



Malta Stakeholder Engagement Survey
Have your say

Thank you for your interest in participating in this stakeholder survey. This survey seeks to gauge the current state of awareness of key stakeholders on the requirements of sustainable finance disclosure and reporting, and the challenges and opportunities arising from the implementation of these requirements.

The feedback gathered forms part of the Stakeholder Engagement and Awareness component of a project being undertaken with the European Commission Directorate General for Structural Reform Support (DG Reform), for the benefit of the Malta Financial Services Authority (MFSA). Further information regarding the project can be accessed here:

https://commission.europa.eu/news/four-financial-supervisor-national-authorities-ready-enhance-supervisory-capacity-field-2023-01-25_en

This survey is being carried out on an anonymous basis by Deloitte Malta. No Personal Data will be collected or processed by Deloitte throughout the completion of the survey. The outcomes of this survey shall be used to support the European Commission and the MFSA in better understanding how they can best guide markets in the implementation of various EU Sustainability Disclosures and Reporting requirements. Therefore, we encourage you to respond as openly and honestly as possible such that the necessary support can be provided.

Survey structure The survey is structured to delve into key aspects of the European Union Sustainability Disclosures and Reporting (EU SD&R) initiatives. Throughout the survey, the term EU Sustainability Disclosures and Reporting is used to refer to the following main legislative documents:

EU Taxonomy Regulation [1] Sustainable Finance Disclosure Regulation (SFDR) [2] Non-Financial Reporting Directive (NFRD) [3] and Corporate Sustainability Reporting Directive (CSRD) [4] EU Benchmarks Regulation [5] Green Bond Standard Regulation [6] Amendments to the Capital Requirements Regulation [7].

Questions are posed across the following main themes:

- **Awareness and understanding:** What is the current level of awareness and maturity among stakeholders regarding sustainable finance regulatory frameworks and EU SD&R?
- **Challenges:** What challenges are stakeholders encountering and/or identifying in adapting to sustainable finance practices in the context of the EU SD&R? What obstacles do stakeholders see and/or face in meeting the EU SD&R requirements?
- **Opportunities:** What opportunities do stakeholders identify in aligning with sustainable finance practices in the context of EU SD&R and how do they plan to leverage them?

The survey primarily consists of open-ended questions, giving you the opportunity to answer freely. These are supplemented with single and multiple-choice questions. Furthermore, in certain questions, you will be asked to assess the statements according to the ranking provided or to determine the degree of conformity with given statements. Completion of the survey is estimated to require approximately 30 – 45 minutes of your time, depending on the type of entity you are representing. Should you encounter any issues with the survey or wish to discuss this topic further, please feel free to reach out on daherrera@deloitte.com.mt.

[1] Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation 2019/2088) and associated delegated acts

[2] Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector

[3] Directive (EU) 2014/95/EU of the European Parliament and of the Council of 22 October 2014 amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups

[4] Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting

[5] Regulation (EU) 2019/2089 of the European Parliament and of the Council of 27 November 2019 amending Regulation (EU) 2016/1011 as regards EU Climate Transition Benchmarks, EU Paris-aligned Benchmarks and sustainability-related disclosures for benchmarks

[6] Regulation (EU) 2023/2631 of the European Parliament and of the Council of 22 November 2023 on European Green Bonds and optional disclosures for bonds marketed as environmentally sustainable and for sustainability-linked bonds

[7] European Commission's proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor & Regulation of the European Parliament and of the Council amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor with respect to Pillar 3 disclosures on ESG risks (Article 449a of Regulation 575/2013) further specified by the Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 amending the implementing technical standards laid down in Implementing Regulation (EU) 2021/637 as regards the disclosure of environmental, social and governance risks.

Part A

Represented stakeholder category:

- AIF managers
- de minimis* AIF managers
- EUVECA fund managers
- Investment firms
- UCITS managers
- Credit institutions
- Insurance undertakings
- Retirement scheme administrators
- Retirement scheme
- Insurance intermediaries
- Listed entities
- Public sector organisation
- Trade/professional association
- Other

Does your organisation currently service any retail clients?

- Yes
- No
- N/A

Part B

Does your organisation find any difficulties in understanding the concept of greenwashing and implementing considerations for it in its operations?

- Yes (please elaborate)
- No (please elaborate)

Is your organisation engaged with private sector entities in communication or educational activities on EU sustainability disclosure and reporting regulation requirements?

Does your organisation plan to use ESG data reported by the private sector for internal or external analysis?
If yes, can you briefly elaborate?

Part C

Overall, from the perspective of your entity, what key challenge do reporting companies face when preparing non-financial reports?

What systemic barriers preventing high-quality non-financial reporting do you observe?

On which non-financial reporting aspect would you most appreciate guidance from the market supervisor? (e.g., human rights due diligence, environmental KPIs, corruption policies, PAIs, Good Governance, DNSH...)

From the perspective of your organisation, in which specific aspect of the EU Taxonomy you would expect systemic solutions to support your organisation in fulfilling reporting obligations?

From the perspective of your organisation, what key challenges does the Maltese financial sector face when preparing disclosures in the context of SFDR?

In the experience of your organisation, what systemic barriers prevent the financial sector from integrating sustainability risks in the investment decision-making process and financial advice?

Based on your organisation's experience, what systemic solutions would support credit institutions in disclosing good quality information on ESG risks (EBA Pillar 3)?

From the perspective of your organisation, what opportunities do you see in integrating sustainability into corporate reporting? If possible, please be specific.

From the perspective of your organisation, rate these opportunities stemming from credible sustainability reporting and disclosures from 1 (not relevant) to 5 (very relevant):

	1	2	3	4	5
Attracting investors					
Attracting new talent					
Increasing consumer demand					
Increasing client trust					
Building a stakeholder communication platform with insights into the long-term value of the business					
Managing long-term risks (e.g. credit, operational)					
Managing short-term risks (i.e., reputational, greenwashing)					
Clarifying strategy position (transition plans)					
Sustainability risk integration					

From the perspective of your organisation, which of the following opportunities connected with EU sustainability disclosures and reporting do you consider relevant?

- Receiving financing of taxonomy-aligned projects
- Green bond issuance
- Receiving an ESG-rating-linked loan
- Receiving a sustainability-linked Loan
- I don't find any of the above relevant for my organisation

Does your organisation use the EU taxonomy to plan investments and set transition targets?

- Yes, we currently use EU taxonomy criteria to scale up environmentally sustainable projects and activities.
- No, we currently do not use EU taxonomy for further purposes than reporting, but we plan to do so in the future.
- No, and we currently do not have any plans to do so in the future.

From the perspective of your organisation, do you envisage any additional opportunities connected with the EU sustainability disclosures and reporting framework/obligations? Please, specify.

What type of engagement do you prefer from the MFSA's side for further market outreach regarding the EY sustainable finance regulatory framework? (e.g., Workshops, Q&A section on website, newsletter, webinar etc.)

Company registration number (optional)



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