

4 September 2023

BY EMAIL; LMTGuidanceConsultation@iosco.org – Subject: LMT Guidance – Consultation Report

Damien Shanahan
International Organization of Securities Commission (IOSCO)
Calle Oquendo 12
28006 Madrid
Spain

Dear Mr. Shanahan,

Re: Public Comment on LMT Guidance – Consultation Report

On behalf of the Asset Management Group (“**AAMG**”) of Asia Securities Industry & Financial Markets Association (“**ASIFMA**”)¹, we would like to thank you for the opportunity to comment on IOSCO’s July 2023 Consultation Report on “Anti-dilution Liquidity Management Tools – Guidance for Effective Implementation of the Recommendations for Liquidity Risk Management for Collective Investment Schemes” (the “**LMT Consultation**”).

To avoid duplication as we share many of the same members as the Asset Management Group (“**SIFMA AMG**”) of the Securities Industry & Financial Markets Association (“**SIFMA**”), AAMG would like to express our agreement with the views and comments expressed by SIFMA and SIFMA AMG in their [response](#) to the LMT Consultation submitted to you on August 31, 2023.

Please contact me at eshen@asifma.org or +852 2531 6570 if you have any questions.

Kind regards,



Eugenie Shen
Managing Director & Head of ASIFMA Asset Management Group

¹ [ASIFMA](#) is an independent, regional trade association with over 165 member firms comprising a diverse range of leading financial institutions from both the buy and sell side, including banks, asset managers, professional and consulting firms, and market infrastructure service providers. Together, we harness the shared interests of the financial industry to promote the development of liquid, deep and broad capital markets in Asia. ASIFMA advocates stable, innovative and competitive Asian capital markets that are necessary to support the region’s economic growth. We drive consensus, advocate solutions and effect change around key issues through the collective strength and clarity of one industry voice. Our many initiatives include consultations with regulators and exchanges, development of uniform industry standards, advocacy for enhanced markets through policy papers, and lowering the cost of doing business in the region. Through the [GFMA](#) alliance with [SIFMA](#) in the US and [AFME](#) in Europe, ASIFMA provides insights on global best practice and standards to benefit the region.

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