

## OTC Derivatives Compliance Calendar

Updated: October 1, 2017

2017		
4Q 2017	EU	For the Financial Benchmarks Regulation (BMR), the European Securities and Markets Authority (ESMA) delivered its final proposal for most of the technical standards to the European Commission (EC) on March 30, 2017. On June 1 ESMA published a report on draft regulatory technical standards on cooperation with third countries under the EU Benchmarks Regulation. The draft version are expected to be close to final, and to be officially published at the end of 2017 (delay possible) after an endorsement by the EC and approval by the European Parliament and the Council of the EU. On June 23, the European Commission (EC) published draft delegated acts on the European Union (EU) Benchmarks Regulation for consultation until July 20. The EC is expected to publish its delegated acts for the European Parliament and the Council of the EU to approve and to be published in the EU Official Journal before the end of the year. The BMR regulation applies from January 1, 2018.
4Q 2017	UK	On June 2, ESMA published its methodological framework for mandatory benchmarks contributions under the Benchmarks Regulation, which has been followed by the UK Financial Conduct Authority's (FCA) June 12 consultation paper on powers in relation to LIBOR contributions. The FCA deadline to respond is August 12. The FCA was expected to publish a summary of responses and a policy statement in September 2017.
October 2017	UK	The UK Financial Conduct Authority's (FCA) consulted (June-August 2017) on proposed changes to their Handbook to accompany the application of the EU Benchmarks Regulation (BMR) from 1 January 2018. The FCA is expected to consider the industry feedback and publish its rules in a policy statement in October 2017.
October 1, 2017	US	Effective date of compliance with FDIC final rule Recordkeeping Requirements for Qualified Financial Contracts.
October 4, 2017	Canada	Canadian regulators have delayed the effective date for the mandatory clearing requirements for all other Canadian market participants until August 20, 2018 for all other Canadian market participants, assuming Ministerial approval. October 4, 2017 was the original effective date.
October / November 2017	O EU	European Commission expected to approve or amend the RTS on the trading obligation for derivatives under MiFIR.
November 1, 2017	O EU	Reporting of EMIR eligible trades under the newly published revised technical standards becomes applicable.
November 6, 2017	US	Expiration of an extension of relief to swap dealers from certain requirements of the U.S. final rule on margin requirements for uncleared swaps when transacting with counterparties subject to the corresponding EU rules (CFTC Letter No. 17-22).
November 13, 2017	US US	Effective date of the FRB's final rule Restrictions on Qualified Financial Contracts of Systemically Important U.S. Banking Organizations and the U.S. Operations of Systemically Important Foreign Banking Organizations; Revisions to the Definition of Qualifying Master Netting Agreement and Related Definitions

November 15, 2017	<b>US</b>	Expiration of CFTC relief for swap execution facilities from certain audit trail requirements in Commission Regulation 37.205 related to post-trade allocation information (CFTC Letter No. 15-68).
November 15, 2017	US	Expiration of an extension of relief to SEFs in connection with the execution of block trades (CFTC Letter No. 16-74).
November 15, 2017	US	<ul> <li>Expiration of relief for the following package transactions (CFTC Letter No. 16-76):</li> <li>MAT/New Issuance Bond</li> <li>MAT/Futures</li> <li>MAT/Non-MAT (Uncleared)</li> <li>MAT/Non-Swap Instruments</li> <li>MAT/Non-CFTC Swap</li> </ul>
November 26, 2017	Global	Deadline for responses to the LEI ROC's consultation on how funds relationships, including Umbrella Funds, Master-Feeder relationships, and other fund families, are recorded in the Global LEI System.
November 30, 2017	<b>US</b>	Expiration of extension of relief to Shanghai Clearing House allowing it to continue to clear certain swaps subject to mandatory clearing in China for the proprietary trades of its clearing members that are US persons or affiliates of U.S. persons (CFTC Letter No. 17-26).
December 1, 2017	US	Expiration of relief from Parts 45 and 46 for swaps with non-US counterparties that are not guaranteed affiliates, or conduit affiliates, of a US person (CFTC Letter No. 16-79) (previously No. 15-61).  Applies to CFTC-registered SDs and MSPs that are non-US persons established under the laws of Australia, Canada, the EU, Japan or Switzerland, and that are not part of an affiliated group in which the ultimate parent entity is a US: SD, MSP, bank, financial holding company or bank holding company.
December 15, 2017	EU	Transitional arrangements under CRR – which allow firms to treat exposures to yet-to-be-recognised CCPs as QCCP exposures – will expire on December 15, 2017. In particular, an Implementing Regulation was published in June allowing firms to treat exposures to yet-to-be-recognised CCPs as QCCP exposures for an additional six months until December 15, 2017.
December 15, 2017	Canada	Expiration of Blanket Order 96-501 which provides for harmonized discretionary relief from certain requirements in Multilateral Instrument 96-101 <i>Trade Repositories and Derivatives Data Reporting</i> , including for masking of counterparty identity, use of LEI to report counterparty and broker identification and local counterparty determination. Similar local relief issued by each of Alberta, New Brunswick, Nova Scotia, Saskatchewan, British Columbia, Newfoundland and Labrador, the Northwest Territories, Nunavut, Prince Edward Island and Yukon.
December 31, 2017	<b>US</b>	Expiration of an extension of relief to Eligible Affiliate Counterparties who do not claim the Inter-Affiliate Exemption from the trade execution requirement (CFTC Letter No. 16-80) (previously No. 15-62).

US	Expiration of an extension of relief to Eligible Affiliate Counterparties from the Outward-Facing Swaps Condition in the Inter-Affiliate Exemption (CFTC Letter No. 16-81) (previously No. 15-63).
<b>US</b>	Expiration of relief providing for the addition of Australia and Mexico to the list of jurisdictions eligible under the alternative compliance framework of Commission regulation 50.52(b)(4)(ii) used to satisfy the Outward-Facing Swaps Condition in the Inter-Affiliate Exemption (CFTC Letter No. 16-84).
Japan	Expiration of temporary exemption for licensing requirements for CCPs:
	<ul> <li>CDS on non-Japanese indices/entities: clearinghouses which were established in US and Europe and holds similar license as Japan</li> <li>IRS denominated in Korean Won: KRX</li> </ul>
	TKS denominated in Rolean Wolf. NKX
EU	MIFID 2/MIFIR Trading obligation for derivatives expected to come in to force.
US	SEC Regulation SBSR (Reporting and Dissemination of Security-Based Swap Information) Compliance.
EU	The European Commission published a legislative proposal on a CCP recovery and resolution framework on November 28, 2016. This legislative proposal was submitted to the European Parliament and the Council of the European Union for their consideration, probably mostly during 2017 and 2018, and subsequent adoption. The European Parliament's draft report is currently expected to be voted in January 2018.
US	Effective date of the FDIC's final rule Restrictions on Qualified Financial Contracts of Certain FDIC-Supervised Institutions; Revisions to the Definition of Qualifying Master Netting Agreement and Related Definitions
<b>E</b> U	Full application date of the EU Regulation on Financial Benchmarks.
○ EU	Implementation date for the Packaged Retail and Insurance-based Investment Products (PRIIPs) Regulation.
Australia	Basel III: Revised APRA prudential standard for securitisation (APS 120) takes effect.
Australia	Expected commencement date of the reforms to the regulation of financial benchmarks.
Singapore	Basel III: Amendments to the capital framework for securitisation exposures and interest rate risk in the banking book (IRRBB) takes effect (MAS Notice 637).
Malaysia	
Malayola	
	Japan  EU  US  EU  EU  EU  EU  Singapore

January 1, 2018	New Zealand	Basel III: Full implementation of CET1 (4.5%), Total Tier 1 (6%), Tier 1 + Tier 2 (8%).
January 1, 2018	Philippines	Basel III: Banks required to meet LCR (90%) threshold and adherence to the 5% Leverage Ratio commences.
January 1, 2018	Philippines	BSP requirements for banks to establish an effective reporting system to comply with BSP reporting standards (Circular No. 963) take effect.
January 1, 2018	Singapore	Basel III: NSFR and NSFR Disclosure implemented.
January 1, 2018	Malaysia	
	Singapore	Basel III: Leverage Ratio requirements implemented
January 1, 2018	Hong Kong	Basel III: Phase 1 Leverage Ratio requirements implemented
	Switzerland	
	Brazil	
	Canada	
January 1, 2018	Hong Kong	Basel III: SA-CCR implemented.
	Korea	
	Singapore	
January 1, 2018	Korea	Basel III: Capital requirements for CCPs implemented.
January 1, 2018	Australia	
	Hong Kong	Basel III: NSFR implemented.
	India	baser III. Not it implemented.
	* China	
	Indonesia	

January 2, 2018	O EU	Effective date of the NFA's Interpretive Notice to NFA Compliance Rule 2-49: Swap Valuation Dispute Filing Requirements (NFA Notice I-17-13).
January 3, 2018	O EU	MiFID2/MiFIR applies to firms.
January 3, 2018	O EU	EMIR margin rules for non-cleared derivatives will apply to physically settled FX forwards.
January 31, 2018	US	Expiration of relief to reporting counterparties clearing swaps through DCOs exempt from registration or CCPs provided relief from the requirement to register as a DCO. The reporting counterparties were granted relief from certain Part 45 reporting obligations. Relief was also granted pertaining to certain data field reporting requirements in Parts 43 and 45 (CFTC Letter No. 16-85).
February 5, 2018	<b>US</b>	Expiration of an extension of relief provided by the SEC in connection with the revision of the definition of "security" to encompass security-based swaps published in the Federal Register on January 25, 2017.
February 11, 2018	US	Expiration of certain SEC exemptions (e.g., from the Exchange Act) for security-based swaps. This is extended from February 2017. (Published in the Federal Register on February 15, 2017.)
February 28, 2018	Korea	End of the six-month transitional period for phase 2 entities for variation margin requirements under the Korean margin guidelines.
March 1, 2018	Australia	Risk mitigation requirements for non-centrally cleared derivatives under CPS 226 take effect.
April 1, 2018	Singapore	
	Hong Kong	Commencement of UTI "share-and-pair" obligations.
	Australia	
April 1, 2018	India	Basel III: SA-CCR implemented.
April 1, 2018	India	Basel III: Standards for the capitalization of banks' exposures to central counterparties implemented.
2H 2018	Korea	Expected commencement of trade reporting under the Financial Investment Services and Capital Market Act (FISCMA).
2H 2018	Singapore	Expected commencement of mandatory clearing under the Securities and Futures (Clearing of Derivatives Contracts) Regulations.
2H 2018	Malaysia	Expected commencement of pilot reporting regime for certain banks in Malaysia.
July 20, 2018	EU	Application of the Money Market Funds (MMFs) Regulation to new MMFs.

August 16, 2018	O EU	Transitional exemption from clearing for pension funds – permitted through a Delegated Act – expires.
August 20, 2018	Canada	Effective date for mandatory clearing requirements for all other Canadian market participants.
September 1, 2018	US	
	EU	
	Switzerland	
	Japan	
	Canada	Initial margin requirements apply under US PR, CFTC, Canada, Japanese, EU, Singapore, Hong Kong and Australian margin rules to Phase 3 entities.
	Singapore	Trong and Additional margin rules to Fridge & Childes.
	★ Hong Kong	
	Australia	
	Korea	
September 27, 2018	Australia	Expiry of ASIC Corporations (Repeal and Transitional) Instrument 2016/396, which provides relief for foreign financial services providers from the requirement to hold an Australian financial services licence when providing financial services to Australian wholesale clients.
4Q 2018	O EU	Effective date for clearing of derivatives by non-financials.
October 1, 2018	Singapore	Commencement of reporting of equity and commodity derivatives booked or traded in Singapore by banks and merchant banks, and reporting of Booking Location and Trading Desk Location fields by all Specified Persons.
December 21, 2018	<b>O</b> EU	The clearing obligation RTS for non-EEA IRS, including Basis, Fixed-to-float, FRA and OIS in EUR, GBP, JPY and USD took effect from June 21, 2016 for category 1 counterparties and from December 21, 2016 for category 2 counterparties. The clearing obligation will be in effect from December 21, 2018 for category 4 counterparties and June 21, 2019 for Category 3 counterparties. The Frontloading Obligation started on February 21, 2016 for Category 1 counterparties and May 2, 2016 for Category 2 counterparties.
December 31, 2018	US	Phase-in termination date of the swap dealer registration de minimis threshold.

2019	EU	European Commission's review of the European Supervisory Authorities (ESAs) was published on September 20, 2017. The Commission invites the European Parliament and the Council to discuss and agree these proposals as a matter of priority, in order to ensure their entry into force before the end of the current legislative term in 2019.
January 1, 2019	Hong Kong	Basel III: Capital Conservation Buffer (2.5%) full implementation.
January 1, 2019	Philippines	Basel III: Banks required to meet LCR (100%) threshold.
January 1, 2019	Singapore	Basel III: Phased in Capital Conservation Buffer (2.5%), Countercyclical Buffer (2.5%), expected for Liquidity Ratio.
January 1, 2019	Australia	Basel III: SA-CCR implemented.
	Singapore	
January 1, 2019	Australia	Basel III: Standards for the capitalization of banks' exposures to central counterparties
		implemented.
January 1, 2019	Singapore	Unmasking date for trades with counterparties where consent has not been received under the Securities and Futures (Reporting of Derivatives Contracts) (Amendment No. 2) Regulations 2017.
February 12, 2019	○ EU	Contracts entered into after August 16, 2012, the entry into force of EMIR and before February 12, 2014, the reporting start date (RSD), and no longer outstanding on the RSD must be reported to TRs. *Note: This was an extension to the previous compliance date (February 12, 2017) adopted when amended Implementing Technical Standards were published in the Official Journal in January 2017. The recent EMIR Refit proposal included an amendment removing this requirement to back report these expired trades completely, and this amendment is expected to be included in the final text adopted in 2018.
March 28, 2019	Australia	Expiry of ASIC Corporations (Repeal and Transitional) Instrument 2017/271, which provides relief for collective investment schemes from local registration and licensing requirements where the relevant overseas regulatory regime delivers regulatory outcomes sufficiently equivalent to the Australian regulatory regime.
March 31, 2019	India	Basel III: Capital Conservation Buffer (2.5%) phased in from March 2016.
April 1, 2019	India	Basel III: Large Exposures framework implemented.

June 21, 2019	O EU	The clearing obligation RTS for credit default swaps, including 5-year iTraxx Europe Main and Crossover contracts, series 17 onwards, entered into force on May 9, 2016. The clearing obligation took effect from August 9, 2017 for Category 2 counterparties. It will take effect from June 21, 2019 for Category 3 counterparties and May 9, 2019 for Category 4 counterparties. The Frontloading Obligation started on October 9, 2016 for both Category 1 and Category 2 counterparties.
June 21, 2019	O EU	The RTS for EEA interest rates derivatives, including SEK, PLN, and NOK fixed-to-float swaps and NOK, PLN and SEK forward rate agreements entered into force on August 9. The clearing obligation took effect from August 9, 2017 for Category 2 counterparties. It will take effect from June 21, 2019 for Category 3 counterparties and August 9, 2019 for Category 4 counterparties. The Frontloading Obligation started on October 9, 2016 for both Category 1 and Category 2 counterparties.
July 1, 2019	Singapore	Unmasking date for historical transactions with counterparties where consent has not been received under the Securities and Futures (Reporting of Derivatives Contracts) (Amendment No. 2) Regulations 2017.
July 20, 2019	O EU	Application of the Money Market Funds (MMFs) Regulation to MMFs that existed before the 20 <sup>th</sup> of July 2017 (date of entry into force of the regulation).
August 12, 2019	US	Expiration of relief from certain position aggregation requirements under Commission Regulation 150.4 (CFTC Letter No. 17-37).
September 1, 2019	US	
	EU	
	Switzerland	
	Japan	
	Canada	Initial margin requirements apply under US PR, CFTC, Canada, Japanese, EU, Singapore, Hong Kong and Australian margin rules to Phase 4 entities.
	Singapore	
	★ Hong Kong	
	Australia	
	Korea	

October 1, 2019	Singapore	Commencement of reporting of interest rate and credit derivative contracts traded in Singapore by finance companies, subsidiaries of banks incorporated in Singapore, insurers and holders of CMS licenses with annual aggregate gross notional amount of specified derivatives contracts of more than S\$5 billion, and all significant derivatives holders.
December 2019	Global	FRTB: Banks are required to report under the new market risk standards by end of 2019.
January 2020	Australia	
	₩ Hong Kong	Basel III: Market risk standards (FRTB) expected to be finalized.
	Singapore	
March 1, 2020	<b>US</b>	Expiration of relief to swap dealers operating in Japan providing for the posting and collection of variation margin to and from certain counterparties operating in Japan on a T+3 basis (CFTC Letter No. 17-13).
September 1, 2020	US US	
	EU	
	Switzerland	
	Japan	
	Canada	Initial margin requirements apply under US PR, CFTC, Canada, Japanese, EU, Singapore, Hong Kong and Australian margin rules to Phase 5 entities.
	Singapore	
	Hong Kong	
	Australia	
	Korea	
September 28, 2020	<b>US</b>	Expiration of an extension of relief and additional relief to reporting parties from certain data reporting requirements implemented in connection with the CFTC's Ownership and Control Reports final rule (CFTC Letter No. 17-45).

October 1, 2020	Singapore	Commencement of reporting of equity, commodity and FX derivative contracts booked or traded in Singapore by finance companies, subsidiaries of banks incorporated in Singapore, insurers and holders of CMS licenses with annual aggregate gross notional amount of specified derivatives contracts of more than S\$5 billion, and all significant derivatives holders.
December 31, 2020	EU	Date by which the European Commission has to publish a legislative proposal on the capital requirement regime for commodity trading firms.

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