



Research Note

Interest Rate Derivatives Trading Activity Reported in EU, UK and US Markets: January 2022

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 January 2022. 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 \$13.4 trillion in January 2022, up from \$8.9 trillion in December 2021.
- Euro-denominated IRD traded notional increased to \$5.8 trillion in January 2022 from \$3.5 trillion the previous month and accounted for 43.1% of total European IRD traded notional. Sterling-denominated transactions grew to \$3.0 trillion from \$2.4 trillion over the same period and comprised 22.1% of the European total. Contracts denominated in US dollars rose to \$3.4 trillion in January 2022 from \$2.1 trillion in December 2021, equating to 25.1% of total European traded notional. Other currencies accounted for 9.6% of total European IRD traded notional².
- Overnight index swaps (OIS) traded notional increased to \$6.6 trillion in January 2022 (49.2% of total European IRD traded notional) from \$4.1 trillion in December 2021. Fixed-for-floating interest rate swaps (IRS) traded notional grew to \$4.1 trillion from \$3.9 trillion over the same period and accounted for 30.8% of the European total. Forward rate agreement (FRA) traded notional increased to \$2.0 trillion from \$0.6 trillion and represented 14.6% of total European IRD traded notional.
- 51.7% of total European IRD traded notional took place on TVs, 41.0% was executed by systemic internalizers³ (SIs) and 7.3% occurred off venue⁴.

UK IRD Trading Activity

- Total IRD traded notional reported by APAs and TVs in the UK grew to \$10.2 trillion in January 2022 from \$6.5 trillion in December 2021, equating to 75.8% of total European IRD traded notional.
- Euro-denominated IRD traded notional increased to \$3.2 trillion in January 2022 from \$1.5 trillion in December 2021, and US dollar-denominated IRD rose to \$3.1 trillion from \$1.9 trillion over the same period. Sterling-denominated IRD traded notional grew to \$2.9 trillion in January 2022 from \$2.4 trillion the previous month. Euro- and US dollar-denominated transactions accounted for 31.6% and 30.1% of total UK IRD traded notional, respectively, while sterling-denominated trades comprised 28.8%. Other currencies accounted for 9.5% of total UK IRD traded notional.
- OIS traded notional increased to \$5.9 trillion in January 2022 from \$3.2 trillion in December 2021. Fixed-for-floating IRS traded notional fell to \$2.4 trillion from \$2.5 trillion, while FRA transactions increased to \$1.3 trillion from \$0.4 trillion over the same period. OIS accounted for 58.1% of total UK IRD traded notional, fixed-for-floating IRS comprised 23.2% and FRAs represented 12.5%.
- 46.6% of total UK IRD traded notional occurred on TVs, 45.0% was executed by SIs and 8.4% took place 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 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

EU IRD Trading Activity

- Total IRD traded notional reported by APAs and TVs in the EU increased to \$3.3 trillion in January 2022 versus \$2.4 trillion in December 2021, accounting for 24.2% of total European IRD traded notional.
- Euro-denominated IRD traded notional rose to \$2.6 trillion in January 2022 from \$2.0 trillion in December 2021 and accounted for 79.1% of total EU IRD traded notional. US dollar-denominated IRD represented 9.4% and sterling-denominated IRD comprised 1.4% of total EU traded notional. Other currencies accounted for 10.0% of the EU total.
- Fixed-for-floating IRS traded notional grew to \$1.8 trillion in January 2022 from \$1.3 trillion in December 2021, while OIS decreased to \$0.7 trillion from \$0.9 trillion over the same period. Fixed-for-floating IRS traded notional comprised 54.5% of the EU total, while OIS and FRA traded notional both totaled 21.4%.
- 67.9% of total EU IRD traded notional took place on TVs, 28.4% was executed by SIs and 3.7% occurred off venue.

European and US IRD Trading Activity

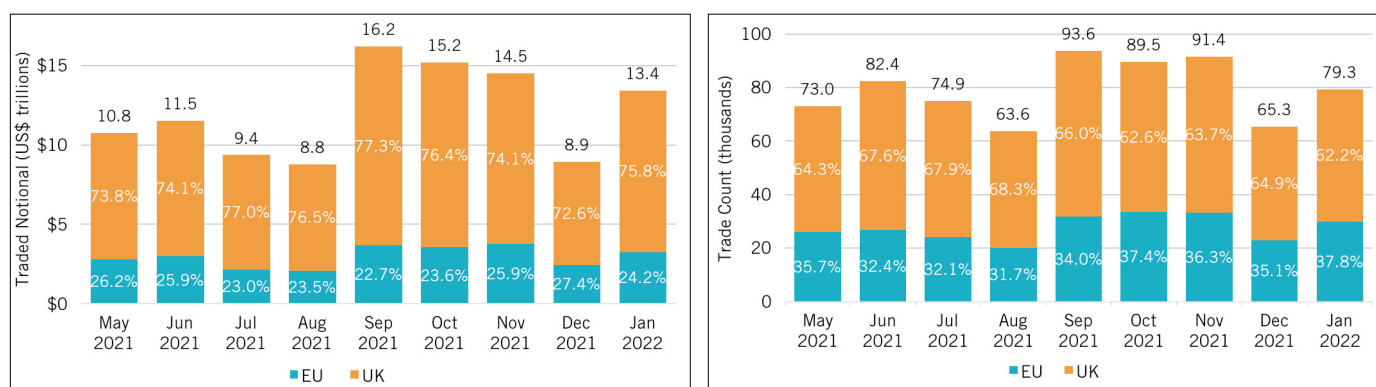
- IRD traded notional reported in the US increased to \$30.8 trillion in January 2022 versus \$15.3 trillion in December 2021⁵. Combined EU, UK and US traded notional rose to \$44.3 trillion from \$24.2 trillion over the same period. US-reported traded notional accounted for 69.6% of the combined total, while the EU and UK made up 7.4% and 23.0%, respectively.
- Of the combined \$44.3 trillion in EU, UK and US IRD traded notional, 44.3% was denominated in US dollars, 35.4% was in euros and 10.5% was in sterling. Other currencies accounted for 9.8% of the total, with Australian dollar and Canadian dollar representing the largest share.
- Total US dollar-denominated IRD traded notional increased to \$19.6 trillion in January 2022 from \$11.0 trillion in December 2021. 82.8% of total US dollar-denominated IRD traded notional was reported in the US. Total euro-denominated IRD traded notional rose to \$15.7 trillion in January 2022 from \$6.4 trillion in December 2021, while total sterling-denominated IRD traded notional increased to \$4.6 trillion from \$3.8 trillion over the same period. Reporting of euro-denominated transactions was split between the three jurisdictions, with 16.4% in the EU, 20.5% in the UK and 63.1% in the US. 63.2% 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 34.5% of total EU, UK and US IRD traded notional in January 2022. OIS and FRAs made up 38.0% and 15.2%, 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 grew to \$13.4 trillion in January 2022 compared to \$8.9 trillion the previous month. Total trade count increased to 79.3 thousand versus 65.3 thousand over the same period. Traded notional reported in the UK accounted for 75.8% of total European IRD traded notional, while UK-reported trade count made up 62.2% of the European total (see Chart 1)⁶.

Chart 1: European IRD Traded Notional and Trade Count



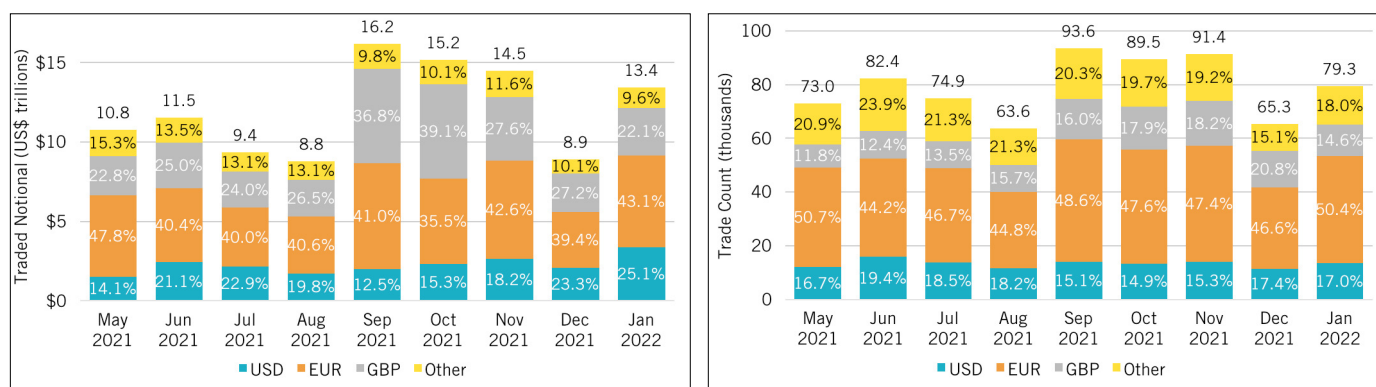
Source: European APAs and TVs

Euro-denominated IRD traded notional increased to \$5.8 trillion in January 2022 from \$3.5 trillion in December 2021 and accounted for 43.1% of total European traded notional. Euro-denominated contracts made up 50.4% of total European trade count.

Sterling-denominated IRD traded notional grew to \$3.0 trillion in January 2022 from \$2.4 trillion in December 2021, while US dollar IRD traded notional increased to \$3.4 trillion from \$2.1 trillion over the same period. Sterling-denominated transactions comprised 22.1% of total European traded notional and 14.6% of trade count, while US dollar contracts represented 25.1% of total European traded notional and 17.0% of trade count (see Chart 2).

Other currencies accounted for 9.6% of total European IRD traded notional and 18.0% of total trade count, with Swedish krona and Australian dollar representing the largest share⁷.

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



Source: European APAs and TVs

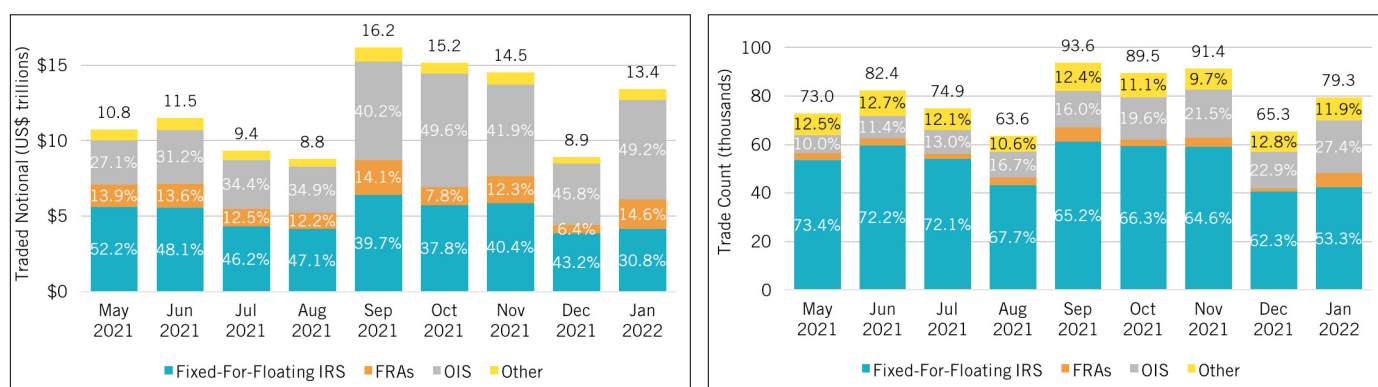
⁶ ISDA's dataset of European data starts in May 2021. See Interest Rate Derivatives Trading Activity Reported in EU, UK and US Markets: May 2021 www.isda.org/a/h6TgE/Interest-Rate-Derivatives-Trading-Activity-Reported-in-EU-UK-and-US-Markets-May-2021.pdf

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 increased to \$6.6 trillion in January 2022 from \$4.1 trillion in December 2021 and represented 49.2% of total European IRD traded notional. OIS contracts made up 27.4% of total European trade count.

Fixed-for-floating IRS traded notional grew to \$4.1 trillion in January 2022 from \$3.9 trillion the previous month. FRA traded notional increased to \$2.0 trillion from \$0.6 trillion over the same period. Fixed-for-floating IRS accounted for 30.8% of total European IRD traded notional and 53.3% of trade count in January 2022, while FRAs represented 14.6% and 7.4% of total European traded notional and trade count, respectively (see Chart 3).

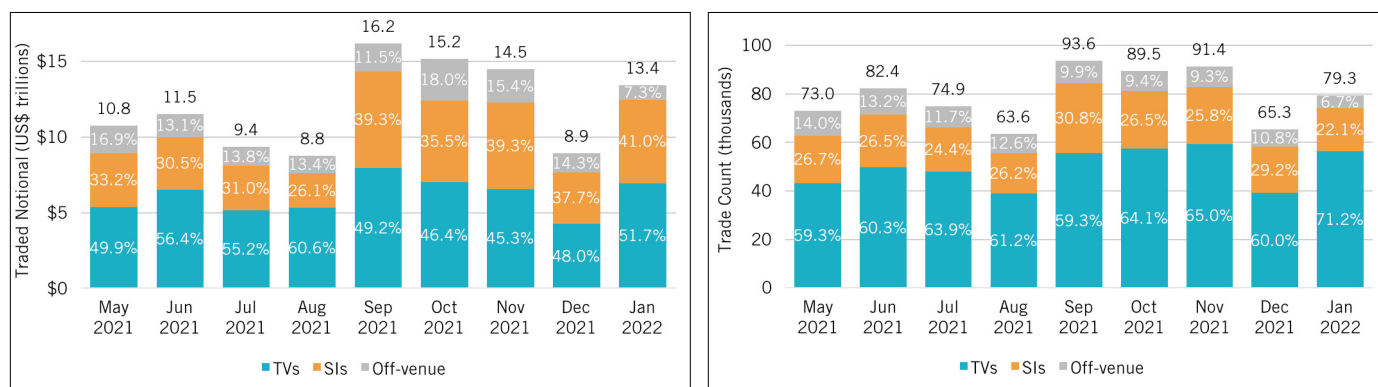
Chart 3: European IRD Traded Notional and Trade Count by Product



Source: European APAs and TVs

In January 2022, 51.7% of total European IRD traded notional and 71.2% of trade count took place on TVs, 41.0% of traded notional and 22.1% of trade count was executed by SIs, and 7.3% of traded notional and 6.7% of trade count occurred off venue⁸ (see Chart 4).

Chart 4: European IRD Traded Notional and Trade Count by Execution Venue



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 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

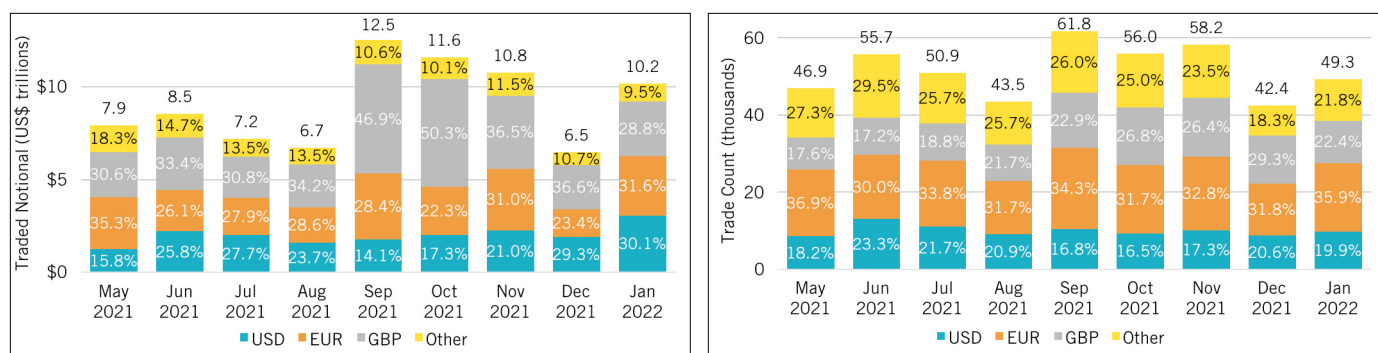
Total IRD traded notional reported by APAs and TVs in the UK rose to \$10.2 trillion in January 2022 from \$6.5 trillion in December 2021, while trade count increased to 49.3 thousand from 42.4 thousand over the same period. UK-reported trading activity accounted for 75.8% of total European IRD traded notional and 62.2% of total trade count (see Chart 1).

Sterling-denominated IRD traded notional grew to \$2.9 trillion in January 2022 from \$2.4 trillion in December 2021, while euro-denominated IRD traded notional rose to \$3.2 trillion from \$1.5 trillion over the same period. US dollar-denominated IRD traded notional increased to \$3.1 trillion in January 2022 from \$1.9 trillion the previous month.

Sterling-denominated transactions represented 28.8% of total UK IRD traded notional and 22.4% of total trade count. Euro-denominated IRD accounted for 31.6% of total UK IRD traded notional and 35.9% of trade count, and US dollar-denominated IRD made up 30.1% of total UK IRD traded notional and 19.9% of trade count (see Chart 5).

Other currencies accounted for 9.5% of total UK IRD traded notional and 21.8% of total trade count. Swedish krona and Australian dollar represented the largest share of other currencies.

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

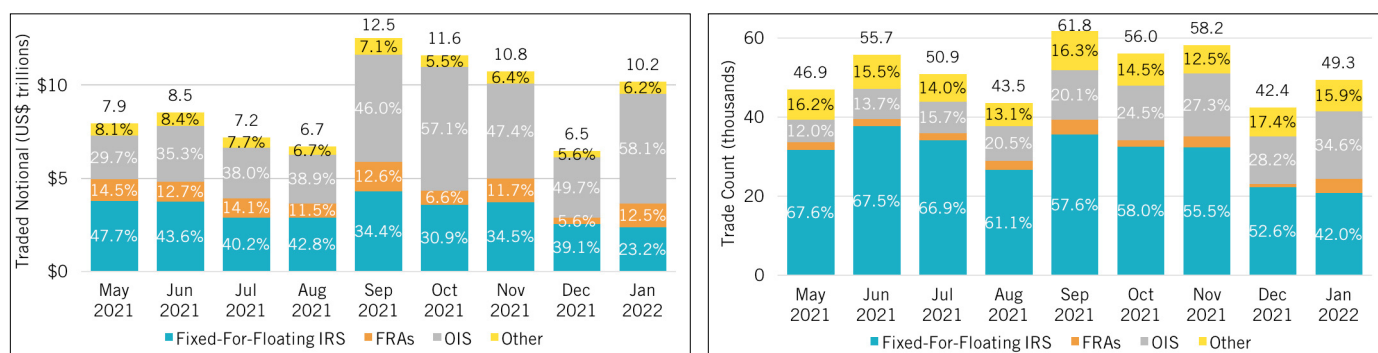


Source: European APAs and TVs

OIS traded notional grew to \$5.9 trillion in January 2022 from \$3.2 trillion in December 2021. Fixed-for-floating IRS traded notional decreased to \$2.4 trillion from \$2.5 trillion, while FRA traded notional rose to \$1.3 trillion from \$361.9 billion over the same period.

OIS transactions accounted for 58.1% of total UK IRD traded notional and 34.6% of total trade count. Single currency fixed-for-floating IRS comprised 23.2% of UK total IRD traded notional and 42.0% of UK IRD trade count, while FRAs made up 12.5% and 7.5% of total UK traded notional and trade count, respectively (see Chart 6).

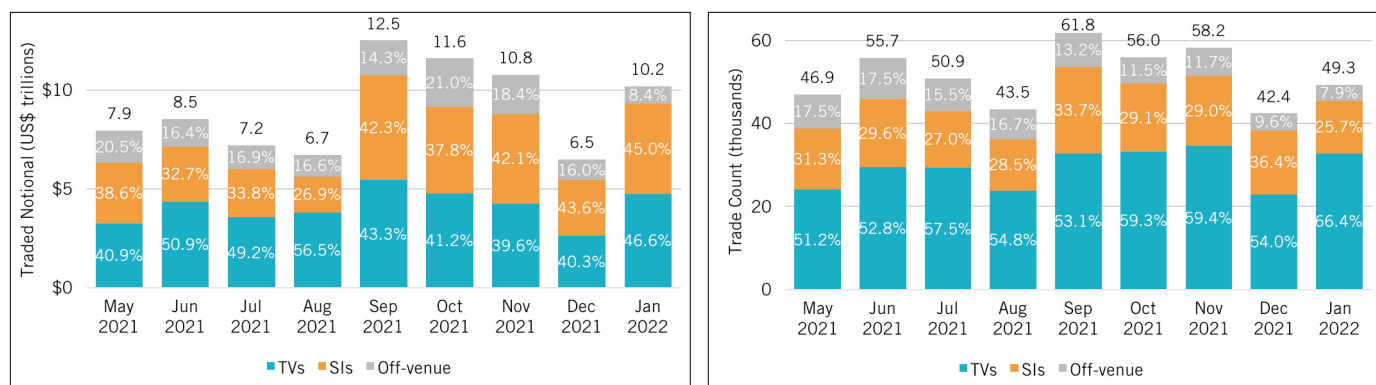
Chart 6: UK IRD Traded Notional and Trade Count by Product



Source: European APAs and TVs

46.6% of total UK IRD traded notional and 66.4% of trade count occurred on TVs, 45.0% of total UK IRD traded notional and 25.7% of trade count was executed by SIs, and 8.4% of traded notional and 7.9% of trade count took place off venue (see Chart 7).

Chart 7: UK IRD Traded Notional and Trade Count by Execution Venue



Source: European APAs and TVs

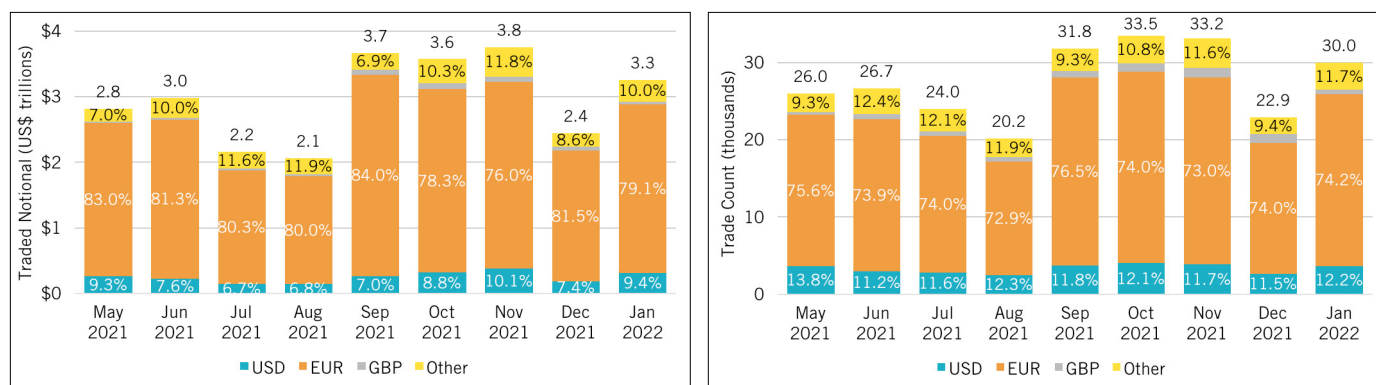
EU IRD TRADING ACTIVITY

Total IRD traded notional reported by APAs and TVs in the EU increased to \$3.3 trillion in January 2022 compared to \$2.4 trillion the previous month. Trade count rose to 30.0 thousand from 22.9 thousand over the same period. EU-reported IRD trading activity comprised 24.2% of total European IRD traded notional and 37.8% of total European trade count (see Chart 1).

Euro-denominated IRD traded notional grew to \$2.6 trillion in January 2022 from \$2.0 trillion in December 2021 and comprised 79.1% of the EU total. Contracts in euro accounted for 74.2% of total EU trade count. US dollar-denominated IRD accounted for 9.4% of total EU IRD traded notional and 12.2% of trade count, while sterling-denominated transactions represented 1.4% and 1.9% of total EU IRD traded notional and trade count, respectively (see Chart 8).

Other currencies accounted for 10.0% of total EU IRD traded notional and 11.7% of trade count. Swedish krona represented the largest share of other currencies.

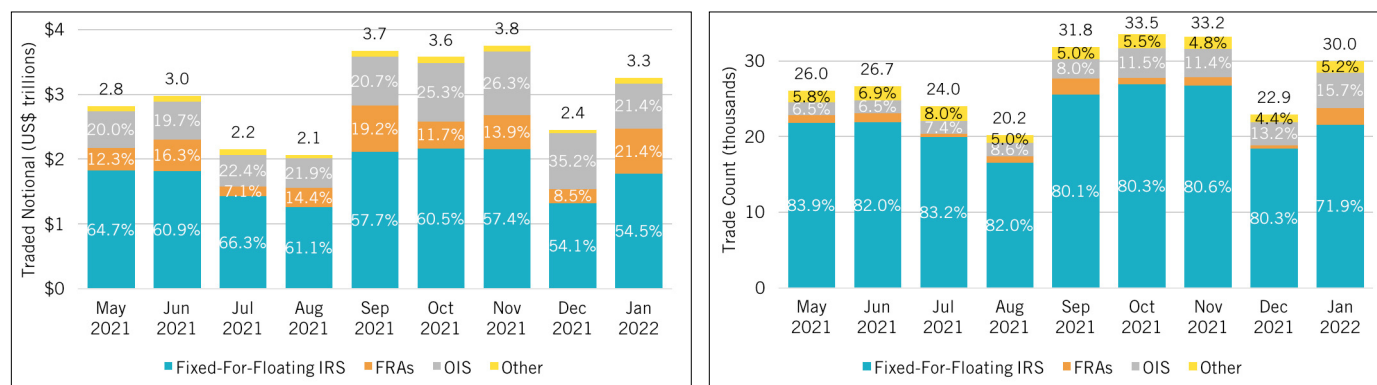
Chart 8: EU IRD Traded Notional and Trade Count by Currency



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 \$1.8 trillion in January 2022 versus \$1.3 trillion in December 2021 and comprised 54.5% of the EU total. Fixed-for-floating IRS made up 71.9% of total European trade count. OIS and FRAs accounted for 21.4% and 21.4% of total EU IRD traded notional and 7.2% and 15.7% of trade count, respectively (see Chart 9).

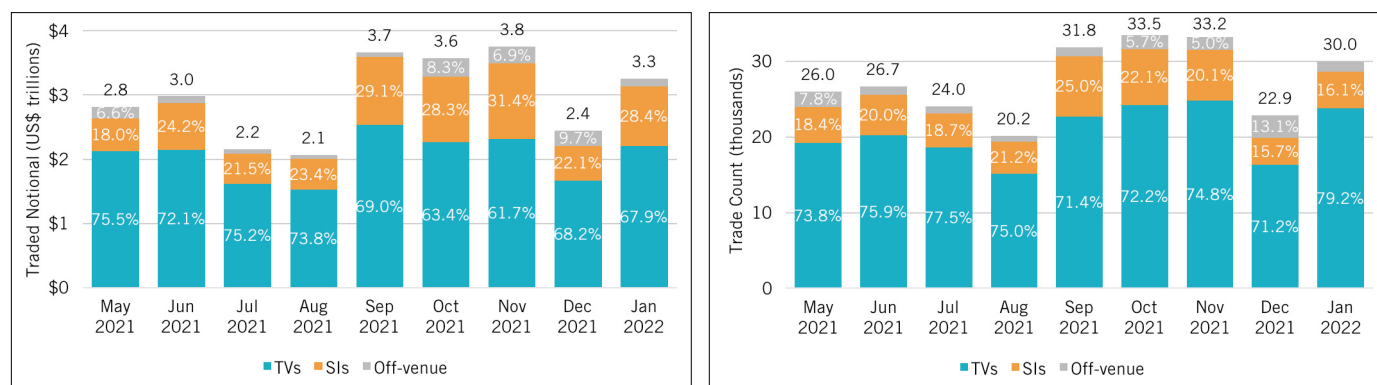
Chart 9: EU IRD Traded Notional and Trade Count by Product



Source: European APAs and TVs

The share of IRD traded notional executed on TVs in the EU was significantly higher compared to the UK. 67.9% of total EU IRD traded notional and 79.2% of total EU IRD trade count took place on TVs, 28.4% of total traded notional and 16.1% of trade count was executed by SIs, and 3.7% of traded notional and 4.6% of trade count occurred off venue (see Chart 10).

Chart 10: EU IRD Traded Notional and Trade Count by Execution Venue



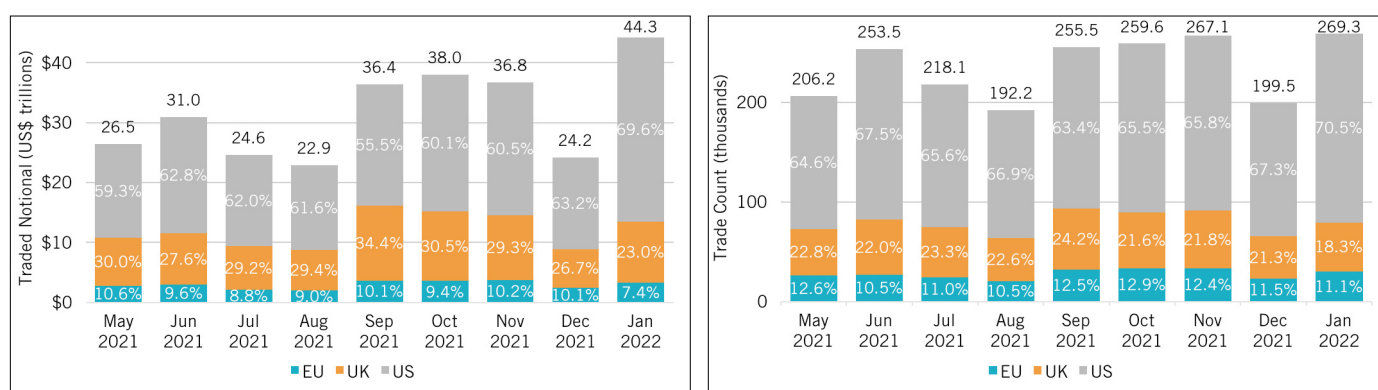
Source: European APAs and TVs

EUROPEAN AND US IRD TRADING ACTIVITY

Total IRD traded notional reported in the US increased to \$30.8 trillion in January 2022 from \$15.3 trillion in December 2021, and trade count grew to 189.9 thousand versus 134.2 thousand⁹. Combined EU, UK and US traded notional rose to \$44.3 trillion from \$24.2 trillion, and trade count increased to 269.3 thousand from 199.5 thousand over the same period.

US-reported traded notional accounted for 69.6% of combined EU, UK and US traded notional, while the EU and UK comprised 7.4% and 23.0%, respectively. US-reported transactions represented 70.5% of total trade count, while the EU and UK accounted for 11.1% and 18.3%, respectively (see Chart 11).

Chart 11: US, UK and EU Traded Notional and Trade Count

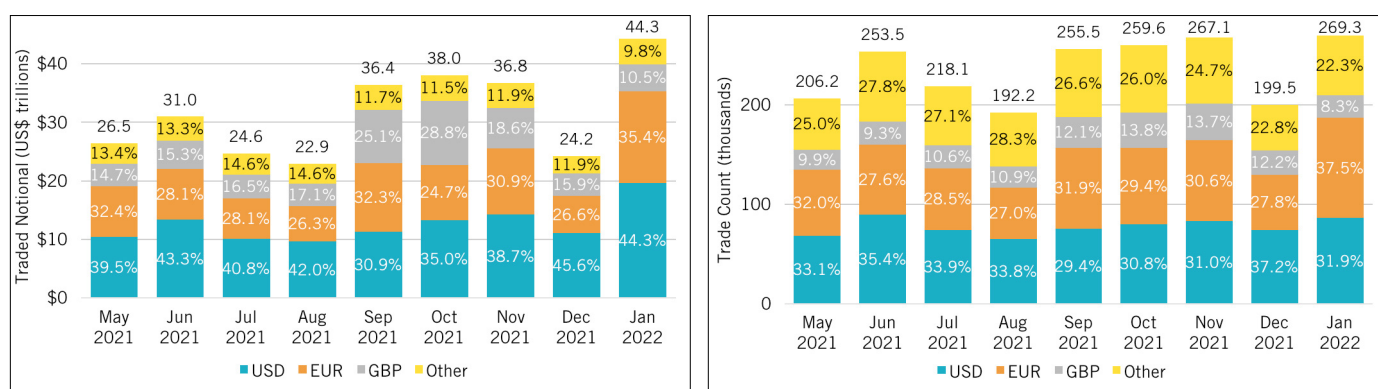


Source: DTCC SDR, European APAs and TVIs

Of the combined \$44.3 trillion in EU, UK and US IRD traded notional, 44.3% was denominated in US dollars, 35.4% was in euros and 10.5% was in sterling. Of the 269.3 thousand in combined trade count, 31.9% was denominated in US dollars, 37.5% was in euros and 8.3% was in sterling (see Chart 12).

Other currencies accounted for 9.8% of combined traded notional and 22.3% of trade count. Australian dollar and Canadian dollar represented the largest share of other currencies.

Chart 12: Combined US, UK and EU IRD Traded Notional and Trade Count by Currency

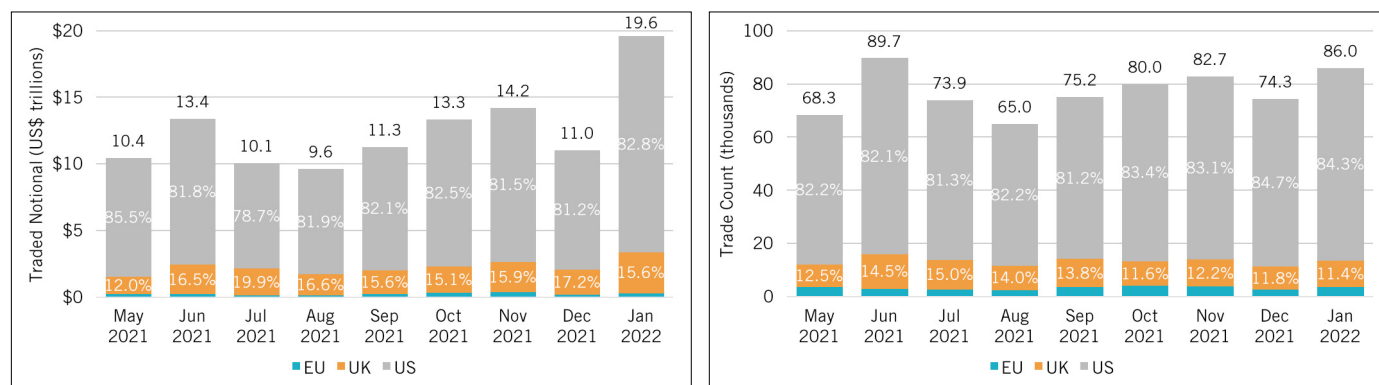


Source: DTCC SDR, European APAs and TVIs

⁹ Based on data from the DTCC 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>

Total US dollar-denominated IRD traded notional grew to \$19.6 trillion in January 2022 from \$11.0 trillion in December 2021. Trade count increased to 86.0 thousand from 74.3 thousand over the same period. 82.8% of total US dollar-denominated IRD traded notional and 84.3% of total trade count was reported in the US, and 15.6% of US dollar-denominated traded notional and 11.4% of trade count was reported in the UK (see Chart 13).

Chart 13: Combined US Dollar-denominated IRD Traded Notional and Trade Count by Jurisdiction

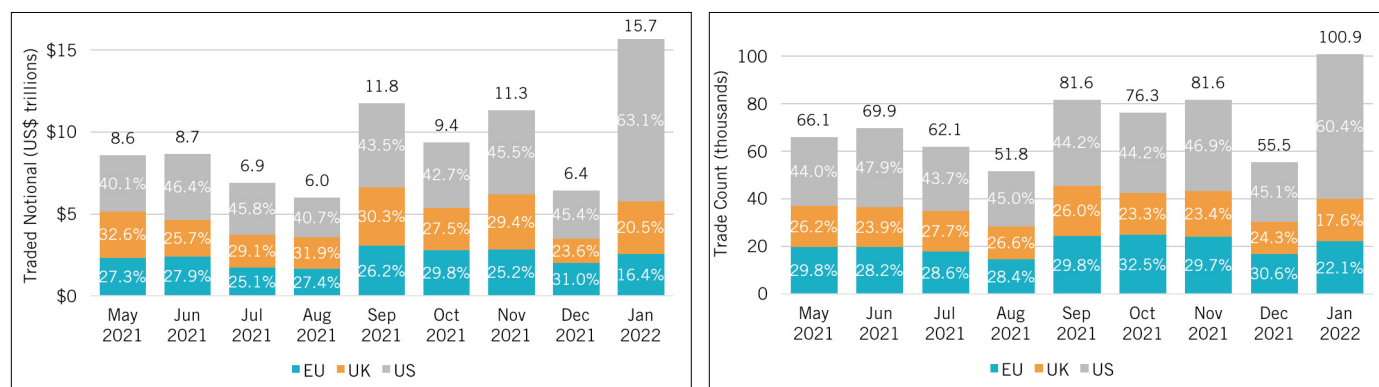


Source: DTCC SDR, European APAs and TVs

Total euro-denominated IRD traded notional increased to \$15.7 trillion in January 2022 from \$6.4 trillion in December 2021, while trade count jumped to 100.9 thousand from 55.5 thousand.

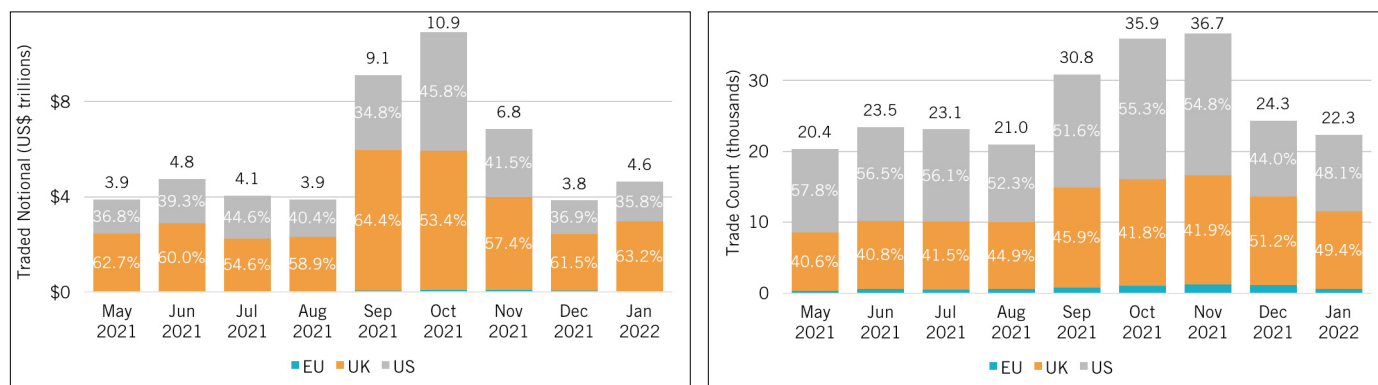
Reporting of euro-denominated IRD transactions was split between the three jurisdictions: 16.4% of traded notional and 22.1% of trade count was reported in the EU, 20.5% of total traded notional and 17.6% of trade count was reported in the UK, and 63.1% of traded notional and 60.4% of trade count was reported in the US (see Chart 14).

Chart 14: Combined Euro-denominated IRD Traded Notional and Trade Count by Jurisdiction



Source: DTCC SDR, European APAs and TVs

Total sterling-denominated IRD traded notional increased to \$4.6 trillion in January 2022 from \$3.8 trillion the previous month, while trade count fell to 22.3 thousand from 24.3 thousand over the same period. 63.2% of sterling-denominated IRD traded notional and 49.4% of trade count was reported in the UK, and 35.8% of traded notional and 48.1% of trade count was reported in the US (see Chart 15).

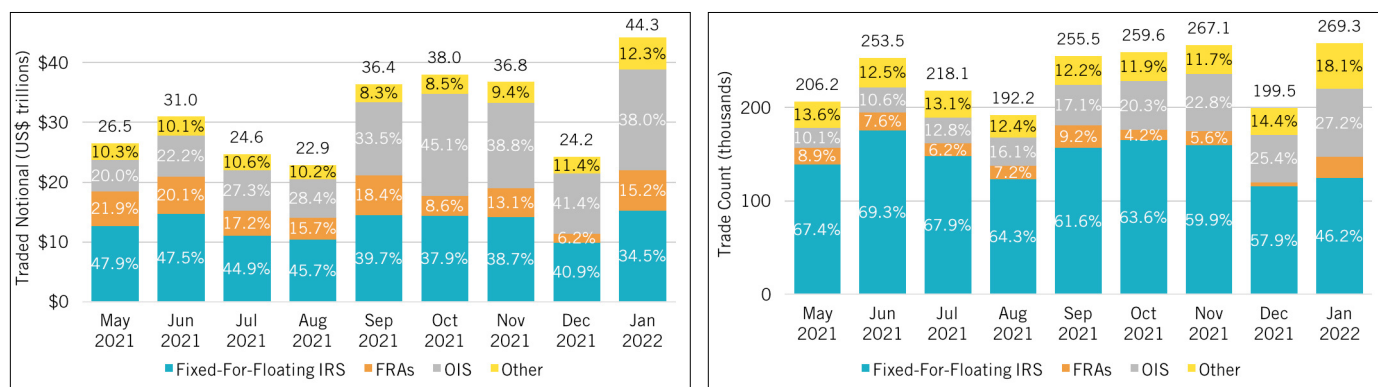
Chart 15: Combined Sterling-denominated IRD Traded Notional and Trade Count by Jurisdiction

Source: DTCC SDR, European APAs and TVs

Single currency fixed-for-floating IRS traded notional increased to \$15.3 trillion in January 2022 from \$9.9 trillion in December 2021. Trade count increased to 124.4 thousand from 115.4 thousand over the same period. Fixed-for-floating IRS accounted for 34.5% of combined IRD traded notional and 46.2% of combined trade count.

Total OIS traded notional rose to \$16.8 trillion in January 2022 from \$10.0 trillion the previous month and represented 38.0% of combined EU, UK and US IRD traded notional. Trade count increased to 73.3 thousand in January 2022 from 50.7 thousand in December 2021 and accounted for 27.2% of combined trade count.

FRA traded notional increased to \$6.7 trillion in January 2022 from \$1.5 trillion in December 2021. FRA trade count grew to 22.7 thousand from 4.8 thousand over the same period. FRAs accounted for 15.2% of combined EU, UK and US traded notional and 8.4% of trade count (see Chart 16).

Chart 16: Combined US, UK and EU IRD Traded Notional and Trade Count by Product

Source: DTCC SDR, European APAs and TVs

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 TV¹⁰s.

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"¹¹.

Trade information must be publicly disseminated either through an APA or by a TV through which a transaction was executed¹². 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) website¹³. In the UK, there were five registered APAs, 223 MTFs and 80 OTFs registered by the Financial Conduct Authority (FCA)¹⁴.

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 TV¹⁵s. 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 transactions¹⁶. 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.

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.

¹⁰ The list of APAs and TVs is included in Appendix 1

¹¹ Markets in Financial Instruments Regulation Article 21 www.esma.europa.eu/databases-library/interactive-single-rulebook/clone-mifir/article-21

¹² 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

¹³ European Securities and Markets Authority (ESMA) List of Registers https://registers.esma.europa.eu/publication/searchRegister?core=esma_registers_upreg

¹⁴ Financial Conduct Authority, The Financial Services Register https://register.fca.org.uk/s/resources#Other_registers

¹⁵ Most APAs and TVs display data only for a short period of time and no historical data is available

¹⁶ Most APAs and TVs don't disclose asset class data and publish all transactions ISINs

US Data

Analysis of US IRD is based on data from the DTCC SDR that only covers transactions required to be disclosed under US regulations¹⁷.

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 execution¹⁸.

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)¹⁹. 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 details²⁰.

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 TVs²¹. Therefore, OTC derivatives not traded on TVs that are not TOTV are not captured.

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 dissemination²². 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.

¹⁷ See Appendix 2 for more detailed information on Post-trade Reporting Requirements in Europe and the US

¹⁸ Commodity Futures Trading Commission 17 CFR Part 43 Real-Time Public Reporting of Swap Transaction Data www.cftc.gov/sites/default/files/ido/groups/public/@lrfederalregister/documents/file/2011-33173a.pdf

¹⁹ Bloomberg SDR was closed in August 2018 and all transactions were moved to DTCC SDR

²⁰ DTCC SDR services <https://pddata.dtcc.com/gtr/cftc/dashboard.do>

²¹ 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

²² 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

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.



ISDA has published other recent research papers:

- ***Digital Regulatory Reporting: Market and Regulatory Initiatives***
www.isda.org/a/33PgE/Digital-Regulatory-Reporting-Market-and-Regulatory-Initiatives.pdf
- ***ISDA-Clarus RFR Adoption Indicator: February 2022***
www.isda.org/a/AY0gE/ISDA-Clarus-RFR-Adoption-Indicator-February-2022.pdf
- ***Interest Rate Derivatives Trading Activity Reported in EU, UK and US Markets: December 2021***
www.isda.org/a/XQ0gE/Interest-Rate-Derivatives-Trading-Activity-Reported-in-EU-UK-and-US-Markets-December-2021.pdf

ISDA has expanded its SwapsInfo website to include IRD trading activity reported in the EU and UK. The new data is based on transactions publicly reported by 30 European APAs and TVs. European data is based on the location of reporting venues (EU versus UK), product taxonomy, currency, tenor and execution venue. To access the expanded SwapsInfo website, [click here](#).

For questions on ISDA Research, please contact:

Olga Roman
Head of Research
International Swaps and Derivatives Association, Inc. (ISDA)
Office: 212-901-6017
oroman@isda.org

ABOUT ISDA

Since 1985, ISDA has worked to make the global derivatives markets safer and more efficient. Today, ISDA has over 980 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 exchanges,

intermediaries, clearing houses and repositories, as well as law firms, accounting firms and other service providers. Information about ISDA and its activities is available on the Association's website:

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