

ISDA OTC Derivatives Compliance Calendar

Updated: October 1, 2016

2016		
2016	O EU	Following the 'equivalence' decisions granted for the regulatory regimes of central counterparties (CCPs) in Australia, Hong Kong, Japan and Singapore on October 30, 2014 (under Article 25(6) of European Market Infrastructure Regulation (EMIR)), the European Commission (EC) granted further equivalence decisions for Switzerland, Mexico, South Africa, Canada and South Korea in November 2015, and granted equivalence with regards the US CFTC in March 2016. Further decisions are expected throughout 2016.
2016	O EU	Estimated publication of the Money Market Funds Regulation in the Official Journal of the European Union and entry into force.
2016	EU	Clearing and frontloading for G4 Interest Rate Derivatives under EMIR go live. The Regulatory Technical Standards (RTS) on clearing for Interest Rate Derivatives entered into force on December 21, 2015. Clearing commenced for Category 1 counterparties (clearing members) on June 21, 2016, and will commence on December 21, 2016 for Category 2 firms (financial counterparties who notional traded exceeds a pre-defined threshold). Trades entered into between Category 1 firms after February 21 will be subject to frontloading, while contracts entered into with Category 2 after May 21 will be subject to frontloading (if those trades have a minimum remaining maturity of six months at the end of the phase-in period).
2H 2016	Global	Expected BCBS finalization of CVA Risk Framework following extensive review.
2H 2016	O EU	The EC is expected to publish a review of EMIR and submit any appropriate proposals to the European Parliament and the Council. The scope of the review includes: CCP access to central bank liquidity; impact of EMIR on use of OTC derivatives by non-financial firms; and the functioning of the supervisory framework and colleges.
2H 2016	E U	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 will take effect from February 9, 2017 for Category 1 counterparties, August 9, 2017 for Category 2 counterparties, February 9, 2018 for Category 3 counterparties and May 9, 2019 for Category 4 counterparties. The Frontloading Obligation will start on October 9, 2016 for both Category 1 and Category 2 counterparties.
2H 2016	E U	A final draft report on revised technical standards for article 9 (reporting) of EMIR (ESMA/2015/1645) was submitted to the European Commission on November 13, 2015. The EC was expected to adopt or reject the technical standards within 3 months, i.e., until February 13, 2016. This has not been sent back to ESMA at this stage. However, ESMA has been preparing validation rules and other sundry documents to be ready for the return of the technical standards from the EC.

2H 2016	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 will take effect from February 9, 2017 for Category 1 counterparties, August 9, 2017 for Category 2 counterparties, February 9, 2018 for Category 3 counterparties and August 9, 2019 for Category 4 counterparties. The Frontloading Obligation will start on October 9, 2016 for both Category 1 and Category 2 counterparties.
4Q 2016	O EU	The European Commission's expected date for the publication of the Delegated Act on the Regulation on Financial Benchmarks.
October 2016	EU	EC expected to further endorse RTS (for which they have not have not expressed any objection) regarding MIFID 2/MIFIR RTS.
October 1, 2016	US	Effective date of the Prudential Regulators' final rule Margin and Capital Requirements for Covered Swap Entities published in the <i>Federal Register</i> on August 2.
October 3, 2016	US	Expiration of relief to Phase I firms from certain custodial requirements of Commission Regulation 23.157 (CFTC Letter No. 16-70).
October 4, 2016	O EU	EC expected to publish draft RTS on Non-Cleared Margin, beginning EP and Council scrutiny periods of these RTS.
October 5, 2016	US	Expiration of temporary exemption from compliance with SEC's SDR Rules (13n-1 to 13n-12 of the Securities Exchange Act of 1934).
October 11, 2016	US	Effective date of the SEC's final rule Regulation SBSR – Reporting and Dissemination of Security-Based Swap Information published in the <i>Federal Register</i> on August 12.
Mid-October 2016	Canada	Expected availability of the ISDA Regulatory Margin Self-Disclosure Letter on ISDA Amend.
	Japan Switzerland US	The ISDA Regulatory Margin Self-Disclosure Letter is intended to assist market participants with the exchange of the information necessary to determine if, and when, their trading relationship will become subject to regulatory margin requirements for uncleared swaps in one or more of the following jurisdictions: (i) Canada, (ii) the European Union, (iii) Japan, (iv) Switzerland, and (v) the US.
October 18, 2016	Japan Switzerland	with the exchange of the information necessary to determine if, and when, their trading relationship will become subject to regulatory margin requirements for uncleared swaps in one or more of the following jurisdictions: (i) Canada, (ii) the European Union, (iii) Japan, (iv) Switzerland, and (v) the US. Deadline to submit comments to the Office of the Comptroller of the Currency's proposed rule Mandatory Contractual Stay Requirements for Qualified Financial Contracts published in the
October 18, 2016 October 31, 2016	Japan Switzerland US	with the exchange of the information necessary to determine if, and when, their trading relationship will become subject to regulatory margin requirements for uncleared swaps in one or more of the following jurisdictions: (i) Canada, (ii) the European Union, (iii) Japan, (iv) Switzerland, and (v) the US. Deadline to submit comments to the Office of the Comptroller of the Currency's proposed rule
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October 31, 2016	Japan Switzerland US US US	with the exchange of the information necessary to determine if, and when, their trading relationship will become subject to regulatory margin requirements for uncleared swaps in one or more of the following jurisdictions: (i) Canada, (ii) the European Union, (iii) Japan, (iv) Switzerland, and (v) the US. Deadline to submit comments to the Office of the Comptroller of the Currency's proposed rule Mandatory Contractual Stay Requirements for Qualified Financial Contracts published in the Federal Register on August 19. Expiration of relief to Singapore Exchange Derivatives Clearing Limited from the requirement to submit daily position reports comporting with certain revisions (CFTC Letter No. 16-06). Anticipated launch of ISDA Amend functionality for ISDA Variation Margin Protocol. This

November 1, 2016	US	Effective date of the SEC's final rule Access to Data Obtained by Security-Based Swap Data Repositories published in the Federal Register on September 2.
November 1, 2016	Canada	Commencement of trade reporting by non-dealers in Alberta, British Columbia, New Brunswick, Northwest Territories, Nova Scotia, Nunavut, Prince Edward Island, Saskatchewan and Yukon. Commencement of trade reporting by clearing agencies, dealers and non-dealers in Newfoundland and Labrador.
November 11, 2016	Australia	Deadline for responses to APRA's consultation on proposed revisions to the counterparty credit risk framework for ADIs and minor amendments to Prudential Standard APS 112.
November 14, 2016	US	Deadline to submit comments to the OCC's proposed rule Industrial and Commercial Metals published in the <i>Federal Register</i> on September 15.
Mid-November 2016	US	Deadline to submit comments to the FDIC's proposed rule Restrictions on Qualified Financial Contracts of Certain FDIC-supervised Institutions; Revisions to the Definition of Qualifying Master Netting Agreement and Related Definitions.
November 15, 2016	US	 Expiration of relief for the following package transactions (CFTC Letter No. 15-55): MAT/New Issuance Bond MAT/Futures MAT/Non-MAT (Uncleared) MAT/Non-Swap Instruments MAT/Non-CFTC Swap
November 15, 2016	US	Expiration of relief to SEFs from the requirement that a block trade occur away from the registered SEF's or DCM's trading system or platform (under Commission Regulation 43.2) (CFTC Letter No. 15-60).
November 16, 2016	O EU	The European Commission's expected date for the publication of a legislative proposal for the CCP Recovery and Resolution Framework for Financial Institutions other than Banks.
November 16, 2016	Mexico	The implementation time frame of the trading and central clearing requirements for banks and brokerage firms that trade with foreign financial institutions or foreign institutional investors (for example, hedge funds).
November 17, 2016	US	Expiration of relief to Reporting Traders from the requirement to report via New Form 40/40S and Reporting Parties from the requirement to report via New Form 71 (CFTC Letter No. 16-32).
November 21, 2016	O EU	Deadline to respond to ESMA's Discussion Paper on the trading obligation for derivatives under MiFIR.
November 21, 2016	₩ Hong Kong	Deadline for responses to the SFC's consultation on enhancements to the position limit regime.
December 2016	O EU	Non-Cleared Margin RTS expected to be published in Official Journal, following finalization following EP and Council scrutiny period.

December 1, 2016	US	 Expiration of relief from Parts 45 and 46 for swaps with non-U.S. counterparties that are not guaranteed affiliates, or conduit affiliates, of a US person (CFTC Letter No. 15-61) (previously No. 14-141). 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 1, 2016	Canada	Deadline for dealers and clearing agencies to report data for pre-existing transactions in Alberta, British Columbia, New Brunswick, Newfoundland and Labrador, Northwest Territories, Nova Scotia, Nunavut, Prince Edward Island, Saskatchewan and Yukon.
December 1, 2016	Japan	Entities subject to mandatory clearing to be expanded to include insurance companies and trust funds which have over JPY 300 billion outstanding.
December 2, 2016	EU	Deadline to respond to the ESMA consultation on draft technical standards for the Regulation on Financial Benchmarks. ESMA is due to deliver its final proposal for technical standards to the European Commission by April 2017.
Mid-December 2016	US	Effective date of the CFTC's final rule Clearing Requirement Determination under Section 2(h) of the Commodity Exchange Act for Interest Rate Swaps.
December 15, 2016	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, 2016. 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, 2016.
December 16, 2016	US	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. 15-62).
December 22, 2016	US	Deadline to submit comments to the FRB's proposed rule Risk-based Capital and Other Regulatory Requirements for Activities of Financial Holding Companies Related to Physical Commodities and Risk-based Capital Requirements for Merchant Banking Investments.
December 27, 2016	US	Compliance Date for the CFTC's Final Rule to Amend Swap Data Recordkeeping and Reporting Requirements for Cleared Swaps under its Part 45 Rule.
December 31, 2016	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. 15-63).
December 31, 2016	EU	Regulation on Packaged Retail and Insurance-based Investment Products (PRIIPs) applies to firms.
December 31, 2016	Japan	 Expiration of temporary exemption for licensing requirements for CCPs: CDS on non-Japanese indices/entities: clearinghouses which were established in US and Europe and holds similar license as Japan IRS denominated in Korean Won: KRX
End 2016	EU	Capital Requirements Directives (CRD): Report including, as appropriate, a legislative proposal to introduce the leverage ratio as a binding measure as of 2018.

End 2016	Singapore	Expected release of the Securities and Futures (Clearing of Derivatives Contracts) Regulations (with commencement mid 2017).
End 2016	** China	Basel III: full implementation of CET1 (5%), Total Tier 1 (6%) and NSFR.
2017 and beyond		
1Q 2017	Global	Expected finalisation and publication of CPMI-IOSCO recommendations on the unique product identifier (UPI).
1Q 2017	O EU	ESMA aims to publish a consultation paper on the trading obligation for derivatives under MiFIR.
1Q 2017	Switzerland	Under the Swiss Financial Market infrastructure Act (FMIA/FinfraG in German), OTC derivative contracts traded by Swiss entities (and their foreign branches) are to be reported to trade repositories approved by FINMA (the Swiss regulator). Reporting of OTC derivatives will be required 6 months after the approval of the first trade repository by FINMA (Swiss regulator). Therefore reporting is currently projected to be beginning at the earliest in Q1 2017.
2Q 2017	Singapore	Expected commencement of reporting of equity and commodity derivatives under the Securities and Futures (Reporting of Derivatives Contracts) Regulations.
2Q/3Q 2017	O EU	ESMA aims to submit a draft technical standard to the European Commission on the trading obligation for derivatives under MiFIR in the summer of 2017.
January 2017	İsrael	OTC derivative contracts in ILS are to be subject to a reporting requirements. Final order was published at the start of June 2016 along with sundry detailed documentation about the reporting specifications. Reporting then begins six months after publication of the final order – expected January 1, 2017.
January 1, 2017	Global	The revised standardized approach for credit counterparty risk (SA-CCR) becomes effective for OTC derivatives, exchange traded derivatives and long settlement transactions as per Basel transitional arrangements.
January 1, 2017	Global	Required implementation date of the final BCBS standards for the capitalization of banks' exposures to central counterparties.
January 1, 2017	Singapore	Basel III: SA-CCR implemented.
January 1, 2017	Singapore	Basel III: Standards for the capitalization of banks' exposures to central counterparties implemented.
January 16, 2017	Canada	Trade repositories required to make transaction level data reports available to the public for all provinces and territories in Canada.

January 16, 2017	Canada	Public dissemination of transaction level data commences in Manitoba, Ontario and Quebec.
January/February 2017	EU	Approximate first effective date for firms subject to IM and VM (>€3 trillion) in Phase 1 under EU Non-Cleared Margin RTS.
February 1, 2017	Canada	Deadline for non-dealers to report data for pre-existing transactions in Alberta, British Columbia, New Brunswick, Newfoundland and Labrador, Northwest Territories, Nova Scotia, Nunavut, Prince Edward Island, Saskatchewan and Yukon.
February 11, 2017	US	Expiration of certain SEC exemptions (e.g., from the Exchange Act) for security-based swaps. This is extended from February 2014.
February 12, 2017	O 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: An amendment to extend this date to February 12, 2019 has been proposed in revised technical standards for article 9 (reporting) of EMIR (ESMA/2015/1645).
February 21, 2017	US	Compliance date of the SEC's final rule Application of Certain Title VII Requirements to Security-Based Swap Transactions Connected with a Non-U.S. Person's Dealing Activity That Are Arranged, Negotiated, or Executed By Personnel Located in a U.S. Branch or Office or in a U.S. Branch or Office of an Agent.
March 2017	Philippines	Expected commencement of trade reporting under the BSP's final reporting guidelines (expected to be released in November 2016).
March 1, 2017	US Japan Canada	Variation margin requirements apply under US PR, CFTC, Canada OSFI and Japanese margin rules.
March 1, 2017	US	Expiration of an extension of relief from the requirements under Parts 20, 45 and 46 to disclose certain counterparty identifying information (CFTC Letter No. 16-03).
March 1, 2017	US	Expiration of relief to Reporting Parties from the requirement to disclose certain counterparty identifying information on Form 102A and Form 102B (CFTC Letter No. 16-33).
March 31, 2017	US	Expiration of an extension of relief to SEFs regarding previously-negotiated freestanding agreements (CFTC Letter No. 16-25).
March 31, 2017	India	Basel III: Fully phased in CET1 (5.5%), Total Tier 1 (7%), Tier 1 + Tier 2 (9%).
March/April 2017	O EU	Effective date for VM for financial counterparties except those already covered by VM requirements under Phase 1.

April 1, 2017	Japan	Regulation to include stay provisions in Master Agreement covering certain financial contracts (OTC derivative transactions, financial and other derivative transactions, sale or purchase of securities on condition of repurchase or resale, lending and borrowing of securities, trading of bonds with options, FX forward transactions, OTC commodity derivative transactions, etc.) comes into forth.
April 1, 2017	India	Basel III: SA-CCR implemented.
April 1, 2017	India	Basel III: Standards for the capitalization of banks' exposures to central counterparties implemented.
May 31, 2017	US	Expiration of relief to Shanghai Clearing House permitting it to clear certain proprietary trades of US clearing members and their affiliates (CFTC Letter No. 16-56).
June 1, 2017	O EU	Prohibition of proprietary trading under EC Bank Structural proposal effective.
June 15, 2017	US	Expiration of relief to SEFs and DCMs toward the resubmission of swap trades with clerical or operational errors (CFTC Letter No. 16-58).
June 30, 2017	Singapore	Expiry of relief for masking counterparty identity where consent has not been received under the Securities and Futures (Reporting of Derivatives Contracts) (Amendment) Regulations 2015.
June 30, 2017	Philippines	Banks required to commence reporting on repo activity per BSP Series of 2016 Circular No.923.
Mid-2017	© Singapore	Expected commencement of mandatory clearing under the Securities and Futures (Clearing of Derivatives Contracts) Regulations.
July 1, 2017	Hong Kong	Commencement of mandatory clearing under the Securities and Futures (OTC Derivative Transactions – Clearing and Record Keeping Obligations and Designation of Central Counterparties) Rules, and Phase 2 mandatory reporting under the Securities and Futures (OTC Derivative Transactions – Reporting and Record Keeping Obligations) Rules.
July 1, 2017	Australia	Final APRA requirements for the governance and risk management components of the framework for supervision of banking and conglomerate groups (Level 3 framework) take effect.
July 24, 2017	US	Expiration of extended CFTC order designating the Global Markets Entity Identifier utility (formerly known as the DTCC-SWIFT utility) and other pre-Local Operating Units as acceptable suppliers of approved LEIs.
September 28, 2017	US	Expiration of relief from submitting certain specified information via New Form 102A (relief period begins September 29, 2016) (CFTC Letter No. 16-32).
September 28, 2017	US	Expiration of relief from submitting certain specified information regarding DCM volume threshold accounts via New Form 102B (relief period begins September 29, 2016) (CFTC Letter No. 16-32).

September 30, 2017	US	Expiration of an extension of relief from Transaction-Level Requirements for certain non-US SDs using personnel or agents located in the US to arrange, negotiate, or execute a swap – CFTC Letter No. 16-64 (extends CFTC Letter No. 15-48, which extended CFTC Letters No. 14-140, 14-74, 14-01 and 13-71).
October 2017	South Korea	Expected commencement of trade reporting under the Financial Investment Services and Capital Market Act (FISCMA).
November 15, 2017	US	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).
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	EU	Date by which the European Commission has to publish a legislative proposal on the capital requirement regime for commodity trading firms.
2018	Philippines	Basel III: Liquidity ratio migration to Pillar 1 after parallel run 2013-2017.
January 1, 2018	EU	Separation of trading activities out of core credit institutions under Bank Structural proposals.
January 1, 2018	O EU	Full application date of the EU Regulation on Financial Benchmarks.
January 1, 2018	Australia	Basel III: NSFR implemented, includes a secured committed liquidity facility.
January 1, 2018	Australia	Proposed implementation of APRA changes to the prudential framework for securitisation.
January 1, 2018	Singapore	Unmasking date for historical trades with counterparties where consent has not been received under the Singaporean trade reporting regime.
January 1, 2018	Hong Kong	Basel III: NSFR implemented.
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.
January 1, 2018	China	Basel III: NSFR implemented.

January 1, 2018	India	Basel III: NSFR implemented.
January 3, 2018	O EU	MiFID2/MiFIR applies to firms.
August 29, 2018	US	Expiration of relief from submitting certain specified information via New Form 102A (relief period begins September 29, 2016) (CFTC Letter No. 16-32).
August 29, 2018	US	Expiration of relief from submitting certain specified information regarding DCM volume threshold accounts via New Form 102B (relief period begins September 29, 2016) (CFTC Letter No. 16-32)
August 29, 2018	US	Expiration of relief from submitting certain specified information regarding SEF volume threshold accounts via New Form 102B (CFTC Letter No. 16-32).
August 29, 2018	US US	Expiration of relief to Reporting Parties from the requirement to report via New Form 102B (for SEFs) (CFTC Letter No. 16-32).
August 29, 2018	US US	Expiration of relief from submitting certain specified information via New Form 102S (relief period begins September 29, 2016) (CFTC Letter No. 16-32).
4Q 2018	O EU	Effective date for clearing of derivatives by non-financials.
January 1, 2019	Hong Kong	Basel III: Capital Conservation (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 (2.5%), Countercyclical Buffer (2.5%), expected for Liquidity Ratio.
March 31, 2019	India	Basel III: Capital Conservation (2.5%) phased in from March 2016.
March 31, 2019	India	Basel III: Large Exposures framework implemented
December 2019	Global	FRTB: Banks are required to report under the new market risk standards by end of 2019.

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