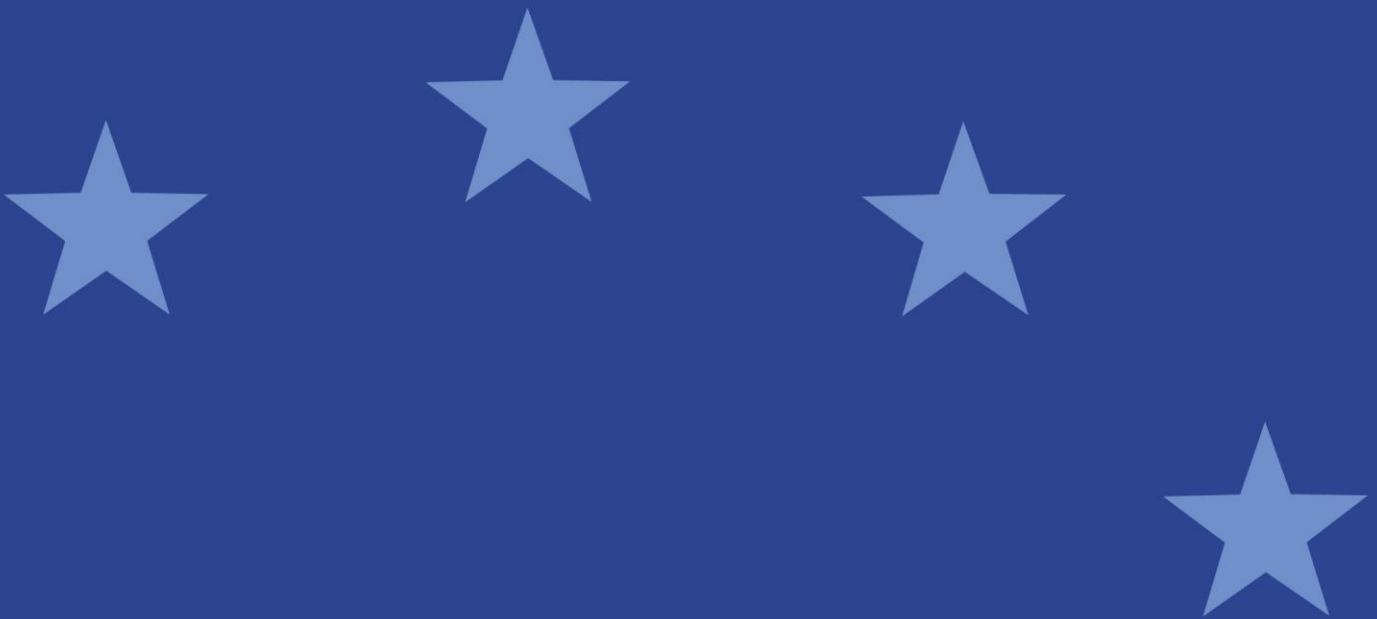


# Response form for the Joint Consultation Paper concerning amendments to the PRIIPs KID





JOINT COMMITTEE OF THE EUROPEAN  
SUPERVISORY AUTHORITIES

## Responding to this paper

The European Supervisory Authorities (ESAs) welcome comments on this consultation paper setting out proposed amendments to Commission Delegated Regulation (EU) 2017/653 of 8 March 2017<sup>1</sup> (hereinafter “PRIIPs Delegated Regulation”).

The consultation package includes:

- The consultation paper
- Template for comments

The ESAs invite comments on any aspect of this paper. Comments are most helpful if they:

- contain a clear rationale; and
- describe any alternatives the ESAs should consider.

When describing alternative approaches the ESAs encourage stakeholders to consider how the approach would achieve the aims of Regulation (EU) No 1286/2014<sup>2</sup> (hereinafter “PRIIPs Regulation”).

## 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 the present response form.
- Please do not remove tags of the type <ESA\_QUESTION\_PKID\_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 response, name your response form according to the following convention: ESA\_PKID\_nameofrespondent\_RESPONSEFORM. For example, for a respondent named ABCD, the response form would be entitled ESA\_PKID\_ABCD\_RESPONSEFORM.

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<sup>1</sup> COMMISSION DELEGATED REGULATION (EU) 2017/653 of 8 March 2017 supplementing Regulation (EU) No 1286/2014 of the European Parliament and of the Council on key information documents for packaged retail and insurance-based investment products (PRIIPs) by laying down regulatory technical standards with regard to the presentation, content, review and revision of key information documents and the conditions for fulfilling the requirement to provide such documents

<sup>2</sup> Regulation (EU) No 1286/2014 of the European Parliament and of the Council of 26 November 2014 on key information documents for packaged retail and insurance-based investment products (PRIIPs), OJ L 352, 9.12.2014, p. 1.

- The consultation paper is available on the websites of the three ESAs and the Joint Committee. Comments on this consultation paper can be sent using the response form, via the [ESMA website](#) under the heading 'Your input - Consultations' by **13 January 2020**.
- Contributions not provided in the template for comments, or after the deadline will not be processed.

### Publication of responses

All contributions received will be published following the close of the consultation, unless you request otherwise in the respective field in the template for comments. 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 ESAs rules on public 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 ESAs Board of Appeal and the European Ombudsman.

### Data protection

The protection of individuals with regard to the processing of personal data by the ESAs is based on Regulation (EU) 2018/1725<sup>3</sup>. Further information on data protection can be found under the [Legal notice](#) section of the EBA website and under the [Legal notice](#) section of the EIOPA website and under the [Legal notice](#) section of the ESMA website.

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<sup>3</sup> Regulation (EU) 2018/1725 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39.

## General information about respondent

Name of the company / organisation	The Danish Consumer Council
Activity	Non-financial counterparty
Are you representing an association?	<input type="checkbox"/>
Country/Region	Denmark

## Introduction

***Please make your introductory comments below, if any:***

<ESA\_COMMENT\_PKID\_1>

The Danish Consumer Council is a non-governmental member organisation with more than 80,000 personal members and 27 organisations and one consumer group as members. We represent the Danish consumers and as such the Danish retail investors.

We would like to thank the ESAs for their work on PRIIPs KID and for facilitating this consultation. It is of great importance for the retail investors to get correct information in a clear, transparent and credible way. Therefore, the work on the draft amendments to the PRIIPs KID is of great importance.

In our view, the most important aspect of the PRIIPs KID is that the information given is correct and valid, and this aspect should never compromise on intelligibility. With that said, the Key Information Document only adds value to the investors if it is understandable to them and presents relevant information. Therefore we are in a strong favour of the ESAs conducting more evidence on how the retail investors use and understand the KID through consumer testing.

We are concerned that not all costs are shown to the investors in the PRIIPs KID possibly creating a bias and lowering the credibility of the information. Therefore we strongly recommend the ESAs to investigate the effects of using different methods for calculating the costs – especially regarding the indirect transaction costs.

<ESA\_COMMENT\_PKID\_1>

**Q1 : Are there provisions in the PRIIPs Regulation or Delegated Regulation that hinder the use of digital solutions for the KID?**

<ESA\_QUESTION\_PKID\_1>

Consumers are asking for digital solutions and would like the PRIIPs KID to be available in a digital format. Digital solutions would make it possible for retail investors to access the KID on webpages, tablets, smartphones etc., and the Danish retail investors are in general quite digital and used to having their financial documents electronically. Providing digital solutions are also in line with the new Commission's ambition to strengthen the digital Europe.

Providing a digital solution for the KID is however more than just presenting a pdf document on a webpage since the pdf format is not suited for tablets and smartphones. As such there would need to be some flexibility regarding the format if the KID should be digitally available.

The paper version of the KID serves among other things, the purpose of retail investors having to look at the information handed out to them. It is of great importance that the PRIIPs KID is required to be shown to the investors whether the document is in paper format or digital. If a digital version is preferred over a paper version, retail investors should still be required to read the document and consent to it.

A digital version of the KID must always be possible to print.

<ESA\_QUESTION\_PKID\_1>

**Q2 : Do you agree that it would be helpful if KIDs were published in a form that would allow for the information to be readily extracted using an IT tool?**

<ESA\_QUESTION\_PKID\_2>

TYPE YOUR TEXT HERE

<ESA\_QUESTION\_PKID\_2>

**Q3 : Do you think that the amendments proposed in the consultation paper should be implemented for existing PRIIPs as soon as possible before the end of 2021, or only at the beginning of 2022?**

<ESA\_QUESTION\_PKID\_3>

We recommend that amendments to the PRIIPs regulation are implemented at one point in time but as soon as possible. Having sequential implementation deadlines can possibly confuse the private investors, and too many updates to the requirement of the KID should be avoided as it would make it difficult to compare KIDs from different points in time.

<ESA\_QUESTION\_PKID\_3>

**Q4 : Do you think that a graduated approach should be considered, whereby some of the requirements would be applied in a first step, followed by a second step at the beginning of 2022?**

<ESA\_QUESTION\_PKID\_4>

TYPE YOUR TEXT HERE

<ESA\_QUESTION\_PKID\_4>

**Q5 : Are there material issues that are not addressed in this consultation paper that you think should be part of this review of the PRIIPs Delegated Regulation? If so, please explain the issue and how it should be addressed.**

<ESA\_QUESTION\_PKID\_5>

OTC products used for hedging are not used for investment purposes, and we are worried that a PRIIPs KID for those types of derivatives can be misleading for retail investors who could possibly be intimidated to hedge risk if the KID indicates it is a bad investment.

Our suggestion is therefore to state at the top of the KID document for OTC products used for hedging that the product is to be seen as risk hedging rather than a real investment. Derivatives must be seen in terms of risk hedging in an 'investment package'. The PRIIPs KID should still be made for the OTC products to ensure uniformity but with the disclaimer added.

We are not convinced that private investors fully understand all the concepts in the KID (e.g. how to interpret risks and the meaning of expected future returns). Therefore we recommend the ESAs to use more resources on testing how consumers perceive the information in the KID. It is crucial that the recipient of the information can actually understand and use the information given.

<ESA\_QUESTION\_PKID\_5>

**Q6 : Do you have comments on the modifications to the presentation of future performance scenarios being considered? Should other factors or changes be considered?**

<ESA\_QUESTION\_PKID\_6>

We appreciate that the decision on these aspects will be made when the results from the consumer tests are collected. We are however worried that the consumer tests are not sufficiently comprehensive (as stated in our answer to question 5).

It is essential that the information provided in the PRIIPs KID is correct and substantiated by a solid and trustworthy methodology. The scenarios should be presented in a meaningful way in which the retail investors understand by giving the investors a clear impression of how the different risk factors may affect the scenarios. But the information must never be twisted to make the communication easier if it compromises the correctness of the data.

Another important aspect regarding the performance scenarios is to ensure that all costs are included and clearly stated.

<ESA\_QUESTION\_PKID\_6>

**Q7 : If intermediate scenarios are to be included, how should they be calculated for Category 3 PRIIPs (e.g. structured products)? If intermediate scenarios are not shown in the performance section, which performance assumption should be used for the 'What are the costs?' section?**

<ESA\_QUESTION\_PKID\_7>

We do not have any comments to this question except to stress the importance of always presenting the downside in the PRIIPs KID.

<ESA\_QUESTION\_PKID\_7>

**Q8 : If a stress scenario is included in the presentation of future performance scenarios, should the methodology be modified? If so, how?**

<ESA\_QUESTION\_PKID\_8>

TYPE YOUR TEXT HERE

<ESA\_QUESTION\_PKID\_8>

**Q9 : Do you agree with how the reference rate is specified? If not, how should it be specified?**

<ESA\_QUESTION\_PKID\_9>

TYPE YOUR TEXT HERE

<ESA\_QUESTION\_PKID\_9>

**Q10 : The revised methodology specifies that the risk premium is determined by future expected yields. The methodology further specifies that future expected yields should be determined by the composition of the PRIIP decomposed by asset class, country and sector or rating. Do you agree with this approach? If not, what approach would you favour?**

<ESA\_QUESTION\_PKID\_10>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_10>

**Q11 : The ESAs are aware that historical dividend rates can be averaged over different time spans or that expected dividend rates can be read from market data providers or obtained from analyst reports. How should the expected dividend rates be determined?**

<ESA\_QUESTION\_PKID\_11>

We are concerned that the market for data is not functioning adequately implying that access to data is quite expensive for the banks and as such means higher costs for the retail investors. In general it is problematic if new requirements results in significantly higher costs for the banking sector, since the higher costs possibly would be channelled into higher prices for retail investors.

Another important aspect is that the data used is based on independent calculations and not biased due to conflict of interests. In Denmark the business association of banks (Finance Denmark) and the association of insurance and pension funds (Insurance & Pension Denmark) have recently launched an approach called "Common returns assumptions on Pension- and Investment products"

(<https://www.pensionsprognoser.dk/samfundsforudsætninger>).

The assumptions for future returns are set by an independent council (Council for Pensions Forecasts) consisting of experts in the academic field of finance. The data used by the council consisted of inputs from different financial institutions. The purpose of having the independent council making common assumptions is to increase transparency and credibility in the pension and investment sectors and thereby strengthening the investment environment in Denmark. We recommend that something similar is done regarding the reference rate and expected yields at the EU level. If such independent assumptions are calculated by ESMA or another third party it would increase transparency and credibility and not incentivise the banking sector to compete on unrealistic expectations to the financial market. This approach would also minimize the potential problem of the markets for data not functioning adequately.

<ESA\_QUESTION\_PKID\_11>

**Q12 : How should share buyback rates be estimated?**

<ESA\_QUESTION\_PKID\_12>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_12>

**Q13 : Do you agree with the approach for money-market funds? Are there other assets which may require a similar specific provisions?**

<ESA\_QUESTION\_PKID\_13>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_13>

**Q14 : The methodology proposes that the future variance be estimated from the 5-year history of daily returns. Should the volatility implied by option prices be used instead? If so, what estimate should be used if option prices are not available for a particular asset (equities namely)?**

<ESA\_QUESTION\_PKID\_14>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_14>

**Q15 : Do you think compensatory mechanisms for unforeseen methodological faults are needed? If yes, please explain why.**

<ESA\_QUESTION\_PKID\_15>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_15>

**Q16 : Do you favour any of the options above? If so, which ones? How would you ensure that the information in the KID remains comparable for all products?**

<ESA\_QUESTION\_PKID\_16>  
We are not in favour of any of the specific options as long as they all makes it possible to compare the PRIIPs KID from different periods. There should neither be possibilities of manipulation by freely choosing the periods that creates more positive results.  
<ESA\_QUESTION\_PKID\_16>

**Q17 : Are there any other compensatory mechanisms that could address unforeseen methodological faults? If yes, please explain the mechanism; explain how it ensures that scenario information in the KID allows investors to compare PRIIPs, and explain how the information for similar products from different manufacturers remains sufficiently consistent.**

<ESA\_QUESTION\_PKID\_17>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_17>

**Q18 : What are your views on the use of a simplified approach such as the one detailed above, instead of the use of probabilistic methodologies with more granular asset specific requirements?**

<ESA\_QUESTION\_PKID\_18>  
We are not sure whether the probabilistic methodologies provides the non-advanced investor added information (value) that matches the costs required to provide the results. We would like to refer to our answer in question 5 stating that more consumer testing should be done. It is crucial to investigate whether a simplified approach is sufficient for the retail investors or whether the investors would benefit from more granular asset specific requirements.  
<ESA\_QUESTION\_PKID\_18>

**Q19 : Do you consider the use of a single table of growth rates appropriate? If no, how should the methodology be amended?**

<ESA\_QUESTION\_PKID\_19>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_19>

**Q20 : More generally, do your views about the use of a probabilistic methodology vary depending on the type of product (e.g. structured products vs non-structured products, short-**



**term vs long-term products)? For which type of products do you see more challenges to define a probabilistic methodology and to present the results to investors?**

<ESA\_QUESTION\_PKID\_20>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_20>

**Q21 : Do you think these alternative approaches should be further assessed? If yes, what evidence can you provide to support these approaches or aspects of them?**

<ESA\_QUESTION\_PKID\_21>  
We think the alternative approaches should be further assessed since it is hard to qualify which approach is preferable. Further assessments should be based on consumer testing to have a solid knowledge base on which to make decisions.  
We embrace that the ESAs are looking towards alternative approaches but the resources used and the additional value for the investors created must be weighted.  
<ESA\_QUESTION\_PKID\_21>

**Q22 : Are there any other approaches that should be considered? What evidence are you able to provide to support these other approaches?**

<ESA\_QUESTION\_PKID\_22>  
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<ESA\_QUESTION\_PKID\_22>

**Q23 : Do you think illustrative scenarios should be included in the KID as well as probabilistic scenarios for structured products?**

<ESA\_QUESTION\_PKID\_23>  
The most important aspect is that PRIIPs KIDs can be compared. If illustrative scenarios can be implemented without losing the comparability of the KID it is great, but if not the focus should be on the comparability between KIDs for different products and periods.  
<ESA\_QUESTION\_PKID\_23>

**Q24 : If not, do you think illustrative scenarios should replace probabilistic scenarios for structured products?**

<ESA\_QUESTION\_PKID\_24>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_24>

**Q25 : Do you agree with this approach to define PRIIPs which would show illustrative performance scenarios using the existing definition of Category 3 PRIIPs? If not, why not? Where relevant, please explain why this approach would not be appropriate for certain types of Category 3 PRIIPs?**

<ESA\_QUESTION\_PKID\_25>  
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<ESA\_QUESTION\_PKID\_25>

**Q26 : Would you be in favour of including information on past performance in the KID?**

<ESA\_QUESTION\_PKID\_26>

A lot of studies within the field of behavioural finance have shown that retail investors are biased because they focus too much on historical results even though they are not necessarily a strong predictor for the future. Therefore, including information on past performance should be done with caution, and it should be clearly stated that the past performance does not say anything about future performance.

On the other hand information on past performance is typically nice to have for the investors, and historical costs could probably have a higher degree of autocorrelation than historical returns, since costs are more controllable.

<ESA\_QUESTION\_PKID\_26>

**Q27 : Would your answer to the previous question be different if it were possible to amend Article 6(4) of the PRIIPs Regulation?**

<ESA\_QUESTION\_PKID\_27>

TYPE YOUR TEXT HERE

<ESA\_QUESTION\_PKID\_27>

**Q28 : Do you think that it can be more appropriate to show past performance in the form of an average (as shown in the ESA proposal for consumer testing) for certain types of PRIIPs? If so, for exactly which types of PRIIPs?**

<ESA\_QUESTION\_PKID\_28>

TYPE YOUR TEXT HERE

<ESA\_QUESTION\_PKID\_28>

**Q29 : Do you have any comments on the statement that would supplement the display of past performance (e.g. with regard to the presentation of costs which are not included in the net asset value (NAV))?**

<ESA\_QUESTION\_PKID\_29>

TYPE YOUR TEXT HERE

<ESA\_QUESTION\_PKID\_29>

**Q30 : Are you of the opinion that an additional narrative is required to explain the relationship between past performance and future performance scenarios?**

<ESA\_QUESTION\_PKID\_30>

TYPE YOUR TEXT HERE

<ESA\_QUESTION\_PKID\_30>

**Q31 : Do you see merit in further specifying the cases where the UCITS/AIF should be considered as being managed in reference to a benchmark, taking into account the provisions of the ESMA Questions and Answers on the application of the UCITS Directive<sup>4</sup>?**

<ESA\_QUESTION\_PKID\_31>

TYPE YOUR TEXT HERE

<ESA\_QUESTION\_PKID\_31>

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<sup>4</sup> See "Section II – Key Investor Information Document (KIID) for UCITS" (in particular, Q&A 8) of the Q&A document available at: [https://www.esma.europa.eu/sites/default/files/library/esma34-43-392\\_qa\\_ucits\\_directive.pdf](https://www.esma.europa.eu/sites/default/files/library/esma34-43-392_qa_ucits_directive.pdf)

**Q32 : Do you see the need to add additional provisions for linear unit-linked insurance-based investment products or linear internal funds?**

<ESA\_QUESTION\_PKID\_32>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_32>

**Q33 : Do you agree that a fixed intermediate time period / exit point should be used instead of the current half the recommended holding period to better facilitate comparability?**

<ESA\_QUESTION\_PKID\_33>  
We support the aim to improve the comparability with MiFID II disclosures. If there is a dispersion between the underlying methodologies of PRIIPs and MiFID II, MiFID should be adjusted if the approach in PRIIPs is considered to be superior. Probably standardised periods will make comparison between different products easier for the retail investor.  
<ESA\_QUESTION\_PKID\_33>

**Q34 : In this case (of a fixed intermediate time period), do you agree to show costs if the investor would exit after 5 years for all PRIIPs with a recommended holding period of at least 8 years? Or do you prefer a different approach such as:**

<ESA\_QUESTION\_PKID\_34>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_34>

**Q35 : Do you think it would be relevant to either (i) use an annual average cost figure at the recommended holding period, or (ii) to present both an annual average cost figure and a total (accumulated) costs figure?**

<ESA\_QUESTION\_PKID\_35>  
Both figures would be highly relevant to show the retail investor. The average annual cost figures makes it easier for retail investors to compare costs for different products. But the accumulated cost figure gives a more tangible cost measure for the investors. Accumulated costs increases the price elasticity of the investors and the competition in the financial market and as such incentivises the funds to lower the costs.  
<ESA\_QUESTION\_PKID\_35>

**Q36 : Do you think that it would be helpful, in particular for MiFID products, to also include the total costs as a percentage of the investment amount?**

<ESA\_QUESTION\_PKID\_36>  
As mentioned in our answer to question 33 we strongly appreciate the intentions to improve the comparability between MiFID II and PRIIPs KID cost disclosures.  
Costs in percentages are easy for the investors to compare. However, we experience that many consumers have a better understanding of the impact of the costs when they are presented as total costs. Therefore we recommend that costs are presented as both percentages and as totals. We also recommend some consumer testing in this regard – comparability has no actual effect if investors do not fully understand the figures presented.  
<ESA\_QUESTION\_PKID\_36>

**Q37 : In this context, are there PRIIPs for which both performance fees and carried interests are applied?**

<ESA\_QUESTION\_PKID\_37>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_37>

**Q38 : Do you agree with this analysis from the ESAs? If yes, what are your views on the extent to which fees related to the management of the underlying real estate assets, i.e. the properties themselves, should be taken into account in the calculation of the cost indicators?**

<ESA\_QUESTION\_PKID\_38>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_38>

**Q39 : Do you agree with the ESAs' preferred option 3 to revise the cost tables?**

<ESA\_QUESTION\_PKID\_39>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_39>

**Q40 : If not, which option do you prefer, and why?**

<ESA\_QUESTION\_PKID\_40>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_40>

**Q41 : In particular, do you think that the proposed changes to the presentation of the impact of costs on the return in percentage terms (i.e. including reduction in return before and after costs) is an improvement on the current presentation?**

<ESA\_QUESTION\_PKID\_41>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_41>

**Q42 : Do you have other comments on the proposed changes to the cost tables?**

<ESA\_QUESTION\_PKID\_42>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_42>

**Q43 : What are your views on the appropriate levels of these thresholds? Please provide a justification for your response.**

<ESA\_QUESTION\_PKID\_43>

It is crucial that implicit transaction costs are included as a cost component. Even though implicit transaction costs do not accrue to someone it is a friction cost that deducts the return and depends on the practice/procedure chosen. The KID is only credible if all costs are included. A correct calculation of all actual costs is crucial for transparency, and transparency is essential for competition which fosters efficiency and low costs.

As such we strongly support the use of the slippage cost methodology for calculation the implicit transaction costs. When using the slippage cost methodology real costs are used and hence incentivising the funds to lower their costs.

We have seen the methodology being used in the United Kingdom with great success as stated by the British Financial Conduct Authority. We highly agree with the ESAs; there is more merit in amending the arrival price methodology rather than replacing it. Therefore, we support a proportional threshold whereby

a PRIIP manufacturer would be able to use a simplified approach where there is a low number of transactions or portfolio turnover. Nevertheless the threshold should be as low as possible to ensure credibility.

We are in favour of the ESAs looking more into the different aspects of different approaches calculating implicit transaction costs. We are worried that the lack of total transparency leads to investment strategies where there is an inefficiently high amount of trading and that it will be a cost driver for investors.

<ESA\_QUESTION\_PKID\_43>

**Q44 : If UCITS would fall in the scope of the PRIIPs Regulation, do you agree that the coexistence of the UCITS KII (provided to professional investors under the UCITS Directive) and the PRIIPs KID (provided to retail investors under the PRIIPs Regulation) would be a negative outcome in terms of overall clarity and understandability of the EU disclosure requirements? Are you of the view that the co-legislators should therefore reconsider the need for professional investors to receive a UCITS KII, as the coexistence of a PRIIPs KID together with a UCITS KII (even if not targeted to the same types of investors) would indeed be confusing, given the differences in the way information on costs, risks and performance are presented in the documents? Alternatively, are you of the view that professional investors under the UCITS Directive should receive a PRIIPs KID (if UCITS would fall in the scope of the PRIIPs Regulation)?**

<ESA\_QUESTION\_PKID\_44>

There is an exceedingly difference between the knowledge and understanding of professional investors and retail investors. Knowing this, it is important to target the information to the reviewing parts. We are not sure that professional investors would use a KII/KID document, since the information could be too basic for them.

<ESA\_QUESTION\_PKID\_44>

**Q45 : What are your views on the issue mentioned above for regular savings plans and the potential ways to address this issue?**

<ESA\_QUESTION\_PKID\_45>

TYPE YOUR TEXT HERE

<ESA\_QUESTION\_PKID\_45>

**Q46 : Do you agree that these requirements from Article 4 should be extended to all types of PRIIPs, or would you consider that it should be restricted to Management Company of UCITS or AIFs?**

<ESA\_QUESTION\_PKID\_46>

TYPE YOUR TEXT HERE

<ESA\_QUESTION\_PKID\_46>

**Q47 : Do you agree that this requirement should be extended to all types of PRIIPs, or would you consider that it should be restricted to Management Company of UCITS or AIF?**

<ESA\_QUESTION\_PKID\_47>

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<ESA\_QUESTION\_PKID\_47>

**Q48 : Do you agree that these requirements should be extended to all types of PRIIPs, or would you consider that they should be restricted to the Management Company of the UCITS or AIF?**

<ESA\_QUESTION\_PKID\_48>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_48>

**Q49 : Do you have any comments on the proposed approaches in relation to the analysis and proposals in this Section, and in particular on the extent to which some of the abovementioned requirements should be extended to other types of PRIIPs?**

<ESA\_QUESTION\_PKID\_49>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_49>

**Q50 : Do you think this proposal would be an improvement on the current approach?**

<ESA\_QUESTION\_PKID\_50>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_50>

**Q51 : Do you envisage significant practical challenges to apply this approach, for example for products which allow the investor to choose between a wide range or large number of options?**

<ESA\_QUESTION\_PKID\_51>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_51>

**Q52 : Do you see any risks or issues arising from this approach in relation to consumer understanding, for instance whether the consumer will understand that other combinations of investment options are also possible?**

<ESA\_QUESTION\_PKID\_52>  
We refer to our answer in question 5 and 21 regarding our desire for more consumer testing.  
<ESA\_QUESTION\_PKID\_52>

**Q53 : Do you think this proposal would be an improvement on the current approach?**

<ESA\_QUESTION\_PKID\_53>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_53>

**Q54 : Are there other approaches or revisions to the requirements for MOPs that should be considered?**

<ESA\_QUESTION\_PKID\_54>  
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**Q55 : Do you have any comments on the preliminary assessment of costs and benefits?**

<ESA\_QUESTION\_PKID\_55>  
TYPE YOUR TEXT HERE  
<ESA\_QUESTION\_PKID\_55>

**Q56 : Are you able to provide information on the implementation costs of the proposed changes, in particular regarding, (1) the proposed revised methodology for performance scenarios (using a reference rate and asset specific risk premia), and (2) the overall changes to the KID template?**

<ESA\_QUESTION\_PKID\_56>  
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<ESA\_QUESTION\_PKID\_56>

**Q57 : Are there significant benefits or costs you are aware of that have not been addressed?**

<ESA\_QUESTION\_PKID\_57>  
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<ESA\_QUESTION\_PKID\_57>