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France Invest's comments on the European Commission's Inception Impact Assessment on a single EU access point for company information

Established nearly 40 years ago, France Invest brings together venture capital, private equity, infrastructure and private debt teams based in France, as well as the associated professions which support them. Its membership currently counts 340 management firms and 170 associate members.

France Invest's members represent one of the main growth drivers for the French and European economy and support a significant portion of employment in France and Europe. In 2019, its members raised 41 bn EUR to finance companies, both through equity and debt, and infrastructure projects, over the coming 5 years.

Data, both financial and non-financial, now plays a crucial role in the value chain and has become a strategic issue. Our members are impacted by data related issues from two different angles, as they are both producers and users of data.

In this context, **we welcome the Commission's proposal to introduce a single EU access point for company information.** Indeed, the emergence of data as "the new black gold" raises questions, not only in terms of availability and cost, but also with regards the sovereignty and competitiveness of the EU.

France Invest's members, as financial companies, produce data. They are subject to supervisory reporting requirements and disclosure obligations towards investors. In this context, we believe that the ESAP would bring about a key missing piece of the CMU and contribute to further integrating European capital markets. In our opinion, it should articulate with existing regulations such as MiFID, NFRD, PRIIPs, Disclosure and Taxonomy Regulations.

Our members, as investors, need easy access to reliable, comparable and affordable data. We fully agree that investors should have access to information on companies and financial products to make sound investment decisions. In particular, venture capital and private equity firms need data on private companies - even though it is understandable that the latter may have less resources to produce information than public companies. Furthermore, our members are required to integrate ESG issues into their policies investment. Currently, most data providers are not subject to any regulatory requirements regarding prices. The ESAP will improve our members' access to data company, allow them to reduce search costs and allocate capital more efficiently across the EU. Conversely, it will ensure more visibility for companies in need of financing.



The format of the information disclosed by companies to the public should be harmonised and standardised, making such information easier to find, compare and analyse. This should increase competition and reduce the cost of data. Currently, the race for the size of data providers leads to a strengthening of dominant positions and to the constitution of oligopolies that impact users. Historic actors are equipped with large means to collect, distribute and control the use of data. Margins of negotiation of the institutions vis-à-vis these actors are then limited, mainly due to this unfavourable balance of power. The ESAP will make data available to all users in an electronic format and at a reasonable cost.

Beyond the issue of the availability at of reliable, comparable and affordable data, we believe that **the competitiveness and sovereignty of the EU are at stake. Indeed, it is of the utmost importance to ensure that we control the chain of data provision as well as the analyses of rating agencies at EU level.** Currently, the actors providing data (data providers, rating agencies, benchmark administrators, etc.) are, for the most part, non-European entities. For instance, there is currently no purely European agency for non-financial data. Reliance on non-EU data service providers should be reduced. In particular, the subject of data sovereignty for all EU companies is a major issue for the application of the Taxonomy Regulation.

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