























Updated: February 2024











\*New additions/content to the calendar are now **highlighted in red**. Please note that any deletions to the calendar are **NOT** emphasized.\*














2024		
<b>February 2024</b>	 <b>Australia</b>	<b>Expected issuance of 3rd consultation paper on OTC derivatives trade reporting.</b>
February 13, 2024	 <b>US</b>	<p>Effective: SEC rules for Security-Based Swap Execution and Registration and Regulation of Security-Based Swap Execution Facilities (See 88 Fed. Reg. 87156-87328 (December 15, 2023)).</p> <p>Comments due on CFTC proposed rule to amend the capital and financial reporting requirements of Swap Dealers (SDs) codifying the no-action position in CFTC Staff Letter No. <u>21-18</u>, as further extended by CFTC Staff Letter No. <u>23-11</u>, regarding alternate financial reporting requirements for SDs subject to the capital requirements of a prudential regulator, and amendments to revise certain Part 23 regulations regarding the financial reporting requirements of SDs, including the required timing of certain notifications; the process for approval of subordinated debt for capital; and the information requested on financial reporting forms to conform to the rules.</p>
<b>February 16, 2024</b>	 <b>US</b>	<p><b>Comment deadline for CFTC proposed rule “Protection of Clearing Member Funds Held by Derivatives Clearing Organizations” (See 89 Fed. Reg. 286-307 (Jan. 3, 2024)).</b></p> <p><b>Comment deadline for CFTC proposed guidance and request for public comment regarding the listing for trading of voluntary carbon credit derivative contracts. (See 88 Fed. Reg. 89410-89428 (Dec. 27, 2023)).</b></p>
February 26, 2024	 <b>US</b>	<p>Deadline for comments to CFTC’s Proposed Amendments to Swap Data Reporting Rules (Parts 43 and 45), including updates to the Technical Specifications. The notice of proposed rulemaking cites that the CFTC is proposing revisions to allow for continued geographic masking after the designation of the unique product identifier (UPI) for Commodities, and to add reportable data fields to Parts 43 and 45 that promote international harmonization and further the Commission’s surveillance and analysis activities, among other things. Link to the <u>Proposed Technical Specifications</u>. Link to the draft <u>Swap Data Rule Amendments</u></p>
March 1, 2024	 <b>EU</b>  <b>Switzerland</b>  <b>US</b>	














	Australia
	Canada
	Hong Kong
	South Korea
	Singapore
	Japan
	UK
	Brazil
	Saudi Arabia
	Mexico
	South Africa
















Three-month calculation period begins to determine whether the average aggregate notional amount of derivatives for an entity and its affiliates exceeds the lowest threshold for application or revocation of initial margin requirements as of the next relevant compliance date of either September 1, 2024, or January 1, 2025 (EU/UK/CHF). In the US, this calculation period only applies under CFTC regulations. In Mexico, the corresponding compliance date is December 31, 2025. Brazil is daily and all others are month-end for March, April, and May average aggregate notional amount.







<b>March 2, 2024</b>	 <b>US</b>	<b><i>Comment deadline for CFTC proposed Operational Resilience Framework for Futures Commission Merchants, Swap Dealers, and Major Swap Participants (See 89 Fed. Reg. 4706-4768 (Jan. 24, 2024)).</i></b>
March 15, 2024	 Mexico	Deadline for entities and investment funds to amend their master agreements for the exchange of margin for uncleared derivatives under the Banco de México's Circular 2/2023.
<b>March 18, 2024</b>	 <b>US</b>	<b><i>Effective: SEC Final Rules implementing Standards for Covered Clearing Agencies for U.S. Treasury Securities and Application of the Broker-Dealer Customer Protection Rule With Respect to U.S. Treasury Securities (See 89 Fed. Reg. 2714-2830 (Jan. 16, 2024)). Please see Part III of the final rule for compliance dates.</i></b>
<b>March 28, 2025</b>	 <b>UK</b>	<b><i>Publication of 3-month synthetic sterling LIBOR setting will cease.</i></b>












March 31, 2024	 Japan	Basel III: Implementation of revised credit risk, CVA, market risk (FRTB) for international active banks and domestic banks using IMM and the leverage ratio (based on the amendment published on March 28, 2023, the implementation date for ultimate parent companies of a broker-dealer (limited to those designated by JFSA) has been changed to March 31, 2025). After March 31, 2023, optionality for financial institutions wishing to implement earlier than the above period must submit a notification to the Financial Services Agency (limited to those designated by JFSA).
<b>Q2 2024</b>	 <b>EU</b>	<b><i>The European Commission (EC) has published the 3rd Capital Requirements Regulation (CRR III) proposal on October 27, 2021, which will implement the Basel 3 framework in Europe. The CRR III will transpose the market risk standards (FRTB) as a binding capital constraint, the output floor, the revised credit valuation adjustment framework, alongside operational and credit risk framework, amongst others. EU policymakers have agreed on a final trilogue deal on 27 June 2023. The technical work to finalize the agreed compromise wording came to a close in October. The European Parliament and Member States endorsed the trilogue text last December. The publication in the Official Journal and entry into force are now expected in Q2 2024 (April-May). The rules are set to apply from January 1, 2025</i></b>
April 1, 2024	 Japan	Go-live of revised JFSA reporting rules based on the CPMI-IOSCO Technical Guidance excluding Unique Product Identifier (UPI) and Delta. JFSA finalized the Guidelines of the revised reporting rules on December 9, 2022.
April 1, 2024	 India	The RBI published draft guidelines on minimum capital requirements for market risk as part of convergence with Basel III standards. Applicable to all commercial banks excluding local area banks, payment banks, regional rural banks, and small finance banks. Not applicable to cooperative banks.
<b>April 16, 2024</b>	 <b>Global</b>	<b><i>Comment deadline for BCBS, CPMI and IOSCO consultation, transparency and responsiveness of initial margin in centrally cleared markets – review and policy proposals.</i></b>
<b>April 17, 2024</b>	 <b>Global</b>	<b><i>Deadline for responding to the BCBS-IOSCO WGMR report on streamlining variation margin processes and initial margin responsiveness of margin models in non-centrally cleared markets.</i></b>
<b>April 24, 2024</b>	 <b>US</b>	<b><i>Comment deadline for <a href="#">CFTC request for information on the use of AI in CFTC-regulated markets</a>.</i></b>
April 29, 2024	 EU	Go-live of EMIR Refit reporting rules.
June 28, 2024	 EU	As part of CRR II, the European Banking Authority is to monitor and report to the European Commission on Required Stable Funding (RSF) requirements for derivatives (including margin treatment and the 5% gross-derivative liabilities add-on).
June 28, 2024	 EU	As part of the review clause inserted in CRR II, the European Commission taking into account the reports by the European Banking Authority are expected to review the treatment of repos and reverse repos as well as securities hedging transactions through a legislative proposal.












June 30, 2024	 EU	The EC to review the application of the Article 8 Taxonomy Regulation including the need for further amendments with regards to the inclusion of derivatives in the numerator of KPIs for financial undertakings.
July 1, 2024	 Singapore	With regards to the final Basel III reforms in Singapore, all standards, other than the revised market risk and credit valuation adjustment (CVA) standards, as required under the revised MAS Notice 637 on Risk Based Capital Adequacy Requirements for Banks Incorporated in Singapore will come into effect from 1 July 2024.  For revised market risk and CVA standards, only compliance with supervisory reporting requirements will come into effect from 1 July 2024.  The output floor transitional arrangement of 50% will commence from 1 July 2024 and reach full phase-in (72.5%) on 1 Jan 2029.
July 1, 2024	 Hong Kong	Implementation date for reporting-only requirement for market risk and CVA-risk.
July 1, 2024	 US	Expiry of CFTC Division of Market Oversight Letter 23-15, providing relief from the block and cap amendments.
July 12, 2024	 US	Compliance date: CFTC Governance Requirements for Derivatives Clearing Organizations (See 88 FR 44675- 44694 (July 13, 2023)).
August 31, 2024	 South Korea	Expiry of the FSS exemption from margin requirements for non-centrally cleared equity options.
September 1, 2024	 US  Australia  Canada  Hong Kong  South Korea  Singapore  Japan	<p>Under CFTC rules only, initial margin requirements apply to covered swap entities with material swaps exposure (average (month-end) aggregate notional amount from March, April, and May 2024 exceeding USD 8 billion).</p> <p>Initial margin requirements apply to Phase 6 APRA covered entities with an average (month-end) aggregate notional from March, April, and May 2024 amount exceeding AUD 12 billion.</p> <p>Under both OSFI and AMF guidelines, initial margin requirements apply to Phase 6 covered entities with average (month-end) aggregate average notional amount from March, April, and May 2024 exceeding CAD 12 billion.</p> <p>Initial margin and risk mitigation requirements apply to HKMA AIs and SFC LCs with an average (month-end) aggregate notional amount from March, April, and May 2024 exceeding HKD 60 billion.</p> <p>Initial margin requirements apply to financial institutions with derivatives exceeding more than average (month-end) aggregate KRW 10 trillion based on calculation from March, April, and May 2024.</p> <p>Initial margin requirements apply to MAS covered entities with an average (month-end) aggregate notional amount from March, April, May 2024 exceeding SGD 13 billion.</p> <p>Initial margin requirements apply to JFSA covered entities with an average (month-end) aggregate notional amount from March, April, and May 2024 exceeding JPY 1.1 trillion.</p>

	 Brazil	Initial margin requirements apply to financial institutions and other entities authorized to operate by the Central Bank of Brazil which have an average (daily) aggregate notional amount from March, April, and May 2024 exceeding BRL 25 billion.
	 South Africa	Initial margin requirements apply to a provider with average (month-end) aggregate notional amount from March, April, and May 2024 exceeding ZAR 8 trillion. (per amended rule pending finalization).
	 Saudi Arabia	Initial margin requirements apply to covered entities belong to a group whose average (month-end) aggregate notional amount of non-centrally cleared derivatives from March, April, and May 2024 exceeds EUR 8 billion.
September 28, 2024	 Canada	Multilateral Instrument 93-101, Business Conduct Rules become effective.
September 30, 2024	 UK	Go-live of UK EMIR Refit reporting.
<b>September 30, 2024</b>	 <b>UK</b>	<b>Publication of 1-,3- and 6-month synthetic US dollar LIBOR settings will cease.</b>
October 1, 2024	 US	Expiration of temporary CFTC relief regarding capital and financial reporting for certain non-US nonbank swap dealers (See CFTC Staff Letter No. 22-10 and CFTC Staff Letter No. 21-20) *relief would also expire upon the Commission's issuance of comparability determinations for the jurisdictions in question.
October 21, 2024	 Singapore	Go-live of the updated MAS OTC derivatives trade reporting regime.
<b>October 21, 2024</b>	 <b>Australia</b>	<b>Go-live of ASIC Derivative Transaction Rules (Reporting) 2024.</b>
<b>December, 2024</b>	 <b>South Korea</b>	<b>Expected go-live of UTI reporting (Phase 1).</b>
<b>December 31, 2024</b>	 <b>US</b>	<b>Expiration of relief under CFTC Letter No. 22-16 which extends no-action positions in response to Brexit for certain entity-level and transaction-level requirements, allowing reliance on EU Comparability Determinations until the earlier of (i) the effective date of any comparability determination issued for the UK to the extent such determination encompasses the subject matter of the EU Comparability Determinations; or (ii) December 31, 2024.</b>
December 31, 2024	 UK	The FCA direction under the temporary transitional powers allowing UK firms to execute certain trades with EU clients on EU venues (even though there is no UK equivalence decision in respect of those venues) expires at the end of 2024.
December 31, 2024	 Mexico	Deadline for banks, broker dealers and investment funds with average (month-end) aggregate notional amount from March, April, and May 2022 of UDI 20 billion to comply with the margin requirements for uncleared derivatives under Banco de México's Circular 2/2023.
2025 and beyond		
January 1, 2025	 EU	Expected implementation of FRTB and CVA risk under the CRR III proposal.













January 1, 2025	 US  EU  Switzerland  UK	<p>Under US Prudential Regulations only, initial margin requirements apply to covered swap entities with material swaps exposure (average (daily) aggregate notional amount from June, July, and August 2024 exceeding USD 8 billion).</p> <p>Initial margin requirements apply to counterparties with an average (month-end) aggregate notional amount from March, April, and May 2024 exceeding EUR 8 billion.</p> <p>Initial margin requirements apply to counterparties whose average (month-end) aggregate notional amount from March, April, and May 2024 exceeds CHF 8 billion.</p> <p>Initial margin requirements apply to counterparties with an average (month-end) aggregate notional amount from March, April, and May 2024 exceeding EUR 8 billion.</p>
January 1, 2025	 Singapore	<p>With regards to the final Basel III reforms in Singapore, compliance with capital adequacy and disclosure requirements for revised market risk and CVA standards will come into effect from 1 January 2025.</p> <p>The output floor transitional arrangement of 55% will commence from 1 January 2025.</p>
January 1, 2025	 Hong Kong	Implementation date for all standards under the Basel III final reform package.
January 1, 2025	 Taiwan	Implementation date for all Basel III standards.
March 1, 2025	 EU  Switzerland  US  Australia   Canada  Hong Kong  South Korea  Singapore	<p>Three-month calculation period begins to determine whether the average aggregate notional amount of derivatives for an entity and its affiliates exceeds the lowest threshold for application or revocation of initial margin requirements as of the next relevant compliance date of either September 1, 2025, or January 1, 2026 (EU/UK/CHF). In the US, this calculation period only applies under CFTC regulations. In Mexico, the corresponding compliance date is December 31, 2026. Brazil is daily and all others are month-end for March, April, and May average aggregate notional amount.</p>

	Japan
	UK
	Brazil
	Saudi Arabia
	Mexico
	South Africa

March 31, 2025	 Japan	Basel III: Implementation of revised credit risk, CVA, market risk (FRTB) for domestic banks not using IMM and ultimate parent companies of a broker-dealer (limited to those designated by JFSA).
April 7, 2025	 Japan	Implementation date for UPI and Delta under the revised Guideline on the JFSA reporting rules, which was finalized on November 21, 2023.
June 18, 2025	 UK	End of the temporary exemption for pension scheme arrangements from clearing and margining under UK EMIR.
June 30, 2025	 EU	The temporary recognition of UK CCPs (LME, ICE and LCH) under the EMIR 2.2 framework expires. Unless further addressed, following this date, EU firms could not have access to the UK CCPs and would need to relocate their clearing activities to EU CCPs. Under EMIR 2.2, ESMA has also performed its tiering assessment, with LME becoming a Tier 1 CCP whereas ICE and LCH are considered Tier 2 CCPs.
June 30, 2025	 EU	The temporary exemption from clearing and margin requirements for cross-border intragroup transactions under EMIR expires.
Q3 2025	 Hong Kong	Expected go-live of the updated HKMA and SFC OTC derivatives trade reporting regime.
July 1, 2025	 UK	Expected implementation of the Basel 3.1 standards.
July 1, 2025	 US	The Basel III endgame proposal has an effective date of July 1st, 2025, accompanied by a 3-year phase-in period for the new ERBA RWAs that starts at 80% of total RWA and phases in incrementally each year until July 1st, 2028.
September 1, 2025	 US  Australia  Canada	<p>Under CFTC rules only, initial margin requirements apply to covered swap entities with material swaps exposure (average (month-end) aggregate notional amount from March, April, and May 2025 exceeding USD 8 billion).</p> <p>Initial margin requirements apply to Phase 6 APRA covered entities with an average (month-end) aggregate notional amount from March, April, and May 2025 exceeding AUD 12 billion.</p> <p>Under both OSFI and AMF guidelines, initial margin requirements apply to Phase 6 covered entities with average (month-end) aggregate average notional amount from March, April, and May 2025 exceeding CAD 12 billion.</p>

	 Hong Kong	Initial margin and risk mitigation requirements apply to HKMA AIs and SFC LCs with an average (month-end) aggregate notional amount from March, April, and May 2025 exceeding HKD 60 billion.
	 South Korea	Initial margin requirements apply to financial institutions with derivatives exceeding more than average (month-end) aggregate notional amount of KRW 10 trillion based on calculation from March, April, and May 2025.
	 Singapore	Initial margin requirements apply to MAS covered entities with an average (month-end) aggregate notional amount from March, April, and May 2025 exceeding SGD 13 billion.
	 Japan	Initial margin requirements apply to JFSA covered entities with an average (month-end) aggregate notional amount from March, April, and May 2025 exceeding JPY 1.1 trillion.
	 Brazil	Initial margin requirements apply to financial institutions and other entities authorized to operate by the Central Bank of Brazil which have an average (daily) aggregate notional amount from March, April, and May 2025 exceeding BRL 25 billion.
	 South Africa	Initial margin requirements apply to a provider with average (month-end) aggregate notional amount from March, April, and May 2025 exceeding ZAR 8 trillion. (per amended rule pending finalization).
	 Saudi Arabia	Initial margin requirements apply to covered entities belong to a group whose average (month-end) aggregate notional amount of non-centrally cleared derivatives from March, April, and May 2025 exceeds EUR 8 billion.
September 30, 2025	 Mexico	Deadline for development banks and corporates with average (month-end) aggregate notional amount from March, April, and May 2022 of UDI 20 billion to comply with the margin requirements for uncleared derivatives under Banco de México's Circular 2/2023.
<b>Q4, 2025</b>	 <b>South Korea</b>	<b>Expected go-live of UPI and CDE reporting (Phase 2)</b>
November 15, 2025	 EU	The CRR 2 IMA reporting requirements for market risk will be applicable from November 15, 2025, in the EU. As things stand currently in the CRR 3 political process, these IMA reporting requirements may become obsolete as we are still looking at a January 1, 2025, start date for the capitalization of market risk in the EU. However, IMA Reporting could still become live if the European Commission decides to enact the two-year delay mentioned under the CRR3 Article 461a FRTB delegated act. As this may still evolve in the CRR 3 negotiations, ISDA will keep monitoring developments in this area.
December 1, 2025	 US	Expiry of extension of relief concerning swap reporting requirements of Part 45 and 46 of the CFTC's regulations, applicable to certain non-US swap dealers (SD) and major swap participants (MSP) established in Australia, Canada, the European Union, Japan, Switzerland and the United Kingdom, that are not part of an affiliated group in which the ultimate parent entity is a US SD, US MSP, US bank, US financial holding company or US bank holding company. See CFTC Staff Letters No. <a href="#">20-37</a> and <a href="#">22-14</a> .



<b>December 31, 2025</b>	 <b>Mexico</b>	<b>Annual compliance date for entities and investment funds to comply with the margin requirements for uncleared derivatives under Banco de México's Circular 2/2023 if average (month-end) aggregate notional amount exceeds UDI 20 billion from March, April, and May 2024.</b>
January 1, 2026	 Australia	Basel III: Expected implementation of APRA FRTB and CVA risk (APS 116 and APS 180) frameworks.
January 1, 2026	 Singapore	With regards to the final Basel III reforms in Singapore, the output floor transitional arrangement of 60% will commence from 1 January 2026.
January 1, 2026	 EU	Expiry of the suspension of the BMR rules allowing EU supervised entities to continue to use non-EU benchmarks.
January 1, 2026	 Switzerland	Expiry of the two-year derogation from margin rules in respect of non-centrally cleared over-the-counter derivatives, which are single-stock equity options or index options.
January 4, 2026	 UK	Expiry of the new two-year derogation from margin rules in respect of non-centrally cleared over-the-counter derivatives, which are single-stock equity options or index options.
January 4, 2026	 EU	Expiry of the new two-year derogation from margin rules in respect of non-centrally cleared over-the-counter derivatives, which are single-stock equity options or index options.
June 1, 2026	 EU	Commodity dealers as defined under CCR and which have been licensed as investment firms under MiFID 2/ MIFIR have to comply with real capital/large exposures/liquidity regime under Investment Firms Regulation (IFR) provisions on liquidity and IFR disclosure provisions.
December 31, 2026	 UK	Expiry of the temporary Intragroup Exemption Regime (TIGER) from clearing and margin requirements
January 1, 2027	 Singapore	With regards to the final Basel III reforms in Singapore, the output floor transitional arrangement of 65% will commence from 1 January 2027.
January 1, 2028	 Singapore	With regards to the final Basel III reforms in Singapore, the output floor transitional arrangement of 70% will commence from 1 January 2028.
January 1, 2028	 Singapore	With regards to the final Basel III reforms in Singapore, the output floor transitional arrangement of 72.5% will commence from 1 January 2029.

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