

# Submission on 2021 Review of the Financial Markets Authority Funding and Levy

## Your name and organisation

<b>Name</b>	Rebecca Sparrow, Legal & Compliance Manager
<b>Organisation (if applicable)</b>	Mainland Capital Investment Management Limited

## Responses to discussion document questions

### Introduction

1 *Do you have any feedback on the objectives of the review?*

### The funding options

2 *Do you have any feedback on the criteria for assessing the funding options?*

### Funding options – Conduct of Financial Institutions

3 *Do you agree with the analysis of the FMA funding options for CoFI? Which option do you consider to be most appropriate and why?*

4 *How would CoFI Option 1 impact you/your business compared to CoFI Option 2?*

5 *If you were to make material changes to the CoFI options, how would you do so and on what basis?*

## Implementation – Conduct of Financial Institutions

6 *Do you have any feedback on the objectives for the implementation of the CoFI regime?*

7 *Do you agree that the CoFI licensing window should begin after financial advice provider transitional licensing window has closed?*

8 *Are there other areas of regulatory reform in the financial services sector, where implementation overlaps with the proposed timeframes above, and that you consider it would be preferable to align CoFI implementation with those timeframes from an efficiency perspective? If so, please provide examples.*

9 *Do you have any feedback on the proposed 18 month window between applications for a conduct licence opening and all the obligations of the CoFI Bill coming into force (including having a conduct licence)?*

10 *Do you think a phased approach to CoFI licensing would be preferable, compared to a single licensing window for all types of financial institutions? Please provide reasons.*

11 *If a phased approach to CoFI licensing would be preferable, what factors do you think should be considered in determining the order of phasing?*

12 *Do you have any other general comments regarding the implementation timing of the CoFI regime?*

## Funding options – Insurance Contract Law

13 *Do you agree with the analysis of the FMA funding options for ICL? Which option do you consider to be most appropriate and why?*

14 *How would ICL Option 1 impact you/your business compared to ICL Option 2?*

15 *If you were to make material changes to the ICL options, how would you do so and on what basis?*

### Funding options – Climate-related Disclosures

16 *Do you agree with the analysis of the FMA funding options for CRD? Which option do you consider to be most appropriate and why?*

17 *How would CRD Option 1 impact you/your business compared to CRD Option 2?*

18 *If you were to make material changes to the CRD options, how would you do so and on what basis?*

### Funding recovery options

19 *Do you think that the proposed additional funding for the FMA should be wholly levy recovered or should the Crown contribute towards the increase? Why?*

20 *Do you think that the Crown should contribute relatively more to any of the regimes than others? If so, please explain why.*

21 *What is the appropriate Crown/levy split of the FMA's appropriation and why?*

## The current FMA levy model

22 Do you have any feedback on the objectives underlying the levy model?

23 Do you agree that larger entities should pay a relatively larger portion of any levy increase? If not, please explain why.

## Proposed changes to the FMA levy

24 Do you think the proposed levy changes meet the objectives?

25 Do you have any comments on the proposed new levy classes/tiers? Should further classes be considered?

26 Do you have any feedback on the impacts of the proposed changes to the levies presented in Annex 1? How would the proposed changes impact your business? Please provide examples.

No

27 Do you think any of the levy classes in Annex 2 should pay an increased levy as a result of these new regimes? If so why?

No. Mainland considers that it is not appropriate entities that are not within the new regimes should pay increased levies as a result of the new regimes.

## Other comments