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中国证券监督管理委员会  
证券投资基金监管司  
西城区金融大街19号富凯大厦  
北京, 中国 100033

China Securities Regulatory Commission  
Department of Fund and Intermediary Supervision  
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敬启者,  
Dear Sir or Madam,

关于《香港互认基金管理规定（修订草案征求意见稿）》的意见  
ASIFMA AMG response to CSRC Consultation on Draft revisions to Provisions  
on the Administration of Recognized Hong Kong Funds

我谨代表亚洲证券业与金融市场协会（“ASIFMA”）<sup>1</sup>的资产管理部（“AAMG”）的会员向中国证券监督管理委员会（“证监会”或“贵会”）提交我们对贵会于2024年6月14日发布的《香港互认基金管理规定（修订草案征求意见稿）》（“《管理规定》”）的意见。

On behalf of members of the Asset Management Group (“AAMG”) of Asia Securities Industry & Financial Markets Association (“ASIFMA”)<sup>1</sup>, I am pleased to submit our comments on the

<sup>1</sup> 亚洲证券业与金融市场协会（ASIFMA）是一个独立的区域性行业协会，会员基础广泛，由银行、资产管理公司、律师事务所及市场基础设施服务供应商等 160 多家领先机构组成。协会的使命是发掘金融行业的共同利益来推动亚洲资本市场发展的深度和广度，为区内的经济发展及增长提供基本条件。ASIFMA 致力于通过清晰而有力的行业共同声音来推动业界就关键议题达成共识、提出解决方案和促进变革。我们所牵头的众多举措包括回应监管机构和交易所的咨询、树立统一的行业标准、通过政策论文倡导更优质的市场，以及为降低亚太区内的业务成本探索可行方案。通过全球金融市场协会（GFMA），ASIFMA 与位于美国的证券业与金融市场协会（SIFMA）以及欧洲的金融市场协会（AFME）形成联盟，共同提供全球最佳行业实践及标准，为区域发展作贡献。详情请参阅 [www.asifma.org](http://www.asifma.org)。

ASIFMA is an independent, regional trade association with over 160 member firms comprising a diverse range of leading financial institutions from both the buy and sell side, including banks, asset managers, law 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, competitive and efficient 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 United States and AFME in Europe, ASIFMA also provides insights on global best practices and standards to benefit the region.

## DEVELOPING ASIAN CAPITAL MARKETS

*Consultation on Draft revisions to Provisions on the Administration of Recognized Hong Kong Funds (“MRF Rules”)* released by the China Securities Regulatory Commission (“CSRC”) on 14 June 2024.

我们的资产管理公司会员欢迎证监会将香港互认基金在内地的销售规模限制由占基金总资产比例的50%放宽至80%，并且允许香港互认基金投资管理职能转授予与管理人同集团的海外资产管理机构。这将进一步满足境内投资者的境外投资需求，更好地发挥跨境资管集团的全球投资经验。

Our asset management members welcome the relaxation of the assets under management (AUM) limit for the sales of recognized Hong Kong funds in the Mainland from 50% to 80% and the flexibility of allowing the delegation of investment management functions of recognized Hong Kong funds to overseas asset management companies within the same group, which would further facilitate domestic investors’ offshore investment needs and better leverage the investment expertise of global asset management groups.

我们感谢证监会回应投资者及境内外市场机构对跨境理财的兴趣与热情，持续优化内地与香港基金互认机制，支持香港国际金融中心建设。

We are grateful to the CSRC for continuing to optimize the Mainland-Hong Kong Mutual Recognition of Funds (MRF) scheme in response to the interest and enthusiasm of investors and domestic and overseas market institutions in cross-border wealth management as well as supporting the development of Hong Kong as an international financial center.

我们期待《管理规定》的最终发布。若您有任何疑问，请随时与我联系（电邮 [eshen@asifma.org](mailto:eshen@asifma.org) 或电话+852 2531 6570）。

We look forward to the final issuance of the MRF Rules. Please feel free to contact me at [eshen@asifma.org](mailto:eshen@asifma.org) or telephone: +852 2531 6570 if you have any questions.

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Yours sincerely,

沈玉琪

沈玉琪 Eugenie Shen

董事总经理 Managing Director

资产管理部主管 Head of Asset Management Group

亚洲证券业与金融市场协会 Asia Securities Industry & Financial Markets Association