

To:

European Commission

Directorate-General for Financial Sta-
bility, Financial Services and Capital
Markets Union

1049 Bruxelles / Brussel

Belgium

Milan, 16 March 2026

RE: AIPB Feedback on the European Commission’s Proposal on the Market Integration and Supervision Package (MISP)

Dear Sirs,

The Italian Private Banking Association (Associazione Italiana Private Banking – “AIPB”) welcomes the opportunity to provide its comments on the European Commission’s proposal for the Market Integration and Supervision Package (MISP), which represents a comprehensive legislative initiative aimed at strengthening the integration of European capital markets and enhancing supervisory convergence across the Union.

Below we outline our main observations on the proposed measures, together with some introductory remarks on AIPB’s role within the financial ecosystem and its involvement in the broader debate surrounding the implementation of the Savings and Investments Union (SIU).

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1. INTRODUCTION

Established in 2004, AIPB brings together leading national and international private banking operators, universities, research centres, service providers, industry associations, and legal and professional firms.

This interdisciplinary network combines its distinctive expertise to foster, develop and broaden the culture of private banking, addressing the needs of families and individuals with significant wealth and

complex investment requirements. AIPB's mission is to promote the recognition of the unique nature and role of private banking within both the financial sector and society at large.

Within this framework, AIPB actively contributes to the debate on the development of European capital markets and the mobilisation of private savings toward long-term investment opportunities. Private banking institutions play a key role in channelling household savings into productive investments and therefore represent an important component of the broader objectives pursued by the SIU.

2. THE MARKET INTEGRATION AND SUPERVISION PACKAGE

AIPB supports the Commission's initiative aimed at promoting deeper integration of EU financial markets and strengthening supervisory convergence across Member States.

A well-functioning single market for financial services is essential to improve access to capital markets, increase investment opportunities for European savers and facilitate the allocation of capital toward European companies and long-term projects.

At the same time, it is important that the measures proposed under the MISP remain targeted and proportionate. Regulatory initiatives should effectively address existing sources of fragmentation while avoiding the introduction of additional complexity or excessive compliance costs for market participants.

Achieving greater harmonisation in the practical application of EU rules across Member States will be essential to ensure that the objectives of market integration and cross-border activity are fully realised.

3. KEY PROPOSED AMENDMENTS AND CLARIFICATIONS

In light of the general considerations outlined above, AIPB would like to highlight the following observations regarding the proposed legislative measures.

a) Simplifying passport notification procedures and harmonising authorisation processes

AIPB strongly supports the Commission's proposal to simplify passport notification procedures and harmonise fund authorisation processes, as these measures can significantly improve the functioning of the single market for financial services.

Reducing regulatory fragmentation and limiting additional national requirements would facilitate cross-border marketing activities for financial operators, increase legal certainty and reduce administrative costs.

Although the current regulatory framework has already produced positive results, **further harmonisation of authorisation requirements, documentation standards and procedural timelines** would contribute to reducing the uncertainty and delays that currently affect cross-border authorisation procedures.

In this context, it will be essential for **ESMA**, which is tasked with developing draft technical regulatory standards, to clearly specify the information requirements, procedural steps and timelines in order to **avoid divergent interpretations by national competent authorities**.

Experience has shown that **fragmentation often arises from differences in supervisory practices rather than from the legislative framework itself**.

b) Harmonising marketing documentation across Member States

AIPB **welcomes the harmonisation of marketing documentation requirements across Member States**, as the current diversity of national rules may hinder the effective functioning of the EU passport regime for investment funds.

Divergent national requirements relating to marketing communications and disclosure documentation may create barriers to cross-border distribution and increase operational complexity for asset managers.

A harmonised framework for marketing documentation would improve transparency, reduce administrative burdens and facilitate the cross-border distribution of investment products within the Union.

When adopting delegated acts, it will therefore be important for the Commission to ensure that **the format and content of marketing communications remain simple, accessible and easily understandable for investors**.

c) Introducing a proportionate regime for intra-group delegation arrangements

AIPB **supports the proposed revision of the current regulatory approach that treats intra-group arrangements in the same way as outsourcing agreements with third parties**.

The current framework may limit the ability of cross-border financial groups to **efficiently allocate resources and expertise within the group**, thereby reducing operational synergies and economies of scale.

Introducing a **more proportionate regulatory treatment for intra-group delegation arrangements** would support operational efficiency and facilitate the integration of financial groups operating across multiple Member States.

At the same time, it will be important to ensure **consistency with other EU regulatory frameworks**, including the **DORA Regulation** and relevant **EBA guidelines**, so that the intended simplification is not undermined by overlapping requirements.

d) Assessing carefully the introduction of an EU passport for depositaries

The introduction of an EU passport for depositaries could potentially enhance operational flexibility and facilitate economies of scale within financial groups.

However, **AIPB believes that further analysis is necessary to assess the actual benefits that such a regime would deliver to end investors**, particularly in terms of costs and quality of service.

At present, **custody costs appear to represent a relatively limited component of overall fund costs**, suggesting that the economic benefits of such a reform may be modest.

Moreover, **cross-border depositary arrangements could raise challenges in terms of supervision and local service provision**, which should be carefully assessed before introducing a new regulatory regime.

e) Eliminating duplication between PRIIPs KID and UCITS KIID

AIPB **strongly supports the removal of the obligation to prepare the UCITS Key Investor Information Document (KIID) where a PRIIPs Key Information Document (KID) is already available.**

UCITS management companies distributing products to retail investors are already required to produce a PRIIPs KID under Regulation (EU) No 1286/2014.

Maintaining the additional obligation to produce a KIID therefore results in **an unnecessary duplication of disclosure requirements.**

Removing this duplication would represent **a meaningful simplification of the regulatory framework**, while maintaining an appropriate level of investor protection.

f) Clarifying ESMA's supervisory role

AIPB expresses some reservations regarding the proposal to introduce a direct annual supervisory review by ESMA for large EU groups.

Such a measure risks **creating a duplication of supervisory responsibilities**, overlapping with the competences of national competent authorities.

A more effective approach could consist in strengthening ESMA's role **through the establishment of cross-border supervisory colleges**, enabling the Authority to coordinate oversight activities and promote supervisory convergence across Member States.

Within this framework, ESMA could provide strategic guidance and facilitate cooperation among national authorities **without introducing additional layers of supervision.**

Finally, AIPB emphasises that **any strengthening of ESMA's supervisory role should not lead to the introduction of additional fees or financial levies on asset managers**, in order to avoid further weighing on the competitiveness of the European financial sector.

ervations regarding the proposed legislative measures.

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AIPB remains fully available to engage in further dialogue and contribute its expertise to support the development of a balanced and effective framework for the integration of European capital markets.

Yours faithfully,

Associazione Italiana Private Banking (AIPB)