
7th June 2019: FCA QTR CP19/19 No 24
Deadline for response: 7th August 2019

Summary

Proposed changes to the Handbook are:

- modification to the General Provisions and fees and levy rate rules for 2019/20 in relation to Gibraltar-based firms
- to introduce new notification procedures for changes to management body
- to amend Handbook form SUP 10C Annex 10D: Statement of Responsibilities
- to update Handbook form SUP 8 Annex 2 Application form for a waiver or modification of rules.

EVIA response to the paper are as follows:

Q2.1: Do you have any comments on the proposed modifications to the general provision and fees and levy rules in relation to Gibraltar based for 2019/20?

A2.1: No comment as members of the European Venues & Intermediaries Association (EVIA) do not have offices based in Gibraltar.

Q3.1: Do you have any comments on the proposed amendments to SUP10A Annex 10 and SUP10C Annex 11? If so please elaborate.

A3.1: EVIA supports the proposed amendments of both forms, firstly as stated in the CP the information required is either a streamlined version of Form A or and assurance that a suitability assessment has been evidenced as part of the on – boarding process of new key function holders or management body.

Q3.2: Do you agree with our proposal of allowing firms to provide information on collective suitability at the same time as notifying the FCA of changes to their management body?

A3.2: EVIA supports this proposal as this will be a more efficient way of keeping FCA records updated.

Q3.3: Do you have any feedback on this CBA?

A3.3: EVIA supports the CBA analysis for the reason that it is recognised that this will be a time-consuming process for firms to complete.

Q4.1: Do you have any comments on the proposed amendments to SUP10C Annex 10D *Statements of Responsibilities* form?

A4.1: EVIA supports these minor changes to align these to the SM&CR rules.

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Q5.1: Do you have any comments on the proposed amendments to SUP8 Annex 2 'Application form for a waiver or modification of rules'? If so please elaborate

A5.1 EVIA supports the proposed amendments to the form and sees no issues with these updates.
