

Template for comments

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

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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	Regulation		4 2	7	Clarification	Can you please clarify what do you consider as "taken up business" : incorporation, first cap call, first closing, first NAV ?		MASSON / KURTZ, Nicolas / Isabelle	Publish
2	Regulation		8 2	9	Clarification	There is mention of "annual statistical information" to be provided. Could you please confirm that these annual information are the compilation of the information provided on a monthly basis, and do not constitute a separate set of information ?		MASSON / KURTZ, Nicolas / Isabelle	Publish
3	Regulation		8 2	9	Clarification	Can you please also confirm that "Annual statistical information" are considering over the fiscal exercise of the IF?		MASSON / KURTZ, Nicolas / Isabelle	Publish
4	Regulation		10 6, 7	10	Clarification	We understood from paragraph 6 that we will have to report monthly security-by-security information. Could you please confirm that starting Jan 2027, this information will be based on the last available NAV as per provisional report (for funds with a less than monthly NAV frequency)?		MASSON / KURTZ, Nicolas / Isabelle	Publish
5	Regulation		10 6, 7	11	Clarification	Our understanding is that once the derogation will end, we have to comply with the timeliness and frequency established. Can you please confirm that the current approach, which is to use the latest previous official NAV figures available, can be renewed ? * In case of Quarterly NAVs, should we provide monthly reports based on latest valited NAVs available ?		MASSON / KURTZ, Nicolas / Isabelle	Publish
6	Annex I	Table 1		15	Clarification	Could you please confirm that Table 1 "Stocks" (monthly) will entirely replace the current S2.13 report (quarterly)?		MASSON / KURTZ, Nicolas / Isabelle	Publish
7	Annex I	Table 2		15	Clarification	Could you please confirm that if NCB request Table 2 , this will be a dedicated report ?		MASSON / KURTZ, Nicolas / Isabelle	Publish
8	Annex I	Tables 1 & 2		15	Clarification	Could you please provide us with more clarifications on how to map and fill out the Table 1 and Table 2 (detailed guidelines)? This will allow us to assess more accurately the technical requirements.		MASSON / KURTZ, Nicolas / Isabelle	Publish
9	Annex I	Table 3		16	Clarification	Could you please confirm that Table 3 "Required security by security information" will replace the current TPTOPS report ?		MASSON / KURTZ, Nicolas / Isabelle	Publish
10	Annex I	Table 3		17	Clarification	Who will be in charge of providing the "issuer identification code" ? (Field #10)		MASSON / KURTZ, Nicolas / Isabelle	Publish
11	Annex I	Table 4		18	Clarification	Can you please confirm that Table 4 will constitute a specific report to be provided on a monthly basis ? (and does not constitute a second part to Table 3 report)		MASSON / KURTZ, Nicolas / Isabelle	Publish
12	Annex I	Table 4		18	Clarification	If Table 4 constitutes a separate report, could you please provide us with the expected format of this report ?		MASSON / KURTZ, Nicolas / Isabelle	Publish
13	Annex I	Table 4		18	Clarification	Could you please confirm fees to be considered as paid by the shareholders ? (management fees, operational fees, other ?). Dividend: for distributive share class, what about others?		MASSON / KURTZ, Nicolas / Isabelle	Publish
14	Annex I	Table 4		18	Clarification	Concerning Dividends paid by the IF to its shareholders, does it also concern Capitalisation shares, alongside distribution ones?		MASSON / KURTZ, Nicolas / Isabelle	Publish
15	Annex I	Table 4		18	Clarification	Could you please confirm if recallable distribution are to be included in the report as "other equivalent distribution" paid to shareholders?		MASSON / KURTZ, Nicolas / Isabelle	Publish
16	Annex I	Table 5		19	Clarification	Could you please confirm that information from Table 5 are to be provided at incorporation of an entity, and does not constitute a distinct regular reporting ?		MASSON / KURTZ, Nicolas / Isabelle	Publish
17	Annex I	Table 5		19	Clarification	Could you please provide your opinion on who shall provide Table 5 informations to NCB (entity, local regulator, central administrator,...)?		MASSON / KURTZ, Nicolas / Isabelle	Publish
18	Annex I	Table 5		19	Clarification	Could you please confirm us the format to be used to provide Table 5 ?		MASSON / KURTZ, Nicolas / Isabelle	Publish
19	Annex III		1	37	Clarification	"If the revaluation adjustment covers only revaluations due to price changes, the relevant NCB collects the necessary data, which should cover as a minimum a currency breakdown into pound sterling, Swiss franc, yen and US dollar in order to derive the revaluations due to exchange rate changes. " => Does it mean that if our portfolio is only in EUR, we have to provide countervalues in the mentioned currencies ? If confirmed, would you mind providing us with further explanations regarding this requirement ?		MASSON / KURTZ, Nicolas / Isabelle	Publish
20	Annex I	Table 5		20	Deletion	Environmental, social and governance (ESG) type : We don't have this data in our systems, we will have to collect this data from our clients, and we have no views on the feasibility to receive them in due time or on a regular basis. 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	MASSON / KURTZ, Nicolas / Isabelle	Publish