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**European Securities and Markets Authority  
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**Consultation on Review of the technical standards on reporting under Article 9 of  
EMIR**

**- Feedback by ANNA – Association of National Numbering Agencies**

Ladies and gentlemen,

We appreciate the possibility to comment on the consultation on the review of technical standards on reporting under Article 9 of EMIR.

We welcome that EMIR and specifically article 9 of the aforesaid regulation is focussing and intending to prescribe the intensive reliance on international ISO standards such as ISO 6166 (ISIN), ISO 10962 (CFI) and ISO 17442 (LEI). We deem the use of these standards essential for the success of regulations as they are allocated and maintained by local agencies such as the appointed National Numbering Agencies (NNAs) for ISIN and CFI as well as pre-LOUs (Local Operating Units) for the LEI. These agencies are supporting a high-quality allocation and maintenance of the aforesaid codes through their federated system and local expertise. ANNA and its members are constantly monitoring the processes and ensure a timely allocation of ISINs and CFIs according to rules outlined in the standard and accompanying Guidelines that are adapted continuously to market requirements.

ISIN especially is capable for identifying uniquely all types of financial instruments (incl. listed options and futures) existing. As of 2013 a new version of the ISO 6166 Standard has been voted positively by the ISO members and has been implemented by the ANNA and its members as of August 1, 2014. New types of financial instruments covered by this version are for instance also Structured Products which are also part of the new version of ISO 10962 (CFI). NNAs of all major markets are allocating ISINs for exchange traded options and futures although use by market participants is limited. We would recommend to focus on ISIN as the identification code and avoid use of other identifiers.

We welcome that the consultation paper in article 29 is proposing to no longer accept interim identifiers but supports the LEI. ANNA and its members who are partially also appointed as pre-LOUs are supportive of the exclusive use of the LEI for reporting purposes as this is globally available.

As small editorial comment: ISO standards number for ISIN is 6166 (in some parts it 61666 is mentioned) and for CFI it is ISO 10962 (instead of 10692).

Kind regards,

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