

16 September 2025

Via online submission

European Securities & Markets Authority
201-203 rue de Bercy
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Re: European Securities and Markets Authority Discussion Paper on the Integrated Collection of Funds' Data

Dear Sir/Madam

Managed Funds Association (“MFA”)¹ appreciates the opportunity to represent the views of the global alternative investment industry in this written response to the European Securities and Markets Authority's (“ESMA”) Discussion Paper on the integrated collection of funds' data (the “Discussion Paper”). We have set out our responses to the relevant questions of the Discussion Paper in the Annex.

At a high-level, MFA supports the simplification of fund reporting, reducing duplication, and improving data quality. However, without proportionality and streamlining, the current EU framework imposes disproportionate burdens on non-EU AIFMs, particularly due to overlapping EU/national requirements, lack of standardisation, and dual-sided reporting obligations.

Executive Summary

In our detailed comments that follow in the Annex, MFA addresses certain specific questions important to MFA member firms. MFA's comments are summarised as follows:

- MFA strongly supports efforts to streamline EU fund reporting, reduce duplication, and improve data quality, particularly for non-EU AIFMs reporting under national private placement regimes.
- Reporting overlaps across AIFMD, EMIR, SFTR, and MiFIR cause redundancy and inefficiency; MFA urges a “report once, use many times” model.
- MFA advocates for data reuse across reporting frameworks where possible as the most practical and proportionate solution, and for coordination across EU and U.S. fund reporting frameworks under AIFMD and Form PF respectively.

¹ Managed Funds Association (“MFA”), based in Washington, D.C., New York City, Brussels, and London, represents the global alternative asset management industry. MFA's mission is to advance the ability of alternative asset managers to raise capital, invest it, and generate returns for their beneficiaries. MFA advocates on behalf of its membership and convenes stakeholders to address global regulatory, operational, and business issues. MFA has more than 180 fund manager members, including traditional hedge funds, private credit funds, and hybrid funds, that employ a diverse set of investment strategies. Member firms help pension plans, university endowments, charitable foundations, and other institutional investors diversify their investments, manage risk, and generate attractive returns throughout the economic cycle.

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- MFA recommends eliminating low-utility data fields (e.g. excessive counterparty disclosures) and using a hybrid top-down/bottom-up approach to define essential metrics.
- MFA calls for an EU-wide data dictionary to align definitions and reduce inconsistencies in interpretation of reporting terms.
- MFA supports a single EU-level reporting portal for AIFMD, and SSR reporting.
- MFA opposes proposals for monthly or daily reporting, and advocates maintaining the current tiered AIFMD model with flexibility for illiquid and closed-ended funds.

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MFA appreciates your consideration of our recommendations. We look forward to working with ESMA to improve the EU fund reporting framework in order to reduce the compliance burden on asset managers, reduce costs for investors, and support economic growth. We would be pleased to discuss our recommendations in further detail. Please do not hesitate to reach out to me on +44 20 3585 2300 or rhailey@mfaalts.org.

Yours sincerely

/s/

Rob Hailey
Managing Director, Head of EMEA Government Affairs
Managed Funds Association

ANNEX

SECTION 3: ASSESSMENT OF OVERLAPS AND INCONSISTENCIES BETWEEN REPORTING FRAMEWORKS

Q3. 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.

MFA Response

Section 3 of the Discussion Paper clearly identifies the fragmentation in EU and national supervisory reporting regimes (e.g. AIFMD, UCITS, MMFR) and how this leads to duplicated submissions and inconsistencies. MFA strongly agrees with this diagnosis.

For example, the Discussion Paper notes that despite ESMA's efforts to harmonise AIFMD reporting through guidelines, Q&As and technical reporting instructions, National Competent Authorities ("NCA") interpret the AIFMD reporting requirements differently, particularly regarding the additional reporting requirements introduced by ESMA's 2013 opinion which have not been endorsed by all Member States.

Additionally, divergences remain in the data submission processes and expectations. For example, some NCAs expect AIFMs that market AIFs in their jurisdiction to proactively submit AIF annual reports to the NCA, whereas others only expect the annual reports to be available upon request.

MFA members also note that, where their vehicles (funds, SPVs, etc) are in scope, they are required to report similar data fields on counterparty and transaction data under SFTR, EMIR and MiFIR transaction reports, yet with different formats, taxonomies, and submission channels. Additionally, as these reporting obligations are dual-sided, both sell-side and buy-side market participants are independently required to file such reports. Buy-side market participants typically will delegate reporting to their sell-side broker/dealer, which means that in practical terms, both sides to the dual-sided reporting obligation are often being fulfilled by one side to the transaction, rendering the buy-side report redundant. Nonetheless, these redundant obligations result in higher compliance costs and operational inefficiencies. MFA therefore supports ESMA's call for greater harmonisation and urges implementation of the "report once, use many times" principle as set out in the Discussion Paper.

SECTION 4: INTEGRATED REPORTING

Q4. 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?

MFA Response

Section 4 underscores that the new AIFMD and UCITS Directive amendments offer a critical opportunity to align and simplify reporting requirements. MFA agrees that integrated reporting across frameworks is a necessary evolution, especially for AIFMs managing AIFs on a cross-border basis. As highlighted in Section 3.3, the current duplication and inconsistent data semantics hinders efficient supervision and increases risk of error. Integrated reporting would streamline compliance and align supervisory outcomes.

However, an integrated reporting framework which addresses multiple regulatory regimes risks introducing unnecessary reporting fields for certain market participants, whereby for example, entities reporting solely under AIFMD are also ‘dragged in’ to compiling and reporting unnecessary data which falls under UCITS or MMFR. As such, MFA urges ESMA to consider carefully the structure of the integrated reporting framework to ensure that it is proportionate in the data it requests, and reporting templates are user-friendly and clearly denote which data inputs are required to satisfy the requirements of a given regulatory regime. The end result should ensure that the integrated reporting framework does not subject entities to additional reporting obligations to which they are not subject today, as this would run counter to the stated simplification objective.

- Q5. 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.**

MFA Response

Of the options discussed in Section 4.2, MFA supports Option IR1 (multiple reporting obligations with reuse of data), as it delivers practical and proportionate harmonisation without requiring a full overhaul. As ESMA notes in paragraphs 65-68, this option would retain structures like MMFR and ECB statistical reporting as separate frameworks while harmonising AIFMD and UCITS reporting templates. This option is especially well-suited to non-EU AIFMs, as it reduces duplication without imposing the heavier cost and system changes implied by Option IR2 (full integration). As such, in order of preference for the three options, MFA considers Option IR1 would be the most preferable, followed by IR2, and does not support IR3.

Option IR2 offers a potentially compelling solution in the longer term. Although this option does indeed require a heavier up-front cost for regulators to overhaul the current reporting templates, as well as for market participants to familiarise themselves with the new requirements, in the long term, once the changes have been bedded in, the modular framework may offer the most streamlined solution. The core dataset would apply in respect of all UCITS and AIFs, creating a dataset that can easily be compared by regulators on a like-for-like basis against other funds. Market participants can then disregard any modules which are not relevant to their fund type/strategy, and only report those modules which are relevant to their fund. However, to maximise the benefits of this option, the reporting template must be designed in

a sufficiently user-friendly way which makes it clear which modules are relevant for what type of fund, with detailed, practical guidelines explaining how to complete the reporting fields.

Option IR3, on the other hand, risks fragmentation by introducing national extensions. National regulators may inadvertently introduce diverging data requirements which create undue burden on reporting persons, having to familiarise themselves with potentially a significant number of different national reporting requirements. Further, the benefit of the national extensions may be limited, as differences between the information requested under the various national extensions would mean that EU-level authorities may not be able to compare effectively the data when carrying out their supervisory functions or considering whether any particular area requires further review.

Q6. 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?

MFA Response

Section 4.3 explains that AIFMD data overlaps heavily with data submitted under EMIR, SFTR, and MiFID transaction reporting obligations (e.g. derivative exposure, counterparty identity, collateral). MFA supports ESMA's proposal to explore synergies across these frameworks. For instance, data already reported under EMIR could be reused in AIFMD Annex IV reporting, rather than resubmitting it in different formats. Granular transaction-level data, or position-level reports submitted under EMIR may be used to calculate the total derivatives exposure of an AIF by fund and asset class, thereby leveraging existing data to supplement, or alleviate the reporting burden under AIFMD. Similarly, equivalent data reported under SFTR may be used to supplement the securities borrowing, and repo trades information collected under AIFMD. This may reduce the administrative burden for market participants and improve consistency.

ESMA has raised the question of whether integration or alignment of the MiFID transaction reporting framework would also be useful. MFA's view is that MiFID portfolio management firms should not be subject to MiFID transaction reporting requirements – like AIFMs. The marginal benefit of a dual-sided transaction reporting obligation is not proportionate to the compliance burden imposed on the additional reporting party; therefore transaction reporting should be a single-sided obligation which is borne by sell-side firms such as dealers. For further detail on MFA's position, please refer to the points made in [MFA's response](#) to Question 6 of the recent FCA consultation on improving the UK transaction reporting regime, which applies equally in the EU context.

In addition to concerns regarding data sharing and alignment among European regulatory reporting frameworks, increasing attention should also be directed toward the widening divergence between the reporting obligations under Annex IV for AIFMs and the Form PF filing requirements imposed by the U.S. Securities and Exchange Commission ("SEC") and the U.S. Commodity Futures Trading Commission ("CFTC"). These disclosures were originally developed in the wake of the 2008 global financial crisis to

equip regulators with greater visibility into the private funds industry, specifically to identify and monitor potential systemic and macroprudential risks.

However, over time, both Form PF and Annex IV reporting have expanded beyond their initial scope, incorporating data fields and reporting requirements that do not directly serve this core objective. This regulatory drift risks undermining the efficiency and effectiveness of these tools as mechanisms for systemic risk oversight.

MFA therefore urges ESMA to engage in international regulatory dialogue and coordination with the SEC and CFTC. The goal should be to recalibrate both Annex IV and Form PF, realigning them with their foundational purpose—namely, the identification of macroprudential risks stemming from fund managers’ investment activities. As part of this effort, MFA recommends a thorough review and removal of data fields and reporting obligations that do not meaningfully contribute to this risk-monitoring function.

SECTION 5: MAIN PRIORITIES FOR THE WORK TOWARDS INTEGRATION

Q7. How should the approach to focus on reporting elements with high added-value approach be implemented to ensure proportionality, efficiency, and data quality?

MFA Response

Section 5.1 proposes prioritising data elements with high added-value. We fully support this approach. Many Annex IV fields require burdensome inputs that are rarely used in supervision. For example, the top-five counterparty exposure breakdowns are requested in relation to the AIF to each counterparty, and also from each counterparty to the AIF, which poses significant challenges from a data gathering perspective but generates marginal insight.

Additionally, MFA members consider that the following are areas where ESMA should consider when determining which fields do not provide sufficient supervisory value relative to the burden of the data collection exercise:

- a. *Duplicative data across manager and fund reports:* The reporting template includes AIFM-level fields and AIF-level fields. Often, aggregated data at the manager level mirrors fund-level data, potentially duplicating effort. This can strain data management without offering distinct supervisory insight beyond consolidation.
- b. *Highly granular Fund or Investor details:* Fields requiring deep breakdowns, such as specific instrument identifiers (ISINs, MICs), or highly granular geographic/currency breakdowns are valuable for traceability but may be of limited marginal supervisory value if regulators are focused on broader systemic risks.

- c. *Static or rarely changed items*: Some fields such as certain structure or service provider descriptors don't change often across reporting periods. While useful at onboarding, their recurrent reporting may add operational burden with low incremental supervisory insight.

Accordingly, MFA considers that a risk-based approach for the areas identified above, driven by supervisory use cases and data utility (see paragraph 108 of the Discussion Paper), would enhance proportionality.

Implementation should begin with regulatory mapping of existing data uses across authorities. As described in paragraph 108, efforts should focus on eliminating redundant data points, validating which inputs are critical to risk monitoring, and leveraging existing data infrastructure. ESMA's hybrid top-down and bottom-up model offers a pragmatic path to identifying essential data that can be gathered efficiently.

Q8. How can semantic data integration best be achieved across reporting frameworks? Please identify areas where alignment would be most beneficial?

MFA Response

Section 5.2 highlights how divergences in data definitions (e.g., NAV, exposure, investor type) cause confusion and inconsistent reporting across jurisdictions. Currently, a number of key technical terms in the templates of fund reporting templates, as set out in EU-level regulations, are not defined terms at all. Instead, market participants are expected to interpret the requirements for the relevant data field based on a natural reading of the terminology. This provides room for divergent understandings of the terms and methodology.

MFA therefore supports ESMA's proposal to develop a common EU data dictionary, drawing on initiatives like the Joint Bank Reporting Committee ("JBRC") model or the EBA's Data Point Model 2.0. Harmonised definitions, metadata, and reporting instructions, with examples, would reduce interpretation risk and enhance comparability. This is especially important for non-EU firms subject to local interpretations of EU rules. The centralised EU-level data dictionary should cover terms used in AIFMD, UCITS, SFTR, EMIR, MiFIR and statistical reporting. Common definitions of NAV, leverage, fund type, etc, would improve consistency and comparability. Current divergences in interpretation across Member States lead to inconsistent filings.

In relation to the AIFMD and UCITS Directive, for example, MFA notes that the concept of AUM is a critical metric for AIFs but does not exist under the UCITS Directive. In principle, AUM should be a common metric by which different types of funds may be compared. As such, the fact that the UCITS Directive does not refer to AUM (using metrics such as NAV instead) means that regulators are missing a key opportunity for comparative analysis between the two regimes which current data definitions do not accommodate.

Q9. 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?

MFA Response

Section 5.3 discusses the reporting flows and data sharing arrangements currently in place for AIFMD reporting in the EU. The current reporting framework is a complex network of data sharing, with agreements between different national regulators, and NCAs and central banks playing different roles depending on the relevant Member State. As such, in particular for non-EU based AIFMs, it is often difficult for managers to appreciate where, and how, data reported to an NCA will be used by other supervisory authorities. MFA therefore agrees that there is a need to streamline the data sharing arrangements across the EU.

Of the options proposed, MFA considers that Option 3: a fully centralised EU data collection system is the most compelling. This would be especially beneficial for non-EU AIFMs registered for marketing under the National Private Placement Regimes (“NPPR”) in multiple jurisdictions who currently report separately to multiple NCAs and are required to comply with multiple national permutations of the Annex IV reporting obligation which in reality stem from the same EU-level regime. Historically, MFA members have experienced friction with managing multiple individual member state reporting portals, some of which are less user-friendly than others. As such, MFA considers that centralising reporting via a designated central EU system would streamline supervision and reduce duplicative filings.

However, MFA considers that it is important for such designated central EU system to be independent of ESMA’s control (whilst being subject to its oversight). Additionally, clear governance, access rights, and support infrastructure should be put in place to ensure that regulators are only able to access information which they are specifically empowered to receive under the relevant EU directives and regulations.

While Option 3 is MFA’s preferred option, we acknowledge that NCAs perform an important function, and consider there are good reasons not to cut out their role in data collection entirely. Furthermore, market participants are familiar with the current reporting framework, or it may be the case that they are only reporting in one member state. As such, as a potential hybrid between Options 2 and 3, ESMA could mandate the creation of a centralised EU system, but the national submission avenues would remain open. Market participants would then have the option of either reporting data to an NCA, or to the centralised EU system. Crucially, in order to eradicate duplicative reporting, the submission of data to a single NCA or the centralised EU system should discharge the Annex IV reporting obligation in its entirety, irrespective of which other member states the relevant fund is marketed to. This approach draws on that taken under REMIT for market participant registration (i.e. where registration with a single NCA will suffice, even if the market participant trades on EU trading venues in multiple jurisdictions), and also the approach in EMIR/SFTR, whereby counterparties may submit transaction reports to a trade repository, or directly to the regulator.

Q11. Are there any other data sharing arrangements, either within or beyond asset management, that you believe would be beneficial for burden reduction?

MFA Response

One significant example outside the specific scope of the fund-specific frameworks covered in the Discussion Paper is the net short position reporting regime under the EU Short Selling Regulation (“SSR”).

Currently, under the SSR, position holders are required to submit net short position reports separately to the NCA of each relevant issuer's home Member State once specified thresholds are met. For asset managers operating across multiple jurisdictions or managing portfolios with EU-wide exposures, this fragmented approach creates substantial operational complexity. It requires familiarity with each NCA's unique portal, submission method, timeline, and confirmation process. Furthermore, firms must track ongoing changes in national rules (e.g. updated thresholds during crisis periods), further increasing compliance risk.

In particular, given the short time frames imposed by the SSR for certain disclosures (e.g. where a net short position must be disclosed, the deadline for notification is 15:30 of the trading day after the relevant threshold is breached), the fact that each EU member state operates its own reporting portal, some of which require a manual approval process to create an account, creates undue barriers to timely reporting. Various MFA members have noted situations where they have triggered a notification obligation in an EU member state in which they have not previously made SSR notifications. In such situations, the notifying party is required to register on the relevant member state's system, navigate an unfamiliar reporting portal and input the relevant information required for the notification, all within a very tight timeframe. This issue is exacerbated where MFA members are based in the U.S. (as many are). This means that the 15:30 reporting deadline, which is on European time, is very early in the day, and in the case of firms on the West Coast, is before the start of the business day. As such, these logistical impediments to timely reporting can have a material impact on a firm's ability to comply with the notification and disclosure requirements under SSR.

The SSR net short reporting framework would greatly benefit from the development of a centralised EU-level reporting portal, similar to what is being considered under the integrated fund data collection initiatives described in this Discussion Paper. Such a portal (whether operated by ESMA or under its oversight) could act as a single point of submission for all net short reporting, which the NCAs of individual EU member states can access. This would not only reduce the operational burden and compliance risk for cross-border managers, but would also improve consistency, auditability, and data quality for regulators.

Moreover, a centralised portal could enable better integration between fund-level reporting (e.g. AIFMD Annex IV or UCITS reporting) and position-level disclosures under SSR, thereby enhancing supervisory insight into market activity while streamlining obligations for managers. MFA therefore encourages ESMA to consider net short position reporting under SSR as a priority candidate for centralisation in any broader EU regulatory data strategy.

- Q12. 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?**

MFA Response

MFA strongly supports ESMA’s suggestion in Section 5.3.6 for phased implementation. Firms should be given time to adapt, especially smaller managers or those with limited EU exposure. Early voluntary adoption should be encouraged, with priority given to aligning semantics and formats. Lessons learned from early adopters can inform broader rollout.

Further, non-EU AIFMs should be integrated early in the process to ensure that frameworks are internationally operable. MFA suggests that ESMA consider issuing guidance specifically relating to how non-EU AIFMs should interact with the new reporting framework, given EU member states have historically taken divergent approaches to the treatment of non-EU AIFMs under the AIFMD and CBDF regimes, which creates additional complexity for non-EU AIFMs that are already navigating an unfamiliar regulatory framework.

SECTION 5.6 – REPORTING FREQUENCY

- Q20. 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?**

MFA Response

Section 5.6.2 suggests a monthly reporting frequency as the new baseline for all fund reporting regimes. However, MFA would caution against this shift. As noted in paragraph 255 of the Discussion Paper, for many AIFs with relatively illiquid strategies (e.g. private credit or private equity), quarterly or even semi-annual valuations are standard. Monthly reporting would require estimation or extrapolation, which would potentially reduce the accuracy of data submitted and create artificial data points which may mislead or distort analysis for regulatory oversight purposes. Accordingly, MFA favours maintaining the current AIFMD tiered frequency model based on size and leverage, with quarterly reporting being the highest frequency for reporting, which is only required for AIFs / AIFMs with large AUMs.

- Q21. What solutions and criteria should be envisaged to ensure a proportionate approach with respect to the reporting frequency?**

MFA Response

MFA supports the proposals in Section 5.6.2 to use structural characteristics (e.g. closed vs open-ended) to determine frequency in addition to the AUM thresholds, as these structural characteristics are more

stable than AUM thresholds. NAV valuation cycles and liquidity profile should drive reporting frequency, with derogations for funds where quarterly reporting is infeasible.

- Q22. 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?**

MFA Response

Ad-hoc reporting at higher-than-normal frequencies should only be applied in exceptional circumstances where strictly necessary for European regulators to maintain effective regulatory oversight, for example during periods of significant financial market disruption. As such, MFA strongly discourages the use of daily reporting requirements, given the significant compliance burden this would place on market participants (noting that even during the height of the COVID-19 pandemic, reporting on the use of liquidity management tools was only required on a bi-weekly basis). The criteria for implementation of such ad-hoc reporting should be coordinated at the EU level, with clear triggers and minimum thresholds. Where daily granularity for data is required, the submission of such data should be permitted on a delayed basis.

- Q23. 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?**

MFA Response

MFA supports the creation of a flexible template for crisis-driven ad-hoc reporting. However, as noted in the response immediately above, its use should be limited and triggered only under formally declared stress conditions. Additionally, non-EU AIFMs should receive clear guidance on the applicability of crisis-driven reporting to them.