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| Reply form  for the Call for Evidence on a Comprehensive Approach for the Simplification of Financial Transaction Reporting |
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**Responding to this paper**

ESMA invites comments on all matters in this call for evidence and in particular on the specific questions. 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 **19th** **September 2025.**

**Instructions**

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

1. Insert your responses to the questions in the Call for Evidence in the present response form.
2. Use this form and send your responses in Word format (**pdf documents will not be considered except for annexes**);
3. Please do not remove tags of the type <ESMA\_QUESTION \_CASR\_1>. Your response to each question has to be framed by the two tags corresponding to the question.
4. 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.
5. When you have drafted your response, name your response form according to the following convention: ESMA\_CASR\_nameofrespondent\_RESPONSEFORM. For example, for a respondent named ABCD, the response form would be entitled ESMA\_CASR\_ABCD\_RESPONSEFORM.
6. Upload the form containing your responses, **in Word format**, to ESMA’s website (www.esma.europa.eu under the heading “Your input – Open Consultations” -> Call for evidence on a comprehensive approach for the simplification of financial transaction reporting”).

**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 [Legal Notice](http://www.esma.europa.eu/legal-notice).

**Who should read this paper**

# This paper is primarily addressed to all financial market participants and in particular reporting entities and market infrastructures, as well as to trade associations and other stakeholders involved in financial regulation, investor education, and retail investment market developments. It seeks input on major cost drivers linked to derivative regulatory reporting and the identification of possibilities on integration, streamlining and simplification.

# The paper is also relevant to competent authorities, with competences in the context of MiFIR, EMIR, SFTR regulation.

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**General information about respondent**

|  |  |
| --- | --- |
| Name of the company / organisation | Bloomberg |
| Activity | Other Financial service providers |
| Are you representing an association? |  |
| Country/Region | Netherlands |

**Questions**

1. Do stakeholders agree with the description of the key challenges outlined above? Is there any other issue linked to multiple regulatory regimes with duplicative or inconsistent requirements that is not reflected in this section? Out of the 10 sources of costs identified in this section and the ones that you may add, what are the three main cost drivers in your view?

<ESMA\_QUESTION\_CASR\_1>

Bloomberg agrees with ESMA’s identification of the 9 key challenges associated with financial transaction reporting. We believe that ESMA has overlooked the following items in addition to those it references in this section. We have observed the nature of these items and commented about these items in relation to ESMA's key objectives, those being 1. Preserve Information Scope, 2. Decrease overlaps, 3. Global Alignment, and 4. Balancing Cost and Benefit.

* **10. The use of ISIN and not UPI for derivatives.** ISIN provides a level of granularity for derivative instruments which provides no incremental value to the market, including regulators, in respect of trading activity analysis. The continued use of ISIN  is not consistent, in our view, with three of the four ESMA objectives. Use of ISINs adds significant cost to market participants (creation and retention), generates duplicate information (multiple representations of the same instrument), and is not globally aligned (the US and UK use UPI not ISIN). We would also argue that  by creating an overly complex information landscape (more records than necessary, over 150 million codes have been generated since 2018)  impedes the ability of the market to effectively interrogate the data.
* 11. **Lack of standard data dictionary** ESMA’s observation about the lack of a centralised, standardised data dictionary is disappointing, given that MiFIR, EMIR, and SFTR reporting have long used ISO 20022, which includes such a dictionary. This issue likely stems from inconsistent mapping of regulatory technical standards to ISO 20022 concepts. Going forward, there must be a stronger commitment to fully leveraging ISO 20022 to align terminology and data structures across regimes.  This is fundamental to preserving information scope, decreasing overlaps, and balancing cost and benefit.
* 12. **The party with best access to information should report.** The obligation to report should rest with the party best placed to access the relevant information. A regulatory process that requires a market participant to obtain data from entities over which it has no authority—solely for the purpose of regulatory reporting, and outside the scope of its ordinary business operations—is inherently flawed. Such an approach is also inconsistent with the overarching objectives of the consultation. This issue already arises in practice under Article 26(5), as previously noted in our submissions. Imposing such obligations leads to unnecessary duplication of costs for no apparent supervisory benefit, increases overlaps in reporting responsibilities, and undermines data quality by introducing third-party dependency risks.

In addition to these three points and in respect of approaches to data quality, we would like to draw attention to ESMA’s comment in paragraph 168 of ESMA’s Final Report on RTS 22, which dismisses industry calls for standardisation of index terminology noting that that this would only be relevant to reporting of minor indices and that ‘their standardisation is less fundamental’. The FIGI is one of the standardised codes in ISO 20022, and is widely supported and used in the industry, including for the identification of indices.  There is industry support for leveraging alternative identifiers where appropriate.

Additionally, in keeping with the principle of global alignment, alternative identifiers may be more appropriate for identifying instruments traded outside the EU.  We note ISIN or UPI is not always available when trading ETDs outside the EU, which makes accurately reporting these instruments difficult under both EMIR and MiFIR

<ESMA\_QUESTION\_CASR\_1>

1. Do stakeholders agree with the proposed principles and related description? Is there any other aspect/principle that should be considered?

<ESMA\_QUESTION\_CASR\_2>

Yes, we agree with the four principles.  See answer to question 1 for our additional aspects/principles.

<ESMA\_QUESTION\_CASR\_2>

1. What are the key advantages of option 1a and how do these benefits address the issues in section 3?

<ESMA\_QUESTION\_CASR\_3>

We can see advantages to the proposal for delineation by instrument type in Option 1a, which would provide an opportunity to reduce duplication, including instances of differing terminology and definitions between reporting regimes.  Removing ETDs from EMIR reporting would bring the EU into global alignment and reduce duplication.  However, for OTC derivatives the approach in 1a would necessitate substantial amendments to EMIR to capture all the data points required for market abuse oversight. This is a non-trivial exercise and there would be costs to firms to make such changes. It would also put the EMIR reporting out of line with international regimes, where trade reporting does not typically capture the range of data points that would be needed to make EMIR compatible with the requirements of transaction reporting.

<ESMA\_QUESTION\_CASR\_3>

1. What are the key limitations and potential risks of option 1a? For example, do you consider the adaptation of the emir template to cover the data points used for market abuse surveillance as meeting the general objective of reducing the reporting burden, and why?

<ESMA\_QUESTION\_CASR\_4>

As indicated above, adapting EMIR to capture the data points for market abuse would be a significant lift in terms of changes to data fields. We consider this approach to have high cost, and consequently high risk. It would likely be simpler to maintain two distinct channels for trade and transaction reporting, though with potential areas for improvement and refinement as identified elsewhere in our response. Our preferred solution would be to focus case by case on leading inefficiencies, rather than opting for a big bang transformation.

The need for Personal Identification Information (PII) is currently supported by MiFIR reporting channels, including via Approved Reporting Mechanisms (ARMs). Depending on ESMA’s (and other EU authorities) long-term approach to reporting schemas, it would be possible for ARMs to submit this data to any ultimate destination including NCAs (as today), Trade Repositories or to ESMA as a central repository.

We also note that EMIR reports are submitted by the principals to the trade, be they financial or non-financial counterparties, whereas MiFIR requires reporting of executions and additionally transactions resulting from transmitted orders.  Merely adding the additional data points to an EMIR report would not be sufficient to capture all PII submitted by MiFID Investment Firms transmitting orders via a chain of executions. An important efficiency principle to reiterate in this context is that the entity with best access to information should report.

<ESMA\_QUESTION\_CASR\_4>

1. What components are missing or not adequately addressed in option 1a? Why are these elements important, and how might their inclusion change the evaluation or implementation of option 1a?

<ESMA\_QUESTION\_CASR\_5>

See response to previous question.

<ESMA\_QUESTION\_CASR\_5>

1. What are the key advantages of option 1b and how do these benefits address the issues in section 3?

<ESMA\_QUESTION\_CASR\_6>

Given the application of reporting obligations under MiFIR (Investment Firms) and EMIR (counterparties to the trade) are not aligned,  Option 1b is not preferred.  

The impact on non-investment firms’ financial counterparties and non-financial counterparties, who do not currently have a MiFIR reporting obligation, is not clear. Would these firms continue to report derivatives to Trade Repositories, or would they need to amend their reporting to align with MiFIR? Such a change would incur additional implementation burden and ultimately increase costs.  

As noted in Q4, and additionally in paragraph 166 of the Final Report on RTS 22, reporting of events under MiFIR and EMIR differs, and it is unclear how reporting derivative trades under MiFIR could preserve information scope, without significant change to the scope of MiFIR.

<ESMA\_QUESTION\_CASR\_6>

1. What are the key limitations and potential risks of option 1b?

<ESMA\_QUESTION\_CASR\_7>

As highlighted in the Call for Evidence, such an amendment risks diminishing the overall value of EMIR reporting and raises concerns regarding consistency with international standards and alignment

<ESMA\_QUESTION\_CASR\_7>

1. What components are missing or not adequately addressed in option 1b? Why are these elements important, and how might their inclusion change the evaluation or implementation of option 1b?

<ESMA\_QUESTION\_CASR\_8>

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<ESMA\_QUESTION\_CASR\_8>

1. What are the key advantages of option 2a and how do these benefits address the issues in section 3?

<ESMA\_QUESTION\_CASR\_9>

Clearly this option is more definitive in terms of addressing duplication and inconsistencies across regimes in the long run, by combining EMIR, MiFIR and SFTR reporting into one regime.   This approach would lead to the creation of a single reporting mandate of extreme granularity, encompassing all data points required under the three regimes.

As noted in paragraph 42 of ESMA’s Call for Evidence, we note that MiFIR and its associated reporting channels currently handle the widest instrument scope, the highest reporting volumes, and operate with established processes for the safe handling of PII.

<ESMA\_QUESTION\_CASR\_9>

1. What are the key limitations and potential risks of option 2a?

<ESMA\_QUESTION\_CASR\_10>

This approach, as mentioned above, is likely to result in extremely granular reporting templates for the purposes of handling all the variables across three reporting regimes. This would be a big lift in terms of the associated changes to firms’ reporting systems required to support such a change, involving significant redevelopment of IT infrastructure, data mapping, and compliance processes. The resulting investment in time, resources, and technology would translate into a **very substantial increase in adaptation costs** for market participants. Such an outcome would directly undermine one of the key policy objectives of the review—namely, to streamline requirements and reduce compliance costs—thereby defeating the cost-reduction driver of the exercise.   We also recognise that the legal changes required to implement such a fundamental reconfiguration of EU reporting would likely entail a protracted process, which represents a significant drawback to this approach.

<ESMA\_QUESTION\_CASR\_10>

1. What components are missing or not adequately addressed in option 2a? Why are these elements important, and how might their inclusion change the evaluation or implementation of option 2a?

<ESMA\_QUESTION\_CASR\_11>

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<ESMA\_QUESTION\_CASR\_11>

1. What are the key advantages of option 2b and how do these benefits address the issues in section 3? What regimes should be included in such an option beyond EMIR, MiFIR and SFTR?

<ESMA\_QUESTION\_CASR\_12>

The downsides are similar to those identified in the response to Q9, though more acute, given the even wider scope envisaged in this option.

<ESMA\_QUESTION\_CASR\_12>

1. What are the key limitations and potential risks of option 2b?

<ESMA\_QUESTION\_CASR\_13>

Please see response  to Q10.

<ESMA\_QUESTION\_CASR\_13>

1. What components are missing or not adequately addressed in option 2b? Why are these elements important, and how might their inclusion change the evaluation or implementation of option 2b?

<ESMA\_QUESTION\_CASR\_14>

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<ESMA\_QUESTION\_CASR\_14>

1. Which of the two main options (1. “removal of duplication in current frameworks” or 2. "report once") and related sub-options identified do you believe should be prioritised, and why?

<ESMA\_QUESTION\_CASR\_15>

Please see response to Q16.

<ESMA\_QUESTION\_CASR\_15>

1. Are there any additional options that should be considered on top of option 1 and 2? For example, do you identify other potential intermediate solutions, combinations of elements from the identified options, or phased approaches? If so, what are their main characteristics, the reasons for considering them, and the key advantages they would bring?

<ESMA\_QUESTION\_CASR\_16>

We support the identification of a long-term strategy for aligned regulatory reporting regimes which are simple for firms to implement. We recommend that, in considering strategy, ESMA focuses on the required data (for example as described in Principle 1) and the ultimate endpoints for such data (be it trade repositories, NCAs or ESMA).

With that strategy clearly articulated, both reporting entities and reporting infrastructure providers (ARMs, Trade Repositories, and technology providers), will choose from the appropriate options available to them to meet those requirements and may innovate and allow further phased opportunities to present themselves.

In theory, a firm could submit a single trade event for a derivative transaction to its ARM in the EMIR schema along with PII information, from which the ARM could create and send a MiFIR transaction report to an NCA or ESMA, and forward the EMIR report to the trade repository. If ESMA were to permit MiFIR reporting via the EMIR schema, the ARM could facilitate that change with little further implementation required from the client.

Many investment firms and some technology vendors (including Bloomberg) operate technology solutions which already facilitate the reporting of data through centralized technology to a variety of different endpoints. If ESMA establishes the consolidated target data set, and target destinations, then the market can solve the issue.

We do also see the possibility of considering a simplified less ambitious approach in the shorter term, which would focus on some or all of the following:

* Alignment of the relevant terminology across the EMIR and MiFIR reporting regimes.
* Ensuring global alignment in the use of data standards.
* Minimisation, where possible, of the duplication of reporting fields across EMIR and MiFIR.
* Removing ETDs from EMIR in order to bring the EMIR reporting in line with similar reporting in other jurisdictions and reduce the reporting burden overall.
* Deprecating dual-sided reporting in EMIR to reduce the number of reports which need to be submitted and managed, and to achieve greater global alignment.

In this context, we wish to draw ESMA's attention to the parallel work of the UK's Financial Conduct Authority, which is pursuing similar objectives. Any divergence between our interconnected markets risks creating significant operational complexity and duplicative compliance burdens. Therefore, we suggest ESMA also considers the FCA's work to foster a consistent approach, reducing burdens on firms and benefiting the market as a whole.

<ESMA\_QUESTION\_CASR\_16>

1. Should the reporting channels, and flows be modified to ensure consistent reporting, and if so, how? Under which option/s do you consider these changes should be implemented?

<ESMA\_QUESTION\_CASR\_17>

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<ESMA\_QUESTION\_CASR\_17>

1. In this regard, and based on the current order book requirements for trading venues and the availability of information, what are the advantages and disadvantages of transferring the reporting of on-venue transactions under MiFIR and EMIR to trading venues?

<ESMA\_QUESTION\_CASR\_18>

We do not consider it advantageous to transfer additional reporting of on-venue transactions under MiFIR and EMIR to investment firms operating trading venues.

Whilst investment firms operating trading venues have access to transaction data relating to the venues’ own participants, underlying client data is necessarily indirect and therefore not readily available to trading venue operators. As articulated in response to Q1, the reporting obligation should rest with the party that has the most direct access to the relevant transaction information. Where the party  is not subject to MiFIR (or EMIR), then imposing the obligation on a trading venue to obtain that information is inefficient, and is unlikely to produce high-quality reporting, since the only data that the trading venue has direct access to and visibility of,  relates to the  transactions executed on its systems.

Furthermore, as trading venue operators do not hold statutory powers to compel participants to provide such data (nor does legislation impose direct penalties on such participants for failure to do so – e.g., failure to provide to the venue complete client identifiers, allocation breakdowns, or lifecycle updates).  This effectively transfers regulatory risk from participants to trading venue operators, who only have limited contractual tools to enforce the provision of information required for regulatory reporting. As articulated previously, this is an existing concern under Article 26(5), and these proposals would further exacerbate the issue.   
   
Accuracy and data quality are maximised when the entity responsible for the regulatory report has direct access to the fullest set of transaction data, including the complete  transaction lifecycle. ESMA’s “report once” option explicitly contemplates one-sided reporting by financial entities and CCPs under a harmonised template—aligning regulatory accountability and exposure with direct access to / control over transaction data.

<ESMA\_QUESTION\_CASR\_18>

1. Additionally, what are your views on enhancing ESMA role as data hub by developing a framework where entities would report consistent and harmonised data directly to ESMA? Should this option consider direct reporting to ESMA coupled with EU and national authorities’ access to the centrally held data, eliminating multiple submissions?

<ESMA\_QUESTION\_CASR\_19>

In previous discussions related to the targeted consultation on integration of EU capital markets, and particularly the sections devoted to centralised supervision, we have posited that the centralisation of transaction reporting data would be a good and rational first step. This would act as a good proof-of-concept for further changes, as this is a well-defined domain where outcomes may be clearly measured against specific objectives. Such a move would directly supportESMA’s supervisory objectives of reducing regulatory burden and improving the efficiency and integration of EU capital markets. Data plays a critical role in regulatory decision-making, we would suggest that all of ESMAs focus should be on this topic.

<ESMA\_QUESTION\_CASR\_19>

1. In the case of centralisation of reporting, please expand on the advantages and disadvantages as well as the implementation challenges and opportunities? Under this scenario, what additional elements should be considered (i.e. Operational aspects, technical implementation, etc.)

<ESMA\_QUESTION\_CASR\_20>

As noted, it is important however to emphasize that the primary goal of centralisation is to simplify reporting processes, avoiding any duplication of reporting requirements with NCAs and ensuring that no additional costs are imposed on market participants.

<ESMA\_QUESTION\_CASR\_20>

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

<ESMA\_QUESTION\_CASR\_21>

It is appropriate to consider the potential role of technology in alleviating the reporting burden. However, in this context, it is not clear what specific challenges blockchain or DLT would address that could not more effectively be resolved through robust implementation of existing technologies. In particular, the core characteristics of DLT – transparency and decentralization of ownership, are not obviously well-suited the data used in transaction reporting. That said, there are already relevant initiatives underway , such as ISDA Digital Regulatory Reporting (DRR) based around the Common Domain Model (CDM), which provide a more practical route to improving the quality and efficiency of regulatory reporting. We would encourage regulatory authorities to remain open to innovation in this space, particularly the adoption of new data standards that can enhance data quality and reduce duplication.

<ESMA\_QUESTION\_CASR\_21>

1. Where do you think the cost associated with dual sided reporting is generated? What would be the cost impact of removing dual-sided reporting (e.g. Substituting reconciliation requirements with other measures such as audits against internal record systems as required in the U.S. or increase interaction among counterparties and NCAs)? Do you consider that dual sided reporting may reduce the ability of reporting entities to fully control the data submitted to authorities? Do you consider that the reporting should be strictly from one side?

<ESMA\_QUESTION\_CASR\_22>

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<ESMA\_QUESTION\_CASR\_22>

1. Would you consider the modification of reporting frequency useful under the general objective of reducing the reporting burden, and why? What would be the specific proposals in this regard?

<ESMA\_QUESTION\_CASR\_23>

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<ESMA\_QUESTION\_CASR\_23>

1. Proportionality measures: how do you consider proportionality can be taken into account in the context of burden reduction in regulatory reporting? What specific measures would you propose and how would you quantify their impact?

<ESMA\_QUESTION\_CASR\_24>

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<ESMA\_QUESTION\_CASR\_24>

1. Question for reporting entities under EMIR: what is the one-off cost of implementing EMIR requirements to date? This cost should include all cost lines, such as familiarisation with obligations, staff recruitment, training, legal advice, consultancy fees, project management and investment/updating in it. Do you identify any other relevant one-off cost line?

<ESMA\_QUESTION\_CASR\_25>

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<ESMA\_QUESTION\_CASR\_25>

1. Question for reporting entities under EMIR: what is your estimated average cost per transaction (on-going cost) to comply with the reporting requirements under EMIR? This cost should include not only the fees associated with reporting through trade repositories (which usually includes data collection and information storage) but also the total cost, including any other cost lines, such as, IT maintenance and support, training, data processing and audit fees. Do you identify any other relevant ongoing cost line?

<ESMA\_QUESTION\_CASR\_26>

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<ESMA\_QUESTION\_CASR\_26>

1. Question for reporting entities under MiFIR: what is the one-off cost of implementing mifir requirements to date? This cost should include all cost lines, such as familiarisation with obligations, staff recruitment, training, legal advice, consultancy fees, project management and investment/updating in it. Do you identify any other relevant one-off cost line?

<ESMA\_QUESTION\_CASR\_27>

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<ESMA\_QUESTION\_CASR\_27>

1. Question for reporting entities under MiFIR: what is your estimated average cost per transaction (on-going cost) to comply with the reporting requirements under MiFIR? This cost should include not only the fees associated with reporting through Approved Reported Mechanisms but also the total cost, including any other cost lines, such as, IT maintenance and support, training, data processing and audit fees. Do you identify any other relevant ongoing cost line?

<ESMA\_QUESTION\_CASR\_28>

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<ESMA\_QUESTION\_CASR\_28>

1. Question for reporting entities under EMIR or MiFIR: Are there other cost-factors that we should consider when estimating the cost saving over a long term horizon?

<ESMA\_QUESTION\_CASR\_29>

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<ESMA\_QUESTION\_CASR\_29>

1. What are the anticipated investments and transition costs associated with implementing option 1a, 1b, 2a and 2b (e.g. Decommissioning of legacy systems, adapting systems to new changes and future evolving requirements, etc.)? Please provide a detailed breakdown of these costs, including any one-off and ongoing expenses. What is the estimated average cost saving per transaction?

<ESMA\_QUESTION\_CASR\_30>

Whilst the impacts on Investment Firms and reporting entities is understandably the priority at this stage, we recommend ESMA engages with ARMs with a similar objective to questions 25-29 to establish the impact on the DRSP market.

<ESMA\_QUESTION\_CASR\_30>