

BETTER FINANCE's feedback on the Commission's proposal for a Directive facilitating cross-border distribution of collective investment funds

BETTER FINANCE, the European Federation of Investors and Financial Services Users, is the dedicated representative of financial services users at European level. It counts about fifty national and international members and sub-member organizations in turn comprising about 4.5 million individual members. Our organization acts as an independent financial expertise centre to the direct benefit of the European financial services users (shareholders, other investors, savers, pension fund participants, life insurance policy holders, borrowers, etc.) and other stakeholders of the European financial services who are independent from the financial industry. As such its activities are supported by the European Commission since 2012.

BETTER FINANCE is the most involved European end user and civil society organisation in the EU Authorities' financial advisory groups, with experts participating in the Securities & Markets, the Banking, the Occupational Pensions and Insurance and Reinsurance Stakeholder Groups of the European Supervisory Authorities; as well as in the European Commission's Financial Services User Group (FSUG), and in the European Financial Reporting advisory Group (EFRAG). Its national members also participate in national financial regulators and supervisors bodies when possible.

For further details please see our website: <http://betterfinance.eu/>

BETTER FINANCE welcomes this opportunity to comment on the Commission's proposal amending the AIFM and UCITS directives with regard to cross-border distribution of investment funds.

Firstly, BETTER FINANCE agrees with the proposal to delete articles 77 and 91(3) of the UCITS directive since those articles have been included in the proposal for a Regulation on the facilitation of cross-border distribution of collective investment funds. This amendment proposal will avoid the multiplication and dissemination of legal requirements for market players.

Secondly, the Commission proposes to include a new article detailing the facilities to be performed by an AIFM when it establishes in a Member State where it intends to market units or shares of an AIF to retail investors. BETTER FINANCE supports this article which ensures that the AIFM will provide the retail investor with all information concerning the subscription, the purchase and the redemption orders and his/her rights in the official language of the Member State where the AIF is marketed.