









































OTC Derivatives Compliance Calendar

Updated: July 2025

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

2025		
July 1, 2025	 EU	The European Commission has adopted an implementing decision to extend the equivalence of UK CCPs to June 30, 2028. This decision applies from July 1, 2025, providing for a seamless transition from the temporary recognition of UK CCPs under the EMIR 2.2 framework, and ensuring continued access to those CCPs for the timeframe necessary for measures in EMIR 3 to improve the attractiveness and competitiveness of EU clearing markets.
July 1, 2025	 Taiwan	Mandatory clearing of New Taiwan Dollar Interest Rate Swaps will be effective from July 1, 2025.
July 12, 2025	 EU	Deadline for EU counterparties exchanging IM based on ISDA SIMM to submit initial application to ECB (Significant Institutions only) and national competent authority for pro forma model authorization.
July 25, 2025	 Canada	Compliance date of the Canadian Securities Administrators (CSA) rule amendments for over-the-counter (OTC) derivatives trade reporting (Amendments to Rule 91-507 Trade Repositories and Derivatives Data Reporting, Companion Policy 91-507CP, Companion Policy 91-506CP, CSA Derivatives Data Technical Manual), <i>except for the reporting of the Unique Product Identifier (UPI) for commodity derivatives (see Coordinated Blanket Order 96-933)</i> .
August 31, 2025	 South Korea	Expiry of the FSS exemption from margin requirements for non-centrally cleared equity options.
September 1, 2025	 US	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).
	 Australia	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.
	 Canada	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.
	 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.
		India	Initial Margin requirements apply to Domestic Covered Entities with an average aggregate notional amount (AANA) of at least ₹60,000 crore and Foreign Covered Entities with an AANA of at least USD 8 billion based on the simple average of outstanding non-centrally cleared derivatives as at the end of March, April and May of this year.
September 1, 2025		Indonesia	Implementation of Indonesia initial margin and variation margin requirements for non-centrally cleared derivatives.
September 29, 2025		EU	Deadline for Member States to transpose the MiFID amendments published on March 8, 2024, into national law.
September 29, 2025		EU	ESMA shall submit draft regulatory technical standards to the European Commission with respect to the revised requirements for transaction reporting and OTC derivatives transparency under MiFIR.
September 29, 2025		Hong Kong	Go-live of the updated HKMA and SFC OTC derivatives trade reporting regime.
September 30, 2025		Mexico	Deadline for development banks and corporates with average (month-end) aggregate notional amount from March, April, and May 2024 of UDI 20 billion to comply with the margin requirements for uncleared derivatives under Banco de México's Circular 2/2023.
October 27, 2025		South Korea	Go-live of UPI and CDE reporting (Phase 2).
November 15, 2025		EU	<i>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, 2027 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.</i>
December 1, 2025		UK	New FCA rules on post trade transparency take effect.

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. <u>20-37</u> and <u>22-14</u> .
December 29, 2025	 EU	Earliest date of initiation of selection process for Consolidated Tape for OTC derivatives under MiFIR.
2026 and beyond		
January 1, 2026	 US	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 2025 exceeding USD 8 billion).
	 EU	Initial margin requirements apply to counterparties with an average (month-end) aggregate notional amount from March, April, and May 2025 exceeding EUR 8 billion.
	 Switzerland	Initial margin requirements apply to counterparties whose average (month-end) aggregate notional amount from March, April, and May 2025 exceeds CHF 8 billion.
	 UK	Initial margin requirements apply to counterparties with an average (month-end) aggregate notional amount from March, April, and May 2025 exceeding GBP 8 billion.
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.
	 EU	
	 Switzerland	
	 US	
	 Australia	
	 Canada	
	 Hong Kong	

March 1, 2026



South Korea

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, 2026, or January 1, 2027 (EU/UK/CHF) or December 31, 2027 (MX). In the US, this calculation period only applies under CFTC regulations. In Mexico, it is only relevant to development banks and corporates. Brazil is daily and all others are month-end calculation for March, April, and May average aggregate notional amount.



Singapore



Japan



UK



Brazil



Saudi Arabia



Mexico



South Africa



India

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.

June 1, 2026



US

Three-month calculation period begins under U.S. Prudential Regulations to determine whether the daily average aggregate notional amount of derivatives for an entity and its affiliates exceeds the USD 8 billion threshold for application or revocation of initial margin requirements as of January 1, 2027.

June 25, 2026



EU

Member States shall transpose 'EMIR' Directive amending UCITS Directive, Investment Firm Directive and Capital Requirement Directive as regards the treatment of concentration risk arising from exposures towards CCPs.

July 6, 2026



UK

New regulatory framework for commodity derivatives comes into force in the UK.















US

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 2026 exceeding USD 8 billion).



Australia

Initial margin requirements apply to Phase 6 APRA covered entities with an average (month-end) aggregate notional amount from March, April, and May 2026 exceeding AUD 12 billion.

September 1, 2026	 Canada	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 2026 exceeding CAD 12 billion.
	 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 2026 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 2026.
	 Singapore	Initial margin requirements apply to MAS covered entities with an average (month-end) aggregate notional amount from March, April, and May 2026 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 2026 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 2026 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 2026 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 2026 exceeds EUR 8 billion.
September 1, 2026	 India	Initial Margin requirements apply to Domestic Covered Entities with an average aggregate notional amount (AANA) of at least ₹60,000 crore and Foreign Covered Entities with an AANA of at least USD 8 billion based on the simple average of outstanding non-centrally cleared derivatives as at the end of March, April and May of this year.
	 China	Variation Margin requirements for non-centrally cleared derivatives apply to financial institutions that are regulated and supervised by the National Financial Regulatory Administration ("NFRA") and its local agencies, and also the asset management products issued by the aforementioned institutions.
November 8, 2026	 US	Termination of the SEC's de minimis phase-in thresholds for security-based swap dealer registration. The phase-in termination date will be November 8, 2026, absent Commission action. On this date, the de minimis threshold for credit default swaps will become an aggregate gross notional amount of no more than \$3 billion, and for security-based swaps that are not credit default swaps the de minimis threshold will become an aggregate gross notional amount of no more than \$150 million. (See 87 Fed. Reg. 29986-29987 (May 17, 2022)).
December 31, 2026	 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.

December 31, 2026	 US	Treasury clearing mandate goes into effect for eligible cash market transactions (See updated final rule at: https://www.sec.gov/files/rules/final/2025/34-102487.pdf)
December 31, 2026	 UK	Expiry of the temporary Intragroup Exemption Regime (TIGER) from clearing and margin requirements
December 31, 2026	 Mexico	Initial and variation margin requirements apply (or disapply) to development banks and corporates with average (month-end) aggregate notional amount from March, April, and May 2025 of UDI 20 billion per Banco de México's Circular 2/2023.
January 1, 2027	 UK	Expected implementation of the Basel 3.1 standards.
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, 2027	 Brazil	Brazil postponed the application of BCB 470 (SBM) component of FRTB SA until January 2027.
January 1, 2027	 EU	FRTB implementation delayed to January 2027.
January 24, 2027	 Canada	Canadian Securities Administrators (CSA) jurisdictions issued Coordinated Blanket Order 96-933 granting temporary exemptions from reporting of the UPI for commodity derivatives under Amendments to Rule 91-507 Trade Repositories and Derivatives Data Reporting. The Blanket Order is effective on July 25, 2025, the date that derivatives data reporting amendments come into force. All jurisdictions under CSA except for Ontario do not currently have an expiry date. In Ontario, the Blanket Order currently expires on January 24, 2027 due to statutory restrictions, and is able to be extended once for an additional period of up to 18 months. CSA expects the Blanket Order to be revoked in all jurisdictions at an appropriate time.
June 30, 2027	 US	Treasury clearing mandate goes into effect for eligible repo market transactions (See updated final rule at: https://www.sec.gov/files/rules/final/2025/34-102487.pdf)
September 1, 2027	 China	Initial Margin requirements for non-centrally cleared derivatives apply to financial institutions and their counterparties with an AANA of non-centrally cleared derivatives exceeding RMB 500 billion for the end of March, April, and May of the most recent year.
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.
September 1, 2028	 China	Initial Margin requirements for non-centrally cleared derivatives apply to financial institutions and their counterparties with an AANA of non-centrally cleared derivatives exceeding RMB 300 billion for the end of March, April, and May of the most recent year.
September 1, 2029	 China	Initial Margin requirements for non-centrally cleared derivatives apply to financial institutions and their counterparties with an AANA of non-centrally cleared derivatives exceeding RMB 60 billion for the end of March, April, and May of the most recent year.

November 5, 2029



Securities and Exchange Commission (SEC) extension of relief for Regulation SBSR to allow a security-based swap dealer to report security-based swaps in a manner consistent with the swap reporting rules of the Commodity Futures Trading Commission (CFTC) until November 5, 2029. See <https://www.sec.gov/files/rules/final/2025/34-102886.pdf>

CONTACT:Asia – Benoît Gourisse (bgourisse@isda.org)Canada – Fred Quenzer (fquenzer@isda.org)Europe – Roger Cogan (rcogan@isda.org)Japan – Tomoko Morita (tmorita@isda.org)US – Chris Young (cyoung@isda.org)