**Reply** **form**

on the Consultation Paper on the Manual on post-trade transparency

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Responding to this paper

ESMA invites comments on all matters in the Consultation Paper and in particular on the specific questions in this reply form. Comments are most helpful if they:

* respond to the question stated;
* indicate the specific question to which the comment relates;
* contain a clear rationale; and
* describe any alternatives ESMA should consider.

ESMA will consider all comments received by **31 March 2023.**

Instructions

In order to facilitate analysis of responses to the Consultation Paper, respondents are requested to follow the below steps when preparing and submitting their response:

* Insert your responses to the questions in the Consultation Paper in this reply form.
* Please do not remove tags of the type <ESMA\_QUESTION\_MPTT\_1>. Your response to each question has to be framed by the two tags corresponding to the question.
* If you do not wish to respond to a given question, please do not delete it but simply leave the text “TYPE YOUR TEXT HERE” between the tags.
* When you have drafted your responses, save the reply form according to the following convention: ESMA\_CP MANUAL post-trade transparency\_nameofrespondent.

For example, for a respondent named ABCD, the reply form would be saved with the following name: ESMA\_CP MANUAL post-trade transparency\_ABCD.

* Upload the Word reply form containing your responses to ESMA’s website (**pdf documents will not be considered except for annexes**). All contributions should be submitted online at [www.esma.europa.eu](http://www.esma.europa.eu) under the heading ‘Your input - Consultations’.

Publication of responses

All contributions received will be published following the close of the consultation, unless you request otherwise. Please clearly and prominently indicate in your submission any part you do not wish to be publicly disclosed. A standard confidentiality statement in an email message will not be treated as a request for non-disclosure. A confidential response may be requested from us in accordance with ESMA’s rules on access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response is reviewable by ESMA’s Board of Appeal and the European Ombudsman.

Data protection

Information on data protection can be found at [www.esma.europa.eu](http://www.esma.europa.eu) under the headings ‘Legal notice’ and heading ‘[Data protection](https://www.esma.europa.eu/about-esma/data-protection)’..

# General information about respondent

|  |  |
| --- | --- |
| Name of the company / organisation | Click here to enter text. |
| Activity | Choose an item. |
| Are you representing an association? |  |
| Country/Region | Choose an item. |

# Questions

Published Q&As moved to the Manual

1. Please share any feedback you may have on the additional topics highlighted in section 3.1. Do you believe that other specific technical topics shall be addressed on top of those described in Sections 3.1 and 3.2 above and presented in the rest of this CP.

<ESMA\_QUESTION\_MPTT\_1>

TYPE YOUR TEXT HERE

<ESMA\_QUESTION\_MPTT\_1>

CFI code – MiFIR identifier mapping analysis

1. Do you agree with ESMA’s proposed amendments to the CFI code – MiFIR identifier mapping?

<ESMA\_QUESTION\_MPTT\_2>

TYPE YOUR TEXT HERE

<ESMA\_QUESTION\_MPTT\_2>

1. Referring to the section “Distinction among the different bond types”, do you see the need for further clarification to be included, or further refinements to the existing CFI-MiFIR Identifier mapping?

<ESMA\_QUESTION\_MPTT\_3>

TYPE YOUR TEXT HERE

<ESMA\_QUESTION\_MPTT\_3>

1. Do you see the need for further clarification to be included, or further refinements to the existing CFI-MiFIR Identifier mapping not presented in the previous answer?

<ESMA\_QUESTION\_MPTT\_4>

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<ESMA\_QUESTION\_MPTT\_4>

Equity - Reporting fields: table 3 of Annex I, RTS 1

1. Do you agree with ESMA’s Level 3 guidance for table 3 of Annex I of RTS 1?

<ESMA\_QUESTION\_MPTT\_5>

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<ESMA\_QUESTION\_MPTT\_5>

Non-equity - Reporting fields: table 2 of Annex II, RTS 2

1. Do you agree with the guidance provided for bonds? Do you think that it is sufficient? If not, in respect of which field(s) should be required? Please provide details.

<ESMA\_QUESTION\_MPTT\_6>

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<ESMA\_QUESTION\_MPTT\_6>

Bonds

1. Do you agree with the guidance provided for bonds? Do you think that it is sufficient? If not, in respect of which field(s) should be required? Please provide details.

<ESMA\_QUESTION\_MPTT\_7>

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<ESMA\_QUESTION\_MPTT\_7>

SFPs

1. Do you agree with the guidance provided for SFPs? Do you think that it is sufficient? If not, in respect of which field(s) should be required? Please provide details.

<ESMA\_QUESTION\_MPTT\_8>

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<ESMA\_QUESTION\_MPTT\_8>

ETCs and ETNs

1. Do you agree with the guidance provided for ETCs and ETNs? Do you think that it is sufficient? If not, in respect of which field(s) should be required? Please provide details.

<ESMA\_QUESTION\_MPTT\_9>

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<ESMA\_QUESTION\_MPTT\_9>

Interest rate derivatives

1. Do you agree with the guidance provided for bond futures, bond forwards and bond options? Do you think that it is sufficient? If not, in respect of which contracts and field(s) should be required? Please provide details.

<ESMA\_QUESTION\_MPTT\_10>

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<ESMA\_QUESTION\_MPTT\_10>

1. Do you agree with the guidance provided for IR futures, FRAs and IR options? Do you think that the guidance is sufficient? If not, in respect of which contracts and field(s) should be required? Please provide details.

<ESMA\_QUESTION\_MPTT\_11>

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<ESMA\_QUESTION\_MPTT\_11>

1. Do you agree with the guidance provided for interest rate swaps (IRS), IR, futures and IR swaptions? Do you think that the guidance is sufficient? If not, in respect of which contracts and field(s) should be required? Please provide details.

<ESMA\_QUESTION\_MPTT\_12>

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<ESMA\_QUESTION\_MPTT\_12>

1. Concerning IRS (section 6.5.1.5), do you consider that a second “spread” field for the spread on the second floating leg would be necessary or in the case of swaps with two floating rates there is always one leg with the spread, if any

<ESMA\_QUESTION\_MPTT\_13>

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<ESMA\_QUESTION\_MPTT\_13>

1. Concerning IRS (section 6.5.1.5), do you consider that a second “price” field for the fixed rate of the second leg in the case of fixed-to-fixed swaps even if such contracts have not been identified to be TOTV at this stage?

<ESMA\_QUESTION\_MPTT\_14>

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<ESMA\_QUESTION\_MPTT\_14>

1. Concerning Bond forwards (section 6.5.1.1), do you consider that further guidance is needed? If, so please provide concrete examples and proposals.

<ESMA\_QUESTION\_MPTT\_15>

TYPE YOUR TEXT HERE

<ESMA\_QUESTION\_MPTT\_15>

Equity derivatives

1. Do you agree with the guidance provided for equity derivatives? Do you think that the guidance is sufficient? If not, in respect of which contracts and field(s) should be required? Please provide details.

<ESMA\_QUESTION\_MPTT\_16>

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<ESMA\_QUESTION\_MPTT\_16>

1. For equity derivatives with an index as underlying (sections 6.5.2.3 and 6.5.2.4) how would you populate the price notation filed until the second RTS 2 review? After the second RTS 2 review, would you agree with ESMA’s proposal to define an appropriate code for this field?

<ESMA\_QUESTION\_MPTT\_17>

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<ESMA\_QUESTION\_MPTT\_17>

Credit derivatives

1. Do you agree with the guidance provided for credit derivatives (CDS and options on CDSs)? Do you think that the guidance is sufficient? If not, in respect of which contracts and field(s) should be required? Please provide details.

<ESMA\_QUESTION\_MPTT\_18>

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<ESMA\_QUESTION\_MPTT\_18>

1. Concerning options on Index CDSs and single-name CDSs (section 6.5.3.2), do you consider that further guidance is needed? If, so please provide concrete examples and proposals.

<ESMA\_QUESTION\_MPTT\_19>

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<ESMA\_QUESTION\_MPTT\_19>

FX derivatives

1. Do you agree with the guidance provided for FX derivatives (forwards, options and swaps)? Do you think that the guidance is sufficient? If not, in respect of which contracts and field(s) should be required? Please provide details.

<ESMA\_QUESTION\_MPTT\_20>

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<ESMA\_QUESTION\_MPTT\_20>

Commodity derivatives

1. Do you agree with the guidance provided for commodity derivatives (futures, options and swaps)? Do you think that the guidance is sufficient? If not, in respect of which contracts and field(s) should be required? Please provide details.

<ESMA\_QUESTION\_MPTT\_21>

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<ESMA\_QUESTION\_MPTT\_21>

Emission allowances and derivatives thereof

1. Do you agree with the guidance provided for emission allowances and derivatives thereof? Do you think that the guidance is sufficient? If not, in respect of which contracts and field(s) should be required? Please provide details.

<ESMA\_QUESTION\_MPTT\_22>

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<ESMA\_QUESTION\_MPTT\_22>

Securitised derivatives

1. Do you agree with the guidance provided for securitised derivatives? Do you think that it is sufficient? If not, in respect of which field(s) should be required? Please provide details.

<ESMA\_QUESTION\_MPTT\_23>

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<ESMA\_QUESTION\_MPTT\_23>

Contract for difference (CFDs) and spread bets

1. Do you agree with the guidance provided for CFDs and spread bets? Do you think that the guidance is sufficient? If not, in respect of which contracts and field(s) should be required? Please provide details.

<ESMA\_QUESTION\_MPTT\_24>

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<ESMA\_QUESTION\_MPTT\_24>

Flags

1. Do you believe that further guidance is needed? Is there any specific use case for which you deem it necessary to provide further guidance?

<ESMA\_QUESTION\_MPTT\_25>

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<ESMA\_QUESTION\_MPTT\_25>

1. Would you agree with ESMA’s proposal to further specify the differences between portfolio transactions and portfolio trades? What are the main differences between a package transaction and a portfolio transaction involving? Please provide details.

<ESMA\_QUESTION\_MPTT\_26>

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<ESMA\_QUESTION\_MPTT\_26>