



Research Note

Interest Rate Derivatives Trading Activity Reported in EU, UK and US Markets: September 2021

ISDA has expanded its SwapsInfo analysis to include interest rate derivatives (IRD) trading activity reported in Europe.

The analysis is based on transactions publicly reported by 30 European approved publication arrangements (APAs) and trading venues (TVs) for September 2021. The report analyzes European transactions based on the location of reporting venues (EU versus UK), currency, product taxonomy and execution venue.

The analysis also compares European IRD reported trading activity to what is reported in the US. US trading activity analysis is based on information from the Depository Trust & Clearing Corporation's (DTCC) swap data repository (SDR), which only includes trades that are required to be disclosed under US regulations.

EXECUTIVE SUMMARY

Total European IRD Trading Activity¹

- Total European IRD trading activity reported by APAs and TVs in the EU and UK was \$16.1 trillion in September 2021, the highest level since ISDA started tracking European trading activity in May 2021. Both UK and EU trading activity almost doubled in September compared to August 2021.
- Euro-denominated IRD traded notional increased to \$6.6 trillion in September from \$3.6 trillion in August 2021 and accounted for 41.0% of total European IRD traded notional. Sterling-denominated transactions grew to \$5.9 trillion from \$2.3 trillion over the same period and comprised 36.8% of total European traded notional in September 2021. Contracts denominated in US dollars increased to \$2.0 trillion in September from \$1.7 trillion in August 2021, equating to 12.5% of total European traded notional. Other currencies accounted for 9.8% of total traded notional².
- Overnight index swaps (OIS) rose to \$6.5 trillion in September 2021 (40.3% of total European IRD traded notional) from \$3.1 trillion in August 2021. Fixed-for-floating interest rate swaps (IRS) increased to \$6.4 trillion from \$4.1 trillion over the same period and accounted for 39.6% of total European IRD traded notional. Forward rate agreements (FRAs) totaled \$2.3 trillion, representing 14.1% of total European IRD traded notional in September 2021.
- 49.2% of total European IRD traded notional was executed on TVs, 39.3% was executed by systemic internalizers³ (SIs) and 11.4% was executed off venue⁴.

UK IRD Trading Activity

- Total IRD traded notional reported by APAs and TVs in the UK jumped to \$12.5 trillion in September 2021 from \$6.7 trillion in August, equating to 77.4% of total European IRD traded notional.
- Both sterling- and euro-denominated IRD trading activity saw significant increases. Sterling-denominated IRD traded notional climbed to \$5.9 trillion in September 2021 from \$2.3 trillion in August 2021, while euro-denominated IRD traded notional grew to \$3.6 trillion from \$1.9 trillion over the same period. Sterling-denominated trades comprised 46.9% of total UK IRD traded notional, euro-denominated trades represented 28.4% and US dollar-denominated transactions accounted for 14.0%. Other currencies accounted for 10.6% of total UK IRD traded notional.
- OIS traded notional increased to \$5.8 trillion in September from \$2.6 trillion in August 2021. Fixed-for-floating IRS rose to \$4.3 trillion from \$2.9 trillion, while FRAs climbed to \$1.6 trillion from \$0.8 trillion over the same period. OIS accounted for 46.0% of total UK IRD traded notional, fixed-for-floating IRS represented 34.4% and FRAs comprised 12.6%.
- 43.4% of total UK IRD traded notional was executed on TVs, 42.4% was executed by SIs and 14.2% was executed off venue.

¹ European IRD trading activity is measured by IRD traded notional and trade count reported by approved publication arrangements (APAs) and trading venues (TVs) in EU and UK. The list of APAs and TVs is included in Appendix 1

² Other currencies include South African rand, Japanese yen, Swedish krona, Norwegian krone, Polish złoty, Czech koruna and other. Cross-currency swaps are also included in other currencies

³ This includes financial instruments admitted to trading or traded on a trading venue, where a transaction on that financial instrument is executed by a systematic internalizer (SI). SIs are investment firms that deal on their own account by executing client orders outside a regulated market (RM) or TV

⁴ This includes financial instruments admitted to trading or traded on a trading venue, where a transaction on that financial instrument is not executed on a trading venue, systematic internalizer or organized trading platform outside the EU or where an investment firm does not know it is trading with another investment firm acting as an SI

EU IRD Trading Activity

- Total IRD traded notional reported by APAs and TVs in the EU was \$3.7 trillion in September 2021 compared to \$2.1 trillion in August 2021, accounting for 22.6% of total European IRD traded notional.
- Euro-denominated IRD traded notional rose to \$3.1 trillion in September from \$1.6 trillion the previous month. Euro-denominated IRD accounted for 84.0% of total EU IRD traded notional, while US dollar-denominated IRD comprised 7.0%. Other currencies accounted for 7.0% of total EU IRD traded notional.
- Fixed-for-floating IRS traded notional increased to \$2.1 trillion in September 2021 from \$1.3 trillion in August 2021. Fixed-for-floating IRS comprised 57.6% of total EU IRD traded notional, while FRAs and OIS totaled 19.3% and 20.7%, respectively.
- 69.2% of total EU IRD traded notional was executed on TVs, 28.8% was executed by SIs and 2.0% was executed off venue.

European and US IRD Trading Activity

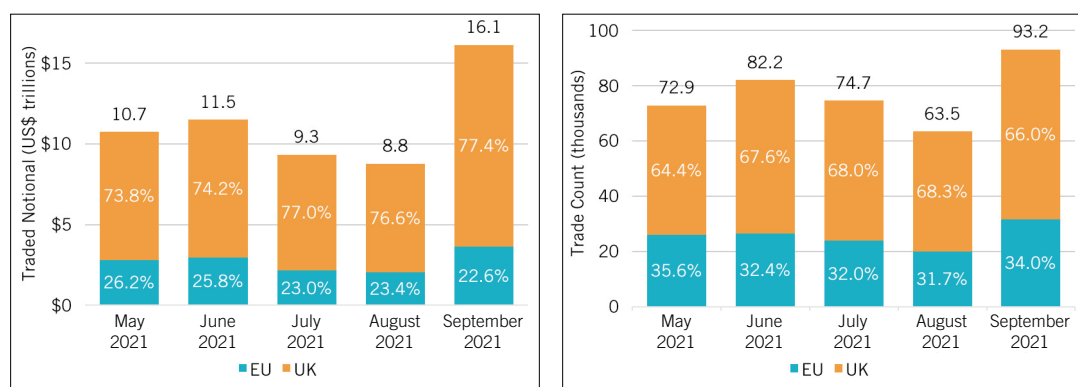
- IRD traded notional reported in the US increased to \$20.2 trillion in September 2021 compared to \$14.1 trillion in August 2021⁵. Combined EU, UK and US traded notional increased to \$36.4 trillion from \$22.9 trillion over the same period. US traded notional accounted for 55.6% of the combined total, while the EU and UK comprised 10.0% and 34.3%, respectively.
- Of the combined \$36.4 trillion in EU, UK and US IRD traded notional, 31.0% was denominated in US dollars, 32.3% was in euros and 25.1% was in sterling. Other currencies accounted for 11.7% of total EU, UK and US IRD traded notional. Australian dollar, Swedish krona and Japanese yen represented the largest share of other currencies.
- Total US dollar-denominated IRD traded notional totaled \$11.3 trillion in September 2021 compared to \$9.6 trillion in August 2021. 82.2% of total US dollar-denominated IRD traded notional was reported in the US. Total euro-denominated IRD traded notional rose to \$11.7 trillion in September 2021 from \$6.0 trillion in August 2021, while total sterling-denominated IRD traded notional increased to \$9.1 trillion from \$3.9 trillion over the same period. Reporting of euro-denominated transactions was split between the three jurisdictions, with 26.2% in the EU, 30.3% in the UK and 43.6% in the US. 64.3% of sterling-denominated IRD traded notional was reported in the UK, with the remainder reported in the US.
- Single currency fixed-for-floating IRS accounted for 39.7% of total EU, UK and US IRD traded notional in September 2021. OIS and FRAs accounted for 33.5% and 18.4%, respectively.

⁵ Based on data from the Depository Trust & Clearing Corporation (DTCC) swap data repository (SDR). This data covers only transactions required to be disclosed under US regulations. Most recent data on US trading activity is available on the ISDA SwapsInfo website <http://swapsinfo.org>

EUROPEAN IRD TRADING ACTIVITY

Total European IRD trading activity reported by APAs and TVs in the EU and UK was \$16.1 trillion in September 2021, the highest level since ISDA started tracking European trading activity in May 2021. Total trade count was 93.2 thousand. Traded notional reported in the UK accounted for 77.4% of total European IRD traded notional and 66.0% of total trade count (see Chart 1)⁶.

Chart 1: European IRD Traded Notional and Trade Count



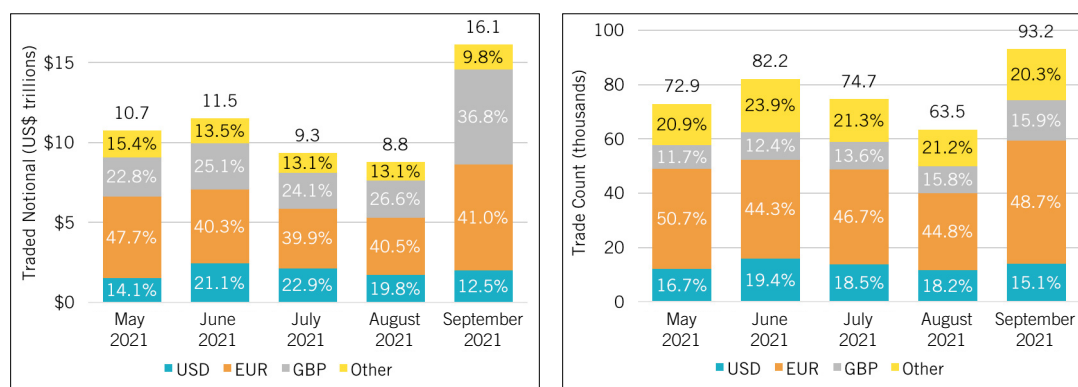
Source: European APAs and TVs

Euro-denominated IRD traded notional increased to \$6.6 trillion in September from \$3.6 trillion in August 2021 and accounted for 41.0% of total European traded notional and 48.7% of total trade count.

Sterling-denominated transactions grew to \$5.9 trillion in September 2021 from \$2.3 trillion the previous month, while contracts denominated in US dollars increased to \$2.0 trillion from \$1.7 trillion over the same period. Sterling-denominated transactions comprised 36.8% of total European traded notional and 15.9% of trade count, while contracts denominated in US dollars contributed 12.5% of total European traded notional and 15.1% of trade count (See Chart 2).

Other currencies accounted for 9.8% of total European IRD traded notional and 20.3% of total trade count. Swedish krona and South African rand represented the largest share of other currencies⁷.

Chart 2: European IRD Traded Notional and Trade Count by Currency



Source: European APAs and TVs

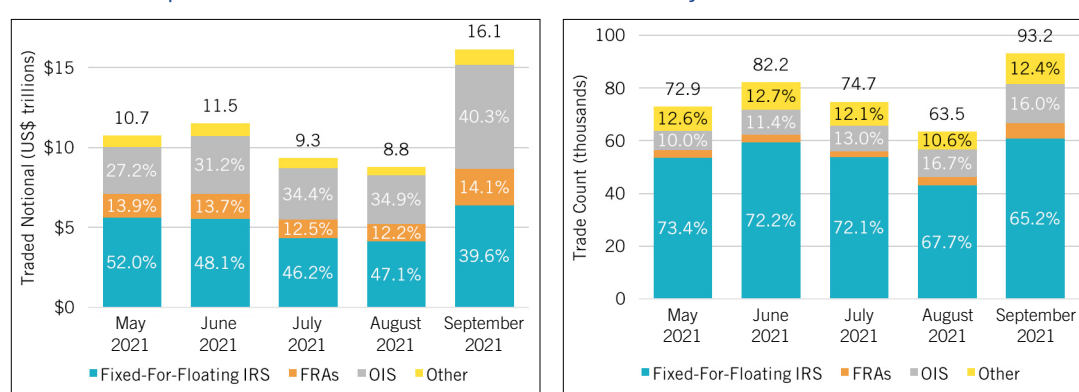
⁶ ISDA's dataset of European data starts in May 2021. See Interest Rate Derivatives Trading Activity Reported in EU, UK and US Markets: May 2021 www.isda.org/a/h6TgE/Interest-Rate-Derivatives-Trading-Activity-Reported-in-EU-UK-and-US-Markets-May-2021.pdf

⁷ Other currencies include South African rand, Japanese yen, Swedish krona, Norwegian krone, Polish złoty, Czech koruna and other. Cross-currency swaps are also included in other currencies

OIS traded notional jumped to \$6.5 trillion from \$3.1 trillion in August 2021 and represented 40.3% of total European IRD traded notional and 16.0% of total trade count.

Fixed-for-floating IRS increased to \$6.4 trillion in September from \$4.1 trillion the previous month. FRAs increased to \$2.3 trillion from \$1.1 trillion over the same period. Fixed-for-floating IRS accounted for 39.6% of total European IRD traded notional and 65.2% of trade count in September 2021, while FRAs represented 14.1% and 6.3% of total European traded notional and trade count, respectively (see Chart 3).

Chart 3: European IRD Traded Notional and Trade Count by Product



Source: European APAs and TVs

Nearly half (49.2%) of total European IRD traded notional was executed on TVs, 39.3% was executed by SIs⁸ and 11.4% was executed off venue⁹ in September 2021 (see Table 1).

Table 1: European IRD Traded Notional and Trade Count by Execution Venue (September 2021)

	TVs	SIs	Off-venue
UK Traded Notional	43.4%	42.4%	14.2%
EU Traded Notional	69.2%	28.8%	2.0%
Total European Traded Notional	49.2%	39.3%	11.4%
UK Trade Count	53.3%	33.8%	12.9%
EU Trade Count	71.6%	24.7%	3.6%
Total European Trade Count	59.6%	30.7%	9.7%

Source: European APAs and TVs

⁸ This includes financial instruments admitted to trading or traded on a trading venue, where a transaction on that financial instrument is executed by an SI. SIs are investment firms that deal on their own account by executing client orders outside a RM or TV

⁹ This includes financial instruments admitted to trading or traded on a trading venue, where a transaction on that financial instrument is not executed on a TV, SI or organized trading platform outside the EU or where an investment firm does not know it is trading with another investment firm acting as an SI

UK IRD TRADING ACTIVITY

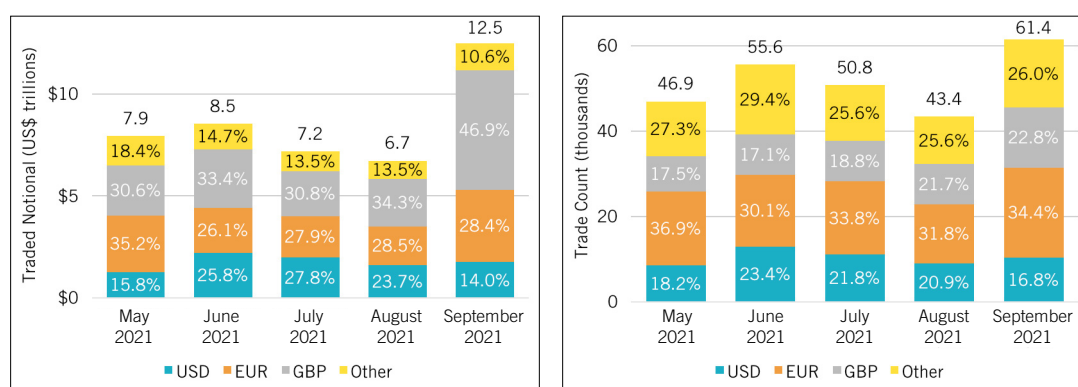
Total IRD traded notional reported by APAs and TVs in the UK climbed to \$12.5 trillion in September 2021 from \$6.7 trillion the previous month, while trade count increased to 61.4 thousand from 43.4 thousand over the same period. UK-reported trading activity accounted for 77.4% of total European IRD traded notional and 66.0% of total trade count (see Chart 1).

Both sterling- and euro-denominated trading activity saw significant increases in September. Sterling-denominated IRD traded notional rose to \$5.9 trillion from \$2.3 trillion in August 2021, while euro-denominated IRD traded notional grew to \$3.6 trillion from \$1.9 trillion over the same period.

Sterling-denominated transactions represented 46.9% of total UK IRD traded notional and 22.8% of total trade count in September 2021. Euro-denominated IRD accounted for 28.4% of total UK IRD traded notional and 34.4% of trade count, and US dollar-denominated IRD contributed 14.0% of total UK IRD traded notional and 16.8% of trade count (see Chart 4).

Other currencies accounted for 10.6% of total UK IRD traded notional and 26.0% of trade count. Swedish krona and Australian dollar represented the largest share of other currencies.

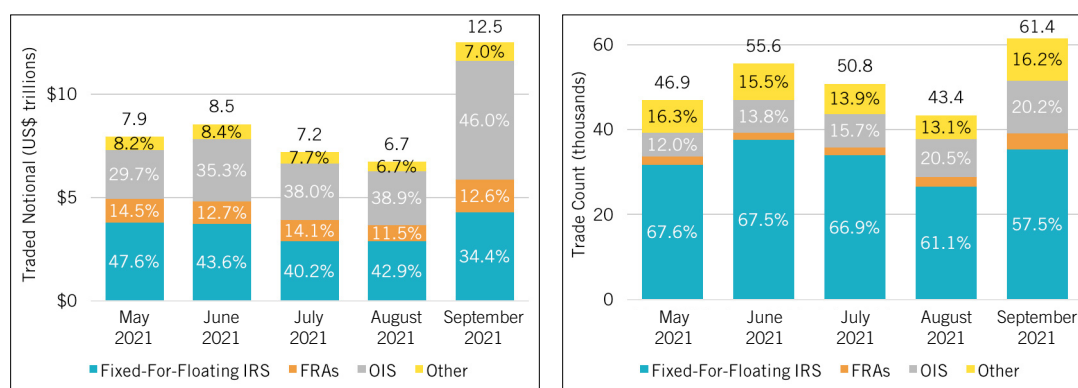
Chart 4: UK IRD Traded Notional and Trade Count by Currency



Source: European APAs and TVs

OIS traded notional increased to \$5.8 trillion in September 2021 from \$2.6 trillion in August 2021. Fixed-for-floating IRS jumped to \$4.3 trillion from \$2.9 trillion, while FRAs rose to \$1.6 trillion from \$0.8 trillion over the same period.

OIS accounted for 46.0% of total UK IRD traded notional and 20.2% of total trade count in September. Single currency fixed-for-floating IRS comprised 34.4% of UK IRD traded notional and 57.5% of UK IRD trade count, and FRAs accounted for 12.6% and 6.0% of total UK traded notional and trade count, respectively (see Chart 5).

Chart 5: UK IRD Traded Notional and Trade Count by Product

Source: European APAs and TVs

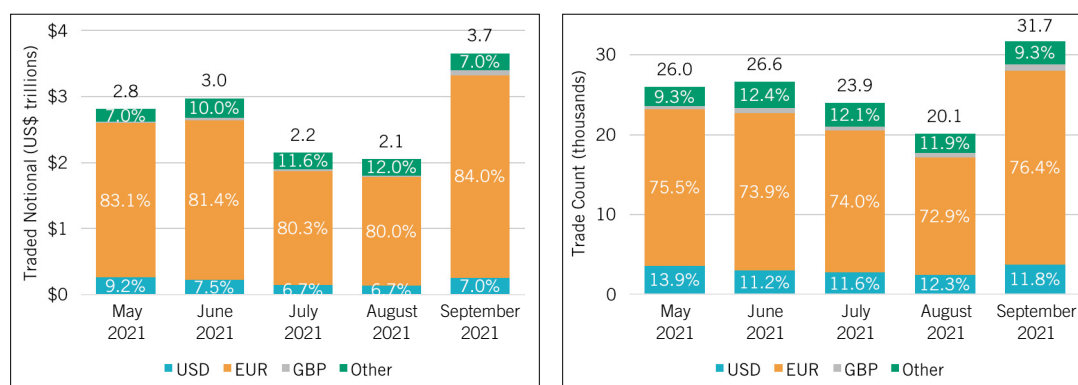
43.4% of total UK IRD traded notional and 53.3% of total trade count occurred on TVs. 42.4% of total UK IRD traded notional and 33.8% of trade count was executed by SIs, and 14.2% of traded notional and 12.9% of trade count took place off venue (see Table 1).

EU IRD TRADING ACTIVITY

Total IRD traded notional reported by APAs and TVs in the EU increased to \$3.7 trillion in September 2021 versus \$2.1 trillion in August 2021. Trade count increased to 31.7 thousand from 20.1 thousand over the same period. EU-reported IRD trading activity comprised 22.6% of total European IRD traded notional and 34.0% of total European trade count (see Chart 1).

Euro-denominated IRD traded notional jumped to \$3.1 trillion in September from \$1.6 trillion the previous month, accounting for the majority of trades reported in the EU. Euro-denominated IRD comprised 84.0% of total EU IRD traded notional and 76.4% of trade count. US dollar-denominated IRD accounted for 7.0% of total EU IRD traded notional and 11.8% of trade count, while sterling-denominated transactions represented only 2.0% and 2.5% of total EU IRD traded notional and trade count, respectively (see Chart 6).

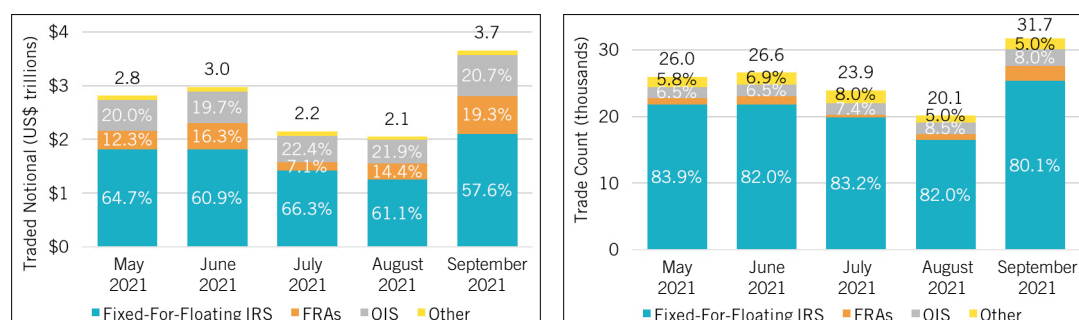
Other currencies accounted for 7.0% of total EU IRD traded notional and 9.3% of trade count. South African rand and Swedish krona represented the largest share of other currencies.

Chart 6: EU IRD Traded Notional and Trade Count by Currency

Source: European APAs and TVs

The composition of swaps reported in the EU differed from those reported in the UK, with a larger share of fixed-for-floating IRS and a smaller share of OIS. Fixed-for-floating IRS traded notional increased to \$2.1 trillion in September 2021 from \$1.3 trillion in August 2021 and comprised 57.6% of total EU IRD traded notional and 80.1% of total EU IRD trade count. FRAs and OIS accounted for 19.3% and 20.7% of total EU IRD traded notional and 6.9% and 8.0% of trade count, respectively (see Chart 7).

Chart 7: EU IRD Traded Notional and Trade Count by Product



Source: European APAs and TVs

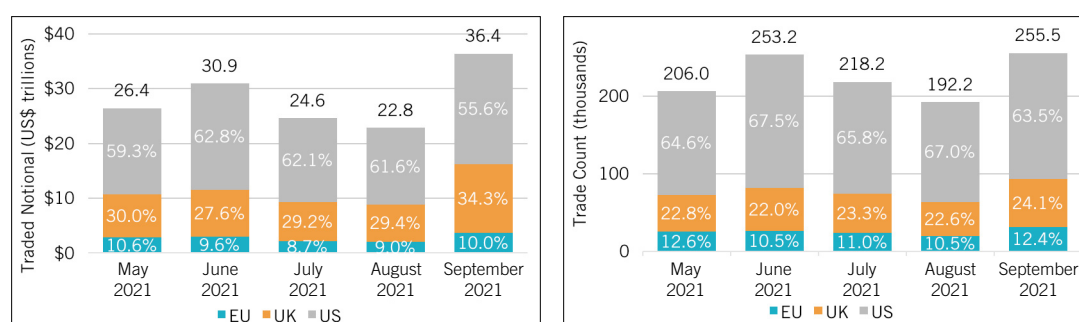
The share of IRD traded notional executed on TVs in the EU was significantly higher compared to the UK. 69.2% of total EU IRD traded notional and 71.6% of total EU IRD trade count took place on TVs, 28.8% of total traded notional and 24.7% of trade count was executed by SIs and 2.0% of traded notional and 3.6% of trade count occurred off venue (see Table 1).

EUROPEAN AND US IRD TRADING ACTIVITY

Total IRD traded notional and trade count reported in the US increased to \$20.2 trillion and 162.3 thousand, respectively, in September 2021 compared to \$14.1 trillion and 128.7 thousand in August 2021¹⁰. Combined EU, UK and US traded notional and trade count climbed to \$36.4 trillion and 255.5 thousand, respectively, in September from \$22.9 trillion and 192.2 thousand the previous month.

US traded notional accounted for 55.6% of combined EU, UK and US traded notional, while the EU and UK comprised 10.0% and 34.3%, respectively. US transactions represented 63.5% of total trade count, while the EU and UK accounted for 12.4% and 24.1%, respectively (see Chart 8).

Chart 8: US, UK and EU Traded Notional and Trade Count



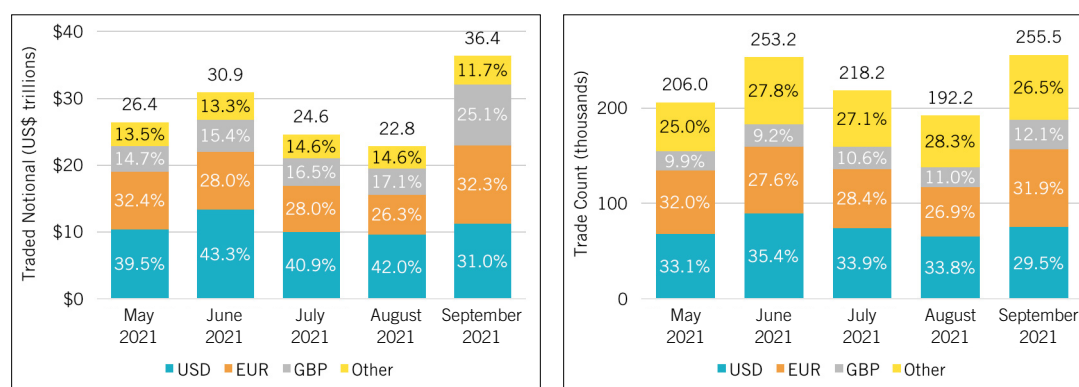
Source: DTCC SDR, European APAs and TVs

¹⁰ Based on data from the Depository Trust & Clearing Corporation (DTCC) swap data repository (SDR). This data covers only transactions required to be disclosed under US regulations. Most recent data on US trading activity is available on the ISDA SwapsInfo website <http://swapsinfo.org>

Of the combined \$36.4 trillion in EU, UK and US IRD traded notional, 31.0% was denominated in US dollars, 32.3% was in euros and 25.1% was in sterling. Of the 255.5 thousand in combined trade count, 29.5% was denominated in US dollars, 31.9% was in euros and 12.1% was in sterling (see Chart 9).

Other currencies accounted for 11.7% of combined traded notional and 26.5% of trade count. Australian dollar, Swedish krona and Japanese yen had the largest share of other currencies.

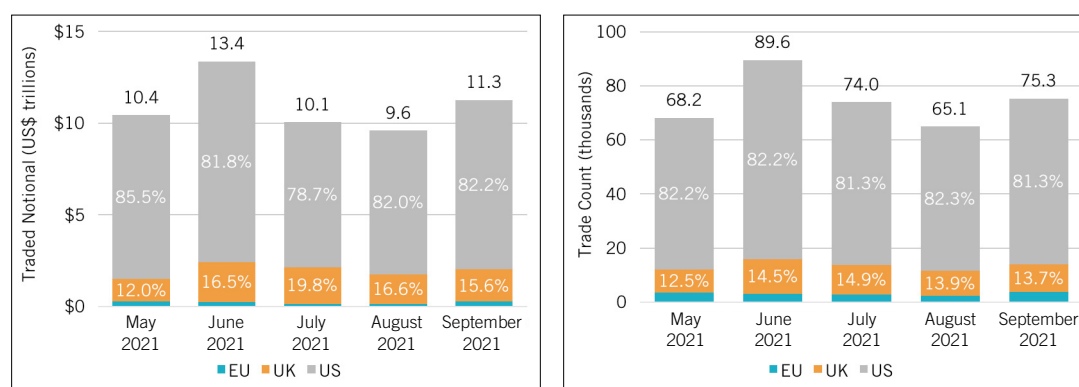
Chart 9: Combined US, UK and EU IRD Traded Notional and Trade Count by Currency



Source: DTCC SDR, European APAs and TVIs

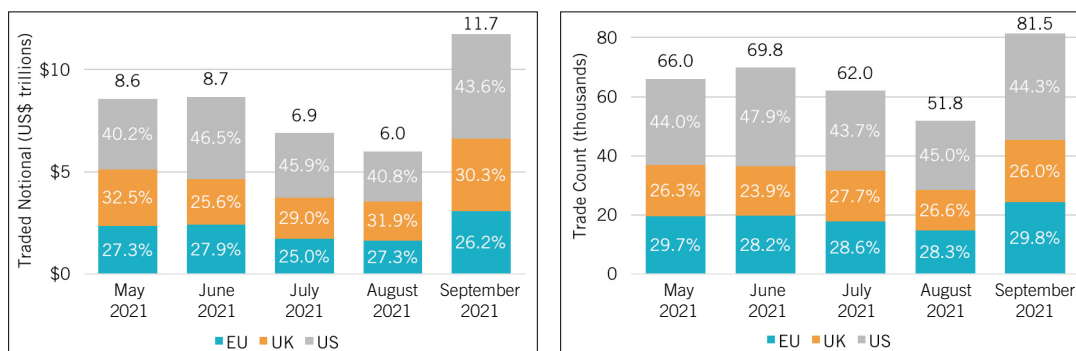
Total US dollar-denominated IRD traded notional totaled \$11.3 trillion in September 2021. 82.2% of total US dollar-denominated IRD traded notional and 81.3% of total trade count was reported in the US, while 15.6% of total US dollar-denominated traded notional and 13.7% of trade count was reported in the UK (see Chart 10).

Chart 10: Combined US Dollar-denominated IRD Traded Notional and Trade Count by Jurisdiction

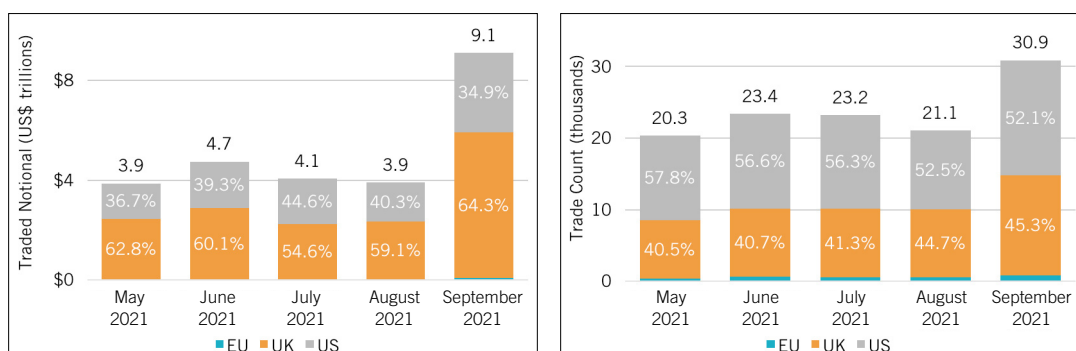


Source: DTCC SDR, European APAs and TVIs

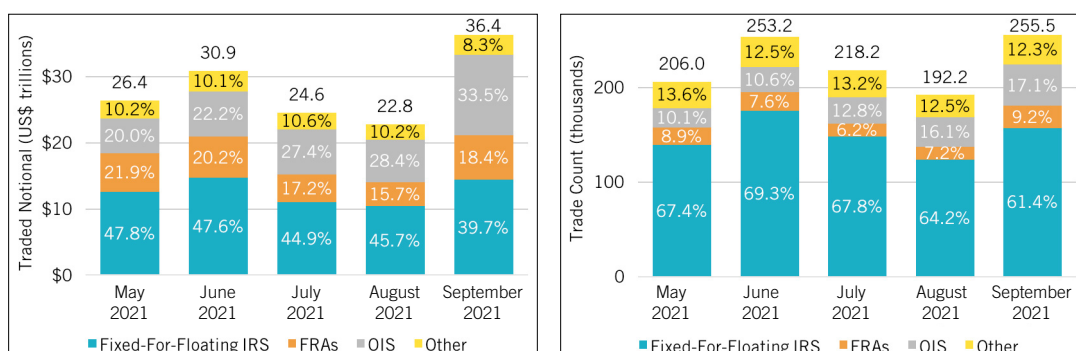
Total euro-denominated IRD traded notional rose to \$11.7 trillion in September 2021 from \$6.0 trillion in August 2021. Reporting of euro-denominated IRD transactions was split between the three jurisdictions: 26.2% of euro-denominated traded notional and 29.8% of trade count was reported in the EU; 30.3% of traded notional and 26.0% of trade count was reported in the UK; and 43.6% of euro-denominated traded notional and 44.3% of trade count was reported in the US (see Chart 11).

Chart 11: Combined Euro-denominated IRD Traded Notional and Trade Count by Jurisdiction

Total sterling-denominated IRD traded notional increased to \$9.1 trillion in September 2021 from \$3.9 trillion in August 2021. 64.3% of sterling-denominated IRD traded notional and 45.3% of trade count was reported in the UK, and 34.9% of sterling traded notional and 52.1% of trade count was reported in the US (see Chart 12).

Chart 12: Combined Sterling-denominated IRD Traded Notional and Trade Count by Jurisdiction

Single currency fixed-for-floating IRS accounted for 39.7% of combined EU, UK and US IRD traded notional and 61.4% of trade count in September. FRAs and OIS accounted for 18.4% and 33.5% of total combined traded notional and 9.2% and 17.1% of trade count, respectively (see Chart 13).

Chart 13: Combined US, UK and EU IRD Traded Notional and Trade Count by Product

APPENDIX 1: LIST OF MAJOR VENUES REPORTING OTC IRD TRANSACTIONS INCLUDED IN THE ISDA EUROPEAN IRD MARKETS DATASET

Venue Name	Venue Type	MIC	Region
Aurel BGC Paris	OTF	AURO	EU
BGC Brokers LP	OTF	BGCO	UK
Bloomberg BV APA	APA	BAPE	EU
Bloomberg BV MTF	MTF	BTFE	EU
Bloomberg UK APA	APA	BAPA	UK
Bloomberg UK MTF	MTF	BMTF	UK
GFI Brokers Limited	OTF	GFBO	UK
GFI Paris	OTF	GFPO	EU
ICAP EU OTF	OTF	ICOT	EU
ICAP Global Derivatives MTF	MTF	IGDL	UK
ICAP Securities OTF	OTF	IOTF	UK
iSWAP EU MTF	MTF	ISWP	EU
I-Swap Euro MTF	MTF	ISWA	UK
TP ICAP EU MTF	MTF	TPIC	EU
TP ICAP UK MTF	MTF	ICPM	UK
TRADEcho NL	APA	ECEU	EU
TRADEcho UK	APA	ECHO	UK
Tradeweb BV APA	APA	TWEA	EU
Tradeweb BV MTF	MTF	TWEM	EU
Tradeweb UK APA	APA	TREA	UK
Tradeweb UK MTF	MTF	TREU	UK
Tradition	OTF	TCDS	UK
Trad-X EU	MTF	TRXE	EU
Trad-X UK	MTF	TRDX	UK
Trax APA	APA	TRAX	UK
Trax NL APA	APA	TRNL	EU
TSAF OTC	OTF	TSAF	EU
Tullett Prebon EU OTF	OTF	TPEU	EU
Tullett Prebon Europe MTF	MTF	TPEL	UK
Tullett Prebon Europe OTF	OTF	TPEO	UK

APPENDIX 2: METHODOLOGY

European Data

ISDA's analysis of European-reported IRD trading data is based on transactions publicly reported by eight European APAs and 22 TVs¹¹.

Under European post-trade reporting requirements, “[i]nvestment firms which, either on own account or on behalf of clients, conclude transactions in bonds, structured finance products, emission allowances and derivatives traded on a trading venue shall make public the volume and price of those transactions and the time at which they were concluded”¹².

Trade information must be publicly disseminated either through an APA or by a TV through which a transaction was executed¹³. As of June 2021, there were 15 active APAs, 142 active multilateral trading facilities (MTFs) and 27 active organized trading facilities (OTFs) registered on the European Securities and Markets Authority's (ESMA) website¹⁴. In the UK, there were five registered APAs, 223 MTFs and 80 OTFs registered by the Financial Conduct Authority (FCA)¹⁵.

While ISDA's data set doesn't include all APAs and TVs that are registered with ESMA and the FCA, the trades reported by the 30 APAs and TVs included in this analysis are believed to cover most over-the-counter (OTC) IRD activity in Europe.

UK IRD trading activity is measured by IRD traded notional and trade count reported by APAs and TVs located in the UK, while EU IRD trading activity is measured by IRD traded notional and trade count reported by APAs and TVs located in the EU. Of the 30 APAs and TVs covered by this analysis, 17 are located in the UK and 13 are located in the EU.

To collect the data, ISDA set up daily feeds from the eight APAs and 22 TVs¹⁶. ISDA also set up a data feed from the Association of National Numbering Agencies' Derivatives Service Bureau to download new International Securities Identification Numbers (ISINs) for IRD transactions¹⁷. By matching IRD ISINs with all daily reported transactions that include various asset classes (equity, fixed income derivatives, etc), ISDA eliminated all non-IRD transactions and kept only the IRD data.

Using ISIN data, ISDA identified IRD instrument type (swap, option, forward, etc), IRD product taxonomy (fixed-for-floating IRS, FRAs, OIS, etc), underlying reference rate and tenor. Using trade details published by APAs and TVs, ISDA identified publication ID, trade data, publication data, venue of execution, notional amount, notional currency, cleared status and supplementary flags.

The ISDA data set includes only new trades. All cancelled transactions are removed and amended trades are updated using the original ID field. Transactions reported with a four-week aggregation flag and volume omission flag are also removed from the data set.

¹¹ The list of APAs and TVs is included in Appendix 1

¹² Markets in Financial Instruments Regulation Article 21 www.esma.europa.eu/databases-library/interactive-single-rulebook/clone-mifir/article-21

¹³ See Appendix 2 in the Interest Rate Derivatives Trading Activity Reported in EU, UK and US Markets: May 2021 for more detailed information on post-trade reporting requirements in Europe and US www.isda.org/a/MdMgE/Interest-Rate-Derivatives-Trading-Activity-Reported-in-EU-UK-and-US-Markets.pdf

¹⁴ European Securities and Markets Authority (ESMA) List of Registers https://registers.esma.europa.eu/publication/searchRegister?core=esma_registers_upreg

¹⁵ UK Financial Conduct Authority The Financial Services Register https://register.fca.org.uk/s/resources#Other_registers

¹⁶ Most APAs and TVs display data only for a short period of time and no historical data is available

¹⁷ Most APAs and TVs don't disclose asset class data and publish all transactions ISINs

Reported notional is converted to US dollars based on daily foreign exchange (FX) rates. All reported transactions are aggregated on a daily basis. Monthly traded notional referenced in this report represents the sum of converted traded notional of all transactions executed during the month. Monthly trade count represents the number of all transactions executed during the month.

Due to post-trade transparency deferrals, the majority of European transactions are published with a four- to five-week delay.

US Data

Analysis of US IRD is based on data from the DTCC SDR that only covers transactions required to be disclosed under US regulations¹⁸.

In the US, the Commodity Futures Trading Commission (CFTC) swap reporting rules were finalized in December 2011 and required all traded swaps to be reported by the end of 2013. These rules require key swap transaction and pricing data to be reported to US-registered SDRs as soon as technologically practicable after execution¹⁹.

There are three major SDRs in the US: DTCC SDR (reports all asset classes); CME (reports all asset classes except for equity); and ICE Trade Vault (reports credit, FX and commodities)²⁰. Almost all OTC IRD are reported by the DTCC SDR.

The DTCC SDR reports execution time stamp, effective date, expiration date, asset class, product taxonomy, notional amount, notional currency, underlying reference rate, execution venue, cleared status and other trade details²¹.

ISDA analysis includes only new transactions. All cancelled transactions are removed and amended trades are updated using the dissemination ID field. Reported notional is converted to US dollars based on daily FX rates. All reported transactions are aggregated on a daily basis.

Delays in reporting (generally 15 or 30 minutes, with a maximum of 24 business hours) are allowed for block trades (transactions with a notional above the minimum block size for the relevant asset class) and large notional trades.

Data Limitations

While ISDA believes this data covers the majority of OTC IRD transactions in Europe, it doesn't capture 100% of the market. First, it doesn't cover all APAs and TVs that are registered with ESMA and the FCA. Second, it captures only transactions that are subject to post-trade transparency reporting requirements. OTC derivatives that are not traded on TVs are considered 'traded on a trading venue' (TOTV) – and are therefore subject to the reporting and transparency requirements – if they share the same reference data details as derivatives traded on TVs²². Therefore, OTC derivatives not traded on TVs that are not TOTV are not captured.

¹⁸ See Appendix 2 for more detailed information on Post-trade Reporting Requirements in Europe and the US

¹⁹ Commodity Futures Trading Commission 17 CFR Part 43 Real-Time Public Reporting of Swap Transaction Data www.cftc.gov/sites/default/files/idc/groups/public/@lrfederalregister/documents/file/2011-33173a.pdf

²⁰ Bloomberg SDR was closed in August 2018 and all transactions were moved to DTCC SDR

²¹ DTCC SDR services <https://pddata.dtcc.com/gtr/cftc/dashboard.do>

²² ESMA Clarifies Traded On a Trading Venue Under MIFID II www.esma.europa.eu/press-news/esma-news/esma-clarifies-traded-trading-venue-under-mifid-ii

When European counterparties face US entities on a swap execution facility (SEF), ESMA does not require EU firms to systematically republish information in the EU about transactions executed on TVs outside the EU that are subject to transparency provisions similar to those applicable to EU TVs. Under US rules, SEFs are required to send relevant trade details to an SDR for real-time public dissemination²³. Therefore, these trades will be captured in US trading activity only, resulting in a potential understatement of European traded notional.

Trades executed on MTFs and OTFs between EU and US counterparties may be disseminated to the public twice. Since EU and US reporting rules have not been determined equivalent, trades executed on MTFs and OTFs are viewed as off-facility transactions for US real-time reporting purposes and are subject to the CFTC reporting rules. At the same time, MTFs and OTFs have an obligation to send trade details for public dissemination. Therefore, these trades may be double counted in European and US combined trading activity analysis.

The majority of block trades and large notional off-facility swaps (LNOFs) are reported to the DTCC SDR with a capped notional. Block trades and LNOFs are transactions above a designated notional threshold (block size). These transactions are reported with a delay at the capped amounts (cap size). As ISDA cleans up DTCC SDR data, all transactions that are reported with a '+' indicating a block trade are counted at the minimum notional. For example, a transaction reported with \$1,000,000+ notional would be counted as \$1,000,000 traded notional. As the result, total DTCC IRD traded notional is likely to be understated.

²³ A Practical Guide to Navigating Derivatives Trading on US/EU Recognized Trading Venues www.isda.org/a/CRmEE/ISDA-Publishes-Guide-to-Trading-on-US-EU-Trading-Venues-FINAL.pdf



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- ***SwapsInfo Third Quarter of 2021 and Year-to-September 30, 2021 Review***

www.isda.org/a/wRegE/SwapsInfo-Third-Quarter-of-2021-and-Year-to-September-30-2021-Review-Summary.pdf

- ***Interest Rate Derivatives Trading Activity Reported in EU, UK and US Markets: August 2021***

www.isda.org/a/GDUgE/Interest-Rate-Derivatives-Trading-Activity-Reported-in-EU-UK-and-US-Markets-August-2021.pdf

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ABOUT ISDA

Since 1985, ISDA has worked to make the global derivatives markets safer and more efficient. Today, ISDA has more than 960 member institutions from 78 countries. These members comprise a broad range of derivatives market participants, including corporations, investment

managers, government and supranational entities, insurance companies, energy and commodities firms, and international and regional banks. In addition to market participants, members also include key components of the derivatives market infrastructure, such as

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