Please describe the steps and how long it takes to issue securities (and, if applicable other financial instruments) in your Member State. Which steps could work better, in particular if undertaken cross-border (ie CSD and/or trading venue is in another Member State)?

ICMA response

In the cross-border (mainly institutional) bond markets[5] (Eurobonds – near USD20 trillion outstanding across circa 2,800 issuances end 1Q2025[6]), the typical main steps for public/syndicated (large-size) issuance (ie drawdowns under issuance programmes) are:

- initial disclosure publication excepting some sovereign issuers (a base prospectus can be separately published up to 12 months earlier and so does not affect an individual issuance timeline);
- marketing period (not needed in the vast majority of cases that involve repeat issuers) – potentially just a couple of days;

5 Bond issuance differs fundamentally from equity issuance in many ways
6 https://www.icmagroup.org/assets/documents/Market-Info/Dealogic/International-DCM-Volume-at-End-of-Quarter-by-Year-Q1-2025-030425.pdf

- execution period – hours intra-day from books open to investor allocations and trade pricing;
- pre-settlement period – three-five days[7] for final documentation (executed two days preceding settlement and exchange listing), for satisfaction of conditions precedent and for allocated investors to finalise their settlement arrangements (submission of instructions one day preceding settlement and exchange listing); and
- closing and settlement – following satisfaction of conditions precedent, minutes intra-day through the two international CSDs (ICSDs), Euroclear and Clearstream.

ICMA has published a 20-minute vlog on the bond issuance life cycle.[8]
(Private/non-syndicated issuance generally in smaller size may trade on a more impromptu basis but tends to settle on a similar basis.)

This process is generally seen as smooth and without significant barriers (or obvious related potential improvements not involving significant trade-offs) and competitive at a global level – with periodic incremental evolution (and ICMA is currently running roundtables with issuers, vendors, infrastructures, traders, investors and syndicates regarding primary market innovation) rather than an averred need for regulatory intervention.

In this respect, the Eurobond markets have a proven track record of delivering sizeable transactions with minimal premiums (including during volatility periods) across multiple currencies – achieving the objectives of issuers and investors. In the EUR currency space, competitiveness has significantly strengthened – with maturities of up to 20-30 years available to non-financial corporate issuers (which was not the case a decade ago) and issuers sometimes able to raise more in EUR than in USD.

This is despite the markets continuing to be subject to some frictions in terms of the prescriptive, granular nature of EU-level regulation (contrasting with more principles-based approaches elsewhere) and also in terms of additional impositions at national level within the EU. ICMA has made various proposals in the context of CMU (notably regarding retail requirements that disincentivise the offering of direct retail participation beyond discretionary portfolio management involving additional fees for investors), which remain outstanding pending the outcome of the Listing Act and Retail Investment Strategy dossiers.

Resilient and efficient global debt capital markets have been built over decades (with ICMA's involvement). In driving and supporting the modernisation of these markets, one must remain guided by the principles of resilience, reliability, connectivity and certainty of execution. One cannot afford to break what is not broken.

The responses to this section 4.3 reflect ICMA's commitment to purposeful change that strengthens the system while ensuring it continues to deliver its core function: enabling the vital task of raising capital for the real economy safely and effectively at all times.

Part II Section 4 question 10

Are there barriers relating to the settlement period of primary market operations?
[Yes/No]

ICMA response

No.

(See response to Question 8 regarding Eurobonds)

7 Similarly to building a new car taking longer than selling a used car, ICMA has recently noted there is no case for regulation to shorten the primary market settlement cycle – see https://www.icmagroup.org/assets/documents/Regulatory/Quarterly_Reports/Articles/ICMA-Quarterly-Report-article-Q1-2025-Shortening-of-the-settlement-cycle-primary-market-aspects-210125.pdf]
8 https://www.youtube.com/watch?v=cwSkICV1wL0]

Part II Section 4 question 11

Are there barriers related to ISIN allocation, or relating to the length of ISIN allocation processes? If so, could any of these barriers be addressed through legislative changes?
[Yes/No]

ICMA response

No.

The market is constantly actively striving for additional efficiency. But whilst mainstream Eurobond ISINs ('XS' prefix) may often be not available by the time of books open, it would be exceptional that they would not be available by pricing. Attribution of some national ISINs within the EU may however take significantly longer. (ICMA understands the international CSDs -ICSDs- acting as numbering agency for the attribution of the XS ISINs need to complete AML and other often significant due diligence tasks ahead of ISIN attribution.) Legislative changes would seem an unnecessarily heavy-handed approach.

Part II Section 4 question 12

Should the attribution of ISIN should be further regulated, eg e introduction of a 'reasonable commercial basis' clause, or the prohibition of entities active in closely linked activities (eg settlement-related activities) from performing tasks as national numbering agencies?
[Yes/No]

ICMA response

No.

ICMA is unaware of any problems arising from the international CSDs (ICSDs) acting as numbering agency for the attribution of the XS ISINs mainly used for Eurobonds.

Part II Section 4 question 13

Should measures be taken to create more competition in the area of ISIN attribution?
[Yes/No]

ICMA response

No.

ICMA is unaware of any problems related to competitiveness in the attribution of XS ISINs mainly used for Eurobonds.

Part II Section 4 question 14

Are there barriers related to the lack of a harmonised approach for investor identification and classification?
[Yes/No]

ICMA response

No.

The Eurobond markets continue to operate as anonymised holding markets, albeit now through the international CSDs and thence sub-custodian accounts (that have been perceived as cheaper and more flexible than direct holding structures). (In this sense, EPTF barrier 5(1)(A) concerning registration, at p.52-54 of the May 2017 EPTF Report[9], does not apply.)

9 https://finance.ec.europa.eu/document/download/2b0b61c2-feee-4224-88ae-35fa628fc15f_en?filename=170515-eptf-report_en.pdf

Whilst this can complicate advertising to front offices around bondholder resolution voting (EPTF barrier 5(1)(C) at p.56 of the May 2017 EPTF Report), the formal voting process itself is generally effective in reaching end-holders' back-offices via the sub-custody chain. In this respect, the Second Quarter 2021 edition[10] of the ICMA Quarterly report noted (at pp.64-65 in the context of post-LIBOR transition):

<< The consent solicitation process works well, but some operational inefficiencies were highlighted at a recent workshop held to discuss measures to help ease the process; this includes, in particular, difficulties in the location of bondholders and the requisite cascade of information and communications between the parties, which can be compounded if there are different ownership structures in place. Much of the operations process is conducted manually, which not only takes up a lot of time in an already compressed time frame, but can also lead to significant extra work for the parties involved. Technical innovation and automation may be helpful, but this is unlikely to be achieved in any meaningful way in the time given this year. >>

Distinctly in terms of new issuance allocation decisions, investor identification is consistent at the institutional/legal level. Characteristics at subsidiary portfolio levels are however often subjective and variable over time (any LEI that might apply would be at the level of an investor's legal identity and so would potentially straddle many investor sub-accounts). Eurobond bookbuilding systems' investor ID processes work well and issuance effectiveness is not impacted – with a few very sophisticated issuers seeking additional granularity.

Part II Section 4 question 15

Are there barriers related to the lack of automation and straight- through processing along the issuance value chain?
[Yes/No]

ICMA response

No.

Whilst there could, and likely will, be significant efficiency gains from further automation and STP (eg in the context of investor back-office OMS connectivity), one cannot characterise the current situation as constituting 'barriers' in the Eurobond market. (ICMA has been developing a Bond Data Taxonomy[11] to assist and is currently conducting roundtables with issuers, vendors, infrastructures, traders, investors and syndicates regarding primary market innovation.)

Part II Section 4 question 16

Are there barriers related to the exchange of data between the stakeholders involved in the issuance?
[Yes/No]

ICMA response

No.

Whilst there could be significant efficiency gains from improved data exchange between some horizontal stakeholders (eg in the context of investor back-office OMS connectivity), one cannot characterise the current situation as constituting 'barriers' in the Eurobond market. (ICMA has been developing a Bond Data Taxonomy[12] to assist and is currently conducting roundtables with issuers, vendors, infrastructures, traders, investors and syndicates regarding primary market innovation.)

10 https://www.icmagroup.org/assets/documents/Regulatory/Quarterly_Reports/ICMA-Quarterly-Report-Second-Quarter-2021v2.pdf
11 https://www.icmagroup.org/fintech-and-digitalisation/fintech-advisory-committee-and-related-groups/bond-data-taxonomy/
12 https://www.icmagroup.org/fintech-and-digitalisation/fintech-advisory-committee-and-related-groups/bond-data-taxonomy/

[Part II Section 4 question 17]

Are there any barriers related to issuance which are not mentioned above?
[Yes/No]

ICMA response

No.

See response to Question 8 regarding Eurobonds.

Part II Section 4 question 18

On a scale from 1 (very complex) to 5 (very straightforward), what is your assessment of the current procedures for issuing debt or equity instrument in the EU, in particular for the first time? Please point to the main difficulties you might have identified, if any.

ICMA response

3 - Neutral

See response to Question 8 regarding Eurobonds (noting that the majority of ICMA's issuer membership is made up of more frequent issuers).

Part II Section 4 question 19

In particular, what is your assessment of the level of competition in the area of underwriting, and of the level of fees for such services? Do you perceive that they can be a significant barrier for those issuers considering issuing financial instruments (debt or equity)? If so, what are the drivers for such difficulties?

ICMA response

No.

ICMA's Primary Market Practices Committee[13] (its main underwriter group) currently gathers 48 institutions (with another 21 on the related ICMA European Bond Syndicate Heads Group[14]), suggesting a healthy number of market participants and consequent choice for issuers.

This area was also reviewed in detail by the UK's FCA before Brexit – See #2 in ICMA October 2014 response[15] and #53-55 at p.15 of ICMA January 2015 response[16]. ICMA is unaware of any issuers subsequently suggesting there is insufficient competitiveness in Eurobond underwriting. (ICMA deliberations do not touch on what fee levels are, as that is something rightly reserved by law to competitive market forces.)

Part II Section 4 question 20

On a scale from 1 (very unsatisfactory) to 5 (very satisfactory), what is the level of transparency of fees structures in the area of underwriting satisfactory?

ICMA response

3- Neutral

13 https://www.icmagroup.org/market-practice-and-regulatory-policy/primary-markets/primary-market-committees/icma-primary-market-practices-committee/
14 https://www.icmagroup.org/About-ICMA/icma-councils-and-committees-2/#:~:text=European%20Bond%20Syndicate%20Heads%20Group%20(EBSH)%0AGathers%20the%20heads%20and%20senior%20members%20of%20the%20syndicate%20desks%20of%20other%20member%20firms%20underwriting%20syndicated%20bond%20issues%20in%20the%20EMEA%20region%20and%20closely%20following%20PMPC%20deliberations
15 https://www.icmagroup.org/assets/documents/Regulatory/Other-projects/ICMA-response-UK-wholesale-competition-review-061014-Final.pdf
16 https://www.icmagroup.org/assets/documents/Regulatory/ICMA-FEMR-CD-response-14-January-2015.pdf

If you think the level of transparency of fees structures is unsatisfactory, do you believe transparency on the prices billed to issuers and investors for such services should be provided on an ex post basis (eg publication of indicative prices for underwriting services) or on an ex ante basis (standard/average price lists)?

ICMA response

No [*Re. providing transparency*]

Underwriting services are not billed to investors.

The topic of underwriting fees billed to issuers was significantly considered in the context of MiFID2 implementation, with a notable ongoing concern that European issuers not be prohibited from remunerating (and so hiring) underwriters to help manage their bond offerings (see #5(A) at p.4 of ICMA August 2023 response[17]) and otherwise the prevailing view was that investors had little or no interest in the level of bond underwriting fees as very rarely a material factor in making an investment decision regarding bonds (see "Inducements and costs & charges" at p.6 of ICMA December 2019 analysis[18]). ICMA is not aware of any indications of changing views in this respect.

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Part II Section 4 question 21

Would a front-to-end pan European platform as proposed by the ECB in 2019 (European Distribution of Debt Instruments (EDDI) initiative) solve the barriers and obstacles identified in the previous questions?
If yes, should this front-to-end pan European platform focus on debts instruments solely or would this service also contribute to improving equities issuance processes too?
If no, how should these barriers and obstacles identified be addressed?

ICMA response

No.

No significant barriers are perceived in the context of Eurobond issuance (see response to Question 8).

The initial perception largely endures that "EDDI seemed to be a solution in search of a problem" (see article at p.25 of ICMA 1Q2022 Quarterly Report[21]).

Part II Section 4 question 22

Are you satisfied with the current level of digitalisation of the bookbuilding process?
Yes, No, don't know.

ICMA response

Yes.

See responses to Questions 8 regarding Eurobonds, 15 regarding automation/STP and 16 regarding data exchange.

17 https://www.icmagroup.org/assets/EU-RIS-proposals-ICMA-comments-2023.pdf
18 https://www.icmagroup.org/assets/documents/Regulatory/MiFID-Review/MiFID-II-R-and-the-bond-markerts-the-second-year-201219.pdf
19 https://www.icmagroup.org/assets/EU-RIS-proposals-ICMA-comments-2023.pdf
20 https://www.icmagroup.org/assets/documents/Regulatory/MiFID-Review/MiFID-II-R-and-the-bond-markerts-the-second-year-201219.pdf
21 https://www.icmagroup.org/assets/documents/ICMA-Quarterly-Report-First-Quarter-2022.pdf

4.4. Innovation – DLT Pilot Regime (DLTPR) and asset tokenisation

Part II Section 4 question 23-25

Do you believe that the DLTPR limit on the value of financial instruments traded or recorded by a DLT market infrastructure should be increased?

ICMA response

Yes.

Do you believe that the scope of assets eligible within the DLTPR should be extended?

Do you believe that the DLTPR should be extended to cover other types of systems, such as clearing systems?

For questions 23 to 25, where your reply is 'yes' please complete the following fields as appropriate.

Please provide details on the preferred changes to the DLTPR and explain your reasoning (how limits should be increased, which concrete assets should be eligible and why)

ICMA response to Q23

The narrow limits (representing a fraction of average daily traded volumes in fixed income securities on electronic trading venues, or daily issuance volumes of debt securities, for example), limited lifespan and uncertain outcome of the EU's DLT Pilot Regime disincentivise market participants from investing resources and impede the development of commercially viable business cases.

ICMA members recommend adopting a flexible approach to setting limits in line with market demand, subject to a periodic review to make adjustments and in consultation with the industry. This should include not only the limits put in place pursuant to article 3(1) of the DLTPR Regulation, but also those pursuant to articles 3(2) and (3) DLTPR Regulation.

Adjustments of volume thresholds are deemed a high priority, in addition to clarity on the EU DLT Pilot Regime's duration, and further harmonisation of the EU's legal and regulatory framework to enable the use of new technologies such as DLT without the need for temporary exemptions and a DLT-specific framework.

Please provide a ranking of the importance of the issue as:

- **high priority**
- medium priority or
- low priority

ICMA response

high priority

Part II Section 4 question 27

What other changes to the DLTPR are needed to ensure that it remains a framework that is fit for the purpose of allowing new entrants and established financial companies to deploy pioneering innovation with DLT in the EU, while also ensuring appropriate risk mitigation?

ICMA response

In addition to ICMA's recommendation in relation to volume limits (highlighted in our response to Q23), the following aspects are of critical importance to ensure the DLTPR becomes a framework that is fit for purpose:

(i) Providing certainty on the duration of the DLT Pilot Regime, enabling firms to mobilise capital and allocate resources accordingly. DLTPR article 14 (1) prescribes a review of the regime three years after entering into force (24 March 2026) while article 14 (2) outlines different outcomes including termination of the regime. While we note that any amendments are subject to a new legislative proposal being passed, the uncertainty arising from these provisions – as well as their temporary nature– are perceived by market participants as a disincentive to mobilise capital and make long-term decisions.

(ii) In addition, the perceived uncertainty of the exit process for firms operating under the EU DLT Pilot Regime and intended outcome of this regime acts as a deterrent. We recommend amending the existing EU legal and regulatory framework permanently (as opposed to temporary exemptions) to enable the use of new technologies including DLT by firms providing regulated services, irrespective of the underlying technology used.

The above aspects are critical – and considered a high priority – from a legal and regulatory perspective.

Additionally, the following aspects are critical to scale the market of DLT-based bonds in the EU:

(iii) Fostering interoperability by building on existing standards such as ICMA's Bond Data Taxonomy in collaboration with the industry as well as international initiatives such as Project Guardian.

(iv) The ability to settle DLT-based securities in central bank money. ICMA welcomed the decision by the Governing Council of the European Central Bank (ECB) to expand its initiative to settle transactions recorded on distributed ledger technology (DLT) in central bank money. ICMA members have consistently highlighted the critical importance of a wholesale CBDC for DLT transactions to fully unlock the benefits of tokenisation, notably next level automation, more efficient post-trade-processing, and ultimately, funding for the real economy.

(v) Acceptance of DLT-based debt securities as eligible collateral by the ECB and the ability for DLT-based bonds to be listed. The absence of such arrangements to date has translated into increased funding costs for issuers, acting as a disincentive.

Part II Section 4 question 30

Do you think that in addition to, or instead of the current derogations-based approach (allowing switching off of certain MIFID and CSDR provisions), the DLTPR should take a principles-based approach whereby high-level provisions govern trading and settlement services, with the purported aim of creating more flexibility for deploying innovative DLT-based projects?
[Yes/**No**]

ICMA response

No.

ICMA members recommend (i) making targeted amendments of the DLT Pilot Regime to ensure it is fit for purpose, and (ii) amending permanently relevant provisions in MiFID II/R and CSDR, for example, as opposed to temporary exemptions. In conjunction with a revision of thresholds in ICMA's response to Q23), this will enable market participants to develop, test and commercialise DLT-based services to foster the development of liquid secondary markets for DLT-based debt securities. The target end state is a regulatory framework which is agnostic to the underlying technology used (whether DLT, cloud, or others).

Part II Section 4 question 36

Basel prudential standards on crypto exposures applicable to credit institutions assign group 2 status to tokenised assets, including tokenised financial instruments, that are issued and recorded on permissionless distributed ledgers. The transitional prudential treatment of exposures to tokenised assets in the Capital Requirements Regulation currently applicable does not make a distinction based on the type of underlying distributed ledgers. Do you believe that prudential rules should differentiate between permissioned and permissionless distributed ledgers?
[Yes/**No**]

ICMA response

No.

As highlighted in joint industry responses to the BCBS second consultation on the Prudential Treatment of Crypto-asset Exposures (September 2022) and subsequent, related BCBS consultations and letters, co-signed by ICMA, we believe it is important that the BCBS promotes a risk-based approach to prudential treatment of DLT-based debt securities, which are subject to the BCBS prudential standard for crypto-assets.

Permissioned versus permissionless blockchain is not a binary distinction. Blockchain network assessment should be case-by-case and risk-based. This analysis is possible within existing governance and control frameworks.

Public permissioned and permissionless blockchain risks can and have been managed by built-in controls (for example by using certain Ethereum token standards or by adding secure blockchain layers). Examples include:

- The EIB's bond issuance on the Ethereum blockchain in April 2021, a highly secure permissioned usage of smart contracts on a public blockchain. Even though a public blockchain was used, underwriting banks were able to limit placement of the bonds to vetted market participants. These restrictions on the investor base exist even during secondary trading, which demonstrates that a public blockchain can include a token with permissioned features.
- Siemens' issuance of a debt security on a public blockchain (Polygon) under the German Electronic Securities Act in February 2023. The issuer was able to sell the bonds directly to investors and was also able to limit the placement to investors, which had to be whitelisted first by the crypto registrar, which acts under a BaFin license.

Further information can be found in the joint industry response to the BCBS 2nd consultation to the prudential treatment of banks' exposures to crypto-assets.

ICMA would like to reiterate that certain elements of the BCBS Crypto-asset Standard are at odds with two cornerstone principles of prudential regulation: technology neutrality and the concept of "same activity, same risk, same regulation". We would also note that risk weights, capital surcharges and limits are too blunt instruments to address technology.

References:
https://www.icmagroup.org/fintech-and-digitalisation/fintech-advisory-committee-and-related-groups/dlt-bonds-working-group/

Part II Section 4 question 41

Lack of standardisation acts as a hindrance to interoperability. This is especially the case with a relatively new technology such as DLT. Where is the greatest need for standardisation in the area of DLT?
Multiple replies are possible. Please rank each of your reply from 1-5, with 1 denoting 'least important'

(a) Business standards applicable to digital assets (for example data taxonomy to describe digital assets)

ICMA response: 5 (denoting most important)

(b) Technical standards applicable to digital assets and smart contract-based applications

ICMA response: 5 (denoting most important)

(c) Technical standards applicable to links (bridges) between DLTs

(d) Other

ICMA response

While there are different dimensions of interoperability (eg between legal frameworks, market infrastructures and DLT or blockchain networks, as well as on an asset level), common standards are critical to scale DLT-based bond markets and avoid market fragmentation.

From an operational perspective, a key initiative to promote interoperability and facilitate automation of issuance, trading, settlement and distribution both of traditional debt securities as well as DLT-based securities is ICMA's Bond Data Taxonomy (BDT). In essence, the BDT provides a common language in a machine-readable format of the key economic terms of a debt security irrespective of its form and the underlying technology. It also includes a DLT extension, which helps capture and transmit relevant DLT-related information of a debt security, such as the DLT platform operator and its LEI.

The BDT has been adopted or is being implemented by a range of stakeholders to date, including for the issuance of digital green bonds by Hong Kong SAR in February 2024, a multilateral development bank to build an AI prototype to reduce settlement fails and enhance liquidity management of traditional debt instruments, by vendors for the automation of issuance processes, and the ICSDs, amongst others. It also forms a centrepiece of the Guardian Fixed Income Framework (GFIF), published in November 2024, which aims to scale asset tokenisation.

In addition, ICMA has partnered with SWIFT to integrate the BDT into the ISO 20022 messaging standard. ISO 20022 is becoming widely adopted by financial institutions across capital markets for trading, settlement, payments, and reporting processes. This initiative was launched in Q1 2025 and is expected to be completed by Q4 2025.

From a legal perspective, ICMA published in August 2024 a Digital Assets Annex, an important addition to the Global Master Repurchase Agreement (GMRA). The Digital Assets Annex provides market participants with a standardised framework and set of terms, which can be used to document repo transactions involving digital cash, DLT-based securities (including tokenised traditional securities), or asset-backed digital assets. It addresses some of the commercial considerations that arise as a result of the operational feasibility of intra-day repo transactions, which have been made possible by the shorter settlement times offered by DLT-based platforms.

References:

- https://www.icmagroup.org/fintech-and-digitalisation/fintech-advisory-committee-and-related-groups/dlt-bonds-working-group/
- https://www.icmagroup.org/News/news-in-brief/icma-publishes-gmra-digital-assets-annex/

5. Asset management and funds

Despite Directive 2009/65/EU relating to undertakings for collective investment in transferrable securities (UCITSD) and the Directive 2011/61/EU on alternative investment fund managers (AIFMD) enabling funds to be marketed across the EU through a relatively simple notification procedure, national barriers, divergent practices, and regulatory complexities often impede efficient and scalable operations, thereby impacting costs and accessibility for EU citizens. This section seeks to:

(i) identify obstacles experienced by EU funds and asset managers to accessing the single market

(ii) gather stakeholder insights on barriers and experiences in managing cross-border investment funds

(iii) explore the effectiveness of existing authorisation and passport systems

(iv) and explore possibilities for simplifying current requirements

Stakeholders input on operational challenges, passporting/marketing of investment funds, national supervisory practices and other barriers more generally are welcome. Stakeholders are encouraged to share quantitative data and practical evidence to support positions.

5.8. Portfolio requirements and investment limits of investment funds

5.8.1. Investment limits – UCITS

Part II Section 5.8.1 question 55 & 56 - Securitisation

Do you believe that Article 56(2)(b) of the UCITS Directive should be amended to allow UCITS to invest more than 10% in an issue of a single securitisation?
If yes, how does the rationale of the 10% issuer limit differ for securitisations compared to corporate bonds issued by a single issuer?

Are there any additional concerns or drawbacks to consider regarding the increase of the threshold?

ICMA response

Yes.

Members believe the current UCITS framework is well-respected, should be preserved, is internationally regarded for its sound risk management standards, and concentration limits have a significant role to play in that regard.

However, some members have commented that the 10% acquisition limit for debt securities in a single issuing body imposed under Article 56 of the UCITS Directive hinders their ability to make larger allocations when investing in a securitisation and wish to make the following comments.

Q55.1: UCITS mutual funds that buy corporate debt do not usually encounter a problem with the 10% acquisition limit because corporate debt issuance is typically large, often running into billions. However, securitisation issuance is much smaller; as the average securitisation issuance is €300 million, UCITS mutual funds can only invest €30 million per securitisation under the current limit. This restriction is particularly burdensome for some funds; it complicates liquidity management and limits investment and diversification opportunities for end-clients. Moreover, it drives more UCITS investments towards unsecured corporate credit with higher risk of defaults, less protections and lower rates of return compared to securitisation.

From a policy rationale perspective, the UCITS 10% limit was not designed with securitisations in mind as the limit was imposed two years before the first securitisation occurred in Europe. The rule's aim is to prevent UCITS funds from exerting control over a "single issuing body". However, concerns about undue investor influence over a securitisation issuer are irrelevant as securitisation vehicles are dedicated pass-through entities that typically only issue securities to the market one time and do not have a broader corporate strategy for an investor to exert influence over.

Q56: Our members have strong concerns that amending Article 56(2)(b) could lead to the wider re-opening of the UCITS Directive framework, which could be a long process and could result in other unnecessary and unwanted changes. For that reason, we highlight two options which do not require a wider re-opening of the UCITS Directive. Option 1 is to introduce a targeted amendment to Article 56 excluding securitisations from the 10% limit via amendments to the EU Securitisation Regulation (Regulation (EU) 2017/2402, or **SECR**). This can be done in the context of the wider securitisation reforms on which legislation proposals from the European Commission are expected soon. That is, the required targeted amendment to Article 56 exempting securitisations could be introduced in a similar way to how the UCITS Directive was amended previously when the SECR came into force (see Article 58 of SECR which amended Directive 2009/65/EC by introducing a new Article 50a relating to consequences of non-compliance with SECR requirements). Option 2 is clarifying via a Level 3 Q&A that the reference to "single issuing body" in Article 56 does not include securitisations, thus excluding securitisations from the acquisition limit in Article 56. As noted above, a securitisation vehicle is not an issuer with the implication of a strong concentration risk which the term "issuing body" was intended to capture. For example, mainstream debt issuers commonly issue different types of debt securities from the same or a single issuing entity under stand-alone bond issuances or bond programmes. In practice, this means that the 10% acquisition limit is calculated by reference to all debt securities that may be issued by the mainstream debt issuer, allowing investors to spread their risk across multiple securities from a single issuer, making it easier to meet investment targets and maintain portfolio balance. This contrasts with the securitisation market, where securitisation special purpose entities (**SSPE**) programmatic issuers are not very common and instead the majority of securitisations are issued as stand-alone transactions by new SSPE issuers. By their nature, many securitisations have diversified pools of underlying loans, thus mitigating the risk of overexposure to a single issuer. The smaller size of securitisation transactions compared to corporate bonds, combined with the inherent risk-mitigating features, including amortisation (which results in a gradual reduction of securitisation positions over time), exacerbates the punitive effects of the 10% limit. By lifting this restriction, EU policymakers could facilitate greater participation in the securitisation market, ultimately fostering a more robust and dynamic financial ecosystem that benefits both investors and the broader economy.

If there are concerns about concentration of investments by UCITS funds should the 10% threshold be no longer applicable for SSPEs, such concerns should already be addressed by the existing UCITS mutual fund-level concentration limits that will continue to apply, ensuring that no single investment can dominate a fund's exposure.

Part II Section 5.8.1 question 57 - Securitisation

Does the 10% issuer limit affect the liquidity management of funds?

ICMA response

No.

UCITS funds are highly regulated and subject to a range of concentration rules and diversification limits; these include the UCITS 5/10/40 rule in article 52(2) of the UCITS Directive 2009/65/EC which provides that no single asset can represent more than 10% of the fund's assets, and holdings of more than 5% cannot in aggregate exceed 40% of the fund's assets. Members consider these existing concentration rules and diversification limits to be important guardrails for fund managers in managing the liquidity of UCITS funds.

Accordingly, members do not consider that the 10% issuer limit in article 56(2) (b) of the UCITS Directive impacts the liquidity management of funds. There are other UCITS rules, which fund managers must comply with that are intended to, and help to ensure, the effective liquidity management of UCITS funds.

Part II Section 5.8.1 question 58 - Securitisation

What are the potential cost savings for fund managers (eg due diligence costs)?

ICMA response

Some members believe, portfolio management would become easier and therefore less costly by increasing limits. It would enable fund managers to make larger investments in securitisations, and this simplifies portfolio management by reducing the complexities of handling many smaller investments and improving overall fund liquidity. Smaller asset managers, that often encounter barriers to entry due to high costs, would be able to focus on fewer, larger investments, allowing them to accumulate assets more effectively and compete with larger firms. As the securitisation market grows with the involvement of more participants, the market would benefit from increased liquidity and better buying opportunities for all market participants, including smaller mutual funds.

6. Supervision

This section covers the European Supervisory Authorities (ESAs) with a special focus on the European Securities and Markets Authority (ESMA). It is divided into three parts.

1. The first part focuses on the effectiveness of the current framework.
2. The second part goes into more detail regarding the specific sectors, ie central counterparties (CCPs), central securities depositories (CSDs), trading venues, asset managers, and cryptos assets service providers.
3. The last part covers four horizontal areas: the governance framework for new direct supervisory mandates, supervisory convergence, data and funding.

Respondents are invited to provide concrete examples to support their responses, and, where possible, include quantitative and qualitative input.

6.2. Specific questions on supervisory arrangements for different sectors

Part II Section 6.2 question 5

Some national competent authorities (NCAs) have developed advanced expertise or specialisation in supervising certain sectors. What is your view on building on these NCAs and creating EU centres of supervisory expertise by sectors?

ICMA response

From an ICMA asset management perspective, we consider it critical to preserve and build on the existing supervisory framework, which allows to benefit from the competences currently offered in the various National Competent Authorities. Asset managers, investment funds, and ultimately the end investors, greatly benefit from the deep, specialised expertise that local NCAs have fostered thanks to their experience in authorising and regulating a diversity of funds. This expertise within the various local NCAs, and the relationships that have been built between the supervisors and the regulated firms, enables greater oversight of complex financial products and risk management practices. These various local supervisory competences are ultimately best-positioned to identify and address any risks related to market stability and investor protection.

ICMA members proposes that improving coordination through data sharing while preserving existing NCA expertise is key to enhancing supervisory outcomes.

6.6. Questions on the supervision of funds and asset managers

6.6.1. Identifying costs related to current supervisory framework and benefits of more integrated EU supervision

Part II Section 6.6.1 question 46

How would you rate the convergence of supervisory practices across Member States in the area of the supervision of funds and asset managers?
Please rate from 1 to 5 (1 very convergent, 5 very divergent)
Please provide examples of divergent outcomes of supervisory practices for funds and asset managers in different Member States.

ICMA response

The issue is not currently the EU supervisory framework but remaining national divergent legislative transpositions (even if unintended by Member States). NCAs behave fairly, mandated to apply their national legislative provisions. But if those national legislative provisions differ from one Member State to another, de facto it will lead to divergent supervisory practices.

Part II Section 6.6.1 question 48

To which extent do you agree with the following statements about possible benefits of more integrated EU supervision (please rate from 1 to 5)?

Please explain your answer providing, where possible, quantitative evidence and examples. If you indicated 'Other', please specify what was intended.

ICMA response

ICMA's buy-side constituency is very supportive of enhancing the efficiency of the current supervisory framework specifically through facilitating greater supervisory coordination. We consider that there should be greater focus on facilitating data sharing between the NCA and the ESAs and how this could also lead to streamlining of existing requirements by NCAs. This could be achieved via the creation of a single regulatory reporting data hub, where NCAs and ESAs have access to relevant data sets, and on an aggregated basis where required, on the data which is already being collected via the different reporting requirements.

Especially given the recent AIFM and UCITS Directives reviews which enhanced reporting requirements (including the requirement for ESMA to develop new reporting templates), it is a timely opportunity to upgrade Europe's data collection infrastructure and sharing mechanisms. This single data hub mechanism has also been proposed by several key EU NCAs. This should also allow to remove existing differences between requirements by NCAs, leading to duplication of obligations that are currently enforced in different ways at national level while referring to the same EU rules.

Part II Section 6.6.1 question 49

Do you consider that more centralised EU supervision could also produce negative side-effects?

ICMA response

From an asset management perspective, it is considered that a centralised supervision model is unlikely to mobilise savings or significantly boost competitiveness, as supervision alone does not directly influence consumer sentiment and may actually add bureaucracy – especially if additional to local NCAs powers and requests - rather than remove barriers. True competition will be enhanced by creating a level playing field and ensuring consistency and stability in the regulatory environment to support retail consumers and comparability.

When considering more centralised EU supervision, it is important to consider the preservation of the existing supervisory expertise within various NCAs. Asset managers, investment funds, and ultimately the end investors, greatly benefit from the deep, specialised expertise that local NCAs have fostered thanks to their experience in authorising and regulating a diversity of funds.

NCAs remain in the best position to carry out the day-to-day task of authorising and supervising funds, they have the staff, expertise and the local knowledge and language to most effectively engage with the local fund providers. Thanks to the EU's passport-driven fund distribution model, funds tend to be domiciled only in a few jurisdictions, where local NCAs have developed a very rigorous and specialised approach to fund authorisation and supervision, and have thus become the supervisory centres of expertise. This expertise, and the relationships that have been built between the supervisor and the regulated firms, enables greater oversight of complex financial products and risk management practices. These supervisory centres of expertise are ultimately best-positioned to identify and address any risks related to market stability and investor protection.

Centralising EU supervision thus risks limiting NCAs in implementing measures that are tailored to their specific national circumstances and domestic fund structures and slow down decision-making processes, reducing their ability to respond swiftly to domestic issues and acting in the best interest of the investors. Centralising supervision at this stage would not mean removing the additional layers of national supervision and would result in firms having to deal with EU level as well as national level supervision with certain overlaps which would add further complexity.

Moreover, until the current legislative process harmonises the NCAs differing, locally adapted, Directive provisions and addresses the inconsistent supervisory interpretations and outcomes, it would be difficult to set up a supervisory college which would result in a successfully integrated, fair and consistent supervisory outcomes.

6.6.2. How could more integrated EU supervision function?

Part II Section 6.6.2 question 51

Please indicate to which extent you support the following possible models of more integrated EU supervision: For each model, options to choose from:
1 (strongly support), 2 (rather support), 3 (neutral), 4 (rather not support), 5 (strongly not support), 6 (no opinion)

a. A single EU supervisor, responsible for the supervision of asset managers with significant cross-border activities, while NCAs remain responsible for the supervision for asset managers with limited or no cross-border activity, UCITS funds and AIFs;	**5**
b. A supervisory college, chaired by an EU supervisor, having the main responsibility for, and taking joint decisions on, the supervision of asset managers with significant cross-border activities, while NCAs remain responsible for the supervision of asset managers with limited or no cross-border activity, UCITS funds and AIFs.	**5**
c. A supervisory college, chaired by a “lead NCA”, having the main responsibility for, and taking joint decisions on, the supervision of asset managers with significant cross-border activities, while NCAs remain responsible for the supervision of asset managers with limited or no cross-border activity, UCITS funds and AIFs	**4**
d. A supervisory coordination college comprised of all relevant national competent authorities and ESMA while supervisory responsibilities remain unchanged.	**3**
e. Other set-up (please explain)	

Please explain your answer providing, where possible, quantitative evidence and examples, including on potential costs and benefits, taking into account experience with voluntary colleges established so far. If you replied ‘Other’, please indicate what was intended.

ICMA response

From an asset management perspective, a centralised supervision model is unlikely to mobilise savings or significantly boost competitiveness, as supervision alone does not directly influence consumer sentiment and may actually add bureaucracy rather than remove barriers. True competition will be enhanced by creating a level playing field and ensuring consistency and stability in the regulatory environment to support retail consumers and comparability.

The process of centralising supervision would be extremely complex, we consider that steps should first be considered in order to improve the existing supervisory framework, before altering the current supervisory architecture.

The current ESMA supervisory coordination powers and other existing tools (listed in detail in 7.7) could achieve significant improvements in consistency, burden reduction, data sharing and collaboration if further and properly used

Particularly applying resources to improving the technology infrastructure, implementing common data language models and data hubs, would drive more effective collaboration and data sharing.

There is a core opportunity to achieve greater EU integrated supervision, by reducing the national gold-plating of level 2/level 3 measures and considering recasting certain Directive provisions into Regulation.

Until the current legislative process harmonises the NCAs differing, locally adapted, Directive provisions and addresses the inconsistent supervisory interpretations and outcomes, it would be difficult to set up a supervisory college which results in a successfully integrated, fair and consistent supervisory outcome.

Finally, the ESA's should also include an active competitiveness objective within their mandates – this would facilitate that in addition to investor protection and market stability, the ESA's could foster the growth and attractiveness of EU capital markets. This is already a standard practice within other jurisdictions such as with the FCA and SEC where the supervisors are mandated to support the international competitiveness of their markets.

1. Benefits of supervisory colleges:

- Level setting NCA and ESMA expectations: provides platform to discuss firm-wide implementations plans, strategies and operational models.
- Facilitate efficiency in times of crisis: enable a single conversation with multiple NCAs rather than having separate communication with each one bilaterally where the same data sets are shared.
- Information sharing and transparency: allows firms to provide a holistic view of how their group companies work together, how their resources are delegated across jurisdictions, and how regulatory compliance obligations are met across the group.
- Ensuring consistency in expectations: helping regulators understand and becoming comfortable with consistent control and oversight models for cross-border activities and delegation.

2. Considerations of supervisory colleges

- Limited experience: There has been limited practical experience with voluntary supervisory colleges, making it difficult to assess their efficiency effectively.
- Heavy administrative burden: Depending on their setup, supervisory colleges could become a heavy administrative burden for both NCAs and industry participants.
- Lengthened decision-making process: They might reduce or bring forward a sort of lengthen decision-making process on the side of the NCAs.
- Added complexity: They may also add an additional layer of complexity to the supervisory architecture, which would not result in simplification.
- Two-tier supervisory framework: Distinguishing asset managers with significant cross-border activities to be subject to a supervisory college model, would result in a two-tier supervisory framework, which would be contrary to efforts to develop integrated European capital markets.

Ultimately, at this stage in the current supervisory architecture model, implementing supervisory colleges would not necessarily result in better alignment since their composition (and internal dynamics) will vary from institution to institution, dependent on each institutions EU footprint. Thus it is important to prioritise to first harmonise the NCAs differing, locally adapted, Directive provisions and addresses the inconsistent supervisory interpretations and outcomes.

7. Horizontal questions on the supervisory framework

The last part covers four horizontal areas: the governance framework for new direct supervisory mandates, supervisory convergence, data and funding

7.2. Supervisory convergence

Part II Section 7.2 question 7

Please rate the effectiveness of supervisory convergence tools from 1 to 5 (1 least effective, 5 most effective)

Please select the ESA for which you are replying, this selection will apply to all questions included in this section. [ESMA / EIOPA / EBA]

ICMA response

ESMA

	1	2	3	4	5	No opinion
Breach of Union law						
Binding mediation						
Peer reviews					X	
Emergency powers						
Opinions						
Recommendations						
Product intervention powers						
Inquiries						
No action letters					X	
Guidelines						
Colleges of supervisors						
Coordination groups						
Collaboration platforms						
Warnings						
Questions and Answers						
Supervisory handbooks						
Stress tests						
Union strategic supervisory priorities						
other, please specify						

7.3. Increasing the effective use of supervisory convergence tools

Part II Section 7.3 question 8

Do you think that the current supervisory convergence tools are used effectively and to the extent that is possible? [Yes/No]

Please select the ESA for which you are replying, this selection will apply to all questions included in this section. [ESMA / EIOPA / EBA]

ICMA response

ESMA

No.

Q&A's: They are often issued without prior industry consultation, they are non-binding but are often treated as mandatory by supervisors resulting in legal uncertainty. They should be updated less frequently, and contradictions should be clarified. If developed with industry consultation, they could play an important role in clarifying rules and not causing further confusion for financial institutions.

No action letters: No action letters should be used more frequently to facilitate ESA's to temporarily suspend certain EU legal requirements. Their scope could be expanded to manage crises, temporary exemptions, implementation delays, and reduce regulatory divergences that harm EU firms' competitiveness and financial stability.

Peer reviews: Peer reviews are an interesting tool that may also be used on a more frequent basis, however the key focus should be on the effective actions taken by the ESAs following the conclusions of the review process.

Coordination groups and collaboration platforms: Proactive convergence mechanisms, such as coordination and collaboration, could be a very effective platform to address industry problems and differences in regulatory approaches. Proactive measures could help prevent issues before they arise and improve overall regulatory effectiveness.

Guidelines: ESAs should work to ensure that the use of this tool does not lead to any confusion of the application of Level 1 and Level 2 legislations. The guidelines should ensure to address only the specificities they are mandated to address in the Level 1 text which would avoid any unintended inconsistencies between level 1 and level 2 texts.

7.6. Data and technology hub

Part II Section 7.6 question 20

Which area(s) would benefit most from an ESA(s)' enhanced role as a data and technology hub?

Please select the ESA for which you are replying, this selection will apply to all questions included in this section. [ESMA / EIOPA / EBA]

ICMA response

ESMA

From a buy-side constituency perspective, the ESA's could most importantly play a vital role in ensuring **more uniform reporting**. Harmonising reporting requirements would reduce costs and eliminate reporting overlap across EU jurisdictions. ICMA's buy-side constituency is very supportive of enhancing the efficiency of the current supervisory framework specifically through facilitating greater supervisory coordination.

ICMA proposes that there should be greater focus on facilitating **data sharing between the NCA** and the ESAs and how this could also lead to streamlining of existing requirements by NCAs. This could be achieved via the creation of a single regulatory reporting data hub, where NCAs and ESAs have access to relevant data sets, and on an aggregated basis where required, on the data which is already being collected via the different reporting requirements.

Especially given the recent AIFM and UCITS Directives reviews which enhanced reporting requirements (including the requirement for ESMA to develop new reporting templates), it is a timely opportunity to upgrade Europe's data collection infrastructure and sharing mechanisms. This single data hub mechanism has also been proposed by several key EU NCAs. This should also allow to remove existing differences between requirements by NCAs, leading to duplication of obligations that are currently enforced in different ways at national level while referring to the same EU rules.

Part II Section 7.6 question 21

In which sectors/areas would the development of supervisory technology tools (suptech, ie use of technology by supervisors to deliver innovative and efficient supervisory solutions that will support a more effective, flexible and responsive supervisory system) be most beneficial to enhance efficiency and consistency of supervision? Please give examples.

ICMA response

From a buy-side constituency perspective, the recent reviews of the AIFMD and UCITS Directives aim at enhancing and harmonising reporting requirements which will apply from 16 April 2027. This harmonisation should reduce regulatory divergence and improve supervisory convergence for UCITS and AIF managers across the EU. It is important that the infrastructure to appropriately facilitate this reporting upgrade is put in place well ahead of 2027 to ensure its effectiveness.

About ICMA

ICMA was founded over 50 years ago and promotes well-functioning cross-border capital markets, which are essential to fund sustainable economic growth. It is a not-for-profit membership association with offices in Zurich, London, Paris, Brussels, and Hong Kong, serving over 620 members in 70 jurisdictions globally. Its members include private and public sector issuers, banks and securities dealers, asset and fund managers, insurance companies, law firms, capital market infrastructure providers and central banks. ICMA provides industry-driven standards and recommendations, prioritising three core fixed income market areas: primary, secondary and repo and collateral, with cross-cutting themes of sustainable finance and FinTech and digitalisation. ICMA works with regulatory and governmental authorities, helping to ensure that financial regulation supports stable and efficient capital markets. www.icmagroup.org

ICMA recognises and supports the important role of regulation in bond market development: creating a level playing field for issuers, investors, intermediaries, and infrastructures; ensuring protection and fairness for investors; maintaining the highest standards of participant behaviour; providing market integrity; creating a nurturing environment for capital formation and investment flows; securing market stability; fostering innovation; and adhering to international standards, while remaining globally competitive.

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ICMA response summary: EU SIU implementation – EU capital market integration consultation – June 2025

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