

## Template for comments

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

**Institution / Company**

Malta Asset Servicing Association

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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.

<b>Deadline:</b>	xx February 2024
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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	Regulation	Article 9	2	10	Clarification	Clarify our understanding that when no NAV's are issued for that period, the estimates are no longer required, and the latest available NAVs will be used for reporting purposes.		Debono, Aronne	Publish
2	Annex I	Table 1 and 2	NA	NA]	Clarification	Will the current reporting be replaced with table 1 and 2 of Annex 1? Will the current quarterly reporting still be required, or will it be replaced?		Debono, Aronne	Publish
3	Regulation	NA	11	3	Clarification	Do the derogations imply that not all funds will be subject to monthly reporting?		Debono, Aronne	Publish
4	Regulation	Article 8	2 c	9	Clarification	Is the annual statistical information required by 30th June different reporting from the monthly requirements? Will the annual reporting be a summation of the monthly? Will this be for a financial yr or December Year end?		Debono, Aronne	Publish
5	Regulation	Article 3	8	3	Clarification	New and more frequent statistics, including statistical information on monthly income and annual fees received and dividends paid by the IF and information on the classification of the IF, are required to enhance the quality and availability of data to the users of statistics on IFs when undertaking the tasks of the ESCB.	Update on reporting re monthly income and annual fees & div paid. Same deadline and frequency as before??	Debono, Aronne	Publish
6	Annex I	Table 3	1	16	Clarification	An email has been sent in January 2024, for more clarification on Debt and equity in the SbSa sheet. Remarks were received to confirm or amend equity to debt on ETC's, to our knowledge ETC's and ETF's are stocks and not debt. For the FS these have been amended however as stated in the email, portfolio does not match since these are classified as stocks.	Clarification is needed to report securities correctly in the returns.	Debono, Aronne	Publish
7	Regulation	Article 3	19	4	Clarification	Will a template with all new/amended parts in the Full Set/ML be sent in advance? Before 01.06.2025?	Confirmation if new template will be sent beforehand, for testing purposes in order for deadline to be met.	Debono, Aronne	Publish

8	Regulation	Article 10	1	10	Clarification	80%/20% category will be amended? On which basis? And from when?		Debono, Aronne	Publish
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