

**Submission Date**

01/04/2026

# **ESMA\_QA\_2828**

Status: Answer Published

## **Additional Information**

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### **Level 1 Regulation**

Markets in Financial Instruments Regulation (MiFIR) Regulation (EU) No 600/2014-  
Secondary Markets

### **Topic**

Data reporting services providers

### **Additional Legal Reference**

Article 22 of MiFIR

## **Subject Matter**

Consolidated Tape Provider (CTP)

## **Question**

Are APAs expected to transmit regulatory data to the CTPs?

## ESMA Answer

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01-04-2026

Original language

Article 22a of MiFIR requires data contributors to transmit regulatory data (i.e. system? matching?order status and financial?instrument status, as defined in Article 2(1), point (36c) of MiFIR and further detailed in Commission Delegated Regulation (EU) 2025/1155) to the data centre of the CTP.

However, given that APAs do not operate any trading system and therefore cannot provide system?level or instrument?status information, the transmission of regulatory data is only anticipated to be relevant for trading venues.

Where an APA acts as a DRSP on behalf of a trading venue, the APA should transmit the regulatory data of that trading venue in its capacity as service provider. The data, however, continues to relate to, and originate from, the trading venue's trading system, not the APA's.