

Via email to fundspolicy@centralbank.ie

Funds Policy,
Central Bank of Ireland,
N Wall Quay,
North Wall,
Dublin,
D01 F7X3,
Ireland

5 November 2025

Dear Sir/Madam,

Re: Consultation Paper 161: Consultation on proposed amendments to the Central Bank UCITS Regulations and the Central Bank Guidance on performance fees for UCITS and certain types of Retail Investor AIFs

We are writing to you in response to your Consultation Paper 161: Consultation on proposed amendments to the Central Bank UCITS Regulations and the Central Bank Guidance on performance fees for UCITS and certain types of Retail Investor AIFs ("CP 161").

Independently ranked as the leading legal advisor to Irish domiciled funds¹, Dillon Eustace advises UCITS management companies, fund promoters and UCITS funds on the establishment and ongoing operation of traditional UCITS, UCITS ETFs, money market fund UCITS and alternative UCITS.

We very much welcome the publication of CP 161 and the opportunity to input on your proposals to make targeted changes to enhance the regulatory regime governing Irish UCITS and Irish UCITS management companies.

We confirm that we have contributed to the Irish Funds Industry Association's response to CP 161 and wish to express our support for the detailed submissions made in that response.

We would be happy to engage further with the Central Bank of Ireland on any aspect of its proposals over the coming months if that would be of assistance.

Yours faithfully



Dillon Eustace LLP

¹ [Monterey Insight Ireland Fund Report 2024](#)

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