



European Securities and
Markets Authority

Response form for the Consultation Paper on the Draft advice to European Commission under Article 8 of the Taxonomy Regulation



Responding to this paper

ESMA invites responses to the questions set out throughout this Consultation Paper and summarised in Annex II. Responses are most helpful if they:

- respond to the question stated and indicate the specific question to which they relate;
- contain a clear rationale; and
- describe any alternatives ESMA should consider.

ESMA will consider all comments received by **4 December 2020**.

All contributions should be submitted online at www.esma.europa.eu under the heading 'Your input - Consultations'.

Instructions

In order to facilitate analysis of responses to the Consultation Paper, respondents are requested to follow the steps below when preparing and submitting their response:

- Insert your responses to the consultation questions in the form "Response form_Consultation Paper on TR Article 8 advice", available on ESMA's website alongside the present Consultation Paper (www.esma.europa.eu → 'Your input – Open consultations' → 'Consultation on advice under Taxonomy Regulation Article 8').
- Please do not remove tags of the type <ESMA_QUESTION_TRART8_1>. Your response to each question has to be framed by the two tags corresponding to the question.
- If you do not wish to respond to a given question, please do not delete it but simply leave the text "TYPE YOUR TEXT HERE" between the tags.
- When you have drafted your response, name your response form according to the following convention: ESMA_TRART8_nameofrespondent_RESPONSEFORM. For example, for a respondent named ABCD, the response form would be entitled ESMA_TRART8_ABCD_RESPONSEFORM.
- Upload the form containing your responses, in Word format, to ESMA's website (www.esma.europa.eu under the heading 'Your input – Open consultations' → 'Consultation on advice under Taxonomy Regulation Article 8').



Publication of responses

All contributions received will be published following the close of the consultation, unless you request otherwise. If you do not wish for your response to be publicly disclosed, please clearly indicate this by ticking the appropriate box on the website submission page. A standard confidentiality statement in an email message will not be treated as a request for non-disclosure. A confidential response may be requested from us in accordance with ESMA's rules on access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response is reviewable by ESMA's Board of Appeal and the European Ombudsman.

Data protection

Information on data protection can be found at www.esma.europa.eu under the heading '[Data protection](#)'.

Who should read this paper?

This Consultation Paper may be of particular interest to non-financial undertakings and asset managers covered by Article 8 of Regulation (EU) 2020/852 (the 'Taxonomy Regulation') as well as to investors and other users of non-financial information



General information about respondent

Name of the company / organisation	Confederation of Swedish Enterprise
Activity	Issuer Association
Are you representing an association?	<input checked="" type="checkbox"/>
Country/Region	Sweden

Introduction

Please make your introductory comments below, if any:

<ESMA_COMMENT_TRART8_1>

As ESMA is well aware of, the consultation period is far too short to be able to provide detailed comments to the questions posed in the draft advice. Within the financial reporting area it is well known that robust accounting standards of high quality requires a due process that include field tests and an extensive stakeholder dialogue. A consultation period of one month is simply not adequate for an entirely new reporting framework that concerns an area of reporting not covered before. Considering the importance of sustainability reporting and the potential consequences in terms of actual investment decisions based on the disclosure, the inadequate and rapid procedure is striking. According to the consultation paper, ESMA has reached out to a number of stakeholders during the preparation of the draft advice. However, ESMA is not transparent regarding which stakeholders that have been addressed in this way. The absence of this information makes it difficult for respondents to assess the procedure and context of the proposals.

The disclosure requirements in article 8 of the Taxonomy Regulation were introduced late in the legislative process and were not submitted to adequate scrutiny. From a corporate reporting perspective, it is not evident what the KPIs are intended to measure and how the information is intended to be used by the market. For a full understanding of the degree of compliance with the Taxonomy, it also seems like the three required KPIs need to be supplemented with a measure of the proportion of compliant capital from a balance sheet perspective. For capital intensive economic activities where turnover is relatively small in relation to the invested capital, the lack of an adequate measure is particularly problematic. As it is now, there is an obvious risk that the KPIs create a distorted understanding of the activities of the reporting entity and thereby provide incentives for decisions that are detrimental to the underlying purpose of the Taxonomy Regulation. We are aware that this issue is outside of the scope of the present consultation but we believe that this is an issue that needs to be addressed within the immediate future.

The limited consultation period makes it difficult to provide adequate feedback on the particular questions posed in the consultation paper. For instance, several questions concern the costs for reporting entities to provide the requested information. It is not possible to attain reasonable and reliable estimates of reporting costs within such a short period of time. Our comments to the consultation paper should thus be viewed in light of the short time allowed to comprehend and analyse the proposals. Our main concerns are summarised below. Where relevant, these comments are also presented as answers to the particular questions posed in the consultation.

There is an imbalance in the approaches to define the numerator and denominator of the KPIs. ESMA's advice focuses around the issue of finding the correct accounting definition of turnover, CapEx and OpEx. A lot of weight is put on differences in measurement that arises when reporting entities apply different accounting standards and principles (IFRS or national GAAP). However, the more complicated question of how the measures should be allocated to different economic activities is not addressed. The granularity with which the denominators are defined in the draft advice creates an impression of accuracy of measurement that the flexibility within which the measures in the numerators can be calculated is unable to match. As there are several sources of potential distortions to the comparability of the required measures that are more severe than the effect of divergent accounting policies, we believe that a principles based approach to defining the measures would have been more adequate. A definition that more directly refers to the figures reported in the audited financial statements

of the reporting entity would also have been easier for users to understand. Regarding the measurement of CapEx, we believe that the figures in the statement of cash flows provide a much better starting point of measurement than the figures in the statement of financial position. The latter figures include for instance exchange rate differences and the effects of any business acquisitions.

- Regarding when CapEx and OpEx can be counted, it appears from the wording in article 8, that all capital expenditure and operating expenditure related to assets or processes associated with economic activities that qualify as environmentally sustainable shall be included. However, ESMA's proposed definitions of CapEx and OpEx only include such incurred costs that are part of a plan to transform an activity from non-compliant to compliant. As such, they will become temporary measures. It is not obvious how they should be interpreted and followed over time. Comparisons between different reporting entities will be difficult as timing of investments and expenditure will have a significant influence on the figures. The measures will also be inadequate for the assessment of the reporting entity's degree of overall Taxonomy compliance. For example, it appears as an entity that makes an investment that further aligns an economic activity to the environmental objectives in the Taxonomy Regulation will not be able to include the capital expenditure when calculating the KPI. Neither can expenditure related to replacements of already compliant PPE be included. We are not convinced that there is ground for the proposal to only include expenditure that is part of a transformation plan in the Taxonomy Regulation. The message in the TEG report on this issue is mixed, but it appears that TEG favours a combined measure of CapEx and OpEx. If the aim is to create a KPI that adequately measures the proportion of expenditure spent on transforming activities to become taxonomy compliant, a combined measure would be more appropriate.
- Additional clarification is needed concerning the definition of the KPI measuring OpEx. ESMA refers to operational expenses in general that are part of main business activities and suggests that costs that are "part of a plan" qualify. It is not evident what type of operational costs ESMA considers could be part of a plan. It appears as TEG realised the complexity in defining OpEx when they concluded that this KPI should be measured "when relevant". As examples of costs that could qualify for the calculation of OpEx TEG mentioned maintenance costs and R&D. If OpEx in general should be used – as ESMA seem to propose – we see a difficulty in finding a reasonable allocation method other than turnover.
- We are also concerned with the proposed requirement to make a plan available for the public in order to qualify incurred costs for the calculation of CapEx and OpEx. A plan to transform an activity or make an investment that aims to contribute to the environmental objectives may very well be subject to confidentiality.
- We question the extensive additional disclosures proposed by ESMA that will significantly enhance the already burdensome reporting obligations under article 8 of the Taxonomy Regulation. ESMA has not presented any grounds for assuming that the benefits of providing the disclosures will outweigh the costs of preparing them. The purpose of these KPIs is primarily to be used by asset managers as a tool to evaluate the extent of taxonomy compliance within a portfolio of investments on an aggregated level. As such, it is unlikely that investors need the granular accompanying information about allocations, policies, alignment with APMs etc. If the allocations etc. need additional explanation to be interpreted correctly, we are convinced that reporting entities will provide the information based on the general reporting principles articulated in the NFRD. According to the TEG report, the disclosures in the NFRD should be used to provide users with the contextual information needed to understand the entity's Taxonomy-related turnover and expenditures. The TEG did not propose any disclosures in addition to that.
- Lastly, ESMA needs to explain how the disclosure requirements in the Taxonomy Regulation should be regarded in light of the materiality principle in the Accounting Directive. For many reporting entities, the economic activities covered by the Taxonomy Regulation will be of little or no relevance. The disclosure requirements however include all entities under the NFRD. To avoid the unnecessary administrative burden and costs of providing immaterial information, the delegated



act should make it clear that a general materiality principle applies to the disclosure requirements under the Taxonomy Regulation.

<ESMA_COMMENT_TRART8_1>



Q1 For this KPI, do you agree with the proposed approach to defining turnover (bullet a in the draft advice)?

<ESMA_QUESTION_TRART8_1>

We believe that a principles based approach to defining the turnover would have been more adequate. A definition that more directly refer to the amount reported in the audited financial statements of the reporting entity would be more easy for users to understand. We believe the effects of differences in accounting policy will be marginal in comparison with the effects of applying different principles of allocating turnover to the economic activities of the reporting entity.

<ESMA_QUESTION_TRART8_1>

Q2 For this KPI, do you agree with the proposed approach to when turnover can be counted (bullet b in the draft advice)?

<ESMA_QUESTION_TRART8_2>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_TRART8_2>

Q3 For this KPI, do you agree with the proposed approach to defining CapEx (bullet a in the draft advice)?

<ESMA_QUESTION_TRART8_3>

We believe that the capital expenditure as presented in the statement of cash flows would provide a much better starting point of measurement than the figures in the statement of financial position. The latter figures include for instance exchange rate differences and the effects of any business acquisitions. Generally, our comments to question 1 applies also here.

<ESMA_QUESTION_TRART8_3>

Q4 For this KPI, do you agree with the proposed approach to when CapEx can be counted, including the definition of 'plan' (bullet b in the draft advice)?

<ESMA_QUESTION_TRART8_4>

According to the wording in article 8, CapEx shall include all capital expenditure related to assets or processes associated with economic activities that qualify as environmentally sustainable. However, the proposed definition of CapEx only include such incurred costs that are part of a plan to transform an activity from non-compliant to compliant. We fear that this will make the KPI difficult to interpret and follow over time. Comparisons between different reporting entities may be misleading as timing of investments and expenditure will have a significant influence on the figure. This measure will also be unable to capture the reporting entity's degree of overall Taxonomy compliance. For example, capital expenditure related to replacements of already compliant PPE will not be included.

Regarding the conditions under which incurred costs qualify for calculation of we are concerned with the requirement to make the plan available to the public. A plan to transform an activity or make an investment that aim to contribute to the environmental objectives may very well be subject to confidentiality. It appears like ESMA has been influenced by the requirements of IAS 37 when developing this part of the draft advice. However, as the purpose and context of the Taxonomy disclosures is different from that of recognising provisions, we do not see that there are legitimate grounds for the requirement to make the plan available to the public.

<ESMA_QUESTION_TRART8_4>

Q5 For this KPI, do you agree with the proposed approach to defining OpEx (bullet a in the draft advice)?



<ESMA_QUESTION_TRART8_5>
See our comments to question 1.
<ESMA_QUESTION_TRART8_5>

Q6 For this KPI, do you agree with the proposed approach to when OpEx can be counted, including the definition of ‘plan’ (bullet b in the draft advice)? With reference to the TEG’s inclusion of the words “if relevant” in relation to OpEx, in which situations should it be possible to count OpEx as Taxonomy-aligned?

<ESMA_QUESTION_TRART8_6>
The proposed definition of OpEx only include such incurred costs that are part of a plan to transform an activity from non-compliant to compliant. As previously mentioned, we believe the wording in article 8, gives room for a wider interpretation ow OpEx (i.e. that all operating expenditure related to assets or processes associated with economic activities that qualify as environmentally sustainable shall be measured). However, considering the difficulty in ring-fencing the proportion of OpEx (or character of expenditure) that should be included in this measure, we believe that perhaps a more narrow scope of this KPI should be considered despite the wording in the Taxonomy Regulation. This would be in line with the TEG report where only certain R&D and maintenance costs was proposed to qualify for the calculation of OpEx.

Our comments regarding the conditions under which incurred costs qualify for calculation our previous comment also applies here. We are concerned with the requirement to make the plan available to the public. A plan to transform an activity or make an investment that aim to contribute to the environmental objectives may very well be subject to confidentiality. It appears like ESMA has been influenced by the requirements of IAS 37 when developing this part of the draft advice. However, as the purpose and context of the Taxonomy disclosures is different from that of recognising provisions, we do not see that there are legitimate grounds for the requirement to make the plan available to the public.
<ESMA_QUESTION_TRART8_6>

Q7 Do you believe that any of the suggested approaches covered in questions 1 to 6 above will impose additional costs on non-financial undertakings? If yes, please specify the type of those costs, including whether they are one-off or ongoing, and provide your best quantitative estimate of their size.

<ESMA_QUESTION_TRART8_7>
The disclosure requirements of the Taxonomy Regulation will be both costly and burdensome for many entities. Therefore, ESMA need to explain how the disclosures should be regarded in light of the materiality principle in the Accounting Directive. For many entities, the economic activities covered by the Taxonomy Regulation will be of little or no relevance. The disclosure requirements however include all entities under the NFRD. To avoid the unnecessary administrative burden and costs of providing immaterial information, the delegated act should make it clear that a general materiality principle applies.
<ESMA_QUESTION_TRART8_7>

Q8 Do you agree that sectoral specificities should not be addressed in the advice, as proposed in Section 3.2.3?

<ESMA_QUESTION_TRART8_8>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_8>

Q9 Do you agree with the requirements for accompanying information which ESMA has proposed for the three KPIs?



<ESMA_QUESTION_TRART8_9>

We do not agree with the extensive additional disclosures proposed by ESMA. The disclosures will significantly enhance the already burdensome reporting obligations under article 8 of the Taxonomy Regulation. ESMA has not presented any grounds for assuming that the benefits of providing the disclosures will outweigh the costs of preparing them. The purpose of these KPIs is primarily to be used by asset managers as a tool to evaluate the extent of taxonomy compliance within a portfolio of investments on an aggregated level. As such, it is unlikely that investors need the granular accompanying information about allocations, policies, alignment with APMs etc. If the allocations etc. need additional explanation to be interpreted correctly, we are convinced that reporting entity's will provide the information based on the general reporting principles articulated in the NFRD. According to the TEG report, the disclosures in the NFRD should be used to provide users with the contextual information needed to understand the entity's Taxonomy-related turnover and expenditures. The TEG did not propose any disclosures in addition to that.

<ESMA_QUESTION_TRART8_9>

Q10 Do you consider that the requirement to refer to the relevant line item(s) in the financial statements for each KPI ensures sufficient integration between the KPIs and the financial statements?

<ESMA_QUESTION_TRART8_10>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_TRART8_10>

Q11 Do you agree with ESMA's suggestion to permit compliance by reference, so that non-financial undertakings may present the accompanying information elsewhere in the non-financial statement than in the immediate vicinity of the KPIs, as long as they provide a hyperlink to the location of the accompanying information?

<ESMA_QUESTION_TRART8_11>

We agree.

<ESMA_QUESTION_TRART8_11>

Q12 Do you consider there are additional topics that should be considered by ESMA in order to specify the content of the three KPIs? If yes, please elaborate and explain the relevance of these topics.

<ESMA_QUESTION_TRART8_12>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_TRART8_12>

Q13 Do you believe that providing the suggested accompanying information will impose additional costs on non-financial undertakings? If yes, please specify the type of those costs, including whether they are one-off or on-going, and provide your best quantitative estimate of their size.

<ESMA_QUESTION_TRART8_13>

Yes. Given the limited consultation period it is not possible to make a quantitative estimation but the costs should not be under-estimated.

<ESMA_QUESTION_TRART8_13>

Q14 Do you agree that non-financial undertakings should provide the three KPIs per economic activity and also provide a total of the three KPIs at the level of the undertaking / group?



If not, please provide your reasons and address the impact of your proposal to financial market participants along the investment chain.

<ESMA_QUESTION_TRART8_14>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_14>

Q15 Do you agree that where an economic activity contributes to more than one environmental objective, non-financial undertakings should explain how they allocated the turnover / CapEx / OpEx of that activity across environmental objectives and where relevant the reasons for choosing one objective over another?

<ESMA_QUESTION_TRART8_15>
No we do not agree. As stated above, we believe that ESMA overestimates the demands for this information. The disclosure requirements are extensive as it is. If a reporting entity makes the assessment the reported figures need additional explanation we are convinced that the entity will disclose the information needed.
<ESMA_QUESTION_TRART8_15>

Q16 Do you agree that non-financial undertakings should provide information on enabling and transitional activities?

<ESMA_QUESTION_TRART8_16>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_16>

Q17 Do you agree that the three KPIs should be provided per environmental objective as well as a total at undertaking or group level across all objectives? If not, please provide your reasons and address the impact of your proposal to financial market participants along the investment chain.

<ESMA_QUESTION_TRART8_17>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_17>

Q18 Do you agree that non-financial undertakings should be required to provide the three KPIs for economic activities which are covered by the Taxonomy, economic activities which are covered by the Taxonomy but for which the relevant criteria are not met and therefore are not Taxonomy-aligned as well as for economic activities which are not covered by the Taxonomy?

<ESMA_QUESTION_TRART8_18>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_18>

Q19 Do you agree with the proposal not to require retroactive disclosure concerning the four environmental objectives relating to the financial year 2021?

<ESMA_QUESTION_TRART8_19>
Yes we agree.
<ESMA_QUESTION_TRART8_19>

Q20 Do you consider that there are specific elements in ESMA’s draft advice which are not in line with the information needed by financial market participants in order to comply with their own obligations under the Taxonomy Regulation and the SFDR? If yes, please specify in your answer.

<ESMA_QUESTION_TRART8_20>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_20>

Q21 Are there points that should be addressed in ESMA’s advice in order to facilitate compliance of financial market participants across the investment chain? If yes, please specify.

<ESMA_QUESTION_TRART8_21>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_21>

Q22 Do you believe that ESMA’s detailed proposals under Section 3.3 will impose additional costs on non-financial undertakings? If yes, please specify the type of those costs, to which specific proposal they relate including whether they are one-off or on-going, and provide your best quantitative estimate of their size.

<ESMA_QUESTION_TRART8_22>
Yes. Given the limited consultation period it is not possible to make a quantitative estimation but the costs should not be under-estimated.
<ESMA_QUESTION_TRART8_22>

Q23 Do you consider there are additional topics that should be considered by ESMA in order to specify the methodology that non-financial undertakings should follow? If yes, please elaborate and explain the relevance of these topics.

<ESMA_QUESTION_TRART8_23>
As already pointed out, ESMA need to explain how the disclosure requirements in the Taxonomy Regulation should be regarded in light of the materiality principle in the Accounting Directive.
<ESMA_QUESTION_TRART8_23>

Q24 Do you agree that in order to ensure the comparability of the information disclosed under Article 8(2) of the Taxonomy Regulation and as such facilitate its usage, ESMA should propose the use of a standardised table?

<ESMA_QUESTION_TRART8_24>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_24>

Q25 Do you consider that the standard table provided in Annex III of this Consultation Paper is fit for purpose? Do you think the standard table provides the right information, taking into account the burden on non-financial undertakings of compiling the data versus the benefit to



users of receiving the data? If not, please explain and provide alternative suggestions to promote the standardisation of the disclosure obligations pursuant to Article 8 of the Taxonomy Regulation.

<ESMA_QUESTION_TRART8_25>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_25>

Q26 Do you agree that the disclosure in the three standard tables should comply with the formatting rules mentioned in Table 5?

<ESMA_QUESTION_TRART8_26>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_26>

Q27 Do you believe that ESMA’s detailed proposals under Section 3.4 will impose additional costs on non-financial undertakings? If yes, please specify the type of those costs, to which specific proposal they relate including whether they are one-off or on-going, and provide your best quantitative estimate of their size.

<ESMA_QUESTION_TRART8_27>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_27>

Q28 Do you agree that a share of investments is an appropriate KPI for asset managers? If you do not, what other KPI could be appropriate, please justify.

<ESMA_QUESTION_TRART8_28>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_28>

Q29 This advice focuses on the collective portfolio management activities of asset managers. Should this advice also cover potentially any other activities that asset managers may have a license for, such as individual portfolio management, investment advice, safekeeping and administration or reception and transmission of orders (‘RTO’)?

<ESMA_QUESTION_TRART8_29>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_29>

Q30 Do you agree that for the numerator of the KPI the asset manager should consider a weighted average of the investments exposed to investee companies based on the share of turnover derived from Taxonomy-aligned activities of the investee companies? If not please propose and justify an alternative.

<ESMA_QUESTION_TRART8_30>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_30>



Q31 Do you agree that in addition to a main turnover-derived Taxonomy-alignment KPI, there is merit in requiring the disclosure of CapEx and OpEx-derived figures for Taxonomy-alignment of an asset managers' investments?

<ESMA_QUESTION_TRART8_31>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_31>

Q32 Do you think sovereign exposures, such as sovereign bonds (but excluding green bonds complying with the EU Green Bond Standard) should be considered eligible investments and if so under what methodology?

<ESMA_QUESTION_TRART8_32>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_32>

Q33 Do you agree that the denominator should consist of the value of eligible investments in the funds managed by the asset manager or should it be simply the value of all assets in the funds managed by the asset manager?

<ESMA_QUESTION_TRART8_33>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_33>

Q34 Do you support restricting the denominator to funds managed by the asset manager with sustainability characteristics or objectives (i.e. governed by Article 8 or 9 of Regulation (EU) 2019/2088)? What are the benefits and drawbacks of such an approach?

<ESMA_QUESTION_TRART8_34>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_34>

Q35 Is it appropriate to combine equity and fixed income investments in the KPI, bearing in mind that these funding tools are used for different purposes by investee companies? If not, what alternative would you propose?

<ESMA_QUESTION_TRART8_35>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_35>

Q36 Do you believe the proposed advice will impose additional costs on asset managers? Please specify the type of those costs, to which specific proposal they relate including whether they are one-off or on-going, and provide your best quantitative estimate of their size.

<ESMA_QUESTION_TRART8_36>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_36>



Q37 What are the benefits and drawbacks of limiting Taxonomy-aligned activities to those reported by Non-Financial Reporting Directive companies?

<ESMA_QUESTION_TRART8_37>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_37>

Q38 Do you agree with ESMA's recommendation that the Commission develop a methodology to allow a sector-coefficient to be assigned for non-reporting investee companies?

<ESMA_QUESTION_TRART8_38>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_38>

Q39 Should netting be allowed, on the lines of Article 3 of the Short-Selling Regulation?

<ESMA_QUESTION_TRART8_39>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_39>

Q40 How should derivatives be treated for the calculation purposes? Should futures be considered as potential Taxonomy-aligned investments?

<ESMA_QUESTION_TRART8_40>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_40>

Q41 What are the costs and benefits associated with the different options for non-reported activity coverage, netting and derivatives treatment presented above? Please provide a quantitative estimate for each option, distinguishing between one-off and on-going costs.

<ESMA_QUESTION_TRART8_41>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_41>

Q42 Do you have any views on the proposed advice recommending a standardised table for presentation of the KPI for asset managers in Annex IV?

<ESMA_QUESTION_TRART8_42>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_42>

Q43 Do you agree with presenting accompanying information in the vicinity of the standard table?

<ESMA_QUESTION_TRART8_43>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_43>

Q44 Do you agree that there would be merit in including in the accompanying information a link, if relevant, to an asset managers' entity-level disclosures on principal adverse impacts of investment decisions on sustainability factors?

<ESMA_QUESTION_TRART8_44>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_44>

Q45 Do you agree with adopting the same formatting criteria as presented in Section 3.4.2 for the asset manager KPI disclosure?

<ESMA_QUESTION_TRART8_45>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_45>

Q46 What are the one-off and on-going costs of setting up the reporting and disclosure under this obligation? Please clarify the type of costs incurred and provide a quantitative estimation where possible.

<ESMA_QUESTION_TRART8_46>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_TRART8_46>