ALFI RESPONSE TO ESMA CONSULTATION ON THE SECURITISATION DISCLOSURE TEMPLATES UNDER ARTICLE 7 OF THE SECURITISATION REGULATION

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association of the luxembourg fund industry

ALFI response to ESMA Consultation Paper on the securitisation disclosure templates under Article 7 of the Securitisation Regulation

The Association of the Luxembourg Fund Industry (ALFI) represents the face and voice of the Luxembourg asset management and investment fund community. The Association is committed to the development of the Luxembourg fund industry by striving to create new business opportunities, and through the exchange of information and knowledge. Created in 1988, the Association today represents over 1,500 Luxembourg domiciled investment funds, asset management companies and a wide range of business that serve the sector.

ALFI has in the past responded to the EU Commission consultation on the functioning of the EU Securitisation Regulation ("SECR"). The SECR, which was aimed at laying down rules for securitisations and developing a simple, transparent and standardised securitisation market. ALFI has in the past commented that overall these objectives have not or have only partially been achieved. ALFI welcomed the findings of the subsequent EU Commission report on the functioning of the SECR and written to the EU Commission and ESMA with an appeal to address this matter urgently.

The main concerns that ALFI has highlighted are the impact of the SECR in terms of triggering material additional human and financial costs without any obvious added-value, especially as far as institutional investors are concerned.

Moreover, the SECR has generated some adverse effects, such as disadvantaging EU institutional investors, in particular to the accessibility of EU institutional investors to the third country securitisation markets. For this reason, we are glad that the disclosure templates subject Article 7 SECR are herewith under review.

ALFI proposes to opt for Option C and the implementation thereof, as the industry really needs viable short-term solutions to address existing compliance challenges.

8.1.1 OPTION A

General

Question 1 Option A focuses on maintaining the current framework in its entirety. Do you agree with maintaining the current disclosure framework unchanged?

ALFI does not endorse Option A, as the current disclosure framework is not fit for purpose. ALFI members clearly favor Option C.

Section 4.2

Question 2 Do you agree that LLD granularity is essential for performing proper risk evaluation, including due-diligence analysis or supervisory monitoring? Please explain your answer considering the costs and benefits of keeping the current level of granularity in terms of operational costs, compliance burden and any other possible implications.

Our members believe that loan-level information is crucial for analyzing certain types of securitisations, but as noted in the consultation paper, loan-level data is not always useful or applicable for certain types of securitisations that are revolving in nature and comprised of short-maturity assets (credit cards, dealer floorplans, fleet lease). The cost of providing loan-level information on these types of receivables far outweighs the benefit to any investor looking to purchase these securitisations. While loan-level data is extremely important for RMBS, CMBS, and probably, CLOs, the extent of detail required under the Annexes for these securitisations is likely excessive.

Section 4.3

Question 3 Do you agree that the current design of disclosure templates is adequately structured to facilitate comprehensive risk evaluation, including due diligence analysis and supervisory monitoring of securitisation transactions?

No, as noted in our response under question 2 above, much of the information required under the Annexes is not used in the evaluation of the securitisation investment opportunity.

Section 4.4

Question 4 Do you agree that disclosure and reporting requirements should be maintained consistent between private and public securitisation?

The usefulness of the information currently provided to investors (and regulators) under the reporting regime in private securitisations is questionable. It generates an operational burden, produces costs and entry barriers for sell- and buy-side parties. It is preferred to have only a simplified template for private securitisations that aims to address supervisory needs and let the transaction parties determine the level of reporting contractually, according to the existing market standards.

ALFI believes that we need to find short-term solutions to some key challenges faced by the industry (e.g. investing into third country securitisations), which is the reason why the majority of our membership supports the introduction of a simplified private securitisation reporting template (Option C).

Other Observations

Question 5 Please insert here any general observations or comments that you would like to make on this CP, including how relevant the revision based on the above approach (Option A) may be to your own activities and potential impacts.

8.1.2 OPTION B

ALFI does not endorse Option B and has as such not responded to any questions hereunder.

General

Question 6 Do you believe that the additional adjustments to the current framework proposed by Option B, such as restricting the use of ND options and including additional risk indicators (including climate-related indicators) are necessary? Do you support a revision of the technical standards accordingly? Please explain your answer, indicating whether you support these proposed adjustments and any reasons for your agreement and disagreement.

Section 5.2

Question 7 Do you believe that a reduction of ND thresholds would materially improve the representation of data of securitisation reports? Please explain your answer.

Question 8 Do you think that the advantages stemming from restricting the consistency thresholds and/or removal of ND options for specific fields, resulting in more accurate representation of data, would justify the heightened compliance costs for reporting entities?

Section 5.3

Question 9 Do you believe that the proposal of enriching the Annexes with additional risk-sensitive indicators (presented in Section 5.3) is necessary?

Question 10 Do you believe that reporting entities would face challenges and/or significant costs if requested to report those additional indicators? If yes, please elaborate your answer.

Section 5.4

Question 11 Do you believe that the proposal of enriching the Annexes with climate risk indicators (presented in Section 5.4) is warranted?

Question 12 In addition to the list of advantages and challenges identified by ESMA in introducing the proposed sustainability indicators, do you believe additional advantages and challenges should be factored in?

Other Observations

Question 13 Please insert here any general observations or comments that you would like to make on this CP, including how relevant the revision based on the above approach (Option B) may be to your own activities and potential impacts.

8.1.3 OPTION C

General

Question 14 Do you agree with Option C as the preferred way forward (simplified template for private transactions, removal/streamlining of loan-level data for some asset classes, new template for trade receivables) for the revision of the disclosure templates?

Option C recognizes the specific case of private securitisations by introducing a dedicated and simplified template. While the template focuses mostly on supervisory needs, if based on the example of the SSM notification template, it will still provide valuable information for investors to perform their due-diligence.

ALFI members agreed to support this option as the most viable, mainly because it introduces a new, simplified template for private securitisations while removing some burden of reporting for public securitisations. This approach would address the issues we have outlined in relation to investments into U.S, Canadian, Australian and other third-country private securitisations. We also think that this option aligns more closely with the European Commission's assessment in its Article 46 Report of October 2022 (the Report) and the industry feedback that it and ESMA have received so far.

We therefore suggest that ESMA prioritise issuing new standards for private securitisations, as this is a pressing matter for EU investors in third-country securitisations. Achieving market consensus and fulfilling the goal of removing or simplifying the data in templates for public securitisations, as well as creating a new template for trade receivables, could take a lot of time and risk delaying the much-needed new rules for private transactions.

We also would like to flag that the simplified template, based on the SSM notification template, is a good starting point to streamline and simplify the disclosure framework, but it may not be applicable to all types of securitisations.

> *As referenced above, we do believe that loan-level disclosures for certain revolving securitisations where the underlying receivables are regularly replaced is unnecessary and not entirely feasible. For example, a credit card receivable may last for only a single month, after which it will be paid off, and the issuer will replace it with another receivable that may also be paid off the following month. Disclosing loan-level information on all of these receivables is not particularly helpful for the investor and potentially not even feasible for the issuer.*

We prefer to have only a simplified form of a template for private securitisations that aims to address supervisory needs and lets the transacting parties determine the level of reporting contractually, according to the existing market standards. In addition, we need to find short-

term solutions to some key challenges faced by the industry (e.g. third country securitisations) and therefore we support the introduction of a simplified private securitisation reporting template (Option C).

Section 6.2

Question 15 Do you agree with the analysis and the inclusion of a new simplified template for private transactions that focuses mostly on supervisory needs?

Yes, ALFI believes that from an EU investor point of view the inclusion of a simplified template for private securitisations will reduce the opportunity cost for EU investors.

- Presently a vast amount of non-EU private securitisation issuers, sponsors or originators do not market within the EU because they cannot meet the disclosure requirements under article 7 in their current forms; most of that is due to the lack of an adapted template;
- When private securitisations are marketed within the EU, the lack of a specific template leads to ad-hoc arrangements to comply with article 7 requirements; these are often bespoke from one issuer to the next, which in turn creates divergence of information standards for investors trying to conduct their due-diligence and to costs for investors arising from having to adapt to different types and formats of disclosures made by issuers, originators and sponsors.

In addition, we support the view that a new simplified template for private securitisations should only focus on supervisory needs, and that the transaction parties should be free to agree bilaterally on the form and content of any loan-level and investor reporting according to their needs, as they did before the adoption of the RTS on reporting under the SECR.

We agree with the Commission's recognition in the Report that private securitisation investors need more tailor-made, deal-specific information than the ESMA templates can provide. Feedback from investors confirms that they often find the bespoke reporting agreed and provided separately on a deal-by-deal basis more useful than the reports submitted to or made available by securitisation repositories. In many cases, these reports are not used much in practice.

This is evidenced by the fact that some industry sectors developed and maintained common standards for tailored reporting between the sell- and buy-side parties, even after the introduction of the Annex 7 templates. For example, this is the case for reporting templates for managed CLO transactions, where monthly and quarterly reports prepared by trustees differ significantly from the Article 7 reports. Similarly, the Commercial Real Estate Finance Council Investor Reporting Package is a well-established industry standard for the U.S. CMBS and CRE CLO market that co-exists with the Article 7 templates. The European version of this investor reporting package was also developed. Furthermore, reporting templates issued by the Reserve Bank of Australia (RBA) under its collateral framework are commonly used as the market standard.

We also support the Commission's proposal to create a simplified template for private securitisations as a solution to the issue of EU investors being effectively prevented from

investing in certain securitisations from third countries, due to the combination of the verification obligation under Article 5(1)(e) of the SECR and the reporting requirement under Article 7. The sell-side parties in those countries have no incentive or obligation to provide the information according to the procedures set out in Article 7. For instance, the reporting entities in the US have established their own reporting processes based on much lighter domestic requirements than those under the SECR. The US market (CMBS, credit card and US managed CLOs) is important for the EU fund sector and the lack of necessary data hampers the EU fund sector. We believe that a simplified template for private securitisations that only covers supervisory needs could address this issue effectively. Our members would welcome and appreciate a swift adoption of this solution.

The ABCP transaction consideration also reinforces the need for a simplified private securitisation reporting template tailored to supervisory purposes only. This relates to the potential dual reporting burden that ABCP transactions may entail when they are funded both through an ABCP conduit and on the bank's own balance sheet. Under the current Article 7 regime, a single originator of a private securitisation may have to report the underlying exposures using both the ABCP and the non-ABCP templates. Moreover, even if the position is not syndicated, the reporting entity may face a situation where the applicable template changes over the course of the securitisation. This could create significant confusion and excessive costs for market participants, who would have to adapt their IT systems to comply with a different disclosure template.

Moreover, feedback from our members confirms that the current prescriptive regulatory reporting regime generates costs and is an operational burden, while the relevance of the information provided to investors is questionable, as mentioned above. The proposed new simplified template could reduce information overload and eliminate the need for originators and issuers to set up costly internal systems or to engage third-party agents to facilitate reporting that no one is using. This would result in more efficiencies, cost savings and a lower entry barrier for sell- and buy-side parties, which could contribute to the growth of the securitisation market in Europe.

We would like to reiterate that creating a new template under this Option C is a safe solution and, in our view, would not jeopardise the stability of the EU financial markets. The EU institutional investors would be protected by other requirements of the SECR that are clear and unambiguous, such as the obligation to verify risk retention, the disclosure of credit-granting standards and the general due diligence that specifically targets credit issues.

Lastly, this change would be advantageous as it would streamline the inconsistent notification criteria of different supervisory authorities. However, it should be ensured that EU supervisory authorities (including ECB) will not require any other notifications or reporting for private securitisations.

Question 16 Do you believe that ESMA should proceed with the review of the RTS based on this option and using the SSM notification template as a starting point? Please provide details in your answer.

We welcome this approach, as the SSM notification template meets the supervisory needs for assessing the compliance with Articles 6 to 8 SECR, while requiring significantly less information than the ESMA templates. We would like to stress that the new template for private securitisations should also be proportionate and consistent with the information standards applicable to third country securitisations, especially those from the US. We urge ESMA to aim for simplification and clarity when reviewing the content, form and means of submission of the new template. The template should serve the supervisory objectives without imposing undue costs or burdens on the market participants. The ESMA guidelines should set clear deadlines for the initial notification, instruct the national competent authorities to provide accessible data rooms or websites (or at least email addresses) for the reporting entities and ensure that the information on submission processes and contacts is publicly available. ESMA should also identify and address any potential overlap in reporting obligations under other EU regulations (such as the NPL Directive (Directive (EU) 2021/2167) and provide guidance to avoid any duplicative reporting on private securitisations. The EU competent authorities (including ECB) should not request any additional reports on private securitisations that are already covered by the new template.

From an investor's perspective the first tab of the template could cover the key features of the securitisation and key risk indicators, with both information type serving as a useful base for investor due-diligence. The detail of the portfolio positions could be aggregated for highly granular portfolios with short-maturity underlying.

Question 17 Do you consider that a simplified template can be useful even though the operational way to submit the data is exempted from the mandatory reporting via the SRs?

We think that the simplified template can provide useful information even if it is not centrally submitted and validated through the SR, as long as the supervisory authorities can access the information and it meets their needs for protecting the EU financial market. However, we also believe that the submission process should be free, simple and accessible, and should not create extra costs or administrative burdens for the reporting entities. The national competent authorities could centralise the information at their level.

In addition, we note that a vast amount of non-EU issuers, sponsors and originators refrain from issuing SECR compliant securitisation because of the lack of an adapted template, the currently available versions being either being too onerous to complete or in adapted to the type of assets held in the collateral pool. Making a simplified template available will lift the burden of disclosure under Article 7 SECR requirements for non-EU originators,

sponsors and issuers thus reducing the opportunity cost for EU investors by enlarging the investable universe

Section 6.3

Question 18 Do you believe that ESMA should proceed with the review of the RTS based on the proposal to deviate from loan-level data reporting for those asset classes which are highly granular, of short-term maturity or revolving pools? What are the potential benefits, challenges, or considerations that ESMA should consider if adopting this approach?

We take the view that loan-level disclosure may not be very useful or beneficial for some asset classes, especially credit card loans and trade receivables with a large number of short-term loans. This has been our consistent position for the last few years and the European Commission acknowledged this in its Report. For credit card securitisations, we find that pool-level features, trends and statistics provide much more relevant information for investors than data on the (very small) individual receivables in the pool. Pool-level data help investors understand the key factors that affect their investment over time, such as excess spread and payment rate. Data on single receivables, however, are quickly outdated due to the short-term and revolving nature of the underlying loans and do not have a significant impact on the credit performance of the whole pool. In addition, a typical credit card receivables securitisation involves reporting more than 700 million data fields at the loan level every quarter. We also hear from our members that the costs of setting up internal systems to enable such reporting are around EUR 500,000. Therefore, the costs of producing this reporting are very high, while the benefits for investors are very low, as they do not use this data for their risk assessment analysis. This is a clear case of disproportionate regulation of the securitisation market under the SECR regime. The same applies to trade receivables.

For asset-classes which are (i) highly granular, (ii) of short-term maturity or (iii) revolving pools, the diversification benefits of the collateral pool offset the individual risk and performance contribution of any single loan in the pool. Therefore, the collateral pool can be aggregated into cohorts with similar characteristics (i.e., original loan term, APR, Credit score (internal or external), LTV, DTI, etc) and this will provide similar, and sufficient, information about the credits in the pool such that loan level disclosures are not needed. In other words, and as an example, loans in ABS pools with similar characteristics tend to perform similarly to each other and can thus be analyzed as a group or cohort.

It is therefore advisable to focus on aggregated collateral level data rather than loan by loan granular data to strike a balance between efficient regulatory supervision and the burden of reporting borne by issuers, originators, or sponsors.

We also suggest that MBS be captured under this category given the highly granular nature of the collateral pool where exposures are aggregated based on pre-defined characteristics at pool-level.

Benefits

Reduced Reporting Burden: By focusing on aggregated collateral level data, issuers, originators, and sponsors can significantly reduce the complexity and cost associated with detailed loan-level reporting, making the securitisation process more accessible and attractive.

Enhanced Regulatory Efficiency: Aggregated data allows regulators to quickly assess the risk and health of securitisation pools without the need for detailed analysis of each underlying loan, thereby streamlining supervisory processes and focusing on key risk indicators.

Improved Market Accessibility: This approach could lower entry barriers for new and smaller issuers by simplifying compliance requirements, thus encouraging diversity and innovation within the securitisation market.

Question 19 Are there any additional asset classes that should be further explored based on the proposal of deviating from the loan-level data reporting? Please list the relevant asset classes or annexes and explain why.

Auto Loans, Student Loans, and Credit Card Receivables: These asset classes typically consist of a large number of small-balance loans or receivables. Their risk and performance are more effectively analyzed through aggregated metrics such as average credit score, payment delinquencies, and loss rates, rather than individual loan details. The homogeneity within these pools means that portfolio-level statistics can provide a sufficient overview of the underlying risks and expected performance.

Consumer ABS: similar to credit card and auto loan securitisations, Consumer Asset-Backed Securities (ABS) can also benefit from aggregated reporting due to the homogeneous nature of the underlying assets, such as personal loans.

Residential Mortgage-Backed Securities (RMBS): standard residential mortgages may not require detailed loan-level reporting due to the availability of historical performance data and established risk models, non-standard or non-conforming mortgages (such as those with variable income verification or to borrowers with non-traditional credit histories) may benefit from a more detailed review to assess their risk accurately.

Trade Receivables: For securitisations backed by trade receivables, especially those involving a large number of debtors with varying creditworthiness and payment terms, aggregated data on debtor concentration, average payment terms, and delinquency rates can provide sufficient oversight without the need for loan-level granularity.

Lease Receivables: Similar to auto loans, lease receivables securitisations can often be effectively managed using aggregated data due to the homogeneous nature of the leases and underlying assets, such as equipment or vehicles.

Section 6.4

Question 20 Do you agree, in the context of option C, that ESMA should further explore the deletion of the current disclosure templates? Please provide details in your answer.

We concur with the proposal to eliminate the existing disclosure templates and, if appropriate, any redundant fields in other templates, in order to match the information reported with the needs of investors. We also endorse the removal of Annexes 10 (NPE) and 14 (Inside Information). As we stated in our answer to Question 16, the overlap between the reporting under the NPL Directive and under Annexes 10 should be examined to avoid any duplicate reporting.

Question 21 Do you agree, in the context of option C, that ESMA should further explore the streamlining of the current disclosure templates? Please provide details in your answer.

We agree with the suggestion to streamline and simplify the current disclosure templates and possibly also other fields in other templates, in order to align the information reported with investors's needs.

However, determining which fields are most relevant and useful for investors will likely be a substantial amount of work. We would recommend consulting with a group of investors that regularly purchase securitisations applicable to each template to determine which fields they find critical, helpful but not absolutely necessary, and those which they completely ignore.

Section 6.5

Question 22 Do you consider that a new template for non-ABCP trade receivables should be included and why? Please provide reasons for your answer.

We agree with the proposals for simplified reporting on non-ABCP trade receivables (using Annex 11 (ABCP portfolio data) rather than Annex 9 (Esoteric)) and synthetic transactions.

Question 23 Which additional template could be relevant for the reporting of other asset classes that are not currently covered in the framework? Please provide details in your answer.

Other Observations

Question 24 Please provide any general observations or comments that you would like to make on this CP, including how the revision based on the above approach (Option C) may be relevant to your own activities, and any potential impacts.

The existing SECR requirements under article 7 are not adapted for CLOs or similar products where the collateral pool supporting the securitisation is not incepted at the time of issuance of the securitisation. The issues are twofold:

- The issuer, sponsor, originator cannot file the relevant Annex XX template with the SR because the collateral pool is not fully constituted until several months after the issue date of the securitisation;

- This impacts the timing of the due-diligence the investor conducts when investing in an eligible securitisation under EUSR. We recommend ESMA to account for the specificity of CLOs and similar instruments where the collateral pool is constituted ex-post to the issuance of the securitisation; the requirements of EUSR under article 7 shall enable flexibility to the investor to address their due-diligence requirements in a manner that is adapted to the functioning of the CLO market

Finally, regarding the new template for private securitisations, we would like to emphasise the importance and urgency of responding swiftly to the current requirements for reporting on third country securitisations, especially regarding the differences between US and EU reporting standards.

On a separate matter, we would like to point out plans from UK FCA to move to a more principles based regime, doing away with any templates and instead requiring investors to verify for UK and overseas securitised products the following:

- the sufficiency of the information a manufacturer has made available to institutional investors to enable them to independently assess the risk of holding the securitisation position;
- that they have received at least the information listed in FCA rules on things such as the risk characteristics of the individual securitisation position and of the securitisation's structural features that could materially impact the performance of the securitisation position; and
- that there is a commitment from the manufacturer to make further information continually available, as appropriate.

It would appear from the above that the proposed UK approach will be less prescriptive than the options being considered by ESMA (which all appear to be template based) and would give asset managers greater flexibility to rely on their own processes for assessing securitised products.

If, e.g for investments in non-EU securitisations, the information and disclosure reporting is available and can be considered equivalent, it should not be required to use the EU templates as this would cause a duplication. It can be noted that that there are service providers outside the EU (e.g. in the USA), which offer such reporting and it may not be very realistic to expect these service providers to offer two kinds of reporting, one for local / US investors and one for non-local / non-US investors.

For this reason our members emphasize that an equivalence regime on transparency disclosures between the USA and the EU should be initiated.

8.1.4 OPTION D

General

Question 25 Do you agree with Option D (a comprehensive review of the disclosure framework) as the preferred way forward for the revision of the disclosure templates?

Whilst we support Option C as the most suitable available option to address certain urgent matters that could help to revive the securitisation markets prior to the wider review of the SECR, we also believe that the disclosure framework should be completely overhauled in the future.

Section 7.2

Question 26 Do you think that it would be possible to achieve a level of simplification and standardisation within fields, across multiple templates, without having an impact on the overall risk analysis of the transaction? Please explain the rationale behind your answer.

Yes, there are multiple fields within the Annexes that are either not regularly used or just completely ignored by investors. In these cases, the additional information is simply "clutter" for the investor. However, they are still required to ensure that the data provided is aligned with the Annex templates, even when they receive no analytical value from the information.

Question 27 Do you think that the overall usability would improve with simplified and standardised templates? Please explain the rationale behind your answer.

As referenced above, reducing the number of unnecessary fields would likely simplify the credit analysis of these securitisations. There would also be less work involved with legal and compliance to ensure that they meet ESMA standards.

Question 28 Do you agree with the approach proposed by Option D, to create a set of templates based on the characteristics and nature of underlying assets rather than the categorisation of the securitisation transaction (i.e., public or private, true sale or synthetic)?

Yes, this is one of the reasons we would prefer Option D to Option C (should Option D not take years to complete and to implement and if it would not overlap with the wider review of the SECR)

as we believe that disclosure requirements should vary depending on the type of collateral being securitized.
Section 7.3

Question 29 Do you believe that ESMA should proceed with the review of the RTS based on the proposal to deviate from loan-level data disclosure for those asset classes which are highly granular, of short-term maturity or revolving pools? What are the potential benefits, challenges, or considerations that ESMA should consider if adopting this approach?

Question 30 Are there any additional asset classes that should be further explored based on the proposal of deviating from the loan-level data reporting? Please list the relevant asset classes or annexes explain why.

Section 7.4

Question 31 What are your views on the proposal to transition from the current 'no-data' options to a framework based on 'mandatory', 'conditional mandatory' and 'optional' fields for securitisation transactions?

We think this proposal has merit. In a lot of cases, the different "ND" options are irrelevant to the investor. If the issuer is not providing the information as part of their disclosures, then the result is the same for the investor whether the reason for the lack of disclosure is that it is not relevant for the investor or that the data was simply not collected. It would be more straightforward to just require issuers to disclose certain fields (mandatory), require them to disclose certain fields under specific conditions (conditional mandatory) and give issuers the option to avoid disclosing certain fields (optional).

It is possible, perhaps even likely, that the optional fields will never be disclosed by issuers so it may be helpful to consult with a group of investors and regulators prior to amending these disclosure requirements to ensure that the most critical fields are classified as mandatory.

Question 32 Do you think that this transition be of added value to the securitisation framework? What challenges or concerns, if any, do you anticipate with the introduction of 'mandatory,' 'optional,' and 'conditionally mandatory' fields? Are there specific considerations related to data availability, feasibility, or implementation that should be considered?

As mentioned in the feedback for question 31, the significant challenges or concerns that ESMA should consider due to the introduction of “mandatory”, “conditional” and “optional” fields are the likelihood of most “optional” fields being left blank by reporting entities. However, this is also present on the current reporting framework as reporting entities have the possibility to use ND options, where allowed. In addition, we also do not anticipate additional challenges with regards to data availability, feasibility or implementation if reporting framework is updated, given these challenges also exist to reporting entities with the current framework. The change in framework could at least lower the cost of the production of the reports, as reporting entities can focus on the disclosure of relevant information to investors.

Question 33 Please provide any general observations or comments that you would like to make on this CP, including how the revision, based on the above approach (Option D) may be relevant to your own activities and any potential impacts.