



**COUNCIL OF
THE EUROPEAN UNION**

**Brussels, 26 June 2014
(OR. en)**

**11105/14
ADD 1**

**Interinstitutional File:
2013/0214 (COD)**

**EF 176
ECOFIN 688
CODEC 1502**

NOTE

From: General Secretariat of the Council
To: Permanent Representatives Committee

Subject: Proposal for a Regulation of the European Parliament and of the Council on European Long-term Investment Funds (ELTIFs)
- General Approach

The following statements are to be entered into the minutes of Coreper (part 1) of 25 June 2014:

Statement by the United Kingdom and Estonia

We are supporting the General Approach in the interests of the progress of this file. Nevertheless we remain concerned about the requirement for retail investors to commit to a minimum investment of €10,000 that has been inserted into Article 24(1)(-ac). The original policy intention of this proposal, supported by responses received to the Commission's 2012 UCITS VI consultation, was to create a retail suitable EU regime and this restriction undermines that aim and could severely restrict uptake. Furthermore we believe that a minimum subscription is also a poor method of determining the appropriateness of a product for an investor. Basing appropriateness on an advised sale process would better meet the proposal's policy aim and also provide more robust protection for European consumers. We will seek to address this issue in the trilogue process.

Statement by Austria, Belgium, France and Portugal

With reference to the general approach on the Proposal for a regulation of the European Parliament and the Council on European Long-term Investment Funds (ELTIFs), Austria, Belgium, Portugal and France consider that a more appropriate balance on the additional requirements for marketing to retail investors (article 24 of the proposal) should have been reached and therefore expect the trilogue to deliver safer rules for products to be distributed to retail investors. Austria, Belgium, Portugal and France would like to recall that they favor a solution of a minimum entry ticket of 100.000€ for retail investors.

Austria, Belgium, Portugal and France would like these abovementioned elements to be taken into account by the incoming Italian Presidency in its negotiations with the European Parliament on the basis of this general approach with a view to reaching an agreement at first reading.
