

The Commission has adopted the PRIIPs RTS

Last week, the European Commission adopted the Level 2 Delegated Regulation, based on the Regulatory Technical Standards (RTS) submitted to it by the ESAs in April.

It has been confirmed that the implementation date is 31 December 2016, but, apart from that and the removal of some minor ambiguities from the text, there are no significant changes from the previous version of the RTS, so a number of concerns remain, including:

- The recitals still require manufacturers, “where possible”, to advise existing clients of updates to the KID, “for example by means of mailing lists or email alerts”;
- There is no clarity over who is responsible for producing KIDs for open architecture products, where clients have a completely open choice of investments, some of which are PRIIPs (including UCITS or NURS funds) and some of which are out of scope;
- It is not clear whether the Composition of Costs table needs to display all those costs that don’t apply to the PRIIP.

We have asked these and other questions and we are hoping for answers in either the much-anticipated FAQ or at the Commission’s PRIIPs workshop in Brussels next Monday.

If you require further information please get in touch with us by calling 020 7337 2291 or by email at fe-kiihub@financialexpress.net.

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