

Direct Debit Authorisation and Change in Collection Date for CBB Annual Fees

Industry Comments and Feedback

Volume 7

July 2013

Specific Comments:			
Reference to the draft Directive:	Comments	REF	CBB's Response
For the year 2014 and thereafter, the BD2,000 annual fee will be due on a date no later than the 2 nd January of the year pertaining to the fees.	<p>With a view to provide more flexibility to the Operators considering that January 1st is usually a public holiday, we propose that the due date for making the payment of fees should be changed from January 2nd to January 15th. As also from an accounting perspective, the expense will be booked in the current year if the due date is January 15th. Whereas if January 2nd remains the due date, then all payments will have to be made in December, thereby leading the fund to bear a prepaid expense. Having regard to the same, we propose revision in the wordings of circular as "For the year 2014 and thereafter, the BD2,000 annual fee will be due on a date no later than the 15th January of the year pertaining to the fees".</p> <p>The suggested dead line of January 2nd. is too short given that Jan. 1st is a public holiday and Jan 2nd will fall on a Friday in 2015. We suggest giving the banks a window of 2 weeks (up to Jan . 15th.) to allow sufficient time for fund managers, and administrators to comply.</p>	SP1	The due date for CIU/PIU annual fees will be amended to 15 th January in the year where the fees are due.