



**ISO/TC68/AG2 - Standards Advisory Group
Secretariat**

+49 69 1344 5898

christine.jozet@ecb.europa.eu

14 February 2019

To: ESMA

**Re: 34-44-149 CONSULTATION ON DRAFT GUIDELINES ON THE REPORTING TO COMPETENT
AUTHORITIES UNDER ARTICLE 37 OF THE MMF REGULATION**

Dear Sir/ Madam,

We write to you in our capacity as co-chairs of the Standards Advisory Group (SAG) of Technical Committee 68 of the International Organization for Standards (ISO) TC68/AG2.

ISO is an independent, non-governmental international organisation with a membership of 163 national standards bodies. Through its members, it brings together experts to share knowledge and develop voluntary, consensus-based, market relevant International Standards that support innovation and provide solutions to global challenges.

TC68 is the Technical Committee within ISO tasked with developing and maintaining international standards covering the areas of banking, securities, and other financial services. It is organized into Sub-Committees encompassing information exchange, reference data and security to quickly respond to the standardization needs of the stakeholders and users mainly in industry, regulators, and central banks.

The Standards Advisory Group (SAG) as a subgroup of TC 68 acts as an advisory sounding board to support and engage with regulators on financial services standards requirements, for the effective and efficient use and development of financial services standards, delivered using a cooperative relationship approach. The SAG enables a proactive dialogue with regulators on financial services standards matters.

The SAG's objectives are:

- Provide a forum for mutual assistance between the global regulatory community and ISO in carrying out their respective authorities and responsibilities with respect to financial services standards;
- Aid the adoption and promotion of consistent standards, where possible;
- Effectively deal with common issues collectively and consistently; and
- Encourage strong and open communication within the regulatory community and with the industry concerning financial services standards.

The present SAG's response represents a collective view of its membership and draws upon its knowledge as an expert standards setting body with practitioner-led experience in the development and use of standards.

We note that the European Securities and Market Authorities (ESMA) recently issued a consultation on Draft guidelines on reporting to competent authorities under art.37 of the MMF regulation. While it is not within our scope to address the specifics of the questions, we do wish to commend the European Securities and Market Authorities for demonstrating within these guidelines and Annex how ISO standards could be used to assist in the consolidation of data in a co-ordinated, international manner.

Further, we would like to thank ESMA for their promotion and usage of ISO standards. Particularly, for the use of ISO 20022 standard, which will allow all reporting agents to communicate in a standardized manner.

In addition, a common reference data management platform utilizing the TC 68 catalogue of international standards will support data accuracy and efficient processing. We specifically stress the use of ISO's Legal Entity Identifier (ISO 17442), International Securities Identification Number (ISO 6166) and Classification of Financial Instrument (ISO 10962). While we are conscious that the AIMD database, implemented already for a long time, could not always integrate the LEI as sole Legal Entity Identifier, we would nevertheless recommend that ESMA continues to influence the sole use of LEI in all European reporting regimes for the identification of legal entities.

We stay at your disposal to address any questions or concerns you might have related to ISO standards in the field of competence of ISO TC68. Such requests should be directed to Christine Jozet, Secretary of the ISO TC68/AG2 (christine.jozet@ecb.europa.eu).

We trust these comments can be taken into consideration and be useful for the progress of your work.

Thank you and regards,

Allie Harris

Co-Chair of the ISO/TC68/AG2

François Laurent

Co-Chair of the ISO/TC68/AG2