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Consultation Paper 142  
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**Private and Confidential**

Our ref  
Matheson Listings

16 July 2021

Dear Sir or Madam

## **Consultation Paper 142 - Consultation on Prospectus Fees and Service Standards**

We are writing to you in connection with Central Bank of Ireland (“CBI”) Consultation Paper 142; Consultation on Prospectus Fees and Service Standards (“CP 142”). We attach the letter dated 16 July 2021 issued to the CBI by the Irish Debt Securities Association (“IDSA”) relating to CP 142 and would note that we agree with the comments set out therein.

In respect of the proposed new fee structure, we would specifically highlight the proposed fee relating to the filing of Final Terms. From our research and feedback from industry, this fee is not charged by competing jurisdictions and we believe its introduction will be likely to damage the perception of Ireland as a leading jurisdiction for listing securities.

In addition, we consider the proposed changes to the service standards to be a reduction in service levels currently offered by the CBI. Proposing a reduction in service levels alongside an increase in fees would be a cause of concern to industry as it would be usual to expect an increase in service to accompany any increase in fee levels being charged for the same service. Such a change is not in keeping with industry standards and, again, we consider that it will have a negative impact on the listing industry in Ireland.

We would be happy to meet with the CBI to discuss the contents of this letter or that of the IDSA letter filed earlier today.

Managing Partner: Michael Jackson - Chairperson: Tara Doyle - Partners: Helen Kelly, Sharon Daly, Ruth Hunter, Tony O'Grady, Anne-Marie Bohan, Patrick Spicer, Turlough Galvin, Patrick Molloy, George Brady, Robert O'Shea, Joseph Beashe, Dualta Counihan, Deirdre Dunne, Fergus Bolster, Christian Donagh, Bryan Dunne, Shane Hogan, Nicola Dunleavy, Julie Murphy-O'Connor, Mark O'Sullivan, Brian Doran, John Gill, Joe Duffy, Pat English, Shay Lydon, Aidan Fahy, Niamh Counihan, Gerry Thornton, Liam Collins, Darren Maher, Michael Byrne, Philip Lovegrove, Rebecca Ryan, Catherine O'Meara, Elizabeth Grace, Deirdre Cummins, Alan Keating, Alma Campion, Brendan Colgan, Garret Farrelly, Rhona Henry, April McClements, Grainne Dever, Oisín McClenaghan, Rory McPhillips, Michelle Ridge, Sally-Anne Stone, Matthew Broadstock, Emma Doherty, Leonie Dunne, Stuart Kennedy, Brian McCloskey, Madeline McDonnell, Barry O'Connor, Donal O'Donovan, Karen Reynolds, Kevin Smith, Chris Bollard, Deirdre Kilroy, Michael Hastings, Maria Kennedy, Barry McGettrick, Kate McKenna, Donal O'Byrne, David O'Mahony, Russell Rochford, Liam Flynn, Grainne Callanan, Geraldine Carr, Brian Doohan, Richard Kelly, Niamh Maher, Yvonne McWeeney, Mairéad Ni Ghabhain, Padraic Roche, Vahan Tchakravian, Kieran Trant, Deirdre Crowley, Philip Tully, David Jones, Kimberley Masuda, Susanne McMenamin, David Fitzgibbon, Cillian O'Boyle, Angela Brennan, Louise Dobbyn, Catriona Cole, Paul Carroll, Stephen Gardiner, Caroline Austin, Sandra Lord. - Tax Principals: Greg Lockhart, Catherine Galvin. - Tax Department Chair: John Ryan. - General Counsel: Dermot Powell. Of Counsel: Paraic Madigan, Liam Quirke.

Yours faithfully

*Matheson*

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