

**Från:** "Helena Mogianos von Gegerfelt"  
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**Skickat:** den 12 maj 2026 15:15:46  
**Till:** "FI Registrator" <fi.registrator@regeringskansliet.se>  
**Ämne:** VB: Article 33 (Depositaries) – Joint comments from Sweden and [REDACTED]  
**Categories:** Öö LHe

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**Från:** Andreas Hadjinicolaou <ahadjinicolaou@treasury.gov.cy>  
**Skickat:** den 12 maj 2026 15:08  
**Till:** Helena Mogianos von Gegerfelt <helena.mogianos.von.gegerfelt@regeringskansliet.se>  
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<eva.cassel@gov.se>; Alexander Dahlqvist <alexander.dahlqvist@regeringskansliet.se>; Christina Loizou <cloizou@sid.mlsi.gov.cy>; Maria Efthyvoulou <mefthyvoulou@mof.gov.cy>  
**Ämne:** Re: Article 33 (Depositaries) – Joint comments from Sweden and [REDACTED]

Dear colleagues,

Many thanks for your email. We have taken good note of your comments submitted via the questionnaire and the issues raised by SE and [REDACTED] and we understand the importance of this specific point for you. We are currently analysing MS comments and we are working to provide MS with revised or new wording solutions. We will do our best to integrate your suggestions.

Kind regards,

Andreas Hadjinicolaou

On behalf of the PCY IORPs team

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**From:** Helena Mogianos von Gegerfelt <helena.mogianos.von.gegerfelt@regeringskansliet.se>  
**Sent:** 07 May 2026 4:41 PM  
**To:** Nicolas Koullapis <nkoullapis@mlsi.gov.cy>; Andreas Hadjinicolaou <ahadjinicolaou@treasury.gov.cy>; Nicoletta Hapside <NHapside@mof.gov.cy>; Francesco Tuzi <ftuzi@mfa.gov.cy>  
**Cc:** [REDACTED]  
[REDACTED] Eva Cassel <eva.cassel@gov.se>; Alexander Dahlqvist <alexander.dahlqvist@regeringskansliet.se>  
**Subject:** Article 33 (Depositaries) – Joint comments from Sweden and [REDACTED]

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Dear Presidency,

Sweden and [REDACTED] would like to thank you for the opportunity to submit written comments.

In this context, we would like to draw your particular attention to Article 33 on depositaries, which remains of key importance to both our delegations. While we appreciate the efforts made in the current compromise proposal, we regret that we are unable to support it in its present form.

In particular, we consider that the proposed approach does not sufficiently accommodate existing national arrangements that ensure an appropriate level of protection for members and beneficiaries. Both Sweden and [REDACTED] attach great importance to preserving the possibility for Member States to rely on such arrangements.

We therefore continue to strongly prefer the introduction of a Member State option along the following lines:

**“Member States may decide not to apply this paragraph for IORPs that provide a level of protection for members and beneficiaries comparable to those laid down in the first subparagraph.”**

We remain available to discuss this issue further and to contribute constructively to finding a balanced and workable solution.

On behalf of [REDACTED] and Swedish delegations,

Kind regards,

**Helena Mogianos von Gegerfelt**

Legal Advisor

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