

Mr Valdis Dombrovskis Vice-President European Commission Rue de la Loi 200 1049 Brussels Belgium

Brussels, 28 November 2018

Dear Vice-President Dombrovskis,

The American Chamber of Commerce to the EU (AmCham EU) is a longstanding advocate of well-functioning, appropriately regulated and open markets, which we believe are a crucial driver of long-term economic growth and competitiveness.

We write in support of the letter sent by a number of trade associations (FIA, AFME, ISDA, ICMA DIA, EDMA, Swiss Finance Council) on 8 November, highlighting their concerns regarding proposals to significantly curtail the EU's existing third country equivalence regime.

AmCham EU shares the concern that these proposals - under consideration as part of the EU's Investment Firm Review (IFR) - will fundamentally undermine the accessibility of Europe's financial markets. This issue is critically important because it impacts the ability of end users to access the services of third country financial services firms.

If access for end users to third country firms becomes more difficult, the EU market would be less attractive, which is at odds with the aim of enhancing the EU's ability to attract external capital. European end users need to be able to trade with financial market participants around the world to diversify risk, to access liquidity and for investment opportunities. Cross-border trading provides these end users with access to greater pools of liquidity than may be available simply domestically or regionally.

It is our strong view that it is in Europe's interest to ensure its capital markets remain open and accessible. Wholesale capital markets are global in nature and separating the EU from other markets around the world would be a significant backwards step for the development of Europe's capital markets.

Yours sincerely,

Catherine Davidson Chair Financial Services Committee AmCham EU