

Template for comments

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

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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:	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	Annex I	Table 5	item 10	19	Amendment	Investment style : We don't have this data in our systems, we will have to collect this data. It will be more simple for ECB to collect directly this data directly from the NCA of the fund	If this requested item remains we will need time to put in place collection and storage of this data in our systems	Faltoni, Guido	Publish
2	Annex I	Table 5	item 13	20	Amendment	Focus of bond investments : We don't have this data in our systems, we will have to collect this data. It will be more simple for ECB to collect directly this data directly from the NCA of the fund. 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. In Luxembourg, the prospectus does not always detail the type of bonds.	If this requested item remains we will need time to put in place collection and storage of this data in our systems	Faltoni, Guido	Publish
3	Annex I	Table 5	item 14	20	Amendment	Listing status: We don't have this data in our systems, we will have to collect this data. It will be more simple for ECB to collect directly this data directly from the NCA of the fund	If this requested item remains we will need time to put in place collection and storage of this data in our systems	Faltoni, Guido	Publish
4	Annex I	Table 5	item 21	20	Deletion	Environmental, social and governance (ESG) type : We don't have this data in our systems, we will have to collect this data. It will be more simple for ECB to collect directly this data directly from the NCA of the fund NB : as we know the SFDR regulation will be amended, and it seems that this classification of IF will disappear (or at least changed)	If this requested item remains we will need time to put in place collection and storage of this data in our systems	Faltoni, Guido	Publish

5	Annex I	Table 3	Field 5	17	Deletion	Currently there is no automated ECB reporting process for transaction data collection on s-b-s level according to the new ECB requirements	If the requirement remains, new technical process will result in significant implementation and monthly operation expenses.	Faltoni, Guido	Publish
6	Annex I	Table 3	Field 6	17	Deletion	Currently there is no automated ECB reporting process for transaction data collection on s-b-s level according to the new ECB requirements	If the requirement remains, new technical process will result in significant implementation and monthly operation expenses.	Faltoni, Guido	Publish
7	Annex I	Table 3	Field 7	17	Deletion	Currently there is no automated ECB reporting process for transaction data collection on s-b-s level according to the new ECB requirements	If the requirement remains, new technical process will result in significant implementation and monthly operation expenses.	Faltoni, Guido	Publish
8	Annex I	Table 3	Field 9	17	Deletion	Currently we have no details on the listed/unlisted status of single equity securities.	If the requirement remains, new technical process will result in significant implementation and monthly operation expenses.	Faltoni, Guido	Publish
9	Annex I	Table 4	Fields 1	18	Deletion	Currently we do not explicitly calculate the total fund income in the automated ECB reporting process according to the new ECB requirements	If the requirement remains, new technical process will result in significant implementation and monthly operation expenses.	Faltoni, Guido	Publish
10	Annex I	Table 4	Field 3	18	Deletion	Scope (specific fee types) and data snapshot (annual fees as of the last IF business year vs. annualized monthly/quarterly fees) to be specified. Also, when it comes to transposition in Germany, could the BVI Ongoing Charge publications be utilized by the German Bundesbank?	The German Bundesbank utilizing the existing BVI Ongoing Charge publication would help to avoid significant costs of implementation and monthly maintenance	Faltoni, Guido	Publish
11	Annex I	Table 5	Item 21	20-21	Deletion	SSBI Regulatory Reporting Germany does not have Sustainability-related information since most clients do not outsource this report. We are wondering if BVI Sustainability publications can be utilized by the German Bundesbank.	The German Bundesbank utilizing the existing BVI Sustainability publication would help to avoid significant costs of implementation and monthly maintenance	Faltoni, Guido	Publish
12	Regulation		6 3	8	Amendment	Details on whether the issued fund shares are bearer or registered shares and also on specific bearers are currently not available. Obtaining those details from e.g. distribution teams in a timely manner to meet the requirements of the monthly reporting is not feasible. (Most of French IFs are distributed via EUROCLEAR. This feature means that nor the IF, or CSD have any information about the bearer. CSD only knows the depositary bank of the bearer.)	If the requirement remains, we will not able to report required data	Faltoni, Guido	Publish

13	Regulation	Article 14, 16, 17	All	13	Amendment	<p>We consider that the proposal date for implementation of this new regulation is too optimistic. After the finalisation of this regulation by ECB, each NCB will have to publish their own local regulation (taking account of local situation), then reporting agents will have to develop and test new IT reporting tools, put in place new databases to collect data to be reported which is not yet available, and increase staffing resources.</p> <p>A minimum of 18 months lead time should be allowed from the finalisation of NCB's requirements for the application of the new requirements.</p>	A too aggressive deadline will result in inaccurate and incomplete reporting	Faltoni, Guido	Publish
14	Annex I	Table 5	All	19-20	Amendment	<p>As a fund administrator we do not customarily record static data on investment policy, style, geographical focus, bond and real estate holdings focus in a systematic way that can facilitate data extract for thousands of sub-funds on a monthly basis. This information is published in fund prospectuses, and given portfolios can be dynamic and subject to change, this would be very challenging to manage.</p> <p>Can the NCBs or ECB source instead such data from the respective national competent authority that is responsible for authorising and overseeing the IFs?</p>	Reliance on fund administrators for the investment classification of certain data points could result in reporting of inaccurate data	Faltoni, Guido	Publish
15	Regulation		9 2	10	Amendment	<p>Lag reporting: For funds that do not produce valuations on a daily basis, particularly quarterly, semi-annual or annual funds, there will be a significant increase in the amount of lagged reporting that is submitted if monthly returns are required, most of which will be either stale or incomplete/estimated. We would question the relevance of such data and propose such funds are exempt from the monthly cycle.</p>		Faltoni, Guido	Publish