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<b>Organization Type</b>	Industry Association	<b>Organization name</b>	ASIFMA Asset Management Group (AAMG)		
<b>Consultation Paper</b>	Consultation paper on Draft Circular for "Simplified registration for Foreign Portfolio Investors (FPIs)"				
<b>Description</b>	This paper seeks comments/views/suggestions from the public on the proposal to ease onboarding of FPI applicants with an abridged version of the Common Application Form, reducing duplication of available information.				

<b>Proposal</b>	Seek comments/views/suggestions from the public on the draft circular titled "Simplification registration for FPIs"
<b>Level of Agreement</b>	Strongly Agree/ Agree/ Partially Agree/ Disagree/ Strongly Disagree
<b>Comments/Views/Suggestions</b>	
<p>1. Our asset manager members are supportive of the introduction of a simplified Common Application Form (CAF) for FPI applicants. This change will reduce the time and laborious efforts required for foreign investors to enter the India market.</p> <p><b>Suggestions:</b></p> <p>(a) Our members have concerns over paragraph 4(c) of the draft circular as it requires the FPI applicant to confirm that all the details other than those mentioned in the abridged version of the CAF remain unchanged without the FPI applicant having access to the information already in the depositories' CAF module. For example, updates communicated by FPIs to their DDPs may not be timely or correctly updated, leading to potential confirmation of incorrect information. Some of our members have encountered issues where the DDPs did not process their changes. To address this issue, DDPs should provide FPI applicants with a pre-populated review form (preferably standardized across all DDPs) containing all existing information before seeking confirmation from the FPI applicants. This would allow FPIs to verify and/or correct their information before giving their consent and confirming.</p>	

- (b) We strongly agree that the implementation standards for this proposal should be standardized so that FPI applicants are not confused by different requirements from different DDPs. However, we urge SEBI to require the CDSSF to also consult FPIs and/or associations that represent them (e.g. AAMG/ASIFMA) before submitting the implementation standards to SEBI for approval so that the different types and circumstances of FPIs can be considered, thereby avoiding the need for further clarifications and frequent updates of these standards. We hope that with this proposal, the length of the FPI application process will be significantly shortened from as long as 6-12 months to 1-3 months.
- (c) While we understand that this consultation is aimed at simplifying the registration of FPIs, we urge SEBI to explore with RBI any potential opportunities to combine FPI and FDI applications given similarities in information being required and this would significantly streamline the process and allow for opening of both types of account simultaneously by the same foreign investor.