



**INVESTMENT  
MIGRATION  
COUNCIL**

Mr Jean-Marc Roirant  
Member of the EESC  
European Economic and Social Committee  
Rue Belliard 99-101  
1000 Brussels  
Belgium

29 August 2019

**Subject: Request to participate in opinion on Investor Citizenship and Residence Schemes in the European Union (SOC/618)**

Dear Mr Roirant,

I am writing on behalf of the Investment Migration Council (IMC) in relation to your forthcoming opinion on Investor Citizenship and Residence Schemes in the European Union (SOC/618), responding to the Commission report of 23 January on the same topic (COM(2019)12).

The IMC is the worldwide non-profit association representing Investment Migration stakeholders, industry and national governments, registered with the EC Transparency Register and admitted to the UN ECOSOC with Special Consultative Status.

We are committed to creating a rigorous, fair and formalised system for Investment Migration and call for effective regulation and high industry standards in due diligence, transparency and governance to mitigate the risks of abuse and maximise the benefits that these programmes bring to society and the economy. Amongst these, we support enhanced transparency and information-sharing mechanisms such as adequate data reporting obligations which ensure that funds invested through Investment Migration are used for the benefit of society.

The IMC actively collaborates with policy and lawmakers to ensure the development of regulation that minimises the risk of abuse and retains the benefits of Investment Migration. As such, we are surprised that the committee has not yet invited the IMC, as subject matter experts, to be consulted during the preparation of this opinion.

Given widely spread misconceptions of these programmes and disinformation campaigns undertaken by certain organisations and individuals, we believe an objective and fact-based approach, including contributions from all relevant stakeholders, is essential in order to ensure a balanced report.

The IMC would therefore welcome the opportunity to meet with you at your earliest convenience, submit a written contribution and participate to the formulation of the opinion the study group is drafting.



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I would also appreciate the opportunity to arrange a short meeting or call with you ahead of the next study group meeting on 4 September.

I remain at your disposal for any clarification you may require.

Yours sincerely,

Bruno L'ecuyer  
Chief Executive &  
Member of the Governing Board