

Response form for the Joint Consultation Paper concerning amendments to the PRIIPs KID





JOINT COMMITTEE OF THE EUROPEAN
SUPERVISORY AUTHORITIES

Responding to this paper

The European Supervisory Authorities (ESAs) welcome comments on this consultation paper setting out proposed amendments to Commission Delegated Regulation (EU) 2017/653 of 8 March 2017¹ (hereinafter “PRIIPs Delegated Regulation”).

The consultation package includes:

- The consultation paper
- Template for comments

The ESAs invite comments on any aspect of this paper. Comments are most helpful if they:

- contain a clear rationale; and
- describe any alternatives the ESAs should consider.

When describing alternative approaches the ESAs encourage stakeholders to consider how the approach would achieve the aims of Regulation (EU) No 1286/2014 (hereinafter “PRIIPs Regulation”).

Instructions

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

- Insert your responses to the questions in the Consultation Paper in the present response form.
- Please do not remove tags of the type <ESA_QUESTION_PKID_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 response, name your response form according to the following convention: ESA_PKID_nameofrespondent_RESPONSEFORM. For example, for a respondent named ABCD, the response form would be entitled ESA_PKID_ABCD_RESPONSEFORM.

¹COMMISSION DELEGATED REGULATION (EU) 2017/653 of 8 March 2017 supplementing Regulation (EU) No 1286/2014 of the European Parliament and of the Council on key information documents for packaged retail and insurance-based investment products (PRIIPs) by laying down regulatory technical standards with regard to the presentation, content, review and revision of key information documents and the conditions for fulfilling the requirement to provide such documents

²Regulation (EU) No 1286/2014 of the European Parliament and of the Council of 26 November 2014 on key information documents for packaged retail and insurance-based investment products (PRIIPs), OJ L 352, 9.12.2014, p. 1.

- The consultation paper is available on the websites of the three ESAs and the Joint Committee. Comments on this consultation paper can be sent using the response form, via the [ESMA website](#) under the heading 'Your input - Consultations' by **13 January 2020**.
- Contributions not provided in the template for comments, or after the deadline will not be processed.

Publication of responses

All contributions received will be published following the close of the consultation, unless you request otherwise in the respective field in the template for comments. 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 ESAs rules on public 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 ESAs Board of Appeal and the European Ombudsman.

Data protection

The protection of individuals with regard to the processing of personal data by the ESAs is based on Regulation (EU) 2018/1725³. Further information on data protection can be found under the [Legal notice](#) section of the EBA website and under the [Legal notice](#) section of the EIOPA website and under the [Legal notice](#) section of the ESMA website.

³Regulation (EU) 2018/1725 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39.



JOINT COMMITTEE OF THE EUROPEAN
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General information about respondent

Name of the company / organisation	ACEPI
Activity	Banking sector
Are you representing an association?	<input checked="" type="checkbox"/>
Country/Region	Italy

Introduction

Please make your introductory comments below, if any:

<ESA_COMMENT_PKID_1>
TYPE YOUR TEXT HERE
<ESA_COMMENT_PKID_1>

Q1 : Are there provisions in the PRIIPs Regulation or Delegated Regulation that hinder the use of digital solutions for the KID?

<ESA_QUESTION_PKID_1>

ACEPI is not aware of any provision that would hinder the use of digital solutions for the KID

<ESA_QUESTION_PKID_1>

Q2 : Do you agree that it would be helpful if KIDs were published in a form that would allow for the information to be readily extracted using an IT tool?

<ESA_QUESTION_PKID_2>

ACEPI believes that such opportunities would provide any advantage to the market in general and to retail investors more specifically. The KID is a unitary document able to provide all the information necessary to make informed investment choices. The extraction of individual parts from the KID would lead to a fragmented reading and the risk of losing some fundamental information in investment choices.

<ESA_QUESTION_PKID_2>

Q3 : Do you think that the amendments proposed in the consultation paper should be implemented for existing PRIIPs as soon as possible before the end of 2021, or only at the beginning of 2022?

<ESA_QUESTION_PKID_3>

ACEPI strongly believes that there should be only one implementation date for all amendments and all products. See also our comments to Q4. It should be considered that the issuers, distributors and retail clients will need time to adapt to the changes (once defined). We estimate that at least 12 months / 18 months should be necessary to adapt to the new requirements.

<ESA_QUESTION_PKID_3>

Q4 : Do you think that a graduated approach should be considered, whereby some of the requirements would be applied in a first step, followed by a second step at the beginning of 2022?

<ESA_QUESTION_PKID_4>

ACEPI strongly believes that there should be only one implementation date on 1/1/2022 for all amendments and all products. Any change to the existing framework would have to be explained to retail investors/ distributors and implemented by issuers. We believe that from the point of view of both retail investors and distributors it is more effective and easier to explain/ understand a new document incorporating all the changes than to produce a series of documents, one different from the other, that progressively incorporate the changes. Also from the issuers point of view it would be more effective to incorporate all the changes at once instead that dealing with successive changes and implementations. We believe that the graduated approach would generate difficulties on interpretation and implementation.

<ESA_QUESTION_PKID_4>

Q5 : Are there material issues that are not addressed in this consultation paper that you think should be part of this review of the PRIIPs Delegated Regulation? If so, please explain the issue and how it should be addressed.

<ESA_QUESTION_PKID_5>

There are several issues that should be addressed and they are not in the consultation paper. The most significant one are related to 1) Scope: we believe that a better specification of products that are inside the scope of the legislation would help to avoid different interpretation by different national authorities or by different authorities. We believe that a specification is needed with reference to: bonds (mainly corporate bonds); plain vanilla derivatives. 2) Grandfathering: We believe that it would be important to have a grandfathering period to PRIIPs issued before the new KID format enter into force.

<ESA_QUESTION_PKID_5>

Q6 : Do you have comments on the modifications to the presentation of future performance scenarios being considered? Should other factors or changes be considered?

<ESA_QUESTION_PKID_6>

ACEPI do not support the use of illustrative scenarios or of a combination of illustrative and probabilistic scenarios. Illustrative scenarios would make PRIIPS using this scenarios not comparable with other PRIIPS even in the same category (category 3). Illustrative scenarios do not fully represent the possible dispersion of values at maturity above all in case of stress scenarios. Furthermore illustrative scenarios are difficult to implement and to produce in an automate way. This would cause a complete change in the process that manufacturer put in place to fulfil current probabilistic scenarios. ACEPI believes that probabilistic scenarios give investors a better idea of possible results at maturity and for this reason we propose to maintain those scenarios with a reviewed methodology and some amendments. We would not favour the introduction of estimates probabilities and the use of words like minimum or maximum return since they are not easy to define. For example, for the minimum return, should the credit risk of the issuer be considered? ACEPI is also against the use of past performance since structured products do not have past performance. So the use of this indicator would not be possible for this products and would lead to breach comparability if used for others.

<ESA_QUESTION_PKID_6>

Q7 : If intermediate scenarios are to be included, how should they be calculated for Category 3 PRIIPs (e.g. structured products)? If intermediate scenarios are not shown in the performance section, which performance assumption should be used for the 'What are the costs?' section?

<ESA_QUESTION_PKID_7>

ACEPI believes that intermediate scenarios give investor relevant information and they should be kept. The use only of the final scenarios do not give investors the idea of what could happen to the price of the product during its life. We believe that information is really important for products that are traded on the secondary market and that can be sold before maturity. As an example, if we think to capital protected products, final scenarios will give the impression that the investor will always get at least the amount invested. This is however not true if the product is sold before. We believe that this information is relevant for retail investors and should be given using intermediate scenarios. Also for path dependent products intermediate scenarios provide important information for retail investors. If ESAs will decide to keep intermediate scenarios, ACEPI would suggest to keep for all products the one year IHP. In any case ACEPI encourage a strong harmonisation between performance tables and costs tables. So also for the cost table the cost could be displayed with reference to the one year holding period.

<ESA_QUESTION_PKID_7>

Q8 : If a stress scenario is included in the presentation of future performance scenarios, should the methodology be modified? If so, how?

<ESA_QUESTION_PKID_8>

ACEPI is in favour to include the stress scenario in the presentation of future performance. This stress scenario could deliver important information to investor above all when, other scenarios shows positive return (or capital protection) but indeed the product is capital at risk. On the other side ACEPI suggests an adjustment to the current methodology to avoid that the stress scenario deliver better results than the others (for instance the negative one in some cases). So we believe that the main problem of stress scenarios is not the stress scenario itself but the methodology. A very simple solution could be to floor the stress scenario to the negative one.

<ESA_QUESTION_PKID_8>

Q9 : Do you agree with how the reference rate is specified? If not, how should it be specified?

<ESA_QUESTION_PKID_9>

ACEPI does not agree with the proposed methodology. ACEPI support instead the use of a currency based (swap rates) rather than a country based methodology. Many PRIIPS have multi-country underlying or indexes and it would be impossible to define

which rate should be used on those case. ACEPI suggests to derive the risk free rate from the swap curve of the currency of the underlying.

<ESA_QUESTION_PKID_9>

Q10 : The revised methodology specifies that the risk premium is determined by future expected yields. The methodology further specifies that future expected yields should be determined by the composition of the PRIIP decomposed by asset class, country and sector or rating. Do you agree with this approach? If not, what approach would you favour?

<ESA_QUESTION_PKID_10>

ACEPI support the idea to use a risk premium that should improve the goodness of the results compared to the current methodology. However ACEPI strongly rejects the dividend based methodology for equity total return products. The proposals is in our opinion very complicated, difficult to interpret or in certain case even impossible to implement, ACEPI would suggest the use a fixed risk premium determined by the ESAs. This would allow to have the maximum harmonisation and comparability and at the same time to have a methodology easier to implement and producing better results. On this point ACEPI strongly recommends to consider different alternatives and methodology to the one proposed in the consultation paper. Volatility based approach, that has been text by an expert group in Eusipa, could for example be considered. Based on preliminary results that approach it is easier to implement and gives good results.

<ESA_QUESTION_PKID_10>

Q11 : The ESAs are aware that historical dividend rates can be averaged over different time spans or that expected dividend rates can be read from market data providers or obtained from analyst reports. How should the expected dividend rates be determined?

<ESA_QUESTION_PKID_11>

ACEPI in against the use of dividends to estimate the risk premium. If dividends should be used ACEPI is in favour of the use of historical dividends to avoid potential differences between issuers.

<ESA_QUESTION_PKID_11>

Q12 : How should share buyback rates be estimated?

<ESA_QUESTION_PKID_12>

As already stated, ACEPI does not support the use of a dividend-based methodology. In the supported methodology, a fixed risk premium, buyback rates are not an issue

<ESA_QUESTION_PKID_12>

Q13 : Do you agree with the approach for money-market funds? Are there other assets which may require a similar specific provisions?

<ESA_QUESTION_PKID_13>

TYPE YOUR TEXT HERE

<ESA_QUESTION_PKID_13>

Q14 : The methodology proposes that the future variance be estimated from the 5-year history of daily returns. Should the volatility implied by option prices be used instead? If so, what estimate should be used if option prices are not available for a particular asset (equities namely)?

<ESA_QUESTION_PKID_14>

ACEPI believes that the use of historical volatility to estimate future variance has to be preferred to the use of implied volatility. Implied volatility could be significant only for actively traded options. Furthermore the use of implied volatility could lead to potential differences between issuers.

<ESA_QUESTION_PKID_14>

Q15 : Do you think compensatory mechanisms for unforeseen methodological faults are needed? If yes, please explain why.

<ESA_QUESTION_PKID_15>

ACEPI believes that such mechanisms are not needed at all. If introduced, would be necessary to specify very well when they should be used. If this were not the case, there would be room for a lack of harmonisation between different issuers. ACEPI supports the view that the methodology should be strong enough to avoid the use of compensations.

<ESA_QUESTION_PKID_15>

Q16 : Do you favour any of the options above? If so, which ones? How would you ensure that the information in the KID remains comparable for all products?

<ESA_QUESTION_PKID_16>

TYPE YOUR TEXT HERE

<ESA_QUESTION_PKID_16>

Q17 : Are there any other compensatory mechanisms that could address unforeseen methodological faults? If yes, please explain the mechanism; explain how it ensures that scenario information in the KID allows investors to compare PRIIPs, and explain how the information for similar products from different manufacturers remains sufficiently consistent.

<ESA_QUESTION_PKID_17>

No in ACEPI view's

<ESA_QUESTION_PKID_17>

Q18 : What are your views on the use of a simplified approach such as the one detailed above, instead of the use of probabilistic methodologies with more granular asset specific requirements?

<ESA_QUESTION_PKID_18>

TYPE YOUR TEXT HERE

<ESA_QUESTION_PKID_18>

Q19 : Do you consider the use of a single table of growth rates appropriate? If no, how should the methodology be amended?

<ESA_QUESTION_PKID_19>

ACEPI welcomes simplified approach but we would suggest the use of a fixed ERP as already explained. ACEPI supports the idea that expected returns should be estimated as the sum of a reference rate (the swap curve of the relevant currency) and a risk premium. ESAs table could determine the equity risk premium based on historical data such as the long term overperformance of a world equity index compared to the risk free rate. For equities without dividends risk premia could be set to 0%. For Commodities and FX could be the expected forward rate less the reference risk free rate.

<ESA_QUESTION_PKID_19>

Q20 : More generally, do your views about the use of a probabilistic methodology vary depending on the type of product (e.g. structured products vs non-structured products, short-

term vs long-term products)? For which type of products do you see more challenges to define a probabilistic methodology and to present the results to investors?

<ESA_QUESTION_PKID_20>

ACEPI strongly believes that the probabilistic methodology should not vary depending on the type of product and between short and long term products. This would ensure the maximum comparability.

<ESA_QUESTION_PKID_20>

Q21 : Do you think these alternative approaches should be further assessed? If yes, what evidence can you provide to support these approaches or aspects of them?

<ESA_QUESTION_PKID_21>

Please make reference to our Q10 answer and what already stated on the use of a fixed risk premia.

<ESA_QUESTION_PKID_21>

Q22 : Are there any other approaches that should be considered? What evidence are you able to provide to support these other approaches?

<ESA_QUESTION_PKID_22>

TYPE YOUR TEXT HERE

<ESA_QUESTION_PKID_22>

Q23 : Do you think illustrative scenarios should be included in the KID as well as probabilistic scenarios for structured products?

<ESA_QUESTION_PKID_23>

ACEPI is against the introduction of illustrative scenarios as an alternative or in addition to probabilistic scenarios. Introducing illustrative scenarios in addition to probabilistic would 1) increase difficulties to understand KID for retail investors (higher number of information to process); 2) breach the limitation of three pages for the KID; 3) be difficult to automate and harmonise. For these reasons and for what we already explained we also against the replacement of probabilistic scenarios with illustrative scenarios.

<ESA_QUESTION_PKID_23>

Q24 : If not, do you think illustrative scenarios should replace probabilistic scenarios for structured products?

<ESA_QUESTION_PKID_24>

ACEPI is strongly against this proposal. We suggest to keep only the probabilistic scenarios. The use of only probabilistic scenarios for structured products will provide investors fewer information. Furthermore comparability with other products would be lost.

<ESA_QUESTION_PKID_24>

Q25 : Do you agree with this approach to define PRIIPs which would show illustrative performance scenarios using the existing definition of Category 3 PRIIPs? If not, why not? Where relevant, please explain why this approach would not be appropriate for certain types of Category 3 PRIIPs?

<ESA_QUESTION_PKID_25>

ACEPI does not support the use of illustrative scenarios (or illustrative + probabilistic). As a consequence we are against the idea to apply it to category 3 PRIIPs.

<ESA_QUESTION_PKID_25>

Q26 : Would you be in favour of including information on past performance in the KID?

<ESA_QUESTION_PKID_26>

Past performance does not exist for structured products. Existing the use of past performance only to some products (such as funds) would introduce specific contents for those products. These would lead to different KIDS for different products and we believe that this is against comparability.

<ESA_QUESTION_PKID_26>

Q27 : Would your answer to the previous question be different if it were possible to amend Article 6(4) of the PRIIPs Regulation?

<ESA_QUESTION_PKID_27>

No we will be in any case against the introduction of past performance. We believe that it would be very difficult for retail investors to combine and read information related to past performance with information related to future performance.

<ESA_QUESTION_PKID_27>

Q28 : Do you think that it can be more appropriate to show past performance in the form of an average (as shown in the ESA proposal for consumer testing) for certain types of PRIIPs? If so, for exactly which types of PRIIPs?

<ESA_QUESTION_PKID_28>

We are against the use of past performance

<ESA_QUESTION_PKID_28>

Q29 : Do you have any comments on the statement that would supplement the display of past performance (e.g. with regard to the presentation of costs which are not included in the net asset value (NAV))?

<ESA_QUESTION_PKID_29>

TYPE YOUR TEXT HERE

<ESA_QUESTION_PKID_29>

Q30 : Are you of the opinion that an additional narrative is required to explain the relationship between past performance and future performance scenarios?

<ESA_QUESTION_PKID_30>

TYPE YOUR TEXT HERE

<ESA_QUESTION_PKID_30>

Q31 : Do you see merit in further specifying the cases where the UCITS/AIF should be considered as being managed in reference to a benchmark, taking into account the provisions of the ESMA Questions and Answers on the application of the UCITS Directive⁴?

<ESA_QUESTION_PKID_31>

TYPE YOUR TEXT HERE

⁴See "Section II – Key Investor Information Document (KIID) for UCITS" (in particular, Q&A 8) of the Q&A document available at: https://www.esma.europa.eu/sites/default/files/library/esma34-43-392_qa_ucits_directive.pdf

<ESA_QUESTION_PKID_31>

Q32 : Do you see the need to add additional provisions for linear unit-linked insurance-based investment products or linear internal funds?

<ESA_QUESTION_PKID_32>
TYPE YOUR TEXT HERE
<ESA_QUESTION_PKID_32>

Q33 : Do you agree that a fixed intermediate time period / exit point should be used instead of the current half the recommended holding period to better facilitate comparability?

<ESA_QUESTION_PKID_33>

ACEPI believes that cost tables and performance scenarios tables should be harmonised.

As already explained we believes that one intermediate holding period should be left.

To increase comparability instead of using the current RHP/2 , that makes the intermediate holding period depending on the RHP, a unique number could be used.

For products with a RHP higher than one year, intermediate costs and performance could be parametrized on 1 year.

For products with a short maturity (less than one year) cost and performance could be referred only to the RHP.

In any case our major concern is that cost and performance table should be harmonized.

<ESA_QUESTION_PKID_33>

Q34 : In this case (of a fixed intermediate time period), do you agree to show costs if the investor would exit after 5 years for all PRIIPs with a recommended holding period of at least 8 years? Or do you prefer a different approach such as:

<ESA_QUESTION_PKID_34>

ACEPI support the idea that:

- for products with a RHP less than one year costs and performance only at RHP should be displayed-
- for other products we could use one year and RHP.

If ESAs decide to keep two intermediate holding periods, than 1 year and 5 years could be used to show costs and performance for all products (instead of the actual RHP/2) .

Again our major point is to have costs and performance tables consistent.

<ESA_QUESTION_PKID_34>

Q35 : Do you think it would be relevant to either (i) use an annual average cost figure at the recommended holding period, or (ii) to present both an annual average cost figure and a total (accumulated) costs figure?

<ESA_QUESTION_PKID_35>

ACEPI first remark is that only one cost figure should be used. Interpreting different numbers could be difficult.

As between the two alternatives we would favour annual average costs.

<ESA_QUESTION_PKID_35>

Q36 : Do you think that it would be helpful, in particular for MiFID products, to also include the total costs as a percentage of the investment amount?

<ESA_QUESTION_PKID_36>

ACEPI believes that any modification to the costs displayed in the KID should lead to a higher consistency of cost indications provided under PRIIPs and MIFID II, with the MiFID cost methodology being the origin of values. For ACEPI harmonisation and consistency between PRIIPs and MIFID II costs information is really needed. In this regard we suggest the replacement of the RIY with the TER that is most known and of easier interpretation. We also believes that option 1 Table 2 already presents MIFID costs (description of costs).

<ESA_QUESTION_PKID_36>

Q37 : In this context, are there PRIIPs for which both performance fees and carried interests are applied?

<ESA_QUESTION_PKID_37>

TYPE YOUR TEXT HERE

<ESA_QUESTION_PKID_37>

Q38 : Do you agree with this analysis from the ESAs? If yes, what are your views on the extent to which fees related to the management of the underlying real estate assets, i.e. the properties themselves, should be taken into account in the calculation of the cost indicators?

<ESA_QUESTION_PKID_38>

TYPE YOUR TEXT HERE

<ESA_QUESTION_PKID_38>

Q39 : Do you agree with the ESAs' preferred option 3 to revise the cost tables?

<ESA_QUESTION_PKID_39>

ACEPI does not agree. We believe that option 3 will in any way provide a good costs representation to retail clients. Information presented on the table are overly complex. Options 1 is ACEPI favourite choice. Indeed this choice will provide continuity with the current presentation and is, on our opinion, the easier to understand.

<ESA_QUESTION_PKID_39>

Q40 : If not, which option do you prefer, and why?

<ESA_QUESTION_PKID_40>

Table 1 Option 1 combined with Table 2 revised to be uniform for all PRIIPs and to avoid to include too many numbers.

<ESA_QUESTION_PKID_40>

Q41 : In particular, do you think that the proposed changes to the presentation of the impact of costs on the return in percentage terms (i.e. including reduction in return before and after costs) is an improvement on the current presentation?

<ESA_QUESTION_PKID_41>

We support the use of TER, however if the ESAs decided to keep the RiY, we agree that the presentation proposed in the consultation paper is easier to understand for retail investors than the current presentation.

<ESA_QUESTION_PKID_41>

Q42 : Do you have other comments on the proposed changes to the cost tables?

<ESA_QUESTION_PKID_42>

ACEPI once again suggests the importance to harmonize performance and cost tables.

<ESA_QUESTION_PKID_42>

Q43 : What are your views on the appropriate levels of these thresholds? Please provide a justification for your response.

<ESA_QUESTION_PKID_43>

TYPE YOUR TEXT HERE

<ESA_QUESTION_PKID_43>

Q44 : If UCITS would fall in the scope of the PRIIPs Regulation, do you agree that the coexistence of the UCITS KII (provided to professional investors under the UCITS Directive) and the PRIIPs KID (provided to retail investors under the PRIIPs Regulation) would be a negative outcome in terms of overall clarity and understandability of the EU disclosure requirements? Are you of the view that the co-legislators should therefore reconsider the need for professional investors to receive a UCITS KII, as the coexistence of a PRIIPs KID together with a UCITS KII (even if not targeted to the same types of investors) would indeed be confusing, given the differences in the way information on costs, risks and performance are presented in the documents? Alternatively, are you of the view that professional investors under the UCITS Directive should receive a PRIIPs KID (if UCITS would fall in the scope of the PRIIPs Regulation)?

<ESA_QUESTION_PKID_44>

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<ESA_QUESTION_PKID_44>

Q45 : What are your views on the issue mentioned above for regular savings plans and the potential ways to address this issue?

<ESA_QUESTION_PKID_45>

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<ESA_QUESTION_PKID_45>

Q46 : Do you agree that these requirements from Article 4 should be extended to all types of PRIIPs, or would you consider that it should be restricted to Management Company of UCITS or AIFs?

<ESA_QUESTION_PKID_46>

No ACEPI strongly disagrees with the idea of extending to other types of PRIIPs specific requirements.

<ESA_QUESTION_PKID_46>

Q47 : Do you agree that this requirement should be extended to all types of PRIIPs, or would you consider that it should be restricted to Management Company of UCITS or AIF?

<ESA_QUESTION_PKID_47>

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<ESA_QUESTION_PKID_47>

Q48 : Do you agree that these requirements should be extended to all types of PRIIPs, or would you consider that they should be restricted to the Management Company of the UCITS or AIF?

<ESA_QUESTION_PKID_48>
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<ESA_QUESTION_PKID_48>

Q49 : Do you have any comments on the proposed approaches in relation to the analysis and proposals in this Section, and in particular on the extent to which some of the abovementioned requirements should be extended to other types of PRIIPs?

<ESA_QUESTION_PKID_49>
TYPE YOUR TEXT HERE
<ESA_QUESTION_PKID_49>

Q50 : Do you think this proposal would be an improvement on the current approach?

<ESA_QUESTION_PKID_50>
TYPE YOUR TEXT HERE
<ESA_QUESTION_PKID_50>

Q51 : Do you envisage significant practical challenges to apply this approach, for example for products which allow the investor to choose between a wide range or large number of options?

<ESA_QUESTION_PKID_51>
TYPE YOUR TEXT HERE
<ESA_QUESTION_PKID_51>

Q52 : Do you see any risks or issues arising from this approach in relation to consumer understanding, for instance whether the consumer will understand that other combinations of investment options are also possible?

<ESA_QUESTION_PKID_52>
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<ESA_QUESTION_PKID_52>

Q53 : Do you think this proposal would be an improvement on the current approach?

<ESA_QUESTION_PKID_53>
TYPE YOUR TEXT HERE
<ESA_QUESTION_PKID_53>

Q54 : Are there other approaches or revisions to the requirements for MOPs that should be considered?

<ESA_QUESTION_PKID_54>

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<ESA_QUESTION_PKID_54>

Q55 : Do you have any comments on the preliminary assessment of costs and benefits?

<ESA_QUESTION_PKID_55>
TYPE YOUR TEXT HERE
<ESA_QUESTION_PKID_55>

Q56 : Are you able to provide information on the implementation costs of the proposed changes, in particular regarding, (1) the proposed revised methodology for performance scenarios (using a reference rate and asset specific risk premia), and (2) the overall changes to the KID template?

<ESA_QUESTION_PKID_56>
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<ESA_QUESTION_PKID_56>

Q57 : Are there significant benefits or costs you are aware of that have not been addressed?

<ESA_QUESTION_PKID_57>
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<ESA_QUESTION_PKID_57>