

Template for comments

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

Institution / Company

ASPIM - French association for real estate investment companies

Contact person

Mr / Ms

First name

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General comments

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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: xx February 2024

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	10	6	11	Amendment	Considering the specific frequency of valuation of real estate assets, real estate AIFs should not be required to produce reporting more than quarterly. The derogation set out in article 10, paragraph 6, of the proposed Regulation should be extended with not time limit. The last sentence of the paragraph 6 should be deleted.	For real estate funds, increasing the frequency from quarterly to monthly will not add any value , as the same values will be repeated from one month to the next. On the contrary, this change is time-consuming and costly for real estate funds, many of which are civil companies. Maintaining the exemption, with no time limit is relevant for non-UCITS IFs that are subject to national accounting rules that allow the valuation of their assets less frequently than monthly.		Do not publish