**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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Information on data protection can be found at [www.esma.europa.eu](http://www.esma.europa.eu) under the headings ‘Legal notice’ and heading ‘[Data protection](https://www.esma.europa.eu/about-esma/data-protection)’..

# General information about respondent

|  |  |
| --- | --- |
| Name of the company / organisation | FundApps Ltd |
| Activity | Other Financial service providers |
| Are you representing an association? |[ ]
| Country/Region | UK |

# 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>

FundApps confirms that harmonisation is still a work in progress. There are a range of issues which other respondents are better able to comment on, so we will focus on the issues with which we are most familiar as a technology vendor. Those are technical points, including the structure of reporting obligations.

**Duplication of Information**

One of the most notable issues for fund managers (particularly those based outside the EU) is that reports that are substantially the same often have to be submitted to multiple regulators. This means that the same information has to be prepared in multiple different formats and submitted multiple times. This is more complex for firms to manage, is not proportionate because regulators ought to be able to share information efficiently, and increases the risk of submission errors.

**Communication of Validation Requirements**

Additionally, some regulators do not communicate clearly what their validation requirements are, or when they change, which can create issues for fund managers at the point of filing. This leads to significant inefficiencies, because data governance best practices generally require that any changes to the firm’s submission go through a review process. This makes late stage adjustments, particularly for larger reporters, needlessly cumbersome. To avoid this and enable efficient reporting, all validation requirements should be publicly available (in a machine-readable format where possible) and changes must be clearly communicated.

**National Reporting Fragmentation**

The other area where we have noticed issues is in the development of reporting requirements outside of formal frameworks (e.g. national regulators imposing fragmented UCITS reporting requirements). Because these do not conform to a standard structure, and can vary across jurisdictions, it is generally not financially viable for fund managers or vendors to develop automated solutions. As a result, they lead to higher reporting costs and administrative burden. Manual solutions also increase the risk of error.

<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>

FundApps has limited comment to make on retail investment funds. But we would note that systems such as EDGAR in the United States, OAMs under the transparency directive and forthcoming ESAP, etc provide efficient ways of accessing data under the “report once” principle. Because information is directly accessible to the public once it has been filed.

<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>

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<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>

FundApps cautiously supports the objective of developing a more integrated reporting framework. Our concern is that this complex project will prevent the quicker benefits of simpler, more targeted improvements. In our view, it would be more efficient to first focus on creating a common data dictionary to ensure alignment across the reporting frameworks, which is likely to bring improvements quickly. Even if the same data has to be reported multiple times, at least there will be consistency in what data is assembled and reported, and firms will have a clear understanding of what to report. Then, based on that alignment and any learnings from introducing a common data dictionary, the frameworks can be aligned.

The biggest risk is that the scale of the task delays benefits for industry and regulators for many years. Provided significant changes are not made too frequently, we believe that incremental change will bring faster benefits, and an opportunity to learn from changes as integration progresses.

<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>

Of the options outlined, we favour Option IR1, with the potential to move towards IR2 in the future.

As discussed in Q4, we believe that priority should be given to changes which can be realised quickly. Regulators can work out how to share relevant data points and agree definitions, as putting these challenges onto firms increases uncertainty and, hence, overall costs. We foresee it potentially being difficult and slow to implement Option IR2 because of the overall complexity of data being gathered (we note that the ESAP project has repeatedly overrun). Whereas Option IR1 is something that regulators can implement relatively quickly, and can then learn from.

We agree that another way to realise benefits relatively quickly would be to develop an integrated and fully harmonised template for UCITS and AIFMD reporting, as this is a significant portion of the reporting burden for many firms.

To ensure proportionality, harmonisation should be enforced for all reporting. Fragmentation of requirements across the EU is one of the key drivers of costs for firms, and must therefore be minimised. IR3 sets out an approach where national variation is accommodated within the reporting framework, and we therefore oppose it. We believe that variations across jurisdictions undermine the Capital Markets Union by making it unnecessarily difficult for funds to be marketed across the Union.

<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>

Seeking to extend the alignment to additional frameworks is likely to significantly delay implementation due to the need for coordination across a range of different business units in firms, and greater coordination with regulators.

As with Q4, FundApps would propose an iterative approach, starting with a common data dictionary to standardise what data is reported (and how to interpret those requirements). Additionally, where fundamentally different types of data are being reported (e.g. transactions versus positions), and frequencies are very different, benefits of alignment are likely to be limited.

<ESMA\_QUESTION\_ICFD\_6>

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

<ESMA\_QUESTION\_ICFD\_7>

Regulators should consider carefully whether the increased alignment brings benefits to firms. We see no reason to implement regulatory changes to increase alignment if it does not lead to improved efficiencies for firms. Any change that reduces efficiency for firms is likely to lead to a reduction in data quality, even if it theoretically leads to standardisation. For quite different frameworks like MiFID/MiFIR, this should be considered as part of wider reviews and updates of the regulation, rather than for its own sake.

Particularly for investment funds, in an increasingly competitive market (driven by the growth of passive funds and greater integration of capital markets), the costs of regulation are ultimately borne by investors, not by the fund managers. It is therefore in the interests of consumers (as well as the goals of proportionality and efficiency) that costs of regulation be minimised through efficient practices, which reduce costs without compromising regulatory objectives.

<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>

We recommend a focus on definitions (ideally with a common data dictionary) of the data most used in reporting. Currently, there is no consensus on how to calculate and report even relatively simple fields like a fund’s unencumbered cash. Again, we would support an iterative approach, where the most commonly used definitions are resolved first, to ensure that the benefits are realised quickly.

<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 prefer Option 3 - centralised reporting. But we think any of the approaches could be made to work, provided firms are easily able to obtain login/authorisation credentials, and the “report once” principle is followed. This means that validations and other requirements must be consistent, wherever information is submitted. Provided validations and other requirements are transparent (and can therefore be managed by reporting entities prior to submission), submission should be a low cost process, which can be easily enabled by modern technology. Fragmentation, inconsistency and unknown requirements are the biggest drivers of cost for submission, along with manual submission/portals. Instead, APIs should be the standard.

The overall aim should be to reduce complexity and costs. Therefore, for fund reporting, we do not see particular benefits from incorporating additional actors, such as central reporting infrastructures.

<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 see no inherent advantage to retaining the supervising NCA as an intermediary. From a practical perspective, if a firm already has login details to securely submit reports to the NCA, it may be easier to use these rather than having to set up a separate authentication. But this should not displace the “report once” principle. At the moment, many non-EEA managers have to report the same AIFMD data to multiple NCAs, and a move to a centralised system should eliminate this. But there may be other ways to remove this duplication.

<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>

We would reinforce our point in Q10 that, where information needs to be distributed to multiple regulators, the burden should be on the regulators to share the information between themselves. Asset managers should not have to submit largely identical reports to multiple regulators.

<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>

As highlighted in our responses to Q4, Q6 and Q8, we believe that an iterative approach enables benefits to be realised more quickly, reduces the risk of project overruns, and allows iterative learning.

<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>

Standardising terminology is often helpful, as it aids understanding. But it is no replacement for standardising interpretations which, as we outlined above, is likely to bring significant benefits. Once standardised interpretations are built into a common data dictionary, it may well make sense to standardise terminology.

Transitioning to a single standard without standardising interpretations and building a common data dictionary is likely to bring significant transition costs to firms for little gain, and we would not advise it.

<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 believe the universal adoption of XBRL as the standard for all AIFMD and UCITS reporting is the most straightforward path toward a more transparent, efficient, and resilient European market.

A standard, structured, machine-readable format is the essential foundation for automation - and therefore for reducing systemic operational risk. XBRL's embedded validation rules raise the baseline for data quality at the point of creation, benefitting all participants in the regulatory data chain: filers, regulators, and investors alike. That said, implementation must be thoughtful; if done too rigidly, it risks reducing flexibility and impairing accurate reporting.

The mandatory use of XBRL for ESEF reporting provides an opportunity to build on this. Standardising now ensures that both financial and non-financial data are equally trustworthy and usable. High-quality structured data is the critical fuel for next-generation analytics - enabling reliable AI-driven oversight and insight. Additionally, as with ESEF reporting, XBRL tagging allows the easy creation of a document that is both machine-readable and human-readable.

In short, standardising on XBRL is not merely a technical preference - it is a strategic move to enhance data integrity, embrace the future of ESG, and prepare Europe for a smarter, more automated era of regulatory supervision.

We strongly support collaboration with industry leaders on further developing this standard - and, as one of them, would be pleased to contribute to that process.

<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>

The most important factor is whether or not change increases data costs for firms. Gathering and enriching data is already a significant part of the costs of monitoring and reporting for firms. If regulators are able to gather granular market data based on identifiers like CFI codes, ISINs or LEIS, that may reduce costs for firms. But if firms are required to provide more data overall in their submissions, that would likely increase costs, and it is unlikely to be proportional as it is unlikely to bring transformational benefits.

 <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 with Q15, our view is that the most significant factors are the costs to firms of gathering data with all relevant identifiers, and the costs to firms of reviewing the submission. Others are better placed to comment on the details but these costs are key to determining whether the approach is proportionate.

<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>

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<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>

It is technically feasible to report data on a security-by-security basis or other granularities (where that granularity exists within the records that the firm holds). There may be a need to apply a de minimis criteria or certain exclusions for non-listed holdings, as relevant data may not exist. And the overall costs and proportionality should be considered carefully.

<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>

One of the key difficulties for most firms in preparing their regulatory reporting is the ability to gather relevant positions data from their fund administrator, as well as certain exposure data from their key counterparties. Fund administrators can often charge significant fees for extracting that critical data, which may lead to market distortions. Additionally, the lack of standardisation can pose significant challenges for larger firms trying to integrate their data. Data integration is critical both for completing any required aggregations, and for ensuring appropriate data governance across all funds that the firm manages.

For the purposes of data quality, efficiency, and promoting effective competition, ESMA and the Commission should consider what data is reliably available from fund administrators, in what format, and on what commercial basis. ESMA and the Commission should then consider what regulation should be implemented to assist in the provision of funds’ own data to fund managers.

<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>

Except where there are significant overlaps in the data, we see relatively little advantage in aligning reporting frequencies.

Quarterly or annual filing is standard for current regulatory reporting such as AIFMD Annex IV, statistical reporting, Form PF in the US, and others.

We don’t see what advantages monthly filing would bring for most funds or for regulators, and therefore it is very unlikely to be proportionate.

<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>

Except where there are significant overlaps in the data, we see relatively little advantage in aligning reporting frequencies.

Quarterly or annual filing is standard for current regulatory reporting such as AIFMD Annex IV, statistical reporting, Form PF in the US, and others.

We don’t see what advantages monthly filing would bring for most funds or for regulators, and therefore it is very unlikely to be proportionate.

<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>

Any extension of daily reporting requirements is very unlikely to be proportionate. No arguments have been set out as to what regulatory benefits this would bring. Currently, fund reporting involves extensive data collection (much of which is not available on a T+0/T+1 basis), and then careful review.

Daily reporting requires major investment and active ongoing monitoring to ensure that high quality data can be delivered. While tech costs should be a relatively small proportion of compliance, daily processing and reporting can lead to significant tech costs for firms.

<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>

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<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>

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<ESMA\_QUESTION\_ICFD\_24>