

**Response Form**  
for the  
***Exposure Draft of the***  
***CFA Institute ESG Disclosure Standards for Investment Products***

CFA Institute is developing voluntary, global industry standards, the CFA Institute ESG Disclosure Standards for Investment Products (the “Standards”), to establish disclosure requirements for investment products with ESG-related features. The purpose of the Standards is to provide greater transparency and consistency in ESG-related disclosures, resulting in clearer communication regarding the ESG-related features of investment products. The goal for this Exposure Draft is to elicit feedback on the proposed principles, requirements, and recommendations within the Standards. Please refer to the “Providing Feedback” guidelines for submitting comments. **All comments must be received by 14 July 2021 in order to be considered.**

### **Providing Feedback**

Public commentary on the Exposure Draft will help shape the final version of the Standards, which is expected to be issued in November 2021. Comments should be provided in this Response Form, found [here](#) on the CFA Institute website, and submitted to [standards@cfainstitute.org](mailto:standards@cfainstitute.org). Designated spaces for comments appear in the Response Form in the order in which the related topic sections appear in the Exposure Draft. Questions directed toward the Standards’ intended users are posed in the Exposure Draft’s Introduction, and these questions appear first in the Response Form, followed by designated spaces for comments related to the Guiding Principles, Provisions, and Glossary. General or summary comments on the Exposure Draft may be provided in the designated section at the end of the Response Form.

Each topic section in the Response Form contains a space for providing general comments pertaining to that section as well as spaces to provide comments for each provision in the section. When providing feedback on a specific provision, it may be helpful to consider whether the meaning of the provision is clearly stated and whether the provision will add value for users of the Standards. You may provide as few or as many comments as you wish.

The deadline for providing feedback is 14 July 2021. **Comments received after 14 July 2021 will not be considered.** Unless otherwise requested, all comments will be posted on the CFA Institute website.

### Guidelines for submission

Comments are most useful when they:

- directly address a specific issue or question,
- provide a rationale and support for the opinions expressed, and
- suggest alternative solutions in the event of disagreement.

Positive comments in support of a proposal are equally as helpful as those that provide constructive suggestions for improvement.

### Requirements for submission

In order for comments to be considered, please adhere to the following requirements:

- **Insert responses in the designated areas of the response form.**
- **Assign a unique file name to your response form before submitting.**
- **Provide all comments in English.**
- **Submit the response form as a Microsoft Word document.**
- **Submit the response form to [standards@cfainstitute.org](mailto:standards@cfainstitute.org) by 5:00 PM E.T. on 14 July 2021.**

## General Information (required)

<b>Respondent:</b> <i>(Please enter your full name if you are submitting as an individual or the name of the organization if you are submitting on behalf of an organization.)</i>	INREV - the European Association for Investors in Non-Listed Real Estate Vehicles.
<b>Stakeholder Group:</b> <i>(Please select the stakeholder group with which you most closely identify.)</i>	Investor / Asset Owner
<b>Region:</b> <i>(If you are submitting as an individual, please select the region in which you live. If you are submitting on behalf of an organization and the organization has a significant presence in multiple regions, please select "Global". Otherwise, please select the region in which the organization has its main office.)</i>	Europe
<b>Country:</b> <i>(If you are submitting as an individual, please enter the country in which you live. If you are submitting on behalf of an organization, please enter the country in which the organization has its main office.)</i>	The Netherlands
<b>Confidentiality Preference:</b> <i>(Please select your preference for whether or not your response is published on the CFA Institute website.)</i>	yes, my response may be published

## QUESTIONS FOR INTENDED USERS

### Questions for Investment Managers

1. Are the draft provisions helpful in establishing or clarifying the type of information that should be included in an investment product's disclosures regarding the ESG-related aspects of the investment product's strategy?

<QUESTION\_01\_01>  
ENTER RESPONSE HERE  
<QUESTION\_01\_01>

2. To what extent are the draft provisions supportive of and complementary with local laws and regulations and other codes and standards? Would preparing and presenting a compliant presentation in any way hinder your ability to comply with local laws and regulation or with other codes and standards?

<QUESTION\_01\_02>  
ENTER RESPONSE HERE  
<QUESTION\_01\_02>

3. Do you expect it will be feasible and practical for your organization to provide the information required by the draft disclosure provisions and adhere to the draft fundamental provisions?

<QUESTION\_01\_03>  
ENTER RESPONSE HERE  
<QUESTION\_01\_03>

4. To what extent would a compliant presentation proactively provide to asset owners, consultants, and advisors the ESG-related information they commonly request in their Requests for Proposals (RFPs), Due Diligence Questionnaires (DDQs), and other types of questionnaires?

<QUESTION\_01\_04>  
ENTER RESPONSE HERE  
<QUESTION\_01\_04>

5. Would it be helpful if the Standards contained a recommended format or template for compliant presentations?

<QUESTION\_01\_05>  
ENTER RESPONSE HERE  
<QUESTION\_01\_05>

## Questions for Investors and Asset Owners

1. After reviewing the draft provisions and the sample compliant presentations, do you think a compliant presentation would help you understand how and why an investment product uses ESG information or addresses ESG issues?

<QUESTION\_02\_01>

We agree that a compliant presentation would help to clarify how and why an investment product uses ESG information or addresses ESG issues

<QUESTION\_02\_01>

2. To what extent would a compliant presentation provide the ESG-related information that you typically request in your Requests for Proposals (RFPs), Due Diligence Questionnaires (DDQs), and other types of questionnaires? Is there information that you would like to see disclosed in a compliant presentation that is not required by the draft provisions? Is there information required by the draft provisions that is not necessary?

<QUESTION\_02\_02>

We suggest adding a compliant presentation focused on the real estate industry, including for example;

- Industry specific sustainability standards as a separate category. For example, “Building Certifications (e.g. BREEAM, LEED)” and “Energy Ratings (e.g. EU EPC)” for the real estate industry
- Sustainability indexes as a separate category in the table, such as DJSI, MSCI ESG.
- Specifications for materiality assessments as a separate category in the table, such as SASB and GRI
- Sector specific climate risk tools and assessments under “Specifications for benchmarks” category, such as CRREM and GRESB for real estate industry
- UN Global Compact under “Codes and Principles of Investing”
- Carbon Disclosure Project (CDP) under “Specifications for measurement and reporting”

<QUESTION\_02\_02>

3. Would the provision of compliant presentations by investment managers complement, streamline, or otherwise improve any of your existing processes, e.g., due diligence, certification, or reporting?

<QUESTION\_02\_03>

A compliant presentation will have the potential to streamline existing processes

<QUESTION\_02\_03>

4. Would you find it helpful if the Standards contained a recommended format or template for compliant presentations?

<QUESTION\_02\_04>

Agree with the approach to create a recommended format or template for compliant presentations. This will create consistency and harmonisation on the interpretation of the standard.

<QUESTION\_02\_04>

Questions for Consultants and Advisors

1. After reviewing the draft provisions and the sample compliant presentations, do you think a compliant presentation would help you understand how and why an investment product uses ESG information or addresses ESG issues?

<QUESTION\_03\_01>  
ENTER RESPONSE HERE  
<QUESTION\_03\_01>

2. Would a compliant presentation help facilitate client discussions regarding ESG-related needs and preferences and suitable investment products?

<QUESTION\_03\_02>  
ENTER RESPONSE HERE  
<QUESTION\_03\_02>

3. To what extent would a compliant presentation provide the ESG-related information that you or your clients typically request in Requests for Proposals (RFPs), Due Diligence Questionnaires (DDQs), and other types of questionnaires? Is there information that you would like to see disclosed in a compliant presentation that is not required by the draft provisions? Is there information required by the draft provisions that is not necessary?

<QUESTION\_03\_03>  
ENTER RESPONSE HERE  
<QUESTION\_03\_03>

4. Would the provision of compliant presentations by investment managers complement, streamline, or otherwise improve any of your existing processes, e.g., investment product due diligence or overall assessments of investment managers' capabilities?

<QUESTION\_03\_04>  
ENTER RESPONSE HERE  
<QUESTION\_03\_04>

5. Would you find it helpful if the Standards contained a recommended format or template for compliant presentations?

<QUESTION\_03\_05>  
ENTER RESPONSE HERE  
<QUESTION\_03\_05>

## Questions for Database Providers and Users

1. To what extent would a compliant presentation provide the ESG-related information that users are looking for?

<QUESTION\_04\_01>  
ENTER RESPONSE HERE  
<QUESTION\_04\_01>

2. Is it necessary, or would it be helpful, for compliant presentations to be in a standardized format? Would it be helpful if a machine-readable template was developed?

<QUESTION\_04\_02>  
ENTER RESPONSE HERE  
<QUESTION\_04\_02>



Questions for regulators and investment professionals

1. Are the draft provisions helpful in establishing or clarifying the type of information that should be included in an investment product's disclosures regarding the ESG-related aspects of the investment product's strategy?

<QUESTION\_05\_01>  
ENTER RESPONSE HERE  
<QUESTION\_05\_01>

2. Is there information that you would like to see disclosed in a compliant presentation that is not required by the draft provisions? Is there information required by the draft provisions that is not necessary?

<QUESTION\_05\_02>  
ENTER RESPONSE HERE  
<QUESTION\_05\_02>

3. Would the Standards be helpful in maintaining a commitment to professional ethics and integrity?

<QUESTION\_05\_03>  
ENTER RESPONSE HERE  
<QUESTION\_05\_03>

4. Would the Standards be helpful in providing investor protection through product transparency?

<QUESTION\_05\_04>  
ENTER RESPONSE HERE  
<QUESTION\_05\_04>

5. Would the Standards be useful in serving as a mechanism to help investors align their ESG-related objectives with those of suitable products?

<QUESTION\_05\_05>  
ENTER RESPONSE HERE  
<QUESTION\_05\_05>

6. Would the Standards be useful in serving as a mechanism to develop product labelling in your country?

<QUESTION\_05\_06>  
ENTER RESPONSE HERE  
<QUESTION\_05\_06>

## GENERAL PRINCIPLES FOR INVESTMENT PRODUCT DISCLOSURES

General comments on the Principles:

<COMMENT\_00\_00>

We suggest that the items listed below would be considered as part of the principles.

1. To prevent 'green washing', the disclosures should be anchored back into the objectives or strategy for an investment vehicle and excluded if they can't meet this test.
2. A principles approach placing the obligation on the manager to give a balanced view is therefore critical.
3. The quality of disclosure would be enhanced by independent review or audit.
4. This raises the wider point of who pays for the additional reports.

<COMMENT\_00\_00>

Comments on Principle #1:

<COMMENT\_00\_01>

ENTER RESPONSE HERE

<COMMENT\_00\_01>

Comments on Principle #2:

<COMMENT\_00\_02>

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<COMMENT\_00\_02>

Comments on Principle #3:

<COMMENT\_00\_03>

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<COMMENT\_00\_03>

Comments on Principle #4:

<COMMENT\_00\_04>

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<COMMENT\_00\_04>

Comments on Principle #5:

<COMMENT\_00\_05>

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<COMMENT\_00\_05>

## SECTION 1: FUNDAMENTAL REQUIREMENTS AND RECOMMENDATIONS

General comments on Section 1:

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Comments on Provision 1.A.1:

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Comments on Provision 1.A.2:

<COMMENT\_01A02>  
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Comments on Provision 1.A.3:

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Comments on Provision 1.A.4:

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Comments on Provision 1.A.5:

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Comments on Provision 1.A.6:

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Comments on Provision 1.A.7:

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Comments on Provision 1.A.8:

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Comments on Provision 1.A.9:

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Comments on Provision 1.A.10:

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Comments on Provision 1.A.11:

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Comments on Provision 1.A.12:

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Comments on Provision 1.A.13:

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Comments on Provision 1.A.14:

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Comments on Provision 1.A.15:

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Comments on Provision 1.A.19:

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Comments on Provision 1.B.1:

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Comments on Provision 1.B.2:

<COMMENT\_01B02>  
This could be optional and recommended as best practice. It would be up to investors and investment managers to determine whether the value of assurance exceeds the cost. Managers should state whether ESG data has been externally assured. If yes, they should disclose assurer and assurance letter.  
<COMMENT\_01B02>

## SECTION 2: GENERAL INFORMATION

General comments on Section 2:

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Comments on Provision 2.A.1:

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Comments on Provision 2.A.2:

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Comments on Provision 2.A.3:

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Comments on Provision 2.A.4:

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Comments on Provision 2.A.5:

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Comments on Provision 2.A.6:

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Comments on Provision 2.A.7:

<COMMENT\_02A07>  
The topics listed below can be added:

- How material ESG topics are identified for an investment product
- The process of ESG risk assessment
- How ESG related risks are managed

<COMMENT\_02A07>

Comments on Provision 2.A.8:

<COMMENT\_02A08>  
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Comments on Provision 2.B.1:

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### SECTION 3: OBJECTIVES

General comments on Section 3:

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Comments on Provision 3.A.1:

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Comments on Provision 3.A.2:

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Comments on Provision 3.B.1:

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## SECTION 4: BENCHMARKS

General comments on Section 4:

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Comments on Provision 4.A.1:

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Comments on Provision 4.A.2:

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Comments on Provision 4.A.3:

<COMMENT\_04A03>  
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<COMMENT\_04A03>

## SECTION 5: SOURCES AND TYPES OF ESG INFORMATION

General comments on Section 5:

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Comments on Provision 5.A.1:

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Comments on Provision 5.A.2:

<COMMENT\_05A02>  
ENTER RESPONSE HERE  
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## SECTION 6: ESG EXCLUSIONS

General comments on Section 6:

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Comments on Provision 6.A.1:

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Comments on Provision 6.A.2:

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Comments on Provision 6.A.3:

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Comments on Provision 6.A.4:

<COMMENT\_06A04>  
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## SECTION 7: ESG INFORMATION IN FINANCIAL ANALYSIS AND VALUATION

General comments on Section 7:

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Comments on Provision 7.A.1:

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Comments on Provision 7.A.2:

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Comments on Provision 7.A.3:

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Comments on Provision 7.A.4:

<COMMENT\_07A04>  
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## SECTION 8: PORTFOLIO-LEVEL ESG CRITERIA AND CHARACTERISTICS

General comments on Section 8:

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Comments on Provision 8.A.1:

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Comments on Provision 8.A.2:

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Comments on Provision 8.B.1:

<COMMENT\_08B01>  
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## SECTION 9: PROCESS TO ACHIEVE IMPACT OBJECTIVE

General comments on Section 9:

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Comments on Provision 9.A.1:

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Comments on Provision 9.A.2:

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Comments on Provision 9.A.3:

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Comments on Provision 9.A.4:

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Comments on Provision 9.A.5:

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Comments on Provision 9.B.1:

<COMMENT\_09B01>  
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## SECTION 10: STEWARDSHIP

General comments on Section 10:

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Comments on Provision 10.A.1:

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Comments on Provision 10.A.2:

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Comments on Provision 10.A.3:

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Comments on Provision 10.A.4:

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Comments on Provision 10.B.1:

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## GLOSSARY

General comments on Glossary:

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Comments on **BENCHMARK**:

<COMMENT\_11A01>  
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Comments on **COMPLIANT PRESENTATION**:

<COMMENT\_11A02>  
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Comments on **ESG INFORMATION**:

<COMMENT\_11A03>  
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Comments on **ESG ISSUE**:

<COMMENT\_11A04>  
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Comments on **EXCLUSION**:

<COMMENT\_11A05>  
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Comments on **FINANCIAL OBJECTIVE**:

<COMMENT\_11A06>  
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Comments on **IMPACT OBJECTIVE**:

<COMMENT\_11A07>



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Comments on **INVESTMENT MANAGER**:

<COMMENT\_11A08>  
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Comments on **INVESTMENT PRODUCT**:

<COMMENT\_11A09>  
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Comments on **INVESTOR**:

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Comments on **STEWARDSHIP**:

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Comments on **STEWARDSHIP ACTIVITY**:

<COMMENT\_11A12>  
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## GENERAL COMMENTS

General comments on Exposure Draft:

<COMMENT\_12A00>  
ENTER RESPONSE HERE  
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