

EU asset management reg framework

	Mutual funds (UCITS)	AIFs (structured products, SPVs)	(Private) Banking	Life insurance	Pension funds
Distribution	MIFID/UCITS	AIFMD/ELTIF	MIFID	IDD (PEPPs)	(PEPPs)
Disclosure	PRIIPS	AIFMD	MIFID	PRIIPS	IORP II
Asset allocation	UCITS IV MMF		(CRDIV)	Solvency II	IORP II
Prudential	UCITS V	AIFMD	(CRDIV)	Solvency II	IORP II



EU capital market supervision today

- National: Mostly functional supervisors or FSAs in EU, few 'twin peaks', but no consistent division
- EU: even more complex structure with banking union, actors:
 - ESAs (all three!), ESRB
 - SSM and ECB
 - SRM and SRB
 - EU Commission
- EU proposed more tasks for ESMA, but insuffucient
- Too much of a 'spaghetti' for efficient supervision, no pooling of expertise
- Too much regulatory competition
 - Reduces trust: no EU-wide issuance (i.e. revised prospectus regulation)
 - i.e. diversity in approval procedures for fund prospectuses



Asset allocation by households, EU vs US



Source: Eurostat (Q3 2017) and US Fed (Q4 2017)

Asset allocation by non-bank financial institutions in EU

1) Investment funds



Sources: 1) ESMA, EFAMA - Q4 2017 (UCITS & AIFs); 2) EIOPA, Insurance Europe - Q2 2017 (look through, unit-linked excluded); 3) EIOPA, PensionsEurope - Q4 2016. By Karel Lannoo, Chief Executive, CEPS



Fund charges up to 1/3 of returns







Huge fee diversity in EU

Table 6: Overview of the spread between the highest and the lowest recurring fee values disclosed by distributors, per product type and across Member States, in percentage points

	Bonds	Equities	ETFs	Bond Funds	Equity Funds	Global or Mixed funds	Money Market Funds	Real estate funds	Life Insurance guaranteed	Life Insurance non- guaranteed	Pension Products guaranteed	Pension Products non- guaranteed	Pension Products mutual funds
Belgium	0,05%	0,14%		0,64%	0,78%	0,37%	0,87%	0,61%	1,41%	1,75%	1,13%	0,72%	0,23%
Czech Republic	0,45%	0,66%		1,15%	0,47%	0,68%	0,75%	1,44%	0,33%	1,48%		0,60%	
Denmark	0,21%	0,22%		0,23%	0,94%	0,76%	0,43%				0,38%	1,03%	1,13%
Estonia	0,84%	0,82%	0,59%	1,60%	2,87%	2,39%	1,80%	1,75%				0,50%	1,15%
France	0,14%	0,14%	0,30%	0,85%	0,91%	0,93%	0,50%	1,65%	0,38%	0,30%	0,85%	0,16%	
Germany	1,36%	1,36%	1,66%	1,53%	1,59%	1,52%	1,50%	0,30%					
Italy	0,45%	0,78%	0,45%	1,07%	0,89%	0,84%	1,05%		3,68%	3,43%	2,68%	1,79%	1,48%
Luxembourg	0,10%	0,10%	0,22%	0,58%	0,66%	0,86%	0,61%	0,23%	0,00%	0,50%	0,00%	0,00%	0,64%
Netherlands			0,13%	0,61%	1,17%	0,82%	0,25%	0,10%		0,07%			0,41%
Poland	0,71%	1,31%		1,05%	1,89%	1,88%	0,09%			3,38%		2,57%	3,47%
Portugal	0,17%	0,17%	0,27%	1,09%	1,66%	1,16%	0,68%	0,46%	0,70%	1,99%	0,81%	0,25%	1,87%
Romania				0,88%	1,56%	1,20%	0,76%		0,77%	3,62%		2,14%	
Spain	0,87%	0,87%	0,80%	0,79%	1,29%	2,45%	0,41%				0,81%	0,39%	
Sweden	0,79%	0,64%	0,16%	0,48%	0,39%	0,87%	0,30%	0,48%		1,10%	1,74%	2,11%	0,68%
United Kingdom			0,60%	0,48%	0,30%	0,34%	0,39%					1,87%	

Source: Intermediaries' websites (2017), Deloitte analysis (2017