



Digital Token Identifier Foundation

✉ secretariat@dtif.org
16 September 2025

To: European Securities and Markets Authority

Re: Call for evidence on a comprehensive approach for the simplification of financial transaction reporting

Submitted via [online form](#)

The [Digital Token Identifier \(DTI\) Foundation](#)¹ and its Product Advisory Committee (PAC) welcome the opportunity to respond to ESMA's [Call for evidence on a comprehensive approach for the simplification of financial transaction reporting](#). We have confined our feedback to Question 21 related to other technologies such as DLT for the reporting process.

We are available to discuss our response or further questions on the DTI standard. Please do not hesitate to contact us at secretariat@dtif.org.

¹ The DTI Foundation is a non-profit division of Etrading Software Limited: <https://etradingsoftware.com/>

Revised Disclosure Requirements

Q21. Do you consider that other technologies (e.g. DLT and smart contracts) should be considered as a way to simplify the reporting process?

The DTI Foundation and its PAC support initiatives that aim to streamline and improve the efficiency of the transaction reporting process.

We consider that a simplified reporting process relies on high-quality, consistent, and meaningful data - regardless of the underlying technology - for effective industry implementation and regulatory use. In the context of a DLT ecosystem, the effectiveness of reporting processes will continue to depend on the use of industry-agreed, interoperable standards.

The Digital Token Identifier (DTI), a globally recognised ISO standard, enables the technical identification of a digital token and its associated ledger. A DTI, in combination with other ISO standards such as ISIN (ISO 6166), FISN (ISO 18774), LEI (ISO 17442), and CFI (ISO 10962), provides a complete picture of technical attributes alongside economic and party details for digital assets in a harmonised and machine-readable format.

As noted in our response to the European Commission's targeted consultation on the integration of EU capital markets, technical standards are essential to support DLT-based financial activities, including reporting.² Foundational data standards - covering identifiers, dates, and currencies - are necessary for clear and harmonised communication throughout the lifecycle of a financial instrument. Trade Associations and industry bodies have also developed standardised taxonomies for the consistent representation of all financial instruments, such as the Common Domain Model developed by ICMA, ISDA, and ISLA.

We believe that the application of such standards can significantly improve interoperability, automation, and transparency, while reducing fragmentation across frameworks such as MiFIR and MiCA.

² [DTIF response to EC targeted consultation](#)

The DTI

The DTI is an ISO standard designed to enable the unique identification of digital assets that use distributed ledger technology (DLT) for token issuance, storage, exchange, ownership records, or transaction validation. Each DTI consists of a randomly generated, unique nine-character alphanumeric code assigned to a specific crypto asset, along with a corresponding record of reference data maintained by the DTI Foundation. This reference data includes details about the underlying DLT, as well as key token attributes such as its address, name(s), and any external identifiers.

The DTI Foundation allocates and maintains DTIs on a cost-recovery basis, in accordance with ISO's governance principles of fairness, reasonability, and non-discrimination (FRAND). As market adoption increases, allocation fees are periodically reviewed to ensure they remain aligned with marginal issuance costs.

The DTI Foundation

The DTI Foundation is the designated Registration Authority responsible for supporting the implementation of the ISO 24165 Digital Token Identifier (DTI) standard. In line with its mission to provide golden-source reference data for the unique identification of crypto assets, the DTI Foundation plays a central role in promoting transparency across digital markets. Initially developed to unambiguously identify cryptocurrencies such as Bitcoin and Ether, the DTI standard has evolved to support the identification of a wide array of digital assets. Its use now spans multiple applications - including the identification of tokenised financial instruments, stablecoins, crypto underliers of financial products, and other real-world assets across various distributed ledgers. The DTI is used by issuers, trading platforms, intermediaries, data providers, as well as regulatory and tax authorities.