

DUFAS RESPONSE – CALL FOR EVIDENCE SAVINGS AND INVESTMENTS ACCOUNT

To: European Commission
From: The Dutch Fund and Asset Management Association (DUFAS)
Date: 8 June 2025
Contact: Manouk Fles, Manager Regulatory Affairs, email: mf@dufas.nl

The Dutch Fund and Asset Management Association (DUFAS) supports the European Commission's objective of developing a Savings and Investments Union to create an inclusive financial ecosystem that empowers retail investors and drives economic growth. DUFAS welcomes the opportunity to provide its views on the blueprint for the savings and investment account.

DUFAS strongly supports the initiative of a Savings and Investment Account (SIA) – a tax-attractive investment account inspired by the savings and investment accounts existing in several Member States, for example Sweden. This SIA should stimulate retail investors to invest in a simple, cost-efficient and tax-friendly way. It should facilitate wealth accumulation, including for households with modest wealth who currently focus on saving.

The SIA framework should help foster a stronger investment culture and mobilize capital for the long term without requiring mandated investments. Imposing limits to allocation (e.g. the EU) or holding period may on the other hand make the account less appealing, possibly limiting its uptake by retail investors. Streamlining the customer journey is also essential to encourage more savers to become investors.

To ensure the success of the SIA framework and enhance its visibility, it would be helpful if the governments of the various Member States actively promoted the SIA — for instance, through campaigns or information on official government websites — possibly supported by educational and informational programs.

Savings and investment account characteristics

Product range

A diverse range of products should be offered via the SIA including single securities, UCITS, ELTIFs, ETFs, and retail AIFs for example..

Although one of the main goals of the Savings and Investment Union is to increase investments available for EU companies, a geographical restriction is not in the interest of investors. Simplified investment services should support household wealth creation, which as a result could lead to a strengthening of the European economy. Moreover, a trend is already noticeable in for example the Netherlands, where investors are less likely to choose American investments and a survey by Rabobank shows that 40 percent of respondents

have become more positive about investing in Europe.¹ Given these developments, a geographical restriction on the SIA does not seem necessary to also achieve the goal of financing the European economy.

Digital access

The investment services, opening and using the account, must be provided in an easily accessible manner, for example via digital channels and making use of tools such as national or EU digital IDs. At the same time, we support optimal investor protection in a digital environment, so cost and charges should be displayed in a clear and transparent manner.

Portability to other providers

Portability to other providers should be 'nice to have' rather than a required characteristic of the savings and investments account. Although portability could be a valuable feature, it could also be a complex factor which could undermine the success of a savings and investment account, especially when it comes to tax and cross-border portability. Simplicity should be the main feature of the account.

Portability across Member States

Cross-border portability should too be a nice-to-have. Again, this too could be a complicating factor, especially when it comes to tax incentives/tax simplification.

Tax simplification and tax advantages

DUFAS considers the following principles to be relevant in the context of tax simplification and tax advantages:

- When it comes to taxation, there should be no attempt to impose a one-size-fits-all SIA across all EU Member States. The EU may provide a common framework, but taxation should remain a national competence.
- The SIA should be simple and straight forward; difficult calculation methods should be avoided as much as possible.
- Tax benefits should be easily accessible to the average retail investor, avoiding complex procedures like reclaim mechanisms. Automatic processing via the tax return would be an effective and efficient approach
- No specific goals or obliged holding period should be attached to the individual savings account, No specific goals or obliged holding period should be attached to the individual savings account, because in our view and experience retail investors have a strong like for flexibility and a strong dislike for inflexibility

Other characteristics

In our view, the following principles should be taken into account in the development of the blueprint:

¹ <https://www.rabobank.nl/kennis/d011483267-nederlandse-beleggers-negatiever-geworden-over-de-vs-positiever-over-europa>

- Several Member States already have well-functioning pension systems. The SIA should not undermine these national arrangements and therefore should not be designed solely for the purpose of pension savings. Instead, the intended use of investments under the SIA should remain flexible.
- It should be possible to invest on a regular/preprogrammed basis. This way it becomes a habit for retail investors to invest freely investable capital, the impact of volatility on their portfolios can be reduced (Euro Cost Averaging) and investors can benefit from compound interest.
- Fractional trading should be made possible to facilitate periodic investing. This would allow investors to invest a fixed amount on a regular basis, regardless of the share price.

Finance Europe Label

We would like to briefly address the Finance Europe label initiative agreed by several Member States.

While the Finance Europe Label initiative is a welcome step, it currently represents a missed opportunity to meaningfully increase retail investor participation across the EU. Although initiatives such as the Finance Europe Label can contribute to broader goals, there is a risk that the label becomes the sole vehicle implemented at national level—without the parallel development of a Savings and Investment Account (SIA). The label alone is unlikely to deliver the necessary retail participation or simplicity that proven models such as the Swedish ISK have demonstrated. A dedicated SIA remains essential to effectively mobilize retail capital and support long-term wealth building across Member States.

The key challenge is not creating new products, but encouraging those who are able to invest to actually do so. For this, simplicity and accessibility are crucial. The ISK model in Sweden has demonstrated that clear tax incentives and ease of use can lead to broad participation—particularly among younger and first-time investors. Similar models have proven effective in other countries as well.

When more people invest, capital is mobilized toward the European economy. Existing evidence shows that even without additional incentives, there is already a strong home bias toward investing in one's own country and in Europe. This natural inclination should be supported—not complicated—by the design of a savings and investment account.

DUFAS: Dutch Fund and Asset Management Association

Since 2003, DUFAS has been committed to a healthy asset management sector in the Netherlands. DUFAS has more than 50 members: from large asset managers who invest Dutch pension and insurance assets to smaller, specialist asset managers. DUFAS increases awareness of the social relevance of investing, helps to develop sector standards and represents the sector in the implementation of new laws and regulations. In addition, DUFAS is committed to a single European market with equal regulations.