



Reporting & Referencing Data SIG (RRDS)
RDS 23: UK OTC reg reporting project plan
2 June 2020, 16:00-17:30

In attendance:

Dimitrios Kottas	Accenture	Will Graham	Independent
Martin Udy	Bank of England	Peter Harris	Invesco
Donald Chapin	Business Semantics	Andrew Bayley	ISDA
Tej Patel	Capco	Ian Sloyan	ISDA
Martin Gould	Citi	Corrina Stokes	JWG
Adriana Ennab	Credit Suisse	PJ Di Giammarino	JWG
Anna Morrison	Credit Suisse	Sid Ives	LBG
Dawd Haque	Deutsche Bank	Daniel Corrigan	LRH
Andrew Douglas	DTCC	Matt Vincent	LSE
Alex McLaren	EY	Lee McGouran	Morgan Stanley
Mike Zehetmayr	EY	Jatha Sundarapalan	Pictet
Sam Kaye	EY	Ian Thomas	Quorsus
John Graham	FIA	Peter Randall	SETL
Niven Payne	Fujitsu	Matthew Beckingham	Stan Chart
Adam Turnbull	Goldman Sachs	Paul Janssens	SWIFT
Richard Comotto	ICMA Group		

The meeting was held under the Chatham House Rule

Meeting materials

RRDS members may access the 23-page presentation and survey results in the members' area. Participants responded to 4 survey questions in advance of the call.

Meeting objectives

The group discussed the approach, key milestones, and governance arrangements for the EMIR Refit Article 9 rewrite project.

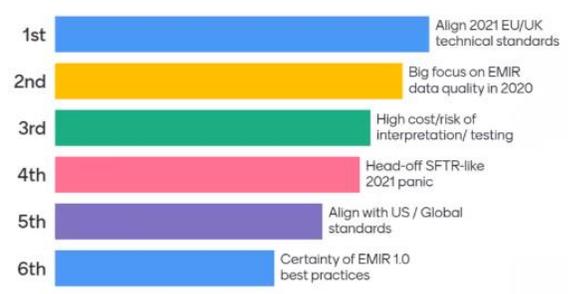
Key points of discussion

- ▶ RRDS 2020 agenda. JWG summarized the 2020 reporting objective to help achieve alignment on **a collective path of action to get from 'rule book' to 'quality data'** leveraging new semantic technology. JWG's Reporting and Reference Data group (RRDS) will continue to provide the regulatory intelligence and collaborative, high-trust environment to ensure market stakeholders fully grasp the evolving landscape, develop their heat maps and identify appropriate solutions in a better, faster, cheaper and safer manner.
- ▶ EMIR project recap. Results from the **four previous 2020 meetings** were reviewed, and the strategic intent, approach and project aims discussed. Participants were invited to provide their views on **the conclusions thus far and raise any project issues** that would need to be resolved in this meeting.



- ▶ EMIR Project opportunity. JWG summarized the opportunity for the industry to transform legal obligations and link to standard business requirements which are then mapped to IT and data requirements. EMIR will be a big issue for both UK and EU implementations, regardless of how they are implemented. If we get the project running now, we can **cut BAU and CTB costs**, increase **data quality** and help **shape global standards**.

Why do an EMIR Refit project now?



- ▶ Project governance. **ISDA, FIA** and other trade associations are looking at how to govern the common domain model (**CDM**) and they are confident that they **can deliver a working governance model**. ISDA and the FIA voiced **support for a project managed by JWG** could be much more fluid and efficient as best practices are implemented.
- ▶ Regulatory involvement. A regulator noted that **reporting is seen as a collaborative process between regulator and regulated** which cannot be dictated by either public or private sector. A consultant noted that **active engagement from both the Bank and FCA would be critical** and that HMT may need to be involved as well. Proactive engagement will be required to provide the clarity to achieve the desired results quickly.
- ▶ Data policy. There will be an element of **policy involvement** in the discussion as the dialogue is very technical. Participants noted an opportunity for this group to provide input to a **high-quality dialogue on the data** which could be removed or refined. This could be aligned with the longer-term view of getting a **more integrated data set** as expressed in both the BoE data consultation and EC papers.
- ▶ Scope & Approach. Getting a **common understanding within the UK of EU requirements** will provide a valuable, **global reference point**. The working group will need to define the detailed working procedures and **start with a simple product** to prove the use case. One member suggested that it is possible to identify core fields that apply cross asset classes bearing in mind TR data quality rules which will make



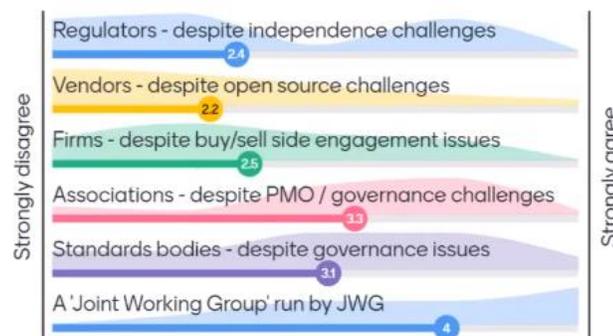
subsequent use cases easier. The project will cover **all OTC asset classes** and **CCPs/TRs will be critical to have at the table**.

Value of disambiguated EMIR Art. 9 text



- ▶ Rule book standards. The group was updated on **2 papers** [here](#) and [here](#) which are being discussed within ISO TC 68 and with UK regulators. It was noted that SBVR is becoming an ISO TC 68 standard.
- ▶ JWG role. The group discussed the options to deliver the project and concluded that **JWG is the preferred option** as it will create the **safe space for firms, vendors and regulators** with an independent focus on the right thing for the industry to do and not be swayed by the biggest voices at the table. As it does not provide consulting or legal services, JWG is ideally placed to **provide the neutral ground to create an open output** and deliver a **working model for new standards**.

A cross trade association/ cross regulatory/ cross vendor EMIR reporting programme can be run by:





- ▶ Engagement model. While it would have been easier to do this project through the **RegTech Council**, that this is **not possible given COVID**. Firms are asked to provide SME resource (at no fee) and for the vendors to provide funding for the resource the project. A draft **governance framework** was presented in which **JWG will run the project and secretariat** and **work at the direction of joint trade associations** who will help define a method to **engage the regulators**. It will also be critical to ensure the impact of the effort is **scaled via public sector and private sector sandboxes**.
- ▶ Next steps. JWG **reviewed the start-up activities** and noted the need for **disambiguation which need to be aligned with EC, BoE and FCA plans**. The group agreed to **start in July to establish detailed plans** which will help get budget and resources.

Next meeting

The group agreed the next agenda would focus on **refining the scope** and understanding of the effort required from the participants.

RRDS 24: UK EMIR Article 9 DRR project launch

Date: 16 July 16:00-17:30

Virtual Protocol:

Webex – please register with your name

Survey questions will be circulated shortly before the meeting

Agenda:

16:00 Introductions

16:10 2 June recap

16:20 Proposed terms of reference & Governance

16:30 Project plan, budget and milestones

17:15 Next steps

17:30 End