

# Central Bank of Ireland finalises filing processes for updates to fund documentation for UCITS and AIFs arising from AIFMD II

February 2026

## What has the Central Bank published?

On 27 February 2026, the Central Bank of Ireland (**Central Bank**) issued a **publication** outlining its streamlined filing process for Irish investment funds updating their constitutive documents/prospectuses to address requirements introduced under Directive 2024/927 which amends both the UCITS<sup>1</sup> and AIFMD<sup>2</sup> frameworks (**AIFMD II**).

It has also **updated** its streamlined application process for Irish AIFMs seeking to extend their existing permissions to include loan origination which it originally published on 29 January 2026.

## What type of streamlined filing process for updates to fund documentation to address AIFMD II has been introduced?

The streamlined filing process is available in respect of any changes made to fund documentation of existing funds to reflect (i) requirements arising from AIFMD II and (ii) any other changes being introduced to the Central Bank's AIF Rulebook and Central Bank UCITS Regulations.

Helpfully, the Central Bank has also confirmed that other changes required as part of a prospectus and/or supplement refresh can avail of the streamlined approval process, save for any changes to a fund's investment objective, policy or strategy which must be filed for review with the Central Bank in accordance with existing filing requirements. The manager of the relevant fund must provide an attestation confirming that the amendments made to the prospectus/fund supplement do not represent a change to the investment objective, policy or strategy of the fund.

Any new fund/sub-fund applications will be subject to the standard review process followed by the Central Bank's Funds Authorisation team.

## When does the streamlined filing process open and close?

The streamlined filing process opens on 2 March 2026 and that there is no set date for its closure. The Central Bank notes that this *"indefinite timeframe will provide for an orderly implementation of the changes by Irish UCITS and AIFs"*

## What changes has the Central Bank made to its process for AIFMs seeking to extend their authorisation to include loan origination?

On 29 January 2026, the Central Bank published a note outlining the streamlined authorisation process for Irish-authorized AIFMs which currently manage QIAIFs which originate loans and which must seek approval from the Central Bank to extend their permissions to include loan origination by 16 April 2026 under AIFMD II.

1 Directive 2009/65/EU as amended

2 Directive 2011/61/EU as amended

---

The Central Bank has updated that note to:

- set down the authorisation process which will apply to Irish authorised AIFMs managing only non-Irish AIFs and/or unauthorised Irish AIFs which originate loans; and
- confirm that once an Irish AIFM which manages non-Irish EU AIFs is authorised by it to engage in loan origination under AIFMD II, the Central Bank will transmit a notification to any relevant EU host competent authority.

## Contact Us

If you would like to discuss the above in further detail, please get in touch with your usual contact in Dillon Eustace or the authors listed below.

## CONTACT POINTS

For more details on how we can help you, to request copies of most recent newsletters, briefings or articles, or simply to be included on our mailing list going forward, please contact any of the team members below.



**Etain de Valera**  
Partner | Dublin

E [etain.devalera@dilloneustace.ie](mailto:etain.devalera@dilloneustace.ie)  
T +353 1 6731739



**Aine McCarthy**  
Of Counsel | Dublin

E [aine.mccarthy@dilloneustace.ie](mailto:aine.mccarthy@dilloneustace.ie)  
T +353 1 6731861

### DISCLAIMER:

This document is for information purposes only and does not purport to represent legal advice. If you have any queries or would like further information relating to any of the above matters, please refer to the contacts above or your usual contact in Dillon Eustace.

### Copyright Notice:

© 2026 Dillon Eustace. All rights reserved.