Reply Form

Consultation Paper on the Amendments to the RTS on Settlement Discipline

Responding to this Consultation Paper

ESMA invites comments on all matters in this Consultation Paper and in particular on the specific questions summarised in Annex 1. 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 **14 April 2025.**

All contributions should be submitted online at [www.esma.europa.eu](http://www.esma.europa.eu) under the heading ‘Your input - Consultations’.

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\_CSDC\_0>. 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\_CP1\_ CSDC\_nameofrespondent.

For example, for a respondent named ABCD, the reply form would be saved with the following name: ESMA\_CP1\_ CSDC\_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* 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 heading ‘[Data protection](https://www.esma.europa.eu/about-esma/data-protection)’.

**Who should read this paper?**

All interested stakeholders are invited to respond to this consultation paper. In particular, ESMA invites market infrastructures (CSDs, CCPs, trading venues), their members and participants, other investment firms, credit institutions, issuers, fund managers, retail and wholesale investors, and their representatives to provide their views to the questions asked in this paper.

# General information about respondent

|  |  |
| --- | --- |
| Name of the company / organisation | FIX Trading Community |
| Activity | Other |
| Are you representing an association? |  |
| Country / Region | UK |

# Questions

**3.1.1 Timing of allocations and confirmations**

1. Do you agree with the proposed amendments to Articles 2(2) and 3 of CDR 2018/1229?

<ESMA\_QUESTION\_CSDC\_1>

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<ESMA\_QUESTION\_CSDC\_1>

1. Would you see merit in introducing an obligation for investment firms to notify their professional clients the execution details of their orders as soon as these orders are fulfilled (in a way that allows STP)? If yes, should it be cumulative to the proposed amendments to Articles 2(2) and 3 of CDR 2018/1229?

<ESMA\_QUESTION\_CSDC\_2>

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<ESMA\_QUESTION\_CSDC\_2>

1. If you support an obligation for investment firms to notify their professional clients the execution as soon as the orders are fulfilled, do you think that clients should be allowed a maximum number of business hours for the allocations and confirmations from the moment of notification by investment firms, instead of having fixed deadlines? If yes, how many hours would be necessary for that?

<ESMA\_QUESTION\_CSDC\_3>

We are supportive of the introduction of deadlines, noting their use in the US as part of their migration to T+1. We recommend an offset to end of trading hours rather than a fixed deadline given the differences in trading hours across markets.

<ESMA\_QUESTION\_CSDC\_3>

1. Should CDR 2018/1229 further specify the term ‘close of business’ for the purpose of Article 2(2)? If yes, how should this take into account the business day at CSD level?

<ESMA\_QUESTION\_CSDC\_4>

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<ESMA\_QUESTION\_CSDC\_4>

1. Should the 10:00 CET deadline for professional clients in different time zones and retail clients be brought forward to 07:00 CET on T+1, to be aligned with the UK deadline?

<ESMA\_QUESTION\_CSDC\_5>

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<ESMA\_QUESTION\_CSDC\_5>

1. Can you suggest any other means to achieve the same objective? If yes, please elaborate

<ESMA\_QUESTION\_CSDC\_6>

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<ESMA\_QUESTION\_CSDC\_6>

**3.1.2 Means for sending allocations and confirmations**

1. Do you agree to make the use of electronic and machine-readable format that allow for STP mandatory for written allocations?

<ESMA\_QUESTION\_CSDC\_7>

We are in general supportive of the use of electronic and machine-readable communications. Platforms such as DTC CTM and open standards such as FIX and ISO 15022 are heavily used for allocations, confirmations and affirmations. However, there is still some manual communication in this area and a mandate may be required to force this into the machine-readable world. We would, however, advise against any requirement to use a specific implementation or messaging standard given the range of electronic solutions used today. We believe the requirement to use electronic and machine-readable communication methods to be sufficient.

<ESMA\_QUESTION\_CSDC\_7>

1. Would you see merit in introducing optionality for investment firms to set deadlines based on whether an electronic, machine-readable format of the communication is used? In such case, do you agree that an earlier deadline could be set for non-machine readable formats, so clients are disincentivised to use them? Which should be such deadline?

<ESMA\_QUESTION\_CSDC\_8>

Introducing essentially a time penalty for use of manual communications has some merit, though it is not clear how such a penalty would be calibrated. However, this would still require firms to employ personnel and/or retain technology to handle non-machine-readable formats which would carry ongoing costs. Moving to a fully machine-readable environment, though initially burdensome for some firms, would present savings in the longer term both for them and their counterparts. We of course recognise that firms will need to support non-machine-readable formats for non-EU (and non-UK) activity, though this tends to be lower in volume for EU-based firms.

<ESMA\_QUESTION\_CSDC\_8>

1. Please provide quantitative evidence regarding the use of non-machine readable formats for written allocations and confirmations.

<ESMA\_QUESTION\_CSDC\_9>

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<ESMA\_QUESTION\_CSDC\_9>

1. Would it be necessary to introduce a similar obligation in other steps of the settlement chain? If yes, please elaborate.

<ESMA\_QUESTION\_CSDC\_10>

Similar to our response to Q7, we are in general supportive of the use of electronic and machine-readable communications, noting the significant use of standards such as ISO 15022 and ISO 20022 already in different parts of the settlement chains. Furthermore, if the term "settlement chain" is intended to include allocation, confirmation, and affirmation then FIX also needs to be considered given its extensive usage across the industry today and its connection with the trading process.

Using machine-readable formats throughout would speed up data transfer, increase quality and reduce time to manage issues. We would, however, advise against any requirement to use a specific implementation or standard given the extensive use of incumbent electronic solutions that have proven highly effective in automating these processes. We believe the requirement to use electronic and machine-readable communication methods to be sufficient.

<ESMA\_QUESTION\_CSDC\_10>

1. Can you suggest any other means to achieve the same objective? If yes, please elaborate

<ESMA\_QUESTION\_CSDC\_11>

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<ESMA\_QUESTION\_CSDC\_11>

**3.1.3 The use of international open communication procedures and standards for messaging and reference data to exchange allocations and confirmations**

1. Do you agree with the proposed amendment to Article 2 of CDR 2018/1229?

<ESMA\_QUESTION\_CSDC\_12>

Similar to our response to Q7, we are in general supportive of the use of electronic and machine-readable communications. However, we take issue with the statements made in paragraphs 59-61 which appear to force the industry in to using ISO 20022 XML for allocations, confirmations, affirmations and other parts of the transaction workflow. The statement that “ISO 20022 is already broadly used” simply isn’t true for allocation, confirmation and affirmation messaging, and it is not clear what synergies exist with “other reporting systems” or indeed what such systems are.

Given machine-readable alternatives (notably DTC's CTM, FIX, ISO 15022) are heavily used and work well, mandating such a move would impose a considerable implementation and cost burden on the industry for little or no benefit. These solutions have been serving the industry well for over thirty years and, as per our response to Q7, improvements in trade processing efficiency and timeliness can be made with greater adoption of these solutions, rather than replacing them.

It should also be recognised that trade processing infrastructures are rarely built on a per-market basis, so it cannot be stated that moving to ISO 20022 will introduce any long-term saving while other markets services by the same technological infrastructure uses existing communication methods.

We do, however, recognise the advantages in having well defined and common data standards throughout the process and suggest that an exercise be undertaken to explore interoperability between ISO 20022 (where indeed such elements and message definitions exist) and incumbent standards and platform solutions.

<ESMA\_QUESTION\_CSDC\_12>

1. Do you agree that settlement efficiency would improve if all parties in the transaction and settlement chain used the latest international standards, such as the ISO 20022 messaging standards, in particular whenever A2A messages and data are exchanged? If not, please elaborate. How long would it take for all parties to adapt to ISO20022?

<ESMA\_QUESTION\_CSDC\_13>

Similar to our responses to Q7 and Q12, we believe that usage of machine-readable standards will improve the quality and timeliness of trade settlement, though recognise that there are many causes of settlement fails, and standardising messages is not the whole solution.

Requiring industry participants to move to ISO 20022 XML in the timelines required for T+1 implementation will take resources away from remediating areas that may have a greater impact and, as per our response to Q12, incur significant costs for little or no benefit. A longer-term direction should entail interoperability with the ISO 20022 standard in implementations, to allow existing industry solutions to be used where interoperable, while achieving the benefits of alignment with a central standard.

<ESMA\_QUESTION\_CSDC\_13>

1. Can you provide figures (by number and type of financial entities, jurisdictions) regarding the current use of international open communication procedures and standards such as: a) ISO 20022, b) ISO 15022, c) others (please specify)?

<ESMA\_QUESTION\_CSDC\_14>

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<ESMA\_QUESTION\_CSDC\_14>

1. Do you agree with the proposal of the EU Industry Task Force whereby allocation requirements should be aligned with CSD-level matching requirements? If not, please elaborate.

<ESMA\_QUESTION\_CSDC\_15>

The industry today has several vendor platforms that facilitate pre-settlement matching of allocations and confirmations, including identifying mis-matches, tolerances, etc. FIX is the standard that is heavily used by market participants and supported by these vendor platforms for this part of the STP chain as it naturally follows the pre-trade and trade activities which FIX is the incumbent standard. Additionally FIX is also used by asset managers who may have direct connections with their brokers and do their own local matching before affirming the confirmation for settlement. The data points suggested are conceptually similar to the matching rules used today.

<ESMA\_QUESTION\_CSDC\_15>

1. Can you suggest any other means to achieve the same objective? If yes, please elaborate.

<ESMA\_QUESTION\_CSDC\_16>

As with our response in Q15, how and where matching is done should be left to the market participants. The most common models are local matching by the asset manager, or central matching. It should be noted that even within the central matching model, some asset managers may still require an explicit affirmation from them before settlement.

<ESMA\_QUESTION\_CSDC\_16>

**3.1.4 Onboarding of new clients**

1. Do you agree with the proposed regulatory change to introduce an obligation for investment firms to collect the data necessary to settle a trade from professional clients during their onboarding and to keep it updated? If not, please explain.

<ESMA\_QUESTION\_CSDC\_17>

We recognise the need for accurate and complete data in advance of trade processing activities, noting of course that in a T+1 environment, any requirement to identify and repair data issues post-trade poses a threat to meeting settlement deadlines. We are not convinced of the need for the introduction of a regulatory obligation in this regard, noting that industry participants are already strongly incentivised to avoid settlement failures caused by missing or inaccurate data, and these incentives become stronger in a T+1 environment.

<ESMA\_QUESTION\_CSDC\_17>

1. Can you suggest any other means to achieve the same objective? If yes, please elaborate.

<ESMA\_QUESTION\_CSDC\_18>

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<ESMA\_QUESTION\_CSDC\_18>

**3.1.6 Partial settlement**

1. Do you agree with the proposed amendment to Article 10 of CDR 2018/1229? If not, please elaborate.

<ESMA\_QUESTION\_CSDC\_19>

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<ESMA\_QUESTION\_CSDC\_19>

1. Do you agree with the deletion of Article 12 of CDR 2018/1229? If not, please elaborate.

<ESMA\_QUESTION\_CSDC\_20>

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<ESMA\_QUESTION\_CSDC\_20>

1. Do you have other suggestions to incentivise partial settlement? If yes, please elaborate.

<ESMA\_QUESTION\_CSDC\_21>

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<ESMA\_QUESTION\_CSDC\_21>

1. Do you think that some types of transactions should not be subject to partial settlement? If yes, could you provide a list and the supporting reasoning?

<ESMA\_QUESTION\_CSDC\_22>

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**3.1.7. Auto-collateralisation**

1. Do you agree with the introduction of an obligation for CSDs to facilitate the provision of intraday cash credit secured with collateral via an auto-collateralisation facility? If not, please elaborate.

<ESMA\_QUESTION\_CSDC\_23>

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<ESMA\_QUESTION\_CSDC\_23>

1. Can you suggest any other means to achieve the same objective? If yes, please elaborate.

<ESMA\_QUESTION\_CSDC\_24>

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<ESMA\_QUESTION\_CSDC\_24>

**3.1.8 Real-time gross settlement versus batches**

1. Should CDR 2018/1229 be amended to require all CSDs to offer real-time gross settlement for a minimum window of time of each business day as well as a minimum number of settlement batches? Please provide arguments to justify your answer.

<ESMA\_QUESTION\_CSDC\_25>

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<ESMA\_QUESTION\_CSDC\_25>

1. What should be the length of the minimum window of time of each business day for real-time gross settlement and the minimum number of settlement batches that should be offered, per business day? Please provide arguments to justify your answer.

<ESMA\_QUESTION\_CSDC\_26>

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<ESMA\_QUESTION\_CSDC\_26>

1. Can you suggest any other means to achieve the same objective? If yes, please elaborate.

<ESMA\_QUESTION\_CSDC\_27>

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<ESMA\_QUESTION\_CSDC\_27>

**3.1.9 Reporting top failing participants**

1. Do you agree with the proposed amendments to Table 1 of Annex I of CDR 2018/1229? If not, please elaborate.

<ESMA\_QUESTION\_CSDC\_28>

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<ESMA\_QUESTION\_CSDC\_28>

1. Should top 10 failing participants be reported both in absolute terms (current approach) and in relative terms (according to the proposed amendments to Table 1 of Annex I of CDR 2018/1229)?

<ESMA\_QUESTION\_CSDC\_29>

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<ESMA\_QUESTION\_CSDC\_29>

1. Do you have additional suggestions regarding the requirements for CSDs to report settlement fails data specified in Annex I and Annex II of CDR 2018/1229? If yes, please elaborate.

<ESMA\_QUESTION\_CSDC\_30>

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<ESMA\_QUESTION\_CSDC\_30>

**3.1.10 Reporting the reasons for settlement fails**

1. Do you agree with the proposed amendments to Article 13(1)(a) of CDR 2018/1229? Or can you suggest alternative options so that CSDs have visibility of the root causes of settlement fails at participants level?

<ESMA\_QUESTION\_CSDC\_31>

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<ESMA\_QUESTION\_CSDC\_31>

1. Based on the experience since the implementation of the settlement discipline regime under CSDR, please describe the main root causes of settlement fails identified so far. Please specify the relevant categories in more granular terms, going beyond “lack of securities”, “lack of cash” and “instructions put on hold”.

<ESMA\_QUESTION\_CSDC\_32>

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<ESMA\_QUESTION\_CSDC\_32>

1. According to Article 13(2) of the CDR, CSDs shall establish working arrangements with their top failing participants to analyse the main reasons for settlement fails. Do you believe that this provision has proven useful in analysing the root causes of fails and in preventing them? Do you have suggestions on other actions which CSDs could take with respect to top failing participants?

<ESMA\_QUESTION\_CSDC\_33>

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<ESMA\_QUESTION\_CSDC\_33>

**3.1.11 CSDs’ public disclosure on settlement fails**

1. Do you agree with the proposed amendments to Table 1 of Annex III of CDR 2018/1229 to include information on the breakdown of the settlement fails per asset class? If not, please elaborate.

<ESMA\_QUESTION\_CSDC\_34>

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<ESMA\_QUESTION\_CSDC\_34>

1. Do you think that CSDs should publish additional information on settlement fails? If yes, please specify.

<ESMA\_QUESTION\_CSDC\_35>

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<ESMA\_QUESTION\_CSDC\_35>

1. Should the frequency of publication of settlement fails data by CSDs increase? Which should be the right frequency?

<ESMA\_QUESTION\_CSDC\_36>

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<ESMA\_QUESTION\_CSDC\_36>

**3.2.1 Unique transaction identifier (UTI)**

1. Do you agree that the use of UTI should not be made mandatory through a regulatory change?

<ESMA\_QUESTION\_CSDC\_37>

We believe this would help adoption of UTIs, though need to recognise that the logic for assigning and managing UTIs throughout complex transaction processes (for example, netting) needs to be well defined and maintain some flexibility in case scenarios are missed in such definitional analysis or new flows emerge.

Given this, our recommendation is we to allow market participants to decide on how UTI should be adopted to facilitate STP, developing market practices as required, rather than mandate the use of UTI at this time.

<ESMA\_QUESTION\_CSDC\_37>

1. What are your views on the use of UTI in general and in the case of netted transactions specifically?

<ESMA\_QUESTION\_CSDC\_38>

We are supportive of use of UTI as a market practice. In cases such as netting of transactions, it is desirable to be able to chain the net together with the underlying transactions.

<ESMA\_QUESTION\_CSDC\_38>

**3.2.2 SSIs format**

1. Should the market standards for the storage and exchange of SSIs be left to the industry or is regulatory action at EU level necessary?

<ESMA\_QUESTION\_CSDC\_39>

We recommend leaving this to the industry. There are industry solutions in place and there is an opportunity here to encourage complete and consistent usage through development and adoption of market practice.

We note there are various solutions available today for managing and communicating SSIs. For example, the FIX Protocol has messages for communicating SSIs, supports updating/receiving SSIs from central databases and supports the inclusion of SSIs on transactional messages (e.g., allocations, confirmations).

<ESMA\_QUESTION\_CSDC\_39>

**3.2.3 Place of settlement (PSET) as mandatory field of written allocations**

1. How can the PSET contribute to improve settlement efficiency and reduce settlement fails? Do you have suggestions on how to make the use of PSET more consistent across the market? If yes, please elaborate.

<ESMA\_QUESTION\_CSDC\_40>

Including PSET has been proven to reduce certain categories of settlement failure, particularly where an instrument can be settled in multiple CSDs. Our belief is that making PSET a matching field should be left to the industry to develop market practice but having a standard for a list of PSETs would be beneficial. We would like to note that PSET is supported on FIX allocation messages for this purpose.

<ESMA\_QUESTION\_CSDC\_40>

1. Do you agree that the PSET should not be made a mandatory field of written allocations under Article 2(1) of CDR 2018/1229? If you have a different view, please elaborate.

<ESMA\_QUESTION\_CSDC\_41>

As per Q40, we believe in principle that use of PSET should be encouraged but not a matching field. This is available on FIX allocation messages.

<ESMA\_QUESTION\_CSDC\_41>

**3.2.4 Place of safe keeping (PSAF) and place of settlement (PSET) as mandatory fields of settlement instructions**

1. Do you agree that the decision to use the PSAF and the PSET in the settlement instructions should be left to the industry?

<ESMA\_QUESTION\_CSDC\_42>

Yes, we believe the industry should develop market practice for this purpose.

<ESMA\_QUESTION\_CSDC\_42>

1. What are the current market practices regarding the use of PSAF and PSET, in particular in the case of netting along the trading and settlement chain?

<ESMA\_QUESTION\_CSDC\_43>

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<ESMA\_QUESTION\_CSDC\_43>

**3.2.5 Transaction type**

1. Do you agree that the transaction type should not become a mandatory matching field under Article 5(4) of CDR 2018/1229?

<ESMA\_QUESTION\_CSDC\_44>

We recognise the issue here and believe that usage of a transaction type schema will be beneficial to eliminate incorrect matches; however we support not making this a matching field at this time and recommend further work be done to refine the list of transaction types and consider the correct matching logic to use in order to achieve the highest levels of successful settlement.

<ESMA\_QUESTION\_CSDC\_44>

1. Do you think the lists mentioned in Article 2(1)(a) and Article 5(4) of CDR 2018/1229 should be updated? If yes, please specify.

<ESMA\_QUESTION\_CSDC\_45>

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<ESMA\_QUESTION\_CSDC\_45>

**3.2.6 Timing for sending settlement instructions to the securities settlement system (SSS)**

1. What are your views on whether market participants should send settlement instructions intra-day rather than in bulk at the end of the day?

<ESMA\_QUESTION\_CSDC\_46>

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<ESMA\_QUESTION\_CSDC\_46>

1. Do you consider it necessary to introduce a deadline for the submission of settlement instructions through a regulatory amendment to CDR 2018/1229? If yes, what should be such a deadline? Please provide arguments to justify your answers.

<ESMA\_QUESTION\_CSDC\_47>

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<ESMA\_QUESTION\_CSDC\_47>

**3.2.7 Alignment of CSDs’ opening hours, real-time/night-time settlement and cut-off times**

1. Do you agree that CSDs’ business day schedule should be left to the industry? If not, please elaborate.

<ESMA\_QUESTION\_CSDC\_48>

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<ESMA\_QUESTION\_CSDC\_48>

1. What would be, in your view, the ideal business day schedule for CSDs taking also into account real-time settlement, night-time settlement and cut-off times? Should they be aligned? Please provide arguments.

<ESMA\_QUESTION\_CSDC\_49>

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<ESMA\_QUESTION\_CSDC\_49>

**3.2.8 Shaping**

1. Do you agree that shaping should be adopted as best practice? If you do not agree and believe that it should be adopted as regulatory change, please indicate which should be the most adequate size to shape transactions per type of financial instrument.

<ESMA\_QUESTION\_CSDC\_50>

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<ESMA\_QUESTION\_CSDC\_50>

**3.2.9 Automated securities lending**

1. Do you see the need for a regulatory action in this area? If yes, please elaborate.

<ESMA\_QUESTION\_CSDC\_51>

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<ESMA\_QUESTION\_CSDC\_51>

**3.2.10 Other proposals regarding settlement discipline measures and tools to improve settlement efficiency**

1. Do you have other proposals regarding settlement discipline measures and tools to improve settlement efficiency in areas not covered in the previous sections? Please give examples and provide arguments and data where available. If relevant, please also include the specific proposed amendments to CDR 2018/1229.

<ESMA\_QUESTION\_CSDC\_52>

We would like to use this question as an opportunity to provide a summary of messaging and features supported by the FIX Protocol to facilitate post-trade processing.

The FIX Protocol has a set of standard messages that facilitates certain post-trade and post-trade life cycle activities. Once a trade is completed our Allocation and Confirmation suite of messages facilitates the interactions between buy-side and sell-side in communicating the allocation instructions (i.e. taking a block trade or a group of transactions and instructing its allocation across 1 or more end accounts) and subsequent confirmation, which the recipient can affirm, in order to ensure orderly and timely settlement. Whilst settlement would occur over the SWIFT network using SWIFT MT messages (an implementation of ISO 15022 settlement messages) or MX messages (an implementation of equivalent ISO 20022 XML settlement messages), FIX has a set of messages that allows the sell-side or custodian to communicate the settlement status changes back up-stream to the client, our Settlement Status set of messages.

Separately FIX has messages for collateral management. These messages allow the participants in the trade to manage their collateral assignment and substitutions for transactions that need collateralization (e.g. repurchase agreements, or securities lending), request for collateral for a given trade, inquiring on collateral status. These same collateral management set of messages works hand-in-hand with FIX's Margin management messages where the latter allows for inquiries into the status of the margin and the former can be used to request for collateral due to margin deficiencies, for example.

Client on-boarding is a key aspect in the trading environment. FIX has a suite of messages related on-board clients that centres on setting up a client's relationships (e.g. who they can enter trades for, who they clear through, etc.), defining their risk limits (e.g. credit, gross, long/short, margin, etc.), and their entitlements (e.g. allow to trade, allow to issue RFQ, etc.). Separately in FIX's message that conveys executions for an order the current risk limit utilization can also be communication.

An ability to suspend a client from trading is a key action in limiting risks. FIX has messages to suspend, halt and reactivate a client's ability to trade. This type of "kill switch" is important for brokers that provide their clients with direct-market access capabilities.

Pre-trade credit/risk limit checks is another aspect of ensuring that the client has sufficient credit to undertake a trade and to ensure that it would be cleared. Pre-trade credit/rick checks is a requirement in some markets to ensure clearing certainty, and to meet the trading community’s needs for this, FIX has messages to facilitate this type of pre-trade credit/risk limit checks.

Lastly, FIX also has a set of messages to convey data (add, change, delete) into a standing settlement instruction (SSI) database and to query an SSI database. Additionally in several FIX messages (e.g. when sending allocation instructions and confirmations) there exists components to convey specific SSI information within these messages.

<ESMA\_QUESTION\_CSDC\_52>

**3.2.11 Costs and Benefits**

1. For all the topics covered in this CP please provide your input on the envisaged costs and benefits using the table below. Please include any operational challenges and the time it may take to implement the proposed requirements. Where relevant, additional tables, graphs and information may be included in order to support the arguments or calculations presented in the table below.

|  |  |  |
| --- | --- | --- |
| **ESMA or respondent’s proposal** |  | |
|  | **Qualitative description** | **Quantitative description/ Data** |
| **Benefits** |  |  |
| **Compliance costs:**  **- One-off**  **- On-going** |  |  |
| **Costs to other stakeholders** |  |  |
| **Indirect costs** |  |  |

<ESMA\_QUESTION\_CSDC\_53>

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<ESMA\_QUESTION\_CSDC\_53>