

Response of the Global Legal Entity Identifier Foundation (GLEIF) to European Securities and Markets Authority (ESMA) Draft guidelines on the reporting to competent authorities under article 37 of the MMF Regulation Consultation Paper

February 14, 2019

The Global Legal Entity Identifier Foundation (GLEIF) is pleased to provide comments to the European Securities and Markets Authority (ESMA) Draft guidelines on the reporting to competent authorities under article 37 of the MMF Regulation Consultation Paper.

GLEIF would like to thank ESMA for mandating to use the LEI for identification of the MMF, manager of the MMF, the depository of the MMF, master of the MMF, issuer and sponsor of the asset held in the portfolio of the MMF, parent company of the asset issuer and the counterparty for different types of assets in ITS.

Taking this opportunity, GLEIF would like to provide a comment for the *“Question 4: Do you identify any other issue that would need to be specified in relation to the above section on “general principles” of the reporting template?”* in the consultation paper.

GLEIF agrees with ESMA that optional fields should be specified, and information marked as mandatory should be reported by all managers of MMFs. Therefore, GLEIF recommends that all requested LEI fields should be marked as mandatory in the reporting template.

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