Comments Template for Joint Consultation Paper concerning amendments to the PRIIPs KID (JC 2018 60)		**Deadline 6 December 2018 23:55 CET**
Name of Company:	International Capital Market Association (ICMA)	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public

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⇨ Do **not** change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool

⇨ Leave the last column empty.

⇨ Please fill in your comment in the relevant row. If you have no comment on a question or a cell, leave the row empty.

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Please send the completed template, in Word Format, to CP-18-005@eiopa.europa.eu

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Reference	Comment	
General Comments	The ESAs stated, in their 19 July letter to the European Commission (JC 2018 21), that *"the ESAs' draft regulatory technical standards were prepared on [the] basis"* that *"the intention of the Regulation, as clearly expressed in Recitals 6 and 7 of the Regulation, [is] to address packaged or wrapped products rather than assets which are held directly, such as shares and non-structured bonds"*.

ICMA is not responding specifically to this consultation about the PRIIPs Delegated Regulation (that was based on the ESAs' draft regulatory technical standards), on the basis (and in the absence of any contrary indication) that the consultation has similarly not been prepared in view of such vanilla bonds (where PRIIPs' product scope remains a major concern as outlined in the | |

Template comments

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	above ESAs' letter and in ICMA's 28 September FCA CFI response).	
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Template comments