

ISDA OTC Derivatives Compliance Calendar

Updated: June 1, 2014

2Q 2014	US	Expected confirmation of new CFTC Chairman and Commissioners.
2Q 2014	O EU	EBA finalization for purposes of Capital Requirements Directive IV (CRD4) and Capital Requirement Regulation (CRR) implementation: PruVal technical standards; interest rate risk on the Banking Book technical standards.
		Bank Recovery & Resolution Directive (BRRD): Publication in EU Official Journal, entry into force.
2Q 2014	Hong Kong	Public consultation of subsidiary legislation regarding OTC derivatives trade reporting and record-keeping rules.
May 22, 2014	O EU	Publication of ESMA Discussion paper on MiFID 2/ MiFIR Regulatory technical standards.
	_	Publication of ESMA Consultation paper on MiFID 2/ MiFIR Advice (in the view of the European Commission Delegated Acts)
		Deadline to respond to these two consultations is August 1, 2014.
June 1, 2014	U S	Expiration of relief for package transactions with at least one individual MAT swap component and each of the other swap components subject to the clearing requirement – See CFTC Letter No. 14-62.
June 2, 2014	India	Mandatory clearing of FX forwards begins for all licensed banks in India.
June 12, 2014	EU	Expected MiFID 2/ MiFIR and Market Abuse Regulation (MAR)/ Market Abuse Directive 2 (MAD) publication in EU Official Journal.
June 15, 2014	US	Expiration of relief for package transactions with all swap components MATed and all other components being U.S. Treasury securities (U.S. Dollar Swap Spreads) – See CFTC Letter No. 14-62.
June 15, 2014	EU	Transitional arrangements on QCCP status expire (for non-EU CCPs that applied for authorization under EMIR before September 15, 2013), unless extended by EC – conditions may have to be in place for QCCP status (and lower capital requirements) to be assumed/applied thereafter.
June 24, 2014	Russia	Scheduled second compliance deadline for trade reporting, all derivatives except FX.

June 30, 2014	US	Expiration of relief related to reporting of valuation data – CFTC Letter No.13-34.
		Expiration of relief related to resubmission for clearing – CFTC Letter No.13-66.
		Reporting of quantitative information re trading activity (Volcker Rule).
		Expiration of relief for the reporting of Identity Information subject to statutory or regulatory prohibitions in certain non-US jurisdictions – CFTC Letter No. 13-41.
		Expiration of relief for DCMs from compliance with certain requirements of Commission Regulation 38.152 re prohibition of pre-arranged trading – CFTC Letter No. 14-50.
June 30, 2014	South Korea	Presumptive date for mandatory clearing of Korean Won IRS at KRX (Korea Exchange).
Mid-2014	Global	Expected final rules: BCBS – Non-internal Model Methods (NIMM) for capitalizing credit risk exposures (Final SA-CCR NIMM framework was published by BCBS on 31 March 2014)
2H 2014	₩ Hong Kong	Public consultation of subsidiary legislation regarding OTC derivatives clearing and earliest possible start date for implementing phase 1 central clearing.
3Q 2014	O EU	Latest date for recognition of third country CCPs (e.g. where 'conditional' equivalence applies).
	_	EMIR: European Supervisory Authorities (ESAs) adopts RTS on Margin.
3Q 2014	Australia	Proposed time for ASIC to consult on rules related to the details of central clearing obligations.
July 1, 2014	US	Comment deadline for SEC Request for Comment re Recordkeeping and Reporting Requirements for Security-Based Swap Dealers, etc.
July 1, 2014	Australia	Australian phase 1 firms commence reporting of non-CFTC swaps (other than single name CDS and equity).
July 1, 2014	China	Mandatory central clearing by Shanghai Clearing House of new RMB interest rate swaps with a tenor of no more than 5 years between financial institutions starts.
July 1, 2014	Singapore	Singapore phase 1c firms (classified as other financial institutions) commence reporting of rates and credit products.
July 3, 2014	US	Comment deadline for CFTC Extension of Comment Period re the Position Limits Proposal and Aggregation Proposal.
July 12, 2014	US	Deadline for FCM risk exposure reports to its senior management and governing body.
		Date for FCM use of new acknowledgement letter templates from custodians.

July 14, 2014	O EU	EMIR: Comments deadline for ESAs consultation on margin RTS
Aug. 1, 2014	O EU	Deadline to respond to the ESMA Discussion Paper and Consultation Paper on MiFID 2/ MiFIR.
Aug. 12, 2014	EU	Trade reporting obligation will include the requirement to report on mark-to-market, or mark-to-model, valuations and information on collateral.
Aug. 15, 2014	US	Expiration of extension of relief to Yieldbroker Pty Limited (Yieldbroker) for the failure to register as a SEF and to Yieldbroker market participants for their relationships with Yieldbroker – CFTC Letter. No. 14-70.
Aug. 31, 2014	EU	Expiration of remaining phase-in for EQD, FX, commodity and other derivatives transactions (apart from CDS, IRS). Confirmations of contracts must now be delivered in:
		 T+1 for FCs dealing with FCs or NFCs+ T+2 for FCs or NFCs+ dealing with NFCs-
September 2014	O EU	ESMA to submit draft RTS on the clearing obligation specifying:
		 the classes of OTC derivatives which would be subject to the clearing obligation; the effective date of such obligation; the remaining maturity of the contracts subject to the clearing obligation.
Sept. 1, 2014	US	End of phase-in for confirmation rules.
Sept. 1, 2014	O EU	End of phase-in for confirmation rules.
Sept. 14, 2014	US	Expiration of relief from transaction-level requirements for certain non-US swap dealers using personnel or agents located in the U.S. to arrange, negotiate, or execute a swap – CFTC Letter No. 14-01 (extends CFTC Letter No 13-71, which extended CFTC Letter No. 13-69).
Sept. 30, 2014	US	Expiration of relief for certain CDS trades executed pursuant to a DCO's CDS Settlement Price Process (includes relief from reporting and SEF trading requirements) – CFTC Letter No. 13-86.
		Expiration of relief for SEFs and DCMs from Compliance with Certain Requirements of Commission Regulation § 37.9(a)(2) (i.e., Methods of Execution for Required or Permitted Transactions), § 37.203(a) (i.e., Prohibition of Pre-arranged Trading (for SEFs)) and § 38.152 (i.e., Prohibition of Pre-arranged Trading (for DCMs)) for Package Transactions – CFTC Letter No. 14-62.
3Q-4Q 2014	Global	Expected publication of the FSB's Application of the Key Attributes of Effective Resolution Regimes to Non-Bank Financial Institutions framework and CPSS-IOSCO's Recovery of FMIs framework.

4Q 2014	EU	ESMA adopts guidelines to clarify the scope of physical commodity forwards traded on MTFs that are subject to MiFID 1 and therefore to the EMIR reporting obligation (full implementation of the reporting obligation began on February 12, 2014).
		Bank Recovery and Resolution Directive (BRRD): Expected publication of EBA consultation on RTS regarding calculation of derivatives value and bail-in.
Oct. 1, 2014	Australia	Australian Phase 1 firms backloading deadline; commence reporting of non-CFTC swaps that are equity derivatives.
		Australian Phase 2 firms credit & rate backloading deadline; commence reporting of other products (commodity, equity and FX. Note that commodity in Australia excludes electricity derivatives).
		Australian Phase 3 firms (for any other firms not in phase 1 and 2, except end-users) commence reporting of credit and rates.
Oct. 1, 2014	Malaysia	Regulators have yet to stipulate a commencement date for trade reporting. and have indicated they will consult industry on the date. However, the Capital Markets and Services (Amendment) Act 2011 (CMSA) provides that obligations (contained in CMSA Subdivision 4 of Division 3 of Part III) come into operation at the expiration of two years or a further period not exceeding one year, from the date of CMSA coming into force (October 2011). Based on this, it is understood that the trade reporting obligations are to commence, at the latest, by October 2014.
Oct. 1, 2014	Singapore	Singapore Phase 1b firms backloading deadline.
		Singapore Phase 1d firms commence reporting of rates and credit products.
		 A phase 1d firm is a "Significant derivatives holder" that is a Singapore resident with outstanding notional exceeding SGD8 billion.
Oct. 2, 2014	US	SEF minimum request for quote (RFQ) requirement increases from two to three.
Oct. 31, 2014	Canada	Trade repository reporting obligations for derivative transactions involving a derivatives dealer or an exempt or recognized clearing agency come into effect in Manitoba, Ontario and Quebec.
Nov. 3, 2014	US	Rules related to segregation of assets held as collateral in uncleared swap transactions come into effect for existing counterparties.
		 An "existing counterparty" is a counterparty with whom, at the time of the effective date of this final rule, an agreement exists between the SD or MSP and that counterparty concerning uncleared swaps. The effective date for this rule was January 6, 2014.

Nov. 15, 2014	US	Expiration of relief for package transactions with:
		 at least one individual MAT swap component and at least one individual swap component that is under the CFTC's exclusive jurisdiction and not subject to the clearing requirement; at least one individual MAT swap component and at least one individual component that is not a swap (to specifically exclude U.S. Dollar Swap Spreads); and at least one individual MAT swap component and at least one individual swap component not under the CFTC's exclusive jurisdiction – See CFTC Letter No. 14-62.
December 2014	O EU	Expected publication of ESMA consultation paper on draft MiFID 2/MiFIR technical standards
Dec. 1, 2014	US	Expiration of relief from Parts 45 and 46 for swaps with non-US counterparties that are not guaranteed affiliates, or conduit affiliates, of a US person - See CFTC Letter No. 13-75.
		 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.
Dec. 1, 2014	Japan	Phase two of clearing.
Dec. 15, 2014	O EU	If EC extends transitional period regarding QCCP status from June 15, 2014, conditions have to be in place from December 15, 2014 for QCCP status (and lower capital requirements) to be assumed/applied thereafter.
Dec. 31, 2014	US	Expiration of extension of relief to Eurex Clearing for failing to register as a DCO and to US Clearing Members of Eurex Clearing for failure to clear certain IRS or CDS on a broad-based index of reference entities (Index CDS) through a registered or exempt DCO – CFTC Letter No. 13-44.
		Expiration of relief for JSCC – CFTC Letter No. 13-73.
		Expiration of relief for SEFs providing "basis risk mitigation services" – CFTC Letter No. 13-81.
		Expiration of relief for ASXCLF (DCO) – CFTC Letter No. 14-07.
		Expiration of relief from certain provisions of the treatment of Outward-Facing Swaps Condition In The Inter-Affiliate Exemption – CFTC Letter No. 14-25.
		Expiration of relief from the Commodity Exchange Act Section 2(h)(8) for swaps executed between certain affiliated entities not electing Commission Regulation 50.52 – CFTC Letter No. 14-26.

Dec. 31, 2014 (continued)	US	Expiration of extension of relief to commodity trading advisors who are members of a SEF or DCM from the requirement under Commission Regulation 1.35(a) to record all oral communications provided or received resulting in the execution of swap transactions – CFTC Letter No. 14-60.
		Expiration of relief to OTC Clearing Hong Kong Limited (OTC Clear HK) for failure to register as a DCO and to OTC Clear HK's U.S. Clearing Members for failure to clear IRS or foreign exchange NDFs through a registered or exempt DCO – CFTC Letter No. 14-68.
Dec. 31, 2014	Singapore	Deadline for firms who applied data masking as permitted by prior rules to unmask the data.
Late 2014	Global	BCBS Fundamental Review of the Trading Book ("FRTB"). Industry has requested extension to perform QIS. Absent an extension, finalization of rules expected around November 2014.
		G-20 meetings.
		Expected finalization of rules (BCBS, FRB and EBA) with regard to CVA/DVA and Funding Valuation Adjustment (FVA).
Late 2014	EU	Date of eventual entry into force of RTS on clearing. If the ESMA proposal on frontloading sent to the Commission (on 8 May) was accepted, the following would happen: (1) Contracts entered into between the notification of the classes of derivatives to ESMA and the entry into force of RTS on clearing shall not be frontloaded, and (2), Contracts entered into between the entry into force and the date of application of the clearing obligation (tbd) shall be frontloaded depending on a "minimum remaining maturity".
		Expected publication of CCP Recovery and Resolution Framework for Financial Institutions other than Banks legislative proposal by the European Commission (possibly early 2015).
Late 2014	Australia	Proposed date for central clearing rules to be completed.
By end-2014	US	Finalization of SEC's cross-border guidance. The SEC has indicated that finalization of other Dodd-Frank implementing rules will follow finalization of the cross-border guidance.
2015		
Jan. 1, 2015	US	Start date for firms using Basel III Standardized Approaches.
Jan. 1, 2015	EU	Final date for EBA to produce a review on the application of CVA charges to non financial counterparties (NFC) established in a third country, according to CRR article 382(5).
		Capital Requirements Directives (CRD): Leverage ratio public disclosure
Jan. 1, 2015	Australia	Basel III: LCR to be implemented; Leverage ratio to be disclosed

Jan. 1, 2015	₩ Hong Kong	Basel III: Phased in CET1 (4.5%), Total Tier 1 (6%), modified version of liquidity ratios to be applied to Als with simpler operations. LCR to be applied to Category 1 Als.
Jan. 1, 2015	India	Basel III: LCR from 1 Jan 2015 and NFSR from 1 Jan 2018. The LCR and NSFR will be applicable to Indian banks on a whole bank level, i.e., on a stand-alone basis including overseas operations through branches, and later on a consolidated level. For foreign banks operating in India, the LCR and NSFR will be applicable on a stand-alone basis.
Jan. 1, 2015	Russia	Scheduled compliance deadline for trade reporting of any outstanding products.
Jan. 1, 2015	© Singapore	Singapore phase 1c firms backloading deadline
		Basel III: Phased in CET 1 (6.5%), Total Tier 1 (8%)
Early 2015	Australia	Proposed commencement date for G4 IRD clearing mandate.
Jan. 22, 2015	US	Deadline for written extension requests re: the Volcker Rule.
March 2015	India	Recommended dates for i) reaching a decision on mandating CCP clearing for interbank IRS trades, ii) review on the introduction of CCP clearing for forex options and, iii) CCP clearing of CDS contracts.
		Recommended dates for review on i) introduction of an exclusive trading platform for forex forwards, ii) mandatory execution of trades in standardized forex swaps and forwards and, iii) mandatory trading of Forex Options.
		 On March 6, 2014, the Implementation Group on OTC Derivatives Reforms issued its report setting out, among others, the roadmap for the implementation of reform measures with regard to OTC derivatives in India including recommended timelines extending up to March 2015. The previous are recommended dates as set out in the Report.
Q2 2015	O EU	Bank Recovery and Resolution Directive (BRRD): Adoption of the RTS on calculation of derivatives value and bail-in by the Commission.
Apr. 1, 2015	Australia	Australian phase 2 firms commodity, equity and FX backloading deadline.
		Australian phase 3 firms credit and rates backloading deadline; commence reporting of other products (commodity, equity and FX).
Apr. 1, 2015	Singapore	Singapore phase 1d firms back loading deadline.
Apr. 1, 2015	India	Basel III: Final leverage ratio requirement (4.5%) to be prescribed by RBI after parallel run (1 Jan 2013 - 1 Jan 2017), taking into account the recommendations from the Basel Committee.

April 30, 2015	Canada	Public dissemination of transaction level data commences in Manitoba, Ontario and Quebec.
		Reporting deadline for pre-existing transactions for clearing agencies and dealers.
June 30, 2015	Canada	Trade repository reporting obligations for non-dealer reporting counterparties come into effect in Manitoba, Ontario and Quebec.
July 1, 2015	EU	Final date by which EBA (with ESMA) shall develop draft RTS on CVA charges to non-financial counterparties (NFC). The RTS will specify the procedures for excluding transactions with NFCs in a third country from the own funds requirement for CVA risk.
July 21, 2015	US	Compliance date for Volcker Rule (expiration of extension granted in late-2013).
September 2015	Japan	Trading mandate.
Oct. 1, 2015	Australia	Australian phase 3 firms commodity, equity and FX backloading deadline.
Dec. 1, 2015	Global	BCBS-IOSCO compliance date for non-cleared margin recommendations. Implementation of these recommendations is at the national level.
Dec. 31, 2015	Canada	Reporting deadline for pre-existing transactions for non-dealers.
Dec. 31, 2015	Philippines	Basel III: CET 1 (6%) and Total Tier 1 (7.5) phasing out of hybrid instruments ends.
End 2015	China	Basel III: Total capital + conservation buffer = 2.5% + 9% + 1% =11.5% for systemically important banks (SIBs). Total capital + conservation buffer = 2.5% + 8% = 10.5% for non-systemically important banks (NSIBs). SIBs will need to meet new standards by end 2013 while NSIBs will be required to meet new standards by 2016.
End 2015	India	Recommended date for review on the introduction of CCP clearing for currency swaps, IRS in FCY and Interest Rate Option in FCY. (See India entry for March 2015 for background.)
2015	South Korea	Basel III: 4% leverage ratio to be adopted; liquidity ratio to be adopted.
2016 and beyond		
1Q 2016	EU	Publication of benchmarks regulation in the EU Official Journal, and entry into force.
Jan. 1, 2016	EU	Bank Recovery and Resolution Directive (BRRD): Bail-in provisions shall apply at the latest

Jan. 1, 2016	Australia	Basel III: Tier 1 + Tier 2 (8%) framework for D-SIFIs expected to come into effect; Capital Conservation (2.5%) Buffer in effect; APRA may, by notice in writing to all ADIs, require the countercyclical buffer (0-2.5%).
Jan. 22, 2016	US	Deadline for final written extension requests re Volcker Rule.
July 2, 2016	EU	MAD 2/MAR package expected to apply to firms.
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	* China	Basel III: full implementation of CET1 (5%), Total Tier 1 (6%) and NSFR.
Jan. 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.
Jan. 2, 2017	EU	MiFID 2/MiFIR package and some MAR/MAD rules expected to apply to firms.
Feb. 11, 2017	US	Expiration of certain SEC exemptions (e.g., from the Exchange Act) for security-based swaps. This is extended from February 2014.
Feb. 12, 2017	O EU	Contracts entered into before RSD and no longer outstanding on that date must be reported to TRs
Mar. 31, 2017	India	Basel III: Phased in CET1 (5.5%), Total Tier 1 (7%), Tier 1 + Tier 2 (9%)
June 1, 2017	EU	Prohibition of proprietary trading under EC Bank Structure proposal effective.
4Q 2017	EU	Effective date for clearing of derivatives by non-financials.
Jan. 1, 2018	EU	Separation of some trading activities out of core credit institutions under Bank Structure proposals.
Jan. 1, 2018	Australia	Basel III: NSFR implemented, includes a secured committed liquidity facility.
Jan. 1, 2018	Hong Kong	Basel III: NSFR implemented
Jan. 1, 2018	New Zealand	Basel III: Full implementation of CET1 (4.5%), Total Tier 1 (6%), Tier 1 + Tier 2 (8%)
Mar. 31, 2018	- India	Basel III: Capital Conservation (2.5%) phased in from March 2015

2018	Philippines	Basel III: Liquidity ratio migration to Pillar 1 after parallel run 2013-2017.
Jan. 1, 2019	Hong Kong	Basel III: Capital Conservation (2.5%) full implementation
Jan. 1, 2019	Singapore	Basel III: Phased in Capital Conservation (2.5%), Countercyclical Buffer (2.5%), expected for Liquidity Ratio

CONTACT:

Asia - Keith Noyes (knoyes@isda.org)

Canada – Katherine Darras (kdarras@isda.org)

EU - Roger Cogan (rcogan@isda.org)

Japan - Tomoko Morita (tmorita@isda.org

US - Mary Johannes (mjohannes@isda.org)