AFG's answer to the EC's call for evidence on Savings and Investment Accounts

8 July 2025

AFG strongly supports initiatives aiming at fostering retail participation in capital markets and financing the European economy in the long term. Savings and Investment Accounts (SIAs), if well designed, can strongly contribute to this objective.

AFG therefore welcomes the opportunity to contribute to the Commission's call for evidence, and welcomes the fact that this is a non-legislative initiative. This point is essential, since a legislative one-size-fits-all approach at European level would not be relevant, and would hinder the development of SIAs.

Such SIAs already exist in some countries, including France with the PEA (Plan d'Epargne en Action) and the individual PER (Plan d'Epargne Retraite), Sweden (ISK), UK (ISA) or Italy (PIR). However, this is probably not the case in all EU countries.

We believe those Member States should be encouraged to introduce SIAs with few characteristics, which would make them compatible with the "Finance Europe" Label:

- **long-term horizon** (for instance minimum of 5 years), with for instance tax incentives for long-term investments, and/or limitations to early withdrawals

- **broad range of eligible assets**, including UCITS, ELTIFs and other AIFs where relevant. This will broaden access to capital markets including through investments funds that are by nature highly diversified, and that benefit from European labels that have already proved their quality. A wide access to these products that offer a high level of investor protection will consistently provide equity and debt financing for the European economy

- **focus on investments in the EU**, with a minimum investment threshold in European assets (NB: 70% in the Finance Europe label)

- **simplicity and flexibility of design:** the less specific features are mandated, the more providers will have opportunities to offer on a voluntary basis, tailored and diverse investment solutions to meet a broad range of investors' needs. For example, in terms of type of management, it should be possible to propose non-advised as well as guided management solutions

- **risk exposure:** a SIA should be largely oriented towards higher return asset classes, including equity (listed and non-listed) and private debt. A public or private guarantee should not be mandatory, nor even encouraged, as a SIA should help build a long-term investment culture and reduce risk adversity

We encourage Member States to consider preferential tax treatments, to incentivize savers to invest in these SIAs in the long run. Such tax treatment should be easy to grasp (understand and access), easy to manage from an administrative point of view, well-calibrated to be sufficiently attractive and incentivize a long-term investment culture, and stable over time.

These SIAs should be easily accessible with a simple investor journey, through digital means but also through traditional channels. Some investors indeed prefer to have an advisor, who can provide explanations and advice based on a holistic view of their holdings. Accessibility of SIAs through a wide variety of channels will attract a greater number of investors.

Portability amongst providers within the same jurisdiction and for the same type of SIA can be useful, but is relevant only if the transfer is tax neutral. For instance, the French PEA can already be transferred from one provider to another. Subject to tax feasibility, retail investors should also be authorized to hold several SIAs.

It will be important, in each Member State, to support the introduction of SIAs, and/or the development of existing SIAs, with information campaigns and initiatives in terms of financial education. AFG has been deeply involved in this topic for years, for example, by publishing an educational guide (labelled EDUCFI) to help savers improve their financial education. You may find it attached to our response.