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Luxembourg Newsflash - 31 March 2023

New deadline for the SFDR data collection exercise

The CSSF has extended the date for the submission of the SFDR data exercise for investment fund managers. The new deadline is 15 June 2023.

On 24 March, the CSSF published a [communiqué](#)_ announcing the extension of the **data collection exercise** related to SFDR which started in February (“the **communiqué**”). This additional phase shifts the focus of the data collection exercise to product-level information.

The scope

Naturally UCITS management companies and authorised AIFMs based in Luxembourg are in scope of the exercise, but those based in another Member State are also captured by the reporting obligation for their Luxembourg-domiciled UCITS, regulated AIFs and ELTIFs.

While funds under all SFDR categorization disclosures are in scope (art.6, art.8 & art.9), sub-funds that have entered into liquidation or AIFs sub-funds that are not being distributed anymore since the entry into force of SFDR RTS (on 1 January 2023) and as a consequence have not updated their prospectus/issuing document are excluded from the reporting obligation.

The full list of FMPs and the products for which the data are to be submitted can be found in the [communiqué](#)_

A [user guide](#)_ was published in order to provide clarifications and guidance regarding the content and the format of the information to be submitted. This includes digital options that will soon be made available:

- either a questionnaire on e-Desk that will have to be completed manually. This should be available as from 2 May or
- a JSON file to be filed with the CSSF through an S3 protocol.

The reporting option you choose should be considered based on the number of sub-funds.

The deadline for submission of the initial report is 15 June 2023.

Aside from the technicalities of the reporting, the content is very much aligned with the SFDR RTS templates and while this can be burdensome, the technical difficulties when acquiring this information does not present challenging technical difficulties. There are some marginal additional questions that are not covered by the SFDR RTS template but these remain very limited.

Our expertise

Arendt can support you in the collection of data, production of the report or filing with the CSSF. Please contact our team should you need any help gathering the information needed for this reporting.

[Access the CSSF's communiqué here_](#)

[Access the user guide here_](#)

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