**Reply** **form**

Discussion Paper on the integrated collection of funds’ data

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Responding to this paper

ESMA invites comments on all matters in the Discussion 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 **21 September 2025.**

Instructions

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

* Insert your responses to the questions in the Discussion Paper in this reply form.
* Please do not remove tags of the type <ESMA\_QUESTION\_ICFD\_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\_ICFD\_nameofrespondent.

For example, for a respondent named ABCD, the reply form would be saved with the following name: ESMA\_ICFD\_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](http://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.

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# General information about respondent

|  |  |
| --- | --- |
| Name of the company / organisation | BlackRock |
| Activity | Investment Services |
| Are you representing an association? |[ ]
| Country/Region | International |

# Questions

1. Do you confirm the findings presented in this stocktake section? If you have additional information, please provide all relevant details.

<ESMA\_QUESTION\_ICFD\_1>

Yes, as a cross-border asset manager we confirm that we have encountered the findings presented in the stocktake section. An overall lack of harmonisation leads to fragmented and overlapping reporting requirements, inconsistencies in the timing and frequency of reporting, high reporting costs, high administrative burden and often no clear link between regulatory objectives and the data being reported. In the current reporting model, we are required to submit variations of the same report in slightly different formats to multiple supervisors, which leads to an unnecessarily large volume of submissions.

From a practical perspective, despite the breadth of the reporting already required by the UCITS D, AIFMD and MMFR, BlackRock still receives hundreds of targeted reviews on our funds each year – largely requesting information that has already been provided in the reporting required by the relevant directives and regulations. It is therefore difficult to see how the reporting data is actually meaningfully used by supervisors in its current form, or its operational benefit. An integrated framework should result in fewer such reviews and should be used by supervisors as the primary source of information.

Another challenge encountered includes the tight reporting deadlines of just 25 calendar days under the MMFR and 30 calendar days under the AIFMD.

<ESMA\_QUESTION\_ICFD\_1>

1. What are the best practices for data collection for retail investment funds in EU and non-EU jurisdictions that ESMA could consider?

<ESMA\_QUESTION\_ICFD\_2>

We have long advocated for a more coordinated approach to data collection. We strongly believe that a coherent and simplified reporting framework can only be achieved by grounding requirements in the data and processes already embedded within the industry. Aligning reporting templates and embedding interoperability by design would unlock significant efficiency gains for market participants, NCAs, and ESMA. This would not only strengthen supervisory capacity but also enable feedback loops that enhance firms’ own risk management and stress testing practices as the first line of defence.

To ensure datasets can be shared and aggregated where needed, interoperability must be *the* foundational design principle. Greater efficiency can be achieved through harmonised templates and - critically - improved data-sharing mechanisms between supervisors. Identifying supervisory data points in advance - as suggested in the discussion paper - would help supervisors detect emerging risks and maintain a comprehensive dashboard in times of crisis.

Automating the delivery of these fields would further benefit both supervisors and market participants. We are strongly supportive of an integrated reporting template, differentiated by fund type, where data points that are relevant across all funds (e.g. NAV) would make up the core section of the report, with modular add-ons for fund-specific data points. Put simply, this would avoid a scenario where UCITS would be asked to provide data that is relevant for AIFs but not for UCITS. This approach would create a shared language between firms and supervisors across EU markets, drive cost savings, and facilitate coordinated supervisory actions, making collaboration platforms, supervisory colleges, and other convergence tools more effective.

Taken together, these measures would support more timely and consistent data reporting, reduce inconsistencies in approach and format, and enhance financial and market integrity.

<ESMA\_QUESTION\_ICFD\_2>

1. What challenges arising from overlapping EU-level and national reporting obligations (e.g. under AIFMD, UCITS, MMFR) does your institution experience? Please describe specific reporting overlaps and their operational impact quantifying and providing examples of redundant submissions.

<ESMA\_QUESTION\_ICFD\_3>

We note the discussion paper’s finding that “there could be more than 100 distinct asset management reporting templates in use across the EU, varying by fund type and jurisdiction.” We agree with ESMA that “this diversity in reporting templates contributes significantly to operational inefficiencies and raises compliance costs, especially for fund managers overseeing diverse fund types across multiple Member States”.

One challenge associated with the current model not mentioned in the discussion paper is that fund-level data is often sourced from both fund administrators and via fund managers, leading to risks of misalignment, errors, and inefficiencies. For example, portfolio holdings, leverage and liquidity information are reported separately under AIFMD Annex IV, UCITS returns and MMFR quarterly reporting. While some data points such as NAVs should be sourced from the official Accounting Book of Record, other specific data are only available in the Investment Book of Records held by the fund manager. Fund managers can provide more timely and comprehensive position data, for example in areas such as risk metrics, exposures, stress testing, and leverage.

Another challenge is that firms currently receive multiple data requests in varying formats, which is both costly and inefficient. This becomes particularly challenging during periods of market stress, when valuable time is diverted from risk management to responding to overlapping supervisory requests. A more coordinated approach would allow EU-wide data to be shared across supervisors, allowing NCAs to follow up with the entity they supervise based on consistent information.

In addition to these 100+ routine reporting templates, firms are also subject to ad-hoc supervisory data requests at both national and European levels – oftentimes requesting information that has already been reported. These may be initiated independently by NCAs or jointly via ESMA through Common Supervisory Actions (CSAs). For cross-border firms, the cumulative impact of these additional requests is significant.

We recognise that NCAs, in fulfilling their supervisory mandates, may need to conduct non-routine enquiries into market dynamics. However, we encourage NCAs to focus on core supervisory priorities and limit other interventions to instances of genuine concern. Supervisors should determine whether the data they seek has already been reported, before initiating these requests. Where possible, NCAs should assess whether similar interests exist in other jurisdictions and coordinate ad-hoc supervisory efforts through a CSA using a standard reporting template to ensure the interoperability of the data provided.

NCAs should also provide early notice - ideally at the start of the year - of their intention to undertake such investigations, enabling firms to allocate resource capacity effectively across jurisdictions. This recommendation does not apply to market stress events however, which are inherently unpredictable and where NCAs must retain their prerogative to act in the interest of financial stability and systemic risk. We recognise that systemic events may necessitate ad-hoc requests and draw ESMA’s attention to our response to Q. 23 on the design of templates to be used in crisis situations.

<ESMA\_QUESTION\_ICFD\_3>

1. Do you support the objective of developing a more integrated reporting framework covering AIFMD, UCITS, MMFR, and ECB statistical reporting? What are the key obstacles or risks linked to integrating fund reporting frameworks?

<ESMA\_QUESTION\_ICFD\_4>

Yes, we strongly support the objective of developing a more integrated reporting framework across AIFMD, UCITS, MMFR. We do consider that it would be premature and potentially counterproductive, to integrate ECB statistical reporting at this initial stage. The primary purpose of this initiative is to support NCAs in their supervisory role and to ease the operational and compliance burden on reporting entities. While the ECB’s data collection serves monetary policy and financial stability analysis, this should not be conflated with the fund-level supervision NCAs and ESMA are responsible for. Including ECB statistical requirements in a supervisory reporting framework, risks conflating fundamentally different objectives and could dilute the effectiveness of both. Furthermore, as noted in paragraph 290 the ECB currently relies on national central bank templates and processes to collect statistical data, and only applies to funds within the Eurozone. This decentralised approach reflects the ECB’s operational model, and alongside the different regional scope, underlines the rationale for maintaining statistical reporting as a separate stream. We therefore support the sub-scenario proposed by ESMA under Option 2 in which a unified supervisory reporting system would be designed for AIFs, UCITS and MMFs, while national central banks would maintain their statistical templates.

A simplified, harmonised template would significantly enhance supervisory effectiveness while reducing duplicative reporting burdens.

There are a number of important factors to consider when progressing this work, including:

* **Sequencing:** While BlackRock supports an integrated approach, we are conscious that we are expecting a change with AIFMD Annex IV reporting in April 2027. Therefore, there will already be a significant cost in the development of a reporting redesign as a result, and we would not wish to have duplication of efforts if further changes are proposed later. Should ESMA determine from this discussion paper that significant changes to fund data collection are warranted across the board, we suggest delaying the AIFMD 2.0 changes, especially since RTS will not have been developed by the time this report is finalised.
* **Frequency:** Funds should report at a frequency that is appropriate to their investment strategy and risk profile – for example it is not possible to report many aspects of AIFMD on a more frequent basis than quarterly where valuations of assets and reporting are carried out on a quarterly basis. We therefore do not support aligning reporting frequencies across fund regimes (i.e. making MMFs, UCITS, AIFs report at the same frequency as each other). There is room for alignment within some regimes however (i.e., for UCITS to report at the same frequency across Europe, in contrast to the current situation where reporting frequency depends on the national regime) [[1]](#footnote-2). The frequency of reporting needs to be considered carefully because increasing reporting frequency for the sake of alignment could result in reporting of stale data and offer limited additional value, but would incur a significant additional burden for reporting entities outweighing the benefit of the change. See response to Q. 20 for more details.
* **Jurisdictional divergence:** If an integrated approach is taken, it will be very important to coordinate changes with core third country jurisdictions, such as the UK for instance, given the level of EU-domiciled funds eligible for the UK Overseas Funds Regime.

ESMA\_QUESTION\_ICFD\_4>

1. Please list your preferred option of those listed in this section and highlight any other option or combination of the ones listed here that you consider effective. In your response, please outline the main expected costs and benefits associated with the options proposed, and identify any preconditions or phased implementation steps that would be necessary to ensure feasibility and proportionality.

<ESMA\_QUESTION\_ICFD\_5>

We support the sub-scenario proposed by ESMA under Option 2 – the fully integrated reporting framework for AIFMD, UCITSD & MMFR, excluding ECB statistical data as discussed in our answer to Q. 4 – as the most effective and proportionate solution among the options presented. It provides a robust foundation for long-term supervisory efficiency and data quality, while also addressing the operational burden currently faced by fund managers.

The key advantage of the sub-scenario in Option 2 lies in its ability to streamline reporting through a modular and layered reporting structure, combining a core set of data applicable to all UCITS and AIFs with additional modules tailored to fund-specific characteristics, such as fund type, strategy and risk profile.

By consolidating multiple reporting regimes in this way, it would significantly reduce duplication and manual effort. The inclusion of dedicated modules tailored to fund-specific characteristics (such as strategy or risk profile) ensures that the framework remains flexible and responsive to the diversity of the European fund landscape. At the same time, the use of a harmonised core dataset enhances data comparability and usability across supervisory domains, improving the alignment between reported data and regulatory objectives.

We acknowledge that the implementation of Option 2 will entail upfront costs, particularly in terms of system upgrades, training, and process redesign. However, if the implementation is done in the right way, with burden reduction front and centre, then these are expected to be offset over time by the efficiency gains and reduced compliance burden.

This approach will require strong coordination between ESMA and the NCAs, to ensure consistent application and interpretation of the framework. In addition, NCAs will admittedly face a reduction in flexibility in order to achieve the desired outcome of long-term harmonisation and supervisory coherence.

To ensure feasibility and proportionality, we recommend a phased implementation. This should begin with a comprehensive stocktake and gap analysis of existing reporting obligations, followed by a pilot phase involving a subset of fund types and jurisdictions. A modular rollout should then be pursued, starting with the core reporting template and gradually introducing fund-specific modules. Throughout this process, industry consultation will be essential. We propose the establishment of a temporary advisory group to provide practical input on data fields, reporting frequency, and technical build and standards. Finally, it is critical that the new framework is designed to ensure interoperability between the separate ECB statistical reporting to maximise data reuse and avoid duplication.

In contrast, Option 1, while less disruptive, does not deliver a sufficient reduction in the reporting burden to justify the change and resource investment it would require. The continued coexistence of multiple templates and conflicting reporting preferences by NCAs would perpetuate inefficiencies and technological integration challenges, offering only marginal improvements over the status quo.

Option 3, although building on the strengths of Option 2, introduces the risk of excessive national divergence and regulatory gold-plating. Allowing national extensions, even in limited cases, could reintroduce fragmentation and complexity, particularly in times of market stress when streamlined data collection is most critical. This would undermine the very objective of harmonisation and simplification that the integrated framework seeks to achieve.

For these reasons, we consider Option 2 to be the most balanced and forward-looking approach. It offers a realistic path to achieving a harmonised, efficient, and future-proof reporting framework that meets both supervisory and industry needs.

<ESMA\_QUESTION\_ICFD\_5>

1. To what extent should the integration or alignment of supervisory and statistical reporting extend beyond the asset management frameworks, such as EMIR, SFTR, or MiFID/MiFIR? What challenges do you foresee? Are there additional reporting regimes that should be considered for future alignment with asset management reporting?

<ESMA\_QUESTION\_ICFD\_6>

A key challenge lies in the reporting frequency, whether daily or periodic. EMIR, SFTR and MiFID/MiFIR frameworks tend to emphasise transactions over positions, and the volume and complexity of daily transaction data, particularly under EMIR and SFTR, would make integration into a periodic system highly impractical. As such, we do not recommend incorporating transaction reporting at this stage.

<ESMA\_QUESTION\_ICFD\_6>

1. How should this approach be implemented to ensure proportionality, efficiency, and data quality?

<ESMA\_QUESTION\_ICFD\_7>

We agree that the starting point must be a systematic analysis to assess whether the data elements currently collected actually contribute meaningfully to supervisory processes. We would support the removal of reporting fields that are found to be redundant, outdated, or of limited analytical or supervisory value.

Regarding the proposed approaches for developing an integrated reporting template thereafter, BlackRock endorses Option 3 – the hybrid approach. This model ensures that data collection is guided by supervisory priorities, while the supporting data points remain aligned with established industry practices. We strongly believe that a coherent and simplified reporting framework can only be achieved by grounding requirements in the data and processes already embedded within the industry.

The hybrid approach offers a pragmatic and efficient path forward. It builds on data already available at the fund level and avoids the risks of excessive data collection and confusion with respect to aggregation that could arise from a purely bottom-up methodology. It enables supervisors to examine existing industry practices and design data requirements that reflect operational realities. This emphasis on reuse, granularity, and automation would not only enhance data quality but also reduce compliance costs and improve interoperability with existing standards. Crucially, it mirrors how risk managers across the industry currently operate.

Conversely, BlackRock considers a fully top-down approach - where supervisors define key risks and then derive data points without regard to industry practices - to be unworkable. Without the use of existing data, top-down initiatives risk generating open-ended debates about which data points would be most appropriate and increasing complexity rather than alleviating reporting burdens.

<ESMA\_QUESTION\_ICFD\_7>

1. How can semantic data integration best be achieved across reporting frameworks? Please identify areas where alignment would be most beneficial?

<ESMA\_QUESTION\_ICFD\_8>

Common data reporting language and templates would greatly assist firms from a burden reduction perspective and prioritise better data sharing. Semantic data integration should prioritise harmonisation of asset class definitions, exposure metrics, and counterparty identifiers.

Aligning on these semantic elements would improve comparability, reduce duplication, and support more accurate systemic risk assessments, particularly for derivatives and leverage metrics, where inconsistent definitions currently hinder supervisory insight.

ESMA\_QUESTION\_ICFD\_8>

1. Which of the proposed options do you consider most efficient? If possible, please quantify the expected cost and benefits for each option. Would you support an alternative option involving additional actors, such as centralised reporting infrastructures?

<ESMA\_QUESTION\_ICFD\_9>

We consider a variation of **Option 2** to be the most efficient and proportionate approach to fund data reporting. **We agree with the benefits of a single collection authority at national level with greater data sharing at EU level amongst NCAs, but stop short of supporting the subsequent transfer of that data to an EU-wide centralised system.**

**Crucially, the national interfaces for submitting should be identical and the data being submitted standardised allowing for no discrepancies from Member State to Member State so that reporting teams only need to be familiar with one model irrespective of where they’re based. That data can then remain in NCA repositories and through blockchain technology, NCAs’ data can be meshed through the cloud without needing a data migration to a centralised hub.** As outlined in response to Q. 10, it is important that NCAs maintain ownership and accountability for the data in keeping with their supervisory responsibilities. Data security must be at the forefront of the new interface build, and this workstream provides the opportunity to significantly strengthen NCAs’ cybersecurity practices with respect to the storage of sensitive data.

This structure simplifies the reporting process by establishing a single reference point and template for firms, while also enhancing data sharing and reducing duplication across supervisory bodies. Importantly, it allows for cost efficiencies through shared infrastructure and pooled analytical resources, particularly for NCAs.

While Option 3 offers theoretical benefits in terms of consistency and centralised validation, we think goes too far in that it cuts NCAs out of the reporting flow altogether. As set out further in response to Q. 10, it is critical that supervising NCAs should remain the primary data collectors and owners, in keeping with their responsibility for ensuring financial stability in their respective jurisdictions. Option 3 would also risk undermining the subsidiarity principle by centralising functions that are more effectively carried out at national level.

Option 1, by contrast, does not go far enough. While it offers some efficiencies through a single national collection point, it fails to address the core issue of fragmented data access and limited interoperability between national and EU-level authorities. As such, the benefits of Option 1 are too limited to justify the effort and investment required to implement it.

In conclusion, Option 2 offers the most coherent and efficient path forward. It preserves the important supervisory role of NCAs, enhances data sharing and oversight, and avoids the pitfalls of both under- and over-centralisation. We recommend ESMA and the Commission to adopt this model as the foundation for a future-proof, proportionate, and effective reporting framework.

<ESMA\_QUESTION\_ICFD\_9>

1. How important is it to retain the supervising NCA as an intermediary between the reporting entity and the centralised system in the reporting process?

<ESMA\_QUESTION\_ICFD\_10>

We believe that **NCAs must remain integral to the reporting flow**. As the authorities responsible for financial stability and investor protection within their jurisdictions, NCAs are best placed to manage relationships with firms operating in their markets. Their proximity to local market practices and supervisory needs ensures that data is interpreted and used in a manner that is both contextually relevant and proportionate. Removing NCAs from the reporting chain would risk weakening this essential link and could lead to a disconnect between data collection and supervisory action.

That said, while it’s crucial to preserve the role of NCAs as intermediaries, there is significant room for improvement in how data harvesting, validation and technical checks are handled by the different NCAs. We often receive locked Excel sheets from NCAs to populate with data that must then be uploaded to aging regulatory tech systems that regularly crash when multiple entities are trying to submit at the same time. This is not efficient for reporting entities submitting large volumes of data, nor is scalable, so we could strongly encourage NCAs to invest in their data harvesting systems. Practices vary widely in the current system with respect to data validation as well, and greater consistency on this point alone would represent a significant improvement to the status quo.

ESMA\_QUESTION\_ICFD\_10>

1. Are there any other data sharing arrangements, either within or beyond asset management, that you believe would be beneficial for burden reduction?

<ESMA\_QUESTION\_ICFD\_11>

Irrespective of the reporting model that is ultimately adopted, we believe it is essential that NCAs can share supervisory data efficiently and securely both across jurisdictions and within Member States. A common reporting framework will only be effective if it is accompanied by mechanisms that allow NCAs to access and exchange relevant data in a timely and consistent manner – ideally through a decentralised blockchain model to maintain supervisory accountability.

Equally important is the ability to share data between different types of authorities within a Member State, e.g., between market supervisors and central banks. This is particularly relevant where statistical and supervisory reporting intersect, or where monetary policy and financial stability considerations overlap. Without such coordination, risks of duplicative requests, inconsistent interpretations, and missed opportunities for early intervention will remain.

We therefore recommend that ESMA prioritise the development of interoperable data-sharing arrangements as part of any integrated reporting framework. This should include clear legal and technical pathways for data exchange, safeguards for confidentiality, and alignment with existing EU data governance initiatives.

ESMA\_QUESTION\_ICFD\_11>

1. Would a phased implementation of the potential changes outlined in the sections on “Integrated reporting” and “Reporting flows and data sharing” help ensure proportionality and facilitate smoother transition?

<ESMA\_QUESTION\_ICFD\_12>

We would not support either of the options proposed by ESMA namely, (i) the introduction of different **transition periods based on the size of the reporting entity, or (ii)** a **hybrid approach to reporting** where only larger entities report directly to an EU-level system while smaller firms continue to report nationally. As outlined already, we are not supportive of a centralised EU-wide hub in the first place, but if ESMA does go down that road, we would emphasise that while these ideas may appear pragmatic, as already mentioned we do not believe it is appropriate – or indeed realistic – to expect NCAs to give up their proximity to the entities that they are responsible for supervising. Therefore, it would inevitably result in a two-tier system where larger firms would have to report at both national and EU levels, introducing even more duplication than the status quo, and undermining simplification – a key objective of this project,

Considering the scale of any change that will be required, we think a phased rollout would be beneficial, however it could be more sensible to phase by reporting regime - starting with the simplest, i.e. UCITS - rather than by firm size. It will also be crucial to allow a significant notice period between finalisation of an integrated model and a go-live date considering the substantial development time needed by reporting entities to redesign systems.

<ESMA\_QUESTION\_ICFD\_12>

1. Do you consider that it would be beneficial to introduce a common standard, such as ISO 20022, across all reporting obligations within the asset management domain? What would be the costs and benefits for reporting entities of transitioning all reported data to a single standard? If ISO 20022 is not the preferred solution, what alternatives could be considered?

<ESMA\_QUESTION\_ICFD\_13>

We agree that aligning on ISO 20022 as a common standard would be preferable. We already support XML across a wide range of reporting functions, and we would see a benefit in coalescing on that format and streamlining the range of formats we need to support. Doing this as we implement reporting for new regulations and refits of existing regulations would be the most effective way of achieving this outcome.

<ESMA\_QUESTION\_ICFD\_13>

1. What would be the main advantages and disadvantages of using respective syntaxes (XML, JSON, XBRL) for reporting frameworks in the asset management sector?

<ESMA\_QUESTION\_ICFD\_14>

We are supportive of XML because of its widespread adoption and support, its extensibility (i.e., its ability to be adapted without requiring major changes to its core architecture) and the strength of validation that is provided by XSD and DTD definitions. JSON is an acceptable alternative because it is more readable, lightweight and heavily used by APIs and web applications, albeit with weaker validation support. XBRL is not widely used by asset management regulatory reporting and is not ISO 20022 compliant.

<ESMA\_QUESTION\_ICFD\_14>

1. Would an increase of data granularity contribute to improved data quality, usability and reduced duplications? To what extent can the greater use of international standards (e.g. CFI codes, LEIs) and master data reduce the compliance costs and improve interoperability in regulatory reporting?

<ESMA\_QUESTION\_ICFD\_15>

It is not clear that increasing data granularity will contribute to improved data quality, usability and reduced duplications.

Currently, data provided on an aggregated basis is enriched and quality-checked by asset managers in order to ensure that it most accurately addresses specific supervisory questions and issues NCAs are trying to assess. Data currently provided on a more granular basis for statistical reporting to the ECB, or under the MMFR, is done so to achieve outcomes well-suited to the nature of those asks. The granular data provided to the ECB is not enriched or structured to support supervisory oversight. The data is primarily designed for macro-level analysis, such as assessing monetary policy transmission, financial stability risks, and sectoral trends. It lacks the contextual and entity-specific enrichment needed to evaluate fund-level compliance, governance, risk management, or investor protection. Supervisory reporting requires interpretation, classification, and aggregation that reflects regulatory frameworks and fund-specific nuances—something raw granular data cannot provide without significant transformation. In the case of MMFs, aggregating data across multiple dimensions (e.g., by issuer, country, maturity, currency) is typically easier to achieve as these funds tend to employ similar investment strategies. This flexibility is less easy to achieve for other UCITS and in particular for AIFs, which often have much more diversified portfolios. For these funds, aggregated reporting provides a clearer and more relevant view of exposures and potential vulnerabilities.

Increasing granularity—such as requiring full portfolio books or raw accounting data—may not improve the reporting process for either asset managers or NCAs. Instead, it may introduce several challenges:

* **Volume of raw data**

Providing the security-by-security level data in a European context represents a substantial increase in the amount of data currently provided to NCAs, and it is not clear that NCAs, or indeed ESMA, would have the requisite infrastructure, resource, or secure storage to prevent this from becoming an additional burden on the current reporting framework.

* **Consistency and interpretation**

This would require NCAs to aggregate data they do not own or have direct oversight of. As mentioned in response to Q.1, BlackRock already receives hundreds of queries on the data we report, and more granular reporting would likely result in increased follow up queries to managers as NCAs are less close to the provenance of the data, and thus less likely understand discrepancies in how certain elements should be understood and are represented.

For aggregated exposures which are grouped by entity or instrument, we support the greater use of international standards such as CFI codes, LEIs, and harmonised master data as a way to improve interoperability, reduce reconciliation efforts, and lower compliance costs. These tools can enhance the consistency and comparability of a sub-set of aggregated data.

In our view, a proportionate, risk-focused framework based on standardised, aggregated data and supported by international identifiers, where appropriate, would better serve the objectives of supervisory oversight while minimising complexity and duplication.

<ESMA\_QUESTION\_ICFD\_15>

1. What are your views on implementing security-by-security as the baseline granularity? What are the main benefits and costs of the presented options? What solutions should be envisaged to ensure a proportionate approach?

<ESMA\_QUESTION\_ICFD\_16>

As stated in paragraph 21 of the consultation, the primary objective of harmonised supervisory reporting frameworks is to facilitate risk assessment or risk monitoring in a harmonised manner. It is not clear that providing data on a security-by-security granularity as the baseline would best serve this purpose.

We agree with trade association comments that the development of a new reporting framework should reflect the ways investors actually approach and manage risk. Rather than focusing solely on individual exposures, a more established practice among NCAs has been to be attentive to how risks can build up and interact across portfolios and institutions. Such huge volumes of granular data will likely be difficult for regulators to translate into meaningful insights, given their distance from its origin and the potential variability across managers in data points.

For data to be useful, it must be structured in a way that allows it to be combined, compared, and analysed. To note, while the current ECB framework is conducted on a security-by-security basis, this is simply a list of the positions held, while ESMA proposes potentially requiring the reporting of all exposures and financial assets on a security basis. Such exposure analysis, exceeds ESMA and NCA practice currently, and the process for transforming this data into useful metrics is not outlined. We strongly believe such a complex third-party aggregation process is unlikely to provide the best chance of identifying systemic risk.

<ESMA\_QUESTION\_ICFD\_16>

1. With respect to share classes, what data should be considered for reporting at the share class level? What operational challenges do you face when reporting at the share class level?

<ESMA\_QUESTION\_ICFD\_17>

Full share class level reporting of performance data would lead to a substantial increase in the volume of data required to be submitted to regulators. Reporting at a representative share class level reduces the burden on industry participants while providing a good representation of the overall performance of a fund.

The reporting of NAV at a share class level may be more relevant as the NAV is naturally calculated at a share class level. Therefore, we suggest that any share class level reporting should be limited to NAV and performance data.

<ESMA\_QUESTION\_ICFD\_17>

1. In your opinion, is it feasible to substitute aggregated reporting data with more granular data within supervisory and statistical reporting frameworks? If yes, what kind of data?

<ESMA\_QUESTION\_ICFD\_18>

We do not believe more granular data – or ‘raw’ data on the portfolio holdings should be provided beyond what is already required, see our answer to Q. 16.

<ESMA\_QUESTION\_ICFD\_18>

1. What additional areas should be investigated under the integrated reporting initiative in terms of data granularity and standardisation?

<ESMA\_QUESTION\_ICFD\_19>

We do not think other areas warrant further exploration at this initial stage.

<ESMA\_QUESTION\_ICFD\_19>

1. Do you consider that frequency should be aligned across reporting regimes and jurisdictions? If yes, what frequency (monthly or another) would provide the best balance of costs and benefits? What kind of challenges would you expect in implementing it?

<ESMA\_QUESTION\_ICFD\_20>

Funds should report at a frequency that is appropriate to their strategy and risk profile. BlackRock supports an integrated reporting template that is designed to incorporate the common data points across all fund types, but also allows for the specificities of each fund type to be accommodated through modular add ons – reporting frequency is one such specificity.

We do not support aligning reporting frequencies across fund regimes (i.e. making MMFs, UCITS, AIFs report at the same frequency as each other). Increasing the frequency of reporting across fund regimes for the sake of alignment in this way would result in such an increased operational burden for reporting entities that the costs would significantly outweigh the benefits.

There is room for alignment *within some* regimes however and we will consider each in turn:[[2]](#footnote-3)

* **AIFMD:** Reporting frequency under AIFMD depends on Level 2 AUM thresholds, leverage and whether the AIF is an unleveraged AIF investing in non-listed companies and issuers to acquire control. Reporting can be quarterly, semi-annually or annually depending on how the specific AIF aligns with those criteria; we believe this is a proportionate approach. While there isn’t a single frequency for AIFs, it is welcome that the criteria for assessment are the same across Member States. We do not advise changes within the AIFMD regime.
* **UCITSD:** Reporting frequency is currently dependent on national reporting regimes which is inefficient, UCITS reporting frequency should be aligned across Member States, and that frequency should be quarterly in our view.
* **MMFR:** Article 37 of the MMFR requires money market funds to report at least quarterly, and for funds under €100m AUM, only annually. In our opinion, information disclosed under this frequency of reporting is unlikely to be of significant use to supervisors. MMFs generally have a short overall maturity, high portfolio turnover (in line with the liquid asset buffers, a significant portion of an MMF’s portfolio will have a maturity of a week or less) and are very actively managed to reflect changing market liquidity conditions and investor subscription and redemption patterns. This means that much of an MMF’s portfolio will have turned over multiple times within the minimum reporting period set out by the regulation. Like index ETFs, MMFs are required to publicly disclose certain information about their NAV and holdings on their website for investor transparency purposes. It could be worth examining whether supervisors could be satisfied with the publicly available information or information already reported using alternate reporting channels, which may offer enhanced and more decision-useful insight.

<ESMA\_QUESTION\_ICFD\_20>

1. What solutions and criteria should be envisaged to ensure a proportionate approach with respect to the reporting frequency?

<ESMA\_QUESTION\_ICFD\_21>

It is not possible to comment meaningfully on the specific solutions needed for proportionate implementation in the absence of a concrete proposal. However, as a general principle, funds should report periodically in line with their underlying dealing frequency, i.e. ideally quarterly but certainly no more than monthly for a daily-dealing fund and less frequently for a quarterly/semi-annually dealing funds.

We appreciate that certain fund types such as money market funds and index ETFs already provide more frequent reporting on holdings to the markets, and we are not proposing changes here – the advantage of a modular reporting system as identified in our response to Q.5 is that it should allow for these differences to be accommodated.

ESMA\_QUESTION\_ICFD\_21>

1. Given that daily reporting requirements are already implemented in certain Member States, how such a frequency could be set up to ensure an integrated approach while avoiding a disproportionate burden for reporting entities?

<ESMA\_QUESTION\_ICFD\_22>

With the exception of money market funds and index ETFs (as described in response to Q.20 and Q.21), daily reporting should be limited to severe market stress events only. BlackRock would not support daily reporting as a baseline frequency in any other scenario. Daily reporting of position-level data on a routine basis is not necessary for supervisory purposes and would increase cybersecurity and market abuse risks. The more detailed and timely the data, the greater the risk of reverse engineering portfolios, front-running, or other misuse of non-public information. This can harm both investors and market integrity. On an international level, while IOSCO and FSB support the regular collection and analysis of investment fund data, neither prescribe daily reporting as a baseline requirement, but instead recommend proportionate risk-based approaches.[[3]](#footnote-4) Instead, we recommend quarterly reporting as the standard for UCITS and AIFs and event-driven reporting for urgent risk signals.

<ESMA\_QUESTION\_ICFD\_22>

1. How the reporting template for use in exceptional circumstances be designed to minimise the complexity for reporting entities, while ensuring sufficient flexibility to adapt to the specific nature of a crisis situation?

<ESMA\_QUESTION\_ICFD\_23>

In our view, reporting templates for use in exceptional circumstances should be designed with three key principles in mind: simplicity, flexibility, and relevance.

**1.** **Simplicity and clarity:** Templates should be streamlined and intuitive, with a limited number of fields focused solely on the information necessary to assess the nature and severity of the crisis. This avoids overburdening firms at a time when operational resources are likely to be stretched. Binary or dropdown-style fields (e.g. “Has the fund halted redemptions? Yes/No”) can help reduce ambiguity and speed up completion.

**2. Flexibility to adapt to different crisis types:** The template should be modular, allowing ESMA or NCAs to activate specific sections depending on the nature of the event (e.g. liquidity stress, counterparty default, market dislocation). This avoids a one-size-fits-all approach and ensures that reporting remains proportionate and targeted.

**3. Focus on systemic risk relevance:** Only data points that are directly relevant to systemic risk transmission should be included. For example, information on margin calls, redemption suspensions, or concentrated counterparty exposures is likely to be more useful than detailed portfolio holdings. This ensures that the reporting supports supervisory decision-making without duplicating existing obligations.

We also recommend that the template be pre-positioned and tested in advance (e.g., as part of routine stress tests), so that firms are familiar with the format and can respond quickly when needed. Where possible, it should align with existing reporting systems to minimise manual intervention.

<ESMA\_QUESTION\_ICFD\_23>

1. Are there any other dimensions not considered in this discussion paper that are relevant for the establishment of a more integrated reporting system? If yes, please provide specific examples and your views on potential improvements that can be made and their priority.

<ESMA\_QUESTION\_ICFD\_24>

No comment.

<ESMA\_QUESTION\_ICFD\_24>

1. As set out on P. 81 of the discussion paper, reporting frequency varies across and within regimes: **AIF** reporting frequency depends on Level 2 AUM thresholds, leverage and whether the AIF is an unleveraged AIF investing in non-listed companies and issuers to acquire control. It can be quarterly, semi-annually or annually. **UCITS** reporting frequency depends on national reporting regimes. **MMF** reporting frequency is usually quarterly, but can be annually if AUM is below a EUR 1 million threshold as stipulated in the MMFR. [↑](#footnote-ref-2)
2. **Note:** We have excluded statistical reporting from this analysis because we think its inclusion would overcomplicate the reporting framework at this design stage and suggest ESMA focus on alignment of supervisory reporting first. [↑](#footnote-ref-3)
3. **FSB’s Revised Policy Recommendations** (2023), “Authorities should collect information on the liquidity profile of open-ended funds in their jurisdiction proportionate to the risks they may pose from a financial stability perspective… reporting should be sufficiently granular and frequent.” **IOSCO, Final Report on Revised Recommendations for Liquidity Risk Management for Collective Investment Schemes,** ““Reporting and liquidity management practices should be proportionate to the nature of the fund and the risks it poses. Supervisory frameworks should allow for flexibility in both normal and stressed market conditions.” [↑](#footnote-ref-4)