Response to the ESMA consultation on the Regulatory Technical Standards (RTS) in accordance with ELTIF Regulation (Regulation (EU) 2015/760) as amended by Regulation (EU) 2023/606.

- **Existing ESMA empowerments under Articles 9(3), 21(3) and 26(2)**

Q1: Do you agree with the proposed approach in relation to the RTS under the abovementioned Articles 9(3), 21, and 26(2) of the ELTIF Regulation?

Assogestioni agrees with the approach adopted by ESMA in relation to the RTS under Articles 9(3), 21, and 26(2) of the ELTIF Regulation.

- **ESMA empowerment under Article 25(3) on cost disclosure**

Q2: Do you agree that the abovementioned pieces of legislation and regulatory material are relevant for the purpose of the RTS on Article 25(3) of the ELTIF Regulation? Which other pieces of legislation and regulatory material do you consider relevant for that purpose)?

The regulations and legislations considered by ESMA for the purpose of the RTS on Article 25(3) of the ELTIF Regulation are relevant with respect to costs disclosure. However, we are of the opinion that additional rules should be considered, such as Article 23 of Directive 2011/61/EU (AIFMD) concerning disclosure to investors and Chapter V, Section I of Commission Delegated Regulation (EU) No 231/2013. Furthermore, it should also be considered that both the proposal of Retail Investment Strategy Directive and the ongoing AIFMD Review contain significant rules on “due” and “undue” costs and, generally, on the costs’ regime of alternative investment funds. Therefore, we believe that negotiations and discussions under these legislation proposals should be duly contemplated by ESMA, also considering that ELTIFs are AIFs and that managers of ELTIFs are subject to AIFMD rules. In this respect, ESMA could also consider the opportunity to wait until an agreement is reached regarding Retail Investment Strategy and AIFMD Review.

Q3: Do you agree with the abovementioned assumptions? In relation to the ELTIF cost ratio figures to be expressed as yearly percentages (of the capital of the ELTIF), would you see merit in expressing it instead in terms of maximum percentages (and, in the prospectus, only refer to the corresponding yearly figures included in the KID, or in the annual report of the ELTIF)?

We appreciate the efforts made by ESMA to develop ways of representing costs that are sufficiently clear and effective for investors, particularly to retail investors. However, we believe that whenever the draft RTS requires that costs are represented as a certain percentage of the capital of the ELTIF, it should be considered that such percentages may vary depending on the size of the ELTIF capital (and not because

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of changes in the amount of those costs). Therefore, especially during the fundraising stage, such percentages could be misleading and not able to correctly represent the entity and trend of the costs. Therefore, the RTS should also allow a representation of such costs as a maximum percentage.

Q4: Do you agree that the types of cost mentioned in the present paragraph are annual costs that could be expressed as a percentage of the capital? What are your views on the list of "other costs" referred to above in paragraph 32(b) which are suggested to be added, as compared to the list of "other costs" referred to in Article 25(1)(e) of the ELTIF Regulation?

We believe that a single and all-inclusive representation of the costs mentioned in paragraph 32 of the consultation paper could be potentially misleading.

As already stated, since the capital of the ELTIF is subject to changes especially in the fundraising/investment stage, a representation of these costs as a percentage of the ELTIF capital could not correctly describe their amount and trend during the ELTIF lifespan.

For the reasons above, it may be advisable to modify the relevant provisions so that the prospectus of ELTIFs may indicate a maximum rate (rather a fixed percentage) by type of costs, also allowing the application of different calculation bases (capital of the ELTIF or investment value).

The RTS should also clarify that the requirements under Article 25 of the ELTIF Regulation apply to ex ante disclosure and that actual costs incurred by the ELTIF (ex post disclosure) are specified in the annual regulatory reporting.

In accordance with article 12, para. 2 of the proposed RTS, ELTIF managers would be required to include carried interest among costs pertaining to management fees and performance fees, as these costs are referred to in point 25 of Annex VI of the PRIIPs Delegated Regulation 2017/653. In this respect, it should be noted that carried interest differs substantially from performance fees, as carried interest is not paid annually but is only paid when the fund, on a cumulative basis, has exceeded a specific performance indicator (such as an "internal rate of return" or a "preferred return"). The draft RTS should therefore require (or at least allow) a separate representation of carried interest and performance fee.

We agree that the list of other costs referred under paragraph 32(b) of the consultation paper describes correctly the "other costs" requirement referred to in Article 25(1)(e) of the ELTIF Regulation.

Q5. Do you agree that the types of cost mentioned in paragraph 33 are fixed costs and that an assumption on the duration of the investment is necessary

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to calculate these costs in the numerator of the overall cost ratio mentioned in Article 25(2), provided that this overall ratio is a yearly ratio? Would you see merit in specifying what is to be meant by the "setting up" of the ELTIF, as referred to in Article 25(1)(a) of the ELTIF Regulation? If yes, could you indicate which elements of the "setting up" of the ELTIF should be clarified?

Setting-up costs are one-off costs normally incurred in the initial stage of the ELTIF's lifespan and are subsequently allocated to the fund on a year-by-year basis for the entire term of duration. Therefore, the duration of the ELTIF is a necessary criterion to determine the "overall cost ratio of the ELTIF" pursuant to Article 25, para. 2 of the ELTIF Regulation.

A further clarification on what is meant by "setting up" of the ELTIF could be useful. In this respect, we believe that "setting up" costs should include, without limitation, all costs and fees relating to Fund structuring and offering, filings, licenses, registrations (including the initial notifications, registrations, filings and compliance and other offerings requirements contemplated by the AIFMD and the ELTF Regulation, the EU Regulation (EU) 2019/2088), capital-raising, printing, legal, regulatory compliance and other organizational expenses.

Q6. Do you agree that the types of costs mentioned in paragraph 36 may be considered as fixed costs in the case of an ELTIF?

We believe that the RTS should provide additional clarifications regarding what is meant by "costs related to the acquisition of assets" to evaluate whether they can be considered as fixed costs in case of an ELTIF. In case such costs include fees and remunerations to professional advisors (such as legal, tax and financial advisors) for the activities relating to the acquisition of assets (including legal and tax due diligence), we believe that the relevant amounts are generally fixed or a percentage of the investment value.

A viable solution would be to express such costs as a maximum percentage of the investment value, it being understood that the ELTIF annual reports will represent the actual amounts of the relevant fees and costs with respect to each reference year.

Q7. Would you see merit in including a specific grand-fathering clause (in relation to the RTS under Article 25(3) of the ELTIF Regulation) for ELTIFs benefitting from the grand-fathering clause provided for in Article 2 of Regulation 2023/606?

We believe that the application of the RTS under Article 25, para. 3 of the ELTIF Regulation should be subject to a grand-fathering clause concerning costs

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disclosure, applicable at least to all ELTIFs which will benefit from the grand-fathering clause already envisaged by Article 2 of Regulation (EU) 2023/606. Such clause would be particularly appropriate for "*ELTIFs authorised in accordance with and complying with the provisions of Regulation (EU) 2015/760 applicable before 10 January 2024, which do not raise additional capital*". Indeed, in the absence of a grand-fathering clause, such ELTIFs would be required to significantly change the modalities and methodology to describe the costs in the prospectus, only to be compliant with the new legal framework and without any actual variation of the costs' regime. We are of the opinion that such changes could be misleading and hard to explain to existing investors.

We also highlight that, without any grand-fathering clause being provided, ELTIFs which do not raise additional capital would also be required to update the prospectus in order to observe the requirement envisaged by Article 12, par. 14 of the draft RTS whereby "*The overall ratio shall be calculated at least once a year*". Such annual update appears to be unhelpful and potentially misleading considering that the ELTIF would be no longer open to new subscriptions.

- <u>**ESMA empowerment under Article 18 on redemption policy**</u>

Q8. Do you agree with the proposed amendment to the existing RTS under the first paragraph of Article 18(6) of the ELTIF Regulation?

We believe that the list of circumstances set forth by Article 2 of the proposed RTS – in which the life of an ELTIF is considered compatible with the life cycles of each of its individual assets – is complete and exhaustive and capable of ensuring adequate flexibility to ELTIFs managers.

Q9. Do you agree with the proposed criteria to determine the minimum holding period (referred to in point (a) of paragraph 2 - Article 18(6)(a)) of the ELTIF Regulation? What are your views on the setting of a minimum of X years for all ELTIFs, irrespective of their individual specificities (with X equal to 3, for example), with respect to the abovementioned minimum holding period?

We are of the opinion that the criteria proposed by ESMA to determine the minimum holding period referred to in point (a) of paragraph 2 - Article 18(6)(a)) of the ELTIF Regulation are, in general terms, significant and appropriate. However, we take the opportunity to make the following observations:

a) the approach to determine the minimum holding period should be qualitative and not quantitative, as the relevant needs and requirements could be different form one type of ELTIF to another (being affected by asset classes, markets and sectors to which ELTIFs are exposed as well as by the types of investors to which ELTIFs may be marketed). This principle appears to be in line with the observations of ESMA under para. 62 of the consultation paper;

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b) PRIIPs Regulation n. 1286/2014 is applicable in any case where an ELTIF is marketed to retail investors. In art. 8, para. 3, let. (g)(iv) of such Regulation reference is made to a “recommended holding period” to be specified in the key information document. Should the RTS require a mandatory minimum holding period, we believe that there is a significant likelihood of confusion and uncertainty arising from the coexistence of two different minimum holding periods (one of which being “recommended” and the other one being “mandatory”).

For the reasons above, we believe that the RTS should not set a mandatory number of years (for example 3 years) for determining the minimum holding period – despite the manager may justify that such period can be shorter – and should give managers adequate flexibility to determine the minimum holding period based on the characteristics of the ELTIFs and the criteria set out under Article 3, para. 1 of the proposed RTS. However, being aware that the provision of a minimum number of years could help to enhance the long-term nature of ELTIFs, this Association would consider acceptable an indication of a “recommended” minimum number of years rather than a “mandatory” one. Such solution would also be consistent with the above-mentioned provision concerning the key information document under PRIIPs regulation.

It should also be considered that certain law provisions in force in Italy (such as art. 1, para. 88 and following of Law no. 232 of 11th December 2016) - which may also apply to ELTIFs – grant tax benefits to retail investors on condition that a minimum holding period is observed. ELTIF managers should therefore have sufficient flexibility to structure the redemption policy in a way that can also accommodate specific requirements deriving from provisions of national law, also concerning the duration of the minimum holding period.

In addition to the foregoing, we believe that the RTS should clarify meaning and consequences of the connection between minimum holding period and ramp-up period in accordance with Article 18, paragraph 2, let. (a) of the amended ELTIF Regulation. In particular, RTS could clarify:

- that redemptions can take place before the ramp-up period if the minimum holding period is shorter than the ramp-up period; and
- in cases where the ELTIF constitutional document do not provide a minimum holding period, if redemptions can take place before the ramp-up period.

Q10. Do you agree with the proposed approach in relation to the minimum information to be provided to the competent authority of the ELTIF (referred to in point (b) of paragraph 2 - Article 18(6)(b) of the ELTIF Regulation)?

In general terms, Assogestioni agrees on the list of minimum information to be provided to the competent authority of the ELTIF.

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With respect to the provisions under Article 4, paragraph 1 of the draft RTS, the requirement to specify, as part of the information to be provided to the competent authority, the "*persons responsible for managing the redemption process*" appears difficult to understand, to the extent that it refers to the individuals (natural persons) who are in charge to manage the redemption process. Indeed, the identity of the natural persons involved in such activities appears to be irrelevant with respect to the need for supervision. We would therefore propose to remove such requirement or to reword the relevant provision, replacing the term "*persons*" with "*entities*".

With respect to the requirements under Article 4, paragraph 2 of the draft RTS, we are of the opinion that the 10 days term as well as the "knowability" criterion provided therein ("*10 days from the date the respective material change became known or should have become known to the ELTIF manager*") appear excessively penalizing for ELTIF managers. Therefore, we would suggest to:

(i) extend the 10 days term to 30 days in order to grant greater operational flexibility to managers; and

(ii) delete the words "*or should have become known*" from paragraph 2, maintaining only the reference to the date on which the information is actually known by the manager.

Q11. a) Do you agree with the proposed approach in relation to the requirements to be fulfilled by the ELTIF in relation to its redemption policy and liquidity management tools, referred to in points (b) and (c) of Article 18(2) – Article 18(6)(c) of the ELTIF Regulation)?

In general terms, we agree with the distinction proposed by ESMA between anti-dilution liquidity management tools and quantity-based liquidity management tools, on the assumption that only anti-dilution LMTs can transfer to the redeeming investor all explicit and implicit costs relating to the redemption request. This distinction appears to be consistent with IOSCO Consultation Report of July 2023 ("*Anti-dilution Liquidity Management Tools – Guidance for Effective Implementation of the Recommendations for Liquidity Risk Management for Collective Investment Schemes*") and the Consultation Report of the Financial Stability Board (FSB) of July 5th, 2023 ("*Addressing Structural Vulnerabilities from Liquidity Mismatch in Open-Ended Funds – Revisions to the FSB's 2017 Policy Recommendations*").

However, although we understand the importance of promoting the use of anti-dilution liquidity management tools, we are of the opinion that ELTIF managers should be allowed to select and implement those LMT that they consider most appropriate with respect to the specific features of their fund, in both normal and exceptional circumstances. By way of example, it should be considered that, in the context of the Italian market, redemption fees (i.e., anti-dilution LMT) and redemption gates (i.e., quantity based LMTs) often coexist within the same fund to ensure financial stability of the redemption policy in the long term, and investors (including retail investors) appear to be familiar with such mechanisms.

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Furthermore, in accordance with the aforesaid consultation papers published by IOSCO and FSB, liquidity management tools are closely tied to other features of the funds, in particular assets, liabilities, and redemption policy. Consequently, the decision on which liquidity management tool to implement, should not be considered in isolation from other factors having a material impact in establishing a sound liquidity risk management system. An adequate implementation of all these elements can ensure that the liquidity is managed effectively and resiliently, without requiring the divestment of the Fund's assets to meet redemption requests or other liabilities.

In accordance with the provisions under Article 5, paragraph 8, of the proposed RTS, ELTIF managers would be required to implement, under “exceptional circumstances”, redemption gates, thus excluding any other LMT of a similar nature that could potentially be used. In this regard, we believe that - in order to grant ELTIF managers with greater flexibility - the RTS should allow managers to adopt quantity-based liquidity management tools other than redemption gates and in any case indicated in Annex V of the AIFMD Review, such as, for example, suspension of redemptions and subscriptions and extension of the notice period.

Finally, ELTIF managers should be allowed to apply additional liquidity management tools (in any case among those listed in Annex V of the AIFMD Review proposal) which the Financial Stability Board, in the above-mentioned report, recognizes as particularly suitable during stressed market conditions, such as, for example, distributions in kind and side pockets.

b) What are your views on the setting of a maximum redemption frequency on a quarterly basis, for all ELTIFs, irrespective of their individual specificities, as suggested in paragraph 84?

With respect to the redemption frequency, we are of the opinion that setting a quarterly frequency as a “standard” maximum frequency is consistent with the features and nature of ELTIFs and would also be appropriate for those ELTIFs that are marketed to retail investors. However, we would also consider acceptable a solution whereby no maximum redemption frequency is envisaged in the RTS, in order to accommodate the solutions identified by those ELTIFs that provide for higher frequencies also through an appropriate calibration of the notice period and of the other LMTs.

c) What are your views on the setting of a notice period of Y months for all ELTIFs (with Y equal to 12, for example)? What are your views on the options 1 and 2, set out in paragraphs 88 to 91, in relation to the specific requirements/circumstances where the notice period could be less than one year, and the numerical values of the parameters Z(1) to Z(4), under option 1, and Y, under option 2?

Regarding the notice period, we believe that ESMA’s proposal to set a 12 months’ notice period for all ELTIFs seems overly restrictive as ELTIF managers (which are also AIFM and therefore subject to the AIFMD rules) may have already implemented

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several LMTs and other measures (including a proper calibration of redemption frequency) in a way that preserves the long-term stability of redemption policies without applying excessively long notice periods. We would therefore recommend that the RTS do not provide for a mandatory duration of the notice period and grant ELTIF managers with greater flexibility to determine such duration in accordance with, *inter alia*, the characteristics of the fund and the types of investors to which the ELTIF is marketed.

With respect to the possible options identified by ESMA in paragraphs 88 and following of the consultation paper, we observe as follows:

- regarding <u>option 1</u>, we are of the opinion that the portion of liquid assets held by an ELTIF should depend on its investment strategies rather than the need to meet redemption requests. Therefore, a further requirement relating to the amount of liquid assets that an ELTIF must hold appears inappropriate, considering the existing obligations concerning ELTIF portfolio composition already provided under Articles 9, 13 and 17 of the ELTIF Regulation and the obligation envisaged under Article 18, para. 2, let. (d) of the ELTIF Regulation to ensure that redemptions are limited to a percentage of the liquid assets held by the ELTIF;

- regarding <u>option 2</u>, we believe that the solution proposed by ESMA may grant greater flexibility as it would allow notice periods shorter than 12 months without introducing additional requirements relating to the holding of liquid assets. However, the functioning of this option should be further specified in order to clarify that this solution is not a "measure" that must be activated in particular circumstances, as it constitutes an application of the requirements already provided under article 9, para. 1, let. (b) and article 18, para. 2, let. (d) of the revised ELTIF Regulation. Further clarifications regarding option 2 appear necessary also in order to distinguish this solution from redemption gates, considering that both modalities seem to limit under a maximum percentage the redemptions requested in the same time window.

d) In your view, how do these requirements on the redemption policy and liquidity management tools of the ELTIF would compare to those applying to existing long-term investment AIFs which would be similar to ELTIFs (e.g. in terms of eligible assets)?
Where possible, please support your answers by providing examples of current liquidity set-up for similar long-term funds marketed to retail investors, analyses of the data available to assess the value of ELTIF long term assets and the length of the valuation process.

In general terms, reference is made to the mechanism envisaged by article 11 of the Italian Ministerial Decree no. 30/2015 (*Decreto del Ministero dell'Economia e delle Finanze 5 marzo 2015, n. 30)* whereby the fund rules or the by-laws of closed-ended alternative investment funds (AIFs) (including those that are open to subscription by retail clients) may provide for the early redemption of units/shares in the following cases:

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a) by the initiative of the Manager, for all investors on a pro-rata basis in relation to the units/shares held by each investor;

b) upon request of individual investors, for an amount not exceeding the value of new subscriptions and, for those AIFs that are not listed on regulated market or a multilateral trading facility, for an amount not exceeding the money borrowed by the fund, provided that 10% of the AIF value is not exceeded. In case the fund rules or by-laws of the fund provide for several subscription periods, early redemptions shall take place with the same frequency and in coincidence with new issues and the NAV per unit/share is calculated on the same date. If the requests for redemptions are larger in amount than new subscriptions, early redemptions are made pro-rata according to the criteria envisaged by the fund' regulation or by-laws to ensure fair treatment of investors.

In accordance with this provision (also mentioned in paragraph 121 and following of the consultation paper), managers are not required to implement additional liquidity management tools, as early redemption requests are limited under certain thresholds specified in point b) above (relating to the value of new subscriptions, the total amounts borrowed by the Fund and subject to a cap equal to 10% of the AIF value). Regarding redemption frequency, the above-mentioned law provisions do not contain specific requirements as they establish a connection between frequency of redemptions and frequency of new subscriptions, with respect to AIFs whose regulation/by-laws envisage several subscription periods. No specific requirements are provided regarding notice period.

Q12. Do you agree with the proposed criteria to assess the percentage referred to in point (d) of Article 18(2) - Article 18(6)(d))?

We believe that the list of criteria proposed by ESMA to assess the percentage referred to in paragraph 2, first subparagraph, point (d) of Article 18 of Regulation (EU) 2015/760 is comprehensive and appropriate. Furthermore, we agree with the principle envisaged by paragraph 3 of Article 6 of the proposed RTS, whereby the percentage may vary depending on the life cycle of the assets of the ELTIF, and the life of the ELTIF, and shall be assessed in accordance with the redemption policy and the valuation procedures of the ELTIF.

We recommend, however, that this percentage be regarded as an integral part of the redemption policy to be taken into account by the ELTIF manager during the normal operations of the Fund, rather than a specific "tool" to be activated in particular circumstances. Therefore, this percentage (as well as any circumstance where such percentage is reached) should not be subject to disclosure requirements either towards the authorities or towards investors.

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- **<u>ESMA empowerment under Article 19 on matching mechanism</u>**

Q.13. Do you agree with the principle-based approach suggested above, in relation to the ESMA RTS under Article 19(2a)?

We agree with the principle-based approach adopted by ESMA with respect to the RTS relating to matching mechanisms, given the absence of similar mechanisms in the EU regulatory environment.

We also agree with ESMA' observations under paragraph 133 of the consultation paper, regarding (i) the significant differences between matching mechanisms and redemption regime, (ii) the voluntary nature of the matching mechanisms and (iii) the absence of an enforceable right of investors to obtain the transfer of their shares/units through a matching mechanism.

Due to the foregoing, we support ESMA's approach whereby matching mechanisms should under no circumstances be considered as a necessary measure, irrespective of whether the ELTIF implements a redemption policy.

Q14. Do you agree with the proposals suggested above and corresponding draft RTS, in relation to the transfer process for both exiting and potential investors, and the role of the manager of the ELTIF or the fund administrator in conducting transfers, and the matching of respective requests?

Assogestioni agrees with the proposals suggested by ESMA as they seem to provide a significant degree of flexibility to those ELTIF managers which intend to establish and implement a matching policy.

However, we believe that the RTS could also provide general guidance on the possible roles that could be assumed by the ELTIF manager and related responsibilities (in addition to the "ordinary" AML and KYC verifications on the transferee, usually performed within secondary market transactions), while maintaining a principle-based approach and without imposing prescriptive rules.

Q15. Do you agree with the proposed approach and corresponding draft RTS, in relation to the periods of time during which exiting and potential investors may request transfer of shares or units of the ELTIF? If both systems under Article 18(2) and 19(2a) coexist, how could the risk of arbitrage between different prices in the primary and the secondary markets be, in your view, mitigated? How could (retail) investors be ensured that the purchase or sale of shares on the secondary market will be executed at prices that reflect the value of the ELTIF?

We support the approach outlined by ESMA both in paragraph 152 and paragraph 153 of the consultation paper, whereby (i) "*the starting point of the RTS under Article 19(2a) should not be to specify specific periods of time during which the*

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matching mechanisms could be used" and (ii) "*the coexistence of both mechanisms under Article 18(2) and 19(2a) might raise specific issues related to investor protection that also need to be addressed in the RTS ESMA shall develop*".

In this regard, we believe that – in order to address any potential issue relating to investor protection – ESMA should maintain the principle-based approach already adopted and avoid imposing prescriptive rules, giving ELTIF managers adequate flexibility to identify organizational and operational solutions that are consistent with equal treatment of investors and ensure appropriate levels of protection to investors.

By way of example, matching policies could contain provisions whereby the execution price of a transfer process under Article 19, para. 2 of the ELTIF Regulation cannot exceed the amount that the exiting investor would have received under the redemption regime, in case redemptions requests and matching mechanisms may take place in the same time period. Again, this solution (or any other possible solution) should be chosen by the ELTIF manager and not imposed by ESMA in the RTS.

Q16. Do you agree with the proposals above and the corresponding draft RTS, in relation to the determination of the execution price and the proration conditions and the level of the fees, costs and charge, if any, related to the transfer process?

Assogestioni agrees with ESMA proposals regarding determination of the execution price, proration conditions and level of fees, costs and charge as they grant a great level of flexibility to managers.

Indeed, we believe that ELTIF managers should be able to identify and implement those solutions which are most appropriate with respect to the features of the ELTIF and the relevant investors' base in order ensure investor protection and fair treatment of investors.

Q17. Do you agree with the proposals above, and the corresponding draft RTS, in relation to the timing and the nature of the disclosure of information with respect to the transfer process conditions?

The proposals and draft RTS in relation to timing and nature of the disclosure of information with respect to the transfer process

We agree with ESMA' proposals and draft RTS in relation to timing and nature of the disclosure of information with respect to the transfer process. Information provided to investors and potential investors should clarify the non-enforceable nature of matching mechanisms and the circumstance that such matching mechanisms are implemented on a voluntary basis and not in compliance with a law requirement.

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- <u>Cost-benefit analysis</u>

Q18: Are you of the view that any of the requirements of the draft RTS under the amending ELTIF Regulation should be adjusted to take into account the specificities of listed ELTIF? If yes, could you specify which requirement should, in your view, be amended?

Q19: Do you agree with the above-mentioned reasoning in relation to the possible costs and benefits of the option taken by ESMA as regards the redemption policy of ELTIF under Article 18(2) of the ELTIF Regulation? Which other types of costs or benefits would you consider in this context?

Q20: Do you agree with the above-mentioned reasoning in relation to the possible costs and benefits of the option taken by ESMA as regards the matching mechanism of ELTIF under Article 19(2a) of the ELTIF Regulation? Which other types of costs or benefits would you consider in this context?

Q21: Do you agree with the above-mentioned reasoning in relation to the possible costs and benefits of the option taken by ESMA as regards common definitions, calculation methodologies and presentation formats of costs of ELTIFs? Which other types of costs or benefits would you consider in this context?

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