

Template for comments

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

Institution / Company

Citco Fund Services (Ireland) Limited

Contact person

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First name

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Email address

Telephone number

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

General comments

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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:	12-Feb-24
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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			8 2	9	Amendment	The draft regulation notes that the statistical information related to IF's is proposed to be reported on a monthly basis. The costs and resources required to implement monthly reporting would be significant, particularly with IT development and an increased personnel demand. These additional resource requirements need to be considered, certainly in the context of the ultimate bearer of the cost, which ultimately will be the investors. In the current economic climate where there is focus on expenses incurred by funds, this proposal could negatively impact investors through increased fees associated. The continuation of quarterly returns would be the favoured approach.	Significant cost to investors, resourcing and IT development of increased frequency of reporting		Do not publish
2			8 2	9	Amendment	For IFs that do not have daily validation, particularly quarterly, semi-annual or annual fund reporting NAVs, there will be a significant increase in the amount of lagged reporting that is submitted if monthly returns are required. In particular most of this information will be estimated, revised or stale. It would be proposed that any such funds would not be in scope for monthly cycle reporting. In particular there is no distinction made in the regulations for such funds and procedures when reporting stale information if valuations are not available. In addition the NCBs have a reporting timeframe much earlier than the 28th business day reporting deadline included within the regulations, increasing the population of funds which may be required to report stale information each month and thereby further duplicating effort and cost for revised returns.	Funds with quarterly, semi-annual, annual cycles will have increased reporting obligations, added costs and potentially stale information		Do not publish

3			5 1	8 & 19	Deletion	Table 5: Point 11 Geographic Focus: We would question how this would be deemed a static requirement and suggest that such information would be obtained from the data provided in relation to investments in the fund. Many AIF's and UCITS would have dynamic portfolios where geographic region would change regularly - resulting in repeated updates to Static information, when it's proposed to be a one off exercise.	Data point on Geographic focus will result in repeated updates to static data		Do not publish
			5 1	9 & 20	Deletion	Table 5: Point 13 Focus on bond investments: We note the request for static data to include details of corporate versus government bonds. It is not clear as to how this would be determined i.e. based on supplement disclosures of the portfolio at any given date. As this is to be considered static data we would propose that this is based on the overall objective of the fund and would therefore be static regardless of the exact make-up of the portfolio.	Data point on static data is overly vague, and unlikely to be static		Do not publish
			5 1	9 & 20	Deletion	Table 5: Point 16 Investor base: We would question how this would be deemed a static requirement and suggest that such information would be obtained from the data provided in relation to investors as required within "IF Shares/Units" section instead	Repetition of data, and potentially resulting in frequent static data revisions		Do not publish
4			10 7	11	Amendment	The draft regulations note that derogations may be available for the statistical information in Article 5 for funds not required under their accounting rules to be valued monthly or to meet the reporting deadlines. However such derogation is only available until December 2026. There is no clarification on how firms and IFs are to report information monthly if valuation periods are greater than 1 month. This would entail reporting estimate information that may not be available to administrators, and ultimately further increasing costs to investors. Propose such funds continue to report quarterly.	Derogation for funds valuing non-monthly is only for limited time, which should be applicable full time to such funds.		Do not publish