

COMMENT LETTER

September 5, 2023

ICI Global Comment Letter on IOSCO Liquidity Management Tool Guidance

On September 2, 2023, ICI Global provided comments on the International Organization of Securities Commission's (IOSCO) consultation on proposed Liquidity Management Tool (LMT) Guidance for Open-Ended Funds (OEFs). Our members help millions of retail investors around the world by offering funds in which they can invest to save for retirement, education, and other important financial goals.

OEFs play an important role in supporting economic growth and capital formation by providing investors, especially retail investors, with the benefits of collective investing. As IOSCO itself has noted, any recommendations regarding the regulation of OEFs should not unduly reduce OEFs' ability to perform their core economic function.

ICI Global is generally supportive of the proposed guidance set forth in the Consultation, which we find extends IOSCO's earlier work by focusing on anti-dilution LMTs. While we do not agree with all aspects of the proposed guidance, we support IOSCO's aim to expand the availability of LMTs for OEFs. We appreciate that IOSCO acknowledges that OEF managers are professionals and fiduciaries and are best positioned to manage liquidity risk, and that flexible access to a broad set of LMTs is in the best interest of investors.

Read more in the [comment letter](#).