

Tuesday, March 18, 2025

## **Union of Savings and Investment: AFG responds to the European Commission's consultation and presents its proposals for a more competitive European union**

**On the eve of the European Commission's publication of its proposal on the Union of Savings and Investment, scheduled for March 19, 2025, AFG has submitted its response to the consultation, outlining its proposals.**

**AFG highlights key principles to strengthen the competitiveness of the European Union and encourage broader citizen participation in financial markets, in service of financing European companies, particularly SMEs and mid-sized enterprises (ETIs).**

Philippe Setbon, President of AFG, stated:

*"The Union of Savings and Investment means both that European households invest more in long-term savings and that European Union businesses—especially SMEs and ETIs—receive adequate financing. One cannot exist without the other. In this regard, our asset management industry plays a key role, with two-thirds of its investments directed toward the EU. We are convinced that this is a major asset for the European Union."*

### **AFG's Proposals**

#### **1. A holistic and coherent approach**

Encouraging households to save for the long term while better financing the European economy are two inseparable objectives.

AFG proposes the creation of an **"INVEST-EU" label** for national long-term savings products that meet specific criteria, such as a minimum investment threshold in EU businesses, particularly listed SMEs. These products could be funded through automatic contributions to foster good savings practices and mitigate market fluctuations.

To enhance the attractiveness of this label, Member States could grant these products tax incentives.

#### **2. SIU's success relies on competitive European asset managers**

European asset managers are essential to financing the European economy. Their competitiveness is critical to the success of the Union of Savings and Investment. They allocate 15 percentage points more to the EU than their non-European counterparts, particularly in funding European SMEs, where local financial expertise is indispensable.



#### **Press contact:**

Delphine de Chaisemartin | 06 75 31 73 91 | [d.dechaisemartin@afg.asso.fr](mailto:d.dechaisemartin@afg.asso.fr)

Caroline Richard | 06 15 45 23 93 | [c.richard@afg.asso.fr](mailto:c.richard@afg.asso.fr)

41 rue de la Bienfaisance | 75008 Paris | T : +33 (0)1 44 94 94 00

Avenue des Arts 44 | 1000 Bruxelles



[www.afg.asso.fr](http://www.afg.asso.fr)

In France, asset managers oversee nearly €5 trillion, with more than 70% invested in the EU—a record level<sup>1</sup>.

### 3. Risks of an exclusively “low-cost” approach

A strategy focused solely on the development of “low-cost” investment products will not achieve the intended objectives.

AFG advocates for an approach **that ensures diversification, quality, and value** for investors while emphasizing the **simplification of the client experience**. This simplification requires the streamlining of existing regulations (MiFID, IDD, PRIIPS). In this regard, the RIS project must be reconsidered to ensure it meets its objectives without introducing unnecessary complexity and additional constraints.

### 4. Removing structural barriers in the ecosystem

Several key areas must be addressed by European institutions:

- **Access to affordable and reliable data** is essential for the competitiveness of European financial markets and the financing of the EU’s ESG transitions.
- Establishing a **competitive and efficient supervisory framework**. Cross-border barriers should be removed through enhanced application of EU law and by recognizing the concept of asset management groups at the EU level.
- **Eliminating existing tax barriers within the EU**, such as withholding taxes, is crucial to facilitating capital movement and financing European priorities. These barriers create complexity, legal uncertainty, and ultimately discourage investment.

[Read the AFG response to the European Commission’s call for evidence on the Savings and Investment Union](#)



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<sup>1</sup> AFG Study: “Asset management fuels the European Economy” - 2025



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### About AFG

For 60 years, the AFG has united asset management professionals, serving the actors of savings and the economy. It is the collective voice of its members, including portfolio management companies, entrepreneurial firms, and subsidiaries of banking or insurance groups, both French and international. In France, asset management involves over 700 management companies, with €4.7 trillion in assets under management.

The AFG is dedicated to the growth of asset management, contributing to the emergence of beneficial solutions for all ecosystem stakeholders, and committed to promoting the industry's influence in France, Europe, and beyond. The AFG is invested in the future.



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