

Template for comments

Public consultation on the draft recast ECB Regulation on investment fund statistics

Institution / Company

Malta Financial Services Authority

Contact person

Mr / Ms

First name

Surname

Email address

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Please tick here if you do not wish your personal data to be published.

General comments

Template for comments

Public consultation on the draft recast ECB Regulation on investment fund statistics

Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate the relevant chapter/article/paragraph/page, where appropriate;
- you indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline: xx February 2024

ID	Chapter	Article	Paragraph	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	Regulation		5 1	7	Amendment	The monthly reporting requirement will place a huge burden on smaller financial jurisdictions such as Malta. Furthermore, there may be inconsistencies between the requirements emanating from the AIFM directive, and the reporting requirements of this regulation. An example would be the valuation. Under the AIFM directive, valuation is required to be carried out once a year and not monthly.		,	Do not publish
2	Regulation	3, 4			Amendment	These articles should be amended to introduce the aspect of proportionality whereby small IFs be excluded from the reporting requirements as the regulation is introducing a massive burden on small IFs, where the benefit of such reporting as opposed to the cost of compliance is not very apparent.		,	Do not publish