



To: Ursula von der Leyen
President
European Commission, Rue de la Loi 200
1049 Brussels

Cc: Valdis Dombrovskis
Executive Vice-President

Subject: Joint letter on the international competitiveness of the financial services sector

Brussels, 3 March 2020

Dear Commission President von der Leyen,

We would like to take this opportunity to offer the full support of the financial services industry for the ambitious path on which you have set Europe. We are delighted to have a leader so committed to Europe and a team with such a wealth of experience at the helm of the European Commission as we look to the opportunities and challenges that lie ahead in the next five years. Under your leadership, we look forward to contributing to a stronger European Union. We are particularly encouraged by the ambitions you have set out to strengthen Europe's leadership in the world and to promote Europe's global competitiveness.

The European financial sector that we jointly represent is a cornerstone of the European economy. Our members are the primary source of financing for businesses and individuals, the managers of people's savings and pensions, and the providers of protection against risks for people, businesses and economies.

Beyond this key role within Europe, our sector is also present beyond the European borders. The significant business presence of major European players outside the borders of the European Union, as well as our strong business relationships with foreign customers and partners, are clear evidence of this worldwide success. Nevertheless, over recent years and in certain parts of the financial sector, Europe has lost ground on the global stage. While the reasons for this are many and varied, we firmly believe that the significant talents, strengths and potential that the European financial sector has today can be key to us becoming more successful at a global level tomorrow.

We fully support your objectives of preserving and improving financial stability, protecting savers and investors, and ensuring flows of capital to where it is needed. A robust regulatory framework is vital for a trusted, healthy and well-functioning financial sector. Likewise, we wholeheartedly welcome your ambition to promote Europe's competitiveness on the global stage. We believe that these goals are two sides of the same European policymaking coin.

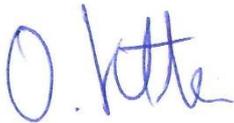
We therefore call on you and your team:

- To explicitly include the **global competitiveness of European businesses** as a key objective in your Commission's policymaking. Such an explicit recognition of Europe's ambition to be a world leader would add weight and help orientate minds in the EU decision-making process.
- To give priority to ensuring an **international level playing field**, with a focus on eliminating the potential for regulatory arbitrage between Europe and other jurisdictions arising from significant divergences in regulatory and supervisory approaches, since this could create competitive disadvantages for Europe vis-à-vis other jurisdictions. In this context, equivalence frameworks should support and promote policymakers' commitment to boost the attractiveness and competitiveness of EU financial markets in a global context so that they can better serve EU companies and investors.

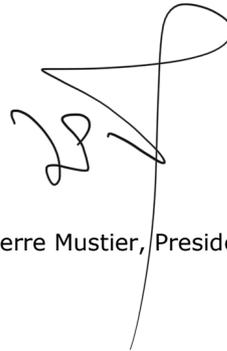
- To continue working with the European Parliament and Council to ensure compliance with the existing **inter-institutional agreement on better law-making** of 13 April 2016. When carrying out impact assessments, the **comprehensive impact analysis** should also be done with global competitiveness in mind.
- To rigorously implement the **“one in – one out” approach** that you have proposed. The compliance burden and risks for the EU (financial services) industry increased considerably during the last Commission mandate, mainly due to EU texts being developed in “silos” and without recognising that at the point of sale multiple EU texts might apply at the same time, thus creating **overload and duplication**. This impacts global competitiveness considerably.
- To acknowledge that a competitive and vibrant European financial services industry is a sine qua non for making the **Capital Markets Union** a reality.

In conclusion, EU financial services companies stand ready today to build on our existing strengths to truly put the EU on the world map. We look forward to continuing this dialogue with you and your team in the months and years to come.

Sincerely,



Andreas Brandstetter, President
Insurance Europe



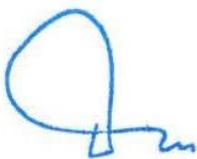
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EBF



Nicolas Calcoen, President
EFAMA



Janwillem Bouma, Chair
Pensions Europe



Grzegorz Buczkowski, President
AMICE

About Insurance Europe

Insurance Europe is the European insurance and reinsurance federation. Through its 37 member bodies — the national insurance associations — Insurance Europe represents all types of insurance and reinsurance undertakings, eg pan-European companies, monoliners, mutuals and SMEs. Insurance Europe, which is based in Brussels, represents undertakings that account for around 95% of total European premium income. Insurance makes a major contribution to Europe's economic growth and development. European insurers generate premium income of more than €1 300bn, directly employ over 900 000 people and invest nearly €10 200bn in the economy.

About the European Banking Federation

The European Banking Federation is the voice of the European banking sector, bringing together national banking associations from 45 countries. The EBF is committed to a thriving European economy that is underpinned by a stable, secure and inclusive financial ecosystem, and to a flourishing society where financing is available to fund the dreams of citizens, businesses and innovators everywhere. Website www.ebf.eu - Twitter: @EBFeu

About EFAMA

EFAMA is the voice of the European investment management industry, representing 28 member associations, 59 corporate members and 22 associate members. At end Q3 2019, total net assets of European investment funds reached EUR 17.2 trillion. These assets were managed by more than 62,500 investment funds, of which almost 34,000 were UCITS (Undertakings for Collective Investments in Transferable Securities) funds, with the remaining funds composed of AIFs (Alternative Investment Funds).

About PensionsEurope

Pensions Europe represents national associations of pension funds and similar institutions for workplace and other funded pensions. Some members operate purely individual pension schemes. PensionsEurope has 23 member associations in 18 EU Member States and 3 other European countries. PensionsEurope member organisations cover different types of workplace pensions for over 110 million people. Through its Member Associations PensionsEurope represents more than € 4 trillion of assets managed for future pension payments. In addition, many members of PensionsEurope also cover personal pensions, which are connected with an employment relation. PensionsEurope also has 30 Corporate and Supporter Members which are various service providers and stakeholders that work with IORPs. PensionsEurope has established a Central & Eastern European Countries Forum (CEEC Forum) to discuss issues common to pension systems in that region. PensionsEurope has established a Multinational Advisory Group (MAG) which delivers advice on pension issues to PensionsEurope. It provides a collective voice and information sharing for the expertise and opinions of multinationals.

About AMICE

The Association of Mutual Insurers and Insurance Cooperatives in Europe aisbl (AMICE) is the voice of the mutual and cooperative insurance sector in Europe. Its primary remit is to advocate for appropriate and fair treatment of all mutual and cooperative insurers in Europe. It also provides a platform for mutual and cooperative insurers of all sizes to combine resources and expertise, exchange experiences across national borders and discuss key issues and concerns relating to planned legislative and regulatory changes and developments. Mutual and cooperative insurance is characterised by customer-membership and democratic governance; such insurers are typically owned by their policyholders. They follow the principles of solidarity and sustainability. More than half of all insurance undertakings in the EU are mutual and cooperative insurers, accounting for a market share of more than 32%. They provide cover for more than 400 million members/policyholders and employ nearly 440,000 people.