13 February 2025
ESMA12-2121844265-4735

Reply form

Consultation Paper on the revision of the disclosure framework for private securitisation under Article 7 of the Securitisation Regulation

Responding to this paper

ESMA invites comments on all matters in the Consultation Paper and in particular on the specific questions in this reply form. Comments are most helpful if they:

- respond to the question stated;
- indicate the specific question to which the comment relates;
- contain a clear rationale; and
- describe any alternatives ESMA should consider.

ESMA will consider all comments received by **31 March 2025.**

Instructions

In order to facilitate analysis of responses to the Consultation Paper, respondents are requested to follow the below steps when preparing and submitting their response:

- Insert your responses to the questions in the Consultation Paper in this reply form.
- Please do not remove tags of the type <ESMA_QUESTION_VALID_1>. Your response to each question has to be framed by the two tags corresponding to the question.
- If you do not wish to respond to a given question, please do not delete it but simply leave the text “TYPE YOUR TEXT HERE” between the tags.
- When you have drafted your responses, save the reply form according to the following convention: ESMA_VALID_nameofrespondent.

  For example, for a respondent named ABCD, the reply form would be saved with the following name: ESMA_VALID_ABCD.
- Upload the Word reply form containing your responses to ESMA’s website (**pdf documents will not be considered except for annexes**). All contributions should be submitted online at www.esma.europa.eu under the heading ‘Your input - Consultations’.

Publication of responses

All contributions received will be published following the close of the consultation, unless you request otherwise. Please clearly and prominently indicate in your submission any part you do not wish to be publicly disclosed. A standard confidentiality statement in an email message will not be treated as a request for non-disclosure. A confidential response may be requested from us in accordance with ESMA's rules on access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response is reviewable by ESMA's Board of Appeal and the European Ombudsman.

Data protection

Information on data protection can be found at www.esma.europa.eu under the headings 'Legal notice' and heading 'Data protection'..

1. General information about respondent

Name of the company / organisation	International Association of Credit Portfolio Managers
Activity	Business Association
Are you representing an association?	☒
Country/Region	International

2. Questions

Q1 Do you agree with the proposed approach to disclosing information on private securitisations? If not, please specify any alternative approaches you would recommend, including their advantages and potential drawbacks.

<ESMA_QUESTION_PRSE_1>

By way of preliminary comment, the International Association of Credit Portfolio Managers (IACPM) is a global association established in 2001 to further the management practice of credit exposures originated by banks. Membership is open to banks as well as credit investors, pension funds, insurers and reinsurers, who participate in credit risk transfer transactions as sellers of credit protection. Therefore, (i) the response provided by the IACPM mostly focuses on the direct and indirect impact of regulatory reforms on the growth of Significant Risk Transfer (SRT) securitisations executed by banks, aiming to share risk and release capital in order to grow banks' lending to the real economy and (ii) no responses are provided in connection with ABCP transactions.

We very much welcome ESMA's engagement with the industry for possible ways to move towards simplification of the SECR reporting requirements. Our response to question 1, however, is 'No'.

As also explained in the IACPM response of 4 December 2024 to the Commission targeted consultation on the functioning of the EU securitisation framework, private SRT securitisations should benefit from simplified reporting templates or, better still, no prescribed template-based investor or loan-by-loan reporting at all. SRT securitisations are private, highly-negotiated transactions and, for the reasons set out in the IACPM response of March 2024 to the ESMA consultation on the reporting templates, the prescribed regulatory reporting templates are not fit for purpose. In any case, deal reporting is always provided and it is always tailored to the requirements of the individual SRT transaction and the relevant investors.

Unfortunately, while we appreciate and support the principle of simplifying securitisation disclosure requirements under the SECR, particularly for private SRT securitisations, we have a number of serious reservations regarding the proposed approach:

- First, given ESMA's intention to ensure that any proposed changes will align with any potential changes in light of the ongoing review of the SECR Level 1 text, our approach to certain questions in this CP is likely to be affected/change depending on the upcoming changes to the SECR level 1 text (particularly the definition of “private” securitisation or the investor due diligence requirements on third country securitisations). Hence, our views expressed herein would need to be revised to reflect any changes to the Level 1 text.
- Secondly, as further elaborated in our response to Question 2 below, we think that limiting the scope of any simplified disclosure template to private securitisations where all of the originators, sponsors, original lenders and SSPEs are established in the Union completely fails to address one of the key concerns in the market, namely the ability of EU-based investors to invest in securitisations originated by non-EU originators, who are not themselves subject to the SECR reporting regime at all.
- Thirdly, we note that the CP provides that "originators, sponsors and SSPEs of private transactions must still provide the full set of 'public' disclosure information outlined in Article 7(1)(a) of the SECR to investors, potential investors and competent authorities upon request" (paragraph 22). This completely defeats the purpose of the exercise, as sell-side parties would still need to collect all of the existing required information and put in place systems to prepare the full "public" template reports (in addition to collecting the information required under the proposed new "simplified" template).
- Fourthly, if Annex XVI is to be developed as a template aimed at meeting the needs of the EU supervisors, the provision of such simplified disclosure should also address the requirement to complete the SSM template (where applicable), to avoid duplication.
- Fifthly, the rationale of the proposed simplified disclosure regime is founded on is investors' ability to negotiate specific disclosure in private securitisations (which is even more prevalent in private SRT securitisations). It therefore follows that the completion of such templated simplified disclosure should also address the requirement to complete the Investor Reports pursuant to Art. 7(1)(e) SECR.
- Finally, the draft legislative instrument does not include any transitional provisions, meaning that existing transactions executed on the basis of the current law would be subject to the new disclosure requirements. This is problematic for legacy transactions as it would require sell side parties to incur unexpected costs in order to adapt to the new simplified template.

In light of the above, we have to conclude that the simplified template does not work in the proposed form. Therefore, our preferred approach to simplified reporting is that any such changes should be introduced as part of a coherent package encompassing amendments to the Level 1 text of the SECR and the corresponding RTS/ITS. Such amendments should contemplate the proposed Annex XVI:

- being developed as a template addressed **only to EU supervisors** of (non-ABCP) private securitisations where either the originator or the sponsor or the SSPE are established in the EU;
- being completed by the relevant EU sell-side party/parties as a one-off reporting within one month of closing (in line with the ECB/SSM notification regime); and
- replacing any non-ABCP private securitisation reporting regime introduced by the SSM/ECB or any NCAs.

In addition, we note that, for private SRT securitisations (and other private securitisations), investors are invariably highly sophisticated and in a position to negotiate for the specific information and the frequency in which they require such information. We therefore propose that the eventual solution (put in place with changes to the Level 1 text of SECR) should also include a principles-based approach to asset-level and investor reporting applicable to EU sell-side parties under Article 7 SECR (which we appreciate that would require amendments to the Level 1 text of the SECR), whereby:

- the asset level reporting requirement will be satisfied by the sell side party disclosing the information as agreed with the relevant initial institutional investors by means of reports containing information sufficient to enable those institutional investors to assess and to model the performance of the underlying exposures, and to validate data in investor reports; and
- the investor reporting requirement will be satisfied by the relevant sell side party disclosing to institutional investors by means of reports covering, *inter alia*, the credit quality and other relevant risk characteristics of the portfolio of underlying exposures, and the performance of the protected tranche.

For completeness, we stress that our proposal for a more principles-based approach also applies in respect of the due diligence on disclosures by EU institutional investors when investing in non-EU securitisation (Article 5(1)(e) SECR).

If a coherent package encompassing amendments to the Level 1 text of the SECR as described above is not implemented expediently, we would urge ESMA to engage urgently with market participants about what form of simplified private template could work for the private SRT market. However, considering the ongoing Securitisation Regulation review and the broadly recognised objective of urgently creating a more competitive Savings and Investments Union, we believe that the solution proposed above is the right one.

<ESMA_QUESTION_PRSE_1>

Q2 Do you agree with the proposed scope of application, which requires all of the originators, sponsors, original lenders and SSPEs to be established in the Union? Alternatively, do you see any merit in applying the new template when at least the originator and sponsor are established in the Union? Please provide specific

examples where the application of the proposed scope might present practical challenges.

<ESMA_QUESTION_PRSE_2>

No. This is a significant limitation, as one of the main reasons market participants have been advocating for a separate private securitisation disclosure regime was to enable EU institutional investors to invest, among others, in non-EU private SRT securitisations by eliminating the need for such investors to obtain the full prescribed EU templated disclosure. Restricting the simplified template to private securitisations where all of the originators, sponsors, original lenders and SSPEs need to be established in the EU would prevent the proposed "simplification" from addressing that need. It is also unclear how this distinction can be supported on the basis of the current Level 1 text

<ESMA_QUESTION_PRSE_2>

Q3 Do you agree that the simplified template should be made available in CSV format, or should ESMA adopt a more flexible approach proposing a machine-readable format to be determined by the CA? Please specify which alternative format(s) you would recommend and provide your rationale.

<ESMA_QUESTION_PRSE_3>

[Yes. We believe that providing CSV format as an option for reporting is a positive development and we would support it (though we note that, given our proposed approach is for Annex XVI to be developed as a template aimed at meeting the needs of the EU supervisors only, it would be primarily for the supervisors to determine the preferred format in which the relevant simplified template should be made available (e.g. in Excel format, given its wide usage by the industry), as long as this wouldn't create fragmentation and a consistent EU approach can be agreed).

<ESMA_QUESTION_PRSE_3>

Q4 Do you agree with the disclosure frequency proposed in the Consultation Paper? Please provide your rationale.

<ESMA_QUESTION_PRSE_4>

No. On private SRT securitisations (and other private securitisations), investors are invariably highly sophisticated and in a position to negotiate for the specific information and the frequency in which they require such information. In addition, we note that in SRT transactions supervisors have direct communication with originators and a priori access to loan-level information at that stage as part of the SRT assessment. Hence, although we acknowledge this is not currently possible in the context of the existing SECR level 1 requirement for periodic reporting pursuant to Articles 7(1)(a) and (e), we are of the view that the frequency of the proposed disclosure template

should depend on whether there have been any updates on the information disclosed, i.e. if there is an unexpected change in any of the template items, an update should be provided to ensure that the previously provided reporting does not become misleading.

<ESMA_QUESTION_PRSE_4>

Q5 Do you agree with the structure of the simplified template, specifically the relevance of Section A to D for private securitisations? If not, please suggest any changes to the template's structure and provide the rationale for your proposed modifications.

<ESMA_QUESTION_PRSE_5>

No. As set out above, investors in private SRT securitisations (and other private securitisations), are invariably in a position to negotiate for the specific information they require in order to properly and independently assess any investment they are considering. Hence, on the basis that IACPM's proposed approach is for Annex XVI is to be developed as a template aimed at meeting the needs of the EU supervisors only, we are of the view that the structure can be simplified to remove certain fields and sections that investors may negotiate to receive).

<ESMA_QUESTION_PRSE_5>

Q6 Do you consider the use of ND Options in the template for private securitisations to be useful? Please provide your rationale.

<ESMA_QUESTION_PRSE_6>

Yes. It is imperative that Annex XVI includes an ND option for many of the proposed data fields, though we note that, to the extent such Annex is developed as a template addressed **only to EU supervisors** of (non-ABCP) private securitisations, many of the proposed data fields should be removed altogether.

<ESMA_QUESTION_PRSE_6>

Q7 Do you agree with the fields proposed in Table 1? If not, please suggest any changes to the Table's structure and provide the rationale for your proposed modifications.

<ESMA_QUESTION_PRSE_7>

Yes. However, given that private SRT securitisations will not always have a SSPE and would practically never have a sponsor, we would propose allowing the use of the ND5 Option in connection with these fields.

<ESMA_QUESTION_PRSE_7>

Q8 Do you agree with the fields proposed in Table 2? If not, please suggest any changes to the Table's structure and provide the rationale for your proposed modifications.

<ESMA_QUESTION_PRSE_8>

No. Templated disclosure for significant events is not currently required, so rather than simplifying, the proposed change would add to the regulatory burden. This would also create confusion on the timing of such disclosure as the Level 1 text mandates the disclosure of any such information under Art. 7(1)(g) SECR to be made available without undue delay, while the frequency of the simplified disclosure template is quarterly. Lastly, if Annex XVI is to be developed as a template aimed at meeting the needs of the EU supervisors only, it would be duplicative with relevant investor communications/notices. We would therefore propose deleting Table 2 in its entirety.

<ESMA_QUESTION_PRSE_8>

Q9 Do you agree with the securitisation characteristics fields proposed in Table 3? If not, please suggest any changes to the Table's structure and provide the rationale for your proposed modifications.

<ESMA_QUESTION_PRSE_9>

We do not have any comments that are specific to private SRT securitisations. We note, however, that the line items assume that there will always be one credit rating / credit rating agency. This requirement should therefore be clarified to cover scenarios where there are multiple credit ratings / credit rating agencies (as is required under CRA3), or indeed where no credit rating is obtained, as is the case for the vast majority of private SRT securitisations. We further note that the description of a "warehouse deal" is unclear and confusing (nor it is clear why this distinction is needed), hence we would propose removing.

<ESMA_QUESTION_PRSE_9>

Q10 Do you agree with the instrument/securities characteristics fields proposed in Table 4? If not, please suggest any changes to the Table's structure and provide the rationale for your proposed modifications.

<ESMA_QUESTION_PRSE_10>

To the extent Annex XVI is developed as a template addressed only to EU supervisors of (non-ABCP) private securitisations only, we would propose removing Table 4 in its entirety. On the proposed content, we note that references to instrument / security type are too vague. It is therefore unclear what kind of information would be expected to be provided under this line item, especially in private SRT securitisations with a SSPE. Separately, we note that some deals may have multiple currencies, hence the relevant item would need to be expanded to also capture these scenarios.

<ESMA_QUESTION_PRSE_10>

Q11 ESMA is not aware of significant issues with the current disclosure framework for ABCP transactions. Do you agree with maintaining this approach (i.e., Annex 11), or do you consider that disclosure via the simplified template would be more appropriate for ABCP transactions? Please provide your rationale.

<ESMA_QUESTION_PRSE_11>

No response

<ESMA_QUESTION_PRSE_11>

Q12 If you support the use of the simplified templates for ABCP transactions (Question 10), do you also agree with the specific fields proposed in Table 5? If not, please suggest any changes to the content or structure of the table, along with the rationale for your proposed modifications.

<ESMA_QUESTION_PRSE_12>

No response

<ESMA_QUESTION_PRSE_12>

Q13 Do you agree with the proposed approach for ABCP transactions, which focuses on information at the programme level? Alternatively, do you consider that disclosure should be based on transaction-level information to ensure alignment with the disclosure requirements for public transactions? Please provide your rationale.

<ESMA_QUESTION_PRSE_13>

No response

<ESMA_QUESTION_PRSE_13>

Q14 Do you agree with the contact information collected under Table 6? If not, please suggest any changes to the Table's structure and provide the rationale for your proposed modifications.

<ESMA_QUESTION_PRSE_14>

[No. It is not clear to us unclear why any law firm contact should be required (or, which law firm's contact details would be included in transactions where multiple firms advise, as is usually the case). We would therefore propose deleting this.

<ESMA_QUESTION_PRSE_14>

Q15 Do you agree with the fields on the underlying exposures proposed in Table 7? If not, please suggest any changes to the Table's structure and provide the rationale for your proposed modifications.

<ESMA_QUESTION_PRSE_15>

As set out above, investors in private SRT securitisations are invariably in a position to negotiate for the specific information they require in order to properly and independently assess any investment they are considering. That said, and on the basis that the simplified disclosure template is aimed at meeting the needs of the EU supervisors, we acknowledge that supervisors may require certain information in order to carry out their functions. Table 7 should therefore be reduced to the minimum information required by supervisors, taking also into account the information they already have access to through SSM disclosure templates or as part of the SRT assessment process). On this basis, we would propose deleting Tables 7.5 and 7.6 in their entirety (also noting that, under line item "Defaulted Exposures" in Table 7.5, references to cut-off date would need to be clarified as to whether they relate to the portfolio, the securitisation or the report).

<ESMA_QUESTION_PRSE_15>

Q16 Do you believe that a minimum set of information should be made available to users to monitor the evolution of the underlying risks? If so, do you consider that the fields proposed in Table 7 to be relevant for this purpose? If not, please indicate which alternative indications should be used and provide the rationale for your suggestions.

<ESMA_QUESTION_PRSE_16>

[IACPM reiterates that investors in private SRT securitisations are invariably in a position to negotiate for the specific information they require in order to properly and independently assess any investment they are considering. Therefore, and on the basis that the simplified disclosure template is aimed at meeting the needs of the EU supervisors, we do not believe these fields need to be included in Annex XVI. We would also note that requiring such information counteracts the proposals' intended purpose, i.e., instead of simplifying and reducing the compliance burden, it increases it.

<ESMA_QUESTION_PRSE_16>

Q17 ESMA proposes the inclusion of fields to capture information on underlying assets to be reported at an aggregated level. Some of this information is also included in the Investor Report for non-ABCP transactions. Do you agree that such information should be provided in both the template for private securitisations and the Investor Report for non-ABCP transactions? Alternatively, would you support introducing the option to flag such fields as 'not applicable' in the Investor Report when used in the context of private securitisations? Please provide your views.

<ESMA_QUESTION_PRSE_17>

We reiterate our view that Annex XVI should be developed as a template addressed only to EU supervisors of (non-ABCP) private securitisations and, on this basis, we don't think that any of this information on underlying assets should be included in the reporting template. We further note that loan-level granularity may or may not be useful on private SRT securitisations depending on the nature of the portfolio, but as explained above, either way, it is not useful to prescribe the data that should be reported (including whether it should be loan-level data). That is a matter better left to negotiations between originators and investors who will have their own views of how best to measure and price risk, and the data inputs required to do so effectively. We also agree that simplified private securitisation reporting regime should avoid duplication when it comes to reporting information under both the template for private securitisations and the Investor Report for non-ABCP transactions.

<ESMA_QUESTION_PRSE_17>

Q18 Do you agree with the inclusion in table 7.5 of fields related to restructured exposures or do you consider that the information included in the investor reports is sufficient? Please provide your rationale for agreeing or disagreeing.

<ESMA_QUESTION_PRSE_18>

See response in Q15 above.

<ESMA_QUESTION_PRSE_18>

Q19 If you agree with the inclusion of restructured exposure fields (Question 17), do you also agree with the specific fields proposed in Table 7.5? If not, please suggest any changes to the structure or content of Table 7.5, along with the rationale for your proposed modifications.

<ESMA_QUESTION_PRSE_19>

See our response in Question 18 above.

<ESMA_QUESTION_PRSE_19>

Q20 Do you agree with the inclusion in table 7.6 of fields related to energy performance? Please provide your rationale for agreeing or disagreeing.

<ESMA_QUESTION_PRSE_20>

No. While IACPM is supportive of the development of ESG initiatives in securitisation as in other markets, we do not believe the development of these metrics is sufficiently mature that it warrants their disclosure being prescribed by regulation at this stage. It is important to balance the requirement for the disclosure of useful metrics with an approach that minimises additional friction in the system. At the moment, requiring such additional information in Annex XVI counteracts the template's intended purpose, i.e. instead of simplifying and reducing the compliance burden, it increases it. In addition, introducing now a requirement to collect and report specific sustainability metrics in respect of all assets securitised would be very challenging (and maybe impossible) for originators to comply with. As a general matter, ESG metrics reported in respect of securitisations should be matched to the metrics that need reporting on underlying assets. Pending the adoption of the EU Commission's proposal for the first “Omnibus” Package on sustainability regulation and reporting, further time is required before these metrics are at a stage where they will be sufficiently mature and stable to warrant inclusion in any regulatory requirement

<ESMA_QUESTION_PRSE_20>

Q21 If you agree with the inclusion of energy performance fields (Question 19), do you also agree with the specific fields proposed in Table 7.6? If not, please suggest any changes to the structure or content of Table 7.6, along with the rationale for your proposed modifications.

<ESMA_QUESTION_PRSE_21>

See our response in Question 20 above.

<ESMA_QUESTION_PRSE_21>

Q22 Do you agree with the inclusion of the proposed fields related to risk retention, considering that this information is already covered in the investor reports? Please provide your rationale for agreeing or disagreeing.

<ESMA_QUESTION_PRSE_22>

To the extent this requirement relates to a broader range of securitisations, we note that IACPM members have no objection in principle to a disclosure requirement that confirms compliance with risk retention rules and the general way in which that is being done. We note, however, that for private SRT securitisations, such information would be included in either the transaction documentation or the transaction summary, hence reporting such information pursuant to Article 7 SECR would in these instances be superfluous.

<ESMA_QUESTION_PRSE_22>

Q23 If you agree with the inclusion of risk retention fields (Question 21), do you also agree with the specific fields proposed in Table 8? If not, please suggest any changes to the structure or content of Table 8, along with the rationale for your proposed modifications.

<ESMA_QUESTION_PRSE_23>

See our response in Question 22 above.

<ESMA_QUESTION_PRSE_23>

Q24 Do you agree with the fields proposed for the position level information in Table 9? If not, please suggest any changes to the Table's structure and provide the rationale for your proposed modifications.

<ESMA_QUESTION_PRSE_24>

No. If Annex XVI is to be developed as a template aimed at meeting the needs of the EU supervisors only, Table 9 should be deleted. Information regarding risk retention should track what is currently required under the ECB/SSM template.

<ESMA_QUESTION_PRSE_24>

Q25 Do you agree with the fields proposed for synthetic securitisation in Table 9? If not, please suggest any changes to the Table's structure and provide the rationale for your proposed modifications.

<ESMA_QUESTION_PRSE_25>

No, requiring such additional information in Annex XVI counteracts the template's intended purpose, i.e. instead of simplifying and reducing the compliance burden, it increases it. In addition, a number of the fields proposed for synthetic securitisation in Table 10 overlaps with information that would already be reported as position level information. Further, given that most synthetic securitisations utilise credit-linked notes held in a clearing system, it is not possible for the originator to report on the name of the protection provider, nor would it be appropriate for the identities of multiple protection providers to be disclosed to other investors or potential investors. In addition, it should be clarified that the first line item is a 'Y/N' question and that there might be multiple credit protection attachment/detachment points. Furthermore, references equating a Financial Guarantee with unfunded credit risk mitigation should be avoided, as they may create confusion in connection with structures that involve SSPEs granting to originators/protection buyer fully funded financial guarantees.

<ESMA_QUESTION_PRSE_25>

Q26 Do you foresee any operational challenges or implications arising from the implementation of the simplified template for EU private securitisations? If so, please describe the challenges you anticipate and suggest any measures that could mitigate them.

<ESMA_QUESTION_PRSE_26>

Yes. The proposals necessitate that reporting entities gather and report new data that they currently do not collect, which means that reporting systems will need to be modified to ensure compliance. Although this could potentially lower operational costs for new entrants, the adaptations required for existing stakeholders could be expensive. Therefore, it would be prudent to delay changes to the reporting system until any forthcoming amendments to the Level 1 SECR text are finalised, allowing all changes to be implemented simultaneously. Moreover, given that the proposals lack transitional provisions, the required new information would need to be reported even for existing transactions completed before the requirement for such reporting systems was known. Lastly, the Consultation Paper's requirement for full "public" disclosure upon request (paragraph 22 of the Consultation Paper) counteracts the proposals' intended purpose, i.e., instead of simplifying and reducing the compliance burden, it increases it. If a private securitisation template is to be implemented prior to any forthcoming amendments to Level 1 SECR despite our objections, we would request, at minimum, an amendment to make the use of the new Annex XVI disclosure optional, so that reporting parties could choose to either disclose against Annex XVI or the full public templates as they currently do.

<ESMA_QUESTION_PRSE_26>

Q27 What are the projected implementation costs for sell-side parties for transitioning to the simplified template for private securitisations, and how do these compare to the reduction of reporting burden?

<ESMA_QUESTION_PRSE_27>

Any modifications to the existing infrastructure or systems established by the relevant sell-side parties will necessitate budget approvals, IT support, and other resources. Whilst estimating the projected implementation costs at this stage would be challenging, it is also reasonable to expect that these costs will be substantial.

<ESMA_QUESTION_PRSE_27>

Q28 To what extent does the simplified disclosure framework for private securitisation improve the usefulness of information for investors while maintaining their ability to perform due diligence?

<ESMA_QUESTION_PRSE_28>

The prescribed templates are in general not used by investors for their due diligence in private SRT securitisations or other private securitisations. Rather, investors rely on the reports in a form they have negotiated separately (and documented in the transaction documents) and receiving the prescribed templates is more of a "tick box" requirement for them solely for the purpose of meeting their statutory SECR due diligence obligations. If anything, the prescribed templates can make it more difficult for investors to get the information they find most useful for the reasons set out above.

<ESMA_QUESTION_PRSE_28>

Q29 Does in your view the introduction of the simplified template enhance the effectiveness of supervisory oversight without imposing disproportionate costs on market participants?

<ESMA_QUESTION_PRSE_29>

As the aim of these proposals is 'simplification', the benchmark should be the preservation of effective supervisory oversight and the reduction of disclosure costs. Per our responses to the questions above (particularly Q1), we are of the view that the current proposal falls short by this measure. Developing Annex XVI as a reporting template focused solely on meeting supervisors' needs could harmonise and streamline the currently fragmented supervisory approach to reporting. This could also potentially lower the costs of complying with supervisory requirements across EU Member States and promote supervisory convergence.

<ESMA_QUESTION_PRSE_29>