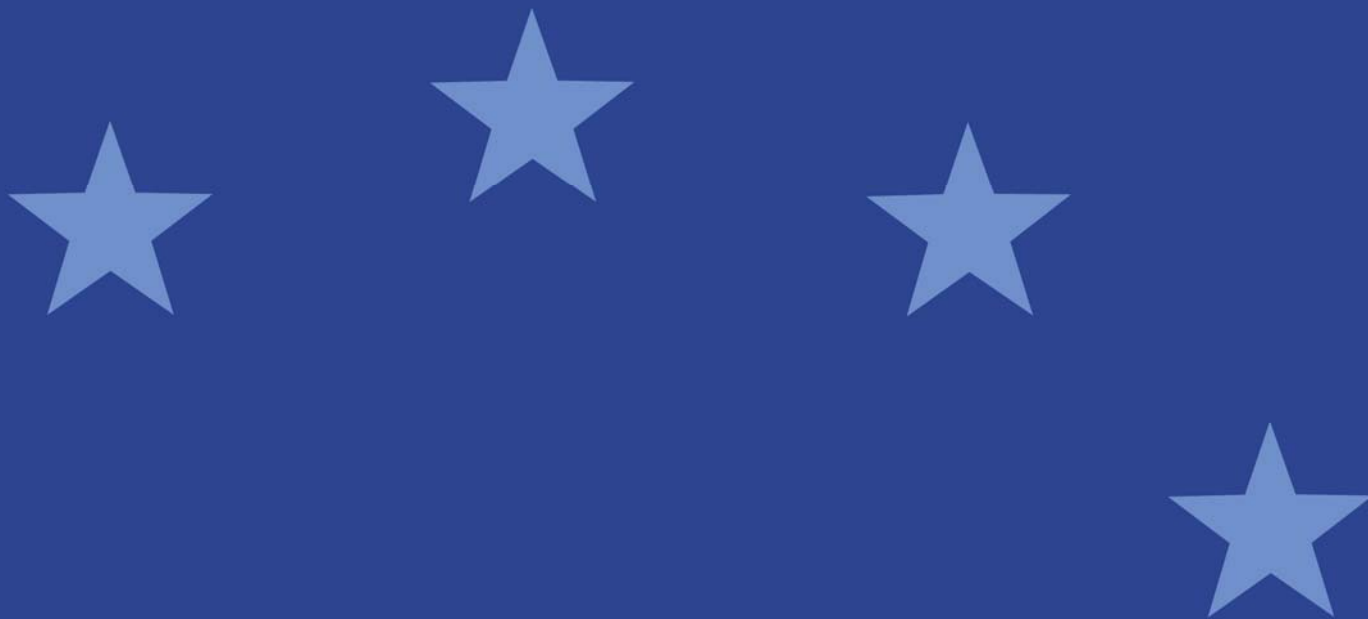




European Securities and
Markets Authority

**Reply form for the Consultation Paper
Draft RTS and ITS under SFTR and amendments to related
EMIR RTS**



Responding to this paper

The European Securities and Markets Authority (ESMA) invites responses to the specific questions listed in Draft RTS and ITS under SFTR and amendments to related EMIR RTS, published on the ESMA website.

Instructions

Please note that, in order to facilitate the analysis of the large number of responses expected, you are requested to use this file to send your response to ESMA so as to allow us to process it properly. Therefore, ESMA will only be able to consider responses which follow the instructions described below:

- use this form and send your responses in Word format (pdf documents will not be considered except for annexes);
- do not remove the tags of type < ESMA_QUESTION_SFTR_1> - i.e. the response to one question has to be framed by the 2 tags corresponding to the question; and
- if you do not have a response to a question, do not delete it and leave the text “TYPE YOUR TEXT HERE” between the tags.

Responses are most helpful:

- if they respond to the question stated;
- contain a clear rationale, including on any related costs and benefits; and
- describe any alternatives that ESMA should consider

Naming protocol

In order to facilitate the handling of stakeholders responses please save your document using the following format:

ESMA_CP_SFTR_NAMEOFCOMPANY_NAMEOFDOCUMENT.

E.g. if the respondent were XXXX, the name of the reply form would be:

ESMA_CP_SFTR_XXXX_REPLYFORM or

ESMA_CP_SFTR_XXXX_ANNEX1

Deadline

Responses must reach us by **30 November 2016**.

All contributions should be submitted online at www.esma.europa.eu under the heading ‘Your input/Consultations’.



Publication of responses

All contributions received will be published following the end of the consultation period, unless otherwise requested. **Please clearly indicate by ticking the appropriate checkbox in the website submission form if you do not wish your contribution to be publicly disclosed. A standard confidentiality statement in an email message will not be treated as a request for non-disclosure.** Note also that a confidential response may be requested from us in accordance with ESMA's rules on access to documents. We may consult you if we receive such a request. Any decision we make is reviewable by ESMA's Board of Appeal and the European Ombudsman.

Data protection

Information on data protection can be found at www.esma.europa.eu under the headings 'Legal notice' and 'Data protection'.

Introduction

Please make your introductory comments below, if any:

<ESMA_COMMENT_SFTR_1>

Assogestioni¹ welcomes the opportunity to comment on the ESMA consultation paper on the Draft RTS and ITS under SFTR and amendments to related EMIR RTS.

As general comment, we welcome and support any effort to align as much as possible the SFTR reporting with the reporting already in place for EMIR. We agree also on the proposals that increase the standardisation like the use of existing reporting format (ISO 22022), identifiers (LEIs) and the existing Trade Repositories.

However, the impact in terms of cost of SFTR reporting seems extremely high. The requested granularity of data under SFTR is much higher than under EMIR. Many fields presented in the SFTR consultation paper are new fields, which cannot be reused from the EMIR infrastructure. In addition as for those fields in EMIR report that appear to be suitable for reuse in the SFTR reporting, we encourage ESMA to ensure consistency between the two models.

In addition, as the Level 1 foresees already a high level of information, we would invite ESMA for an appropriate valuation of the cost and benefit analysis in the developing of the specific elements of the reporting.

From a buy-side perspective the generation of the UTI is also a key operating issue for SFT trades that are generally not conducted on platforms. The process for generating the UTI and its reporting to the counterparty in a timely manner should be operationally efficient to avoid unnecessary costs. In particular, in case of absence of an agreement on who is responsible for generating the UTI, we would encourage ESMA to review the proposal and exclude UCITS/AIFs and pensions funds from the obligation of its generation. In addition, rules should be designed in a way to allow the process of communicating the UTI to be automated as much as possible.

Finally, we would also recommend ESMA to reconsider the deadline of collateral reporting when the trades involve a collateral not known by the reporting deadline. An additional day would enable the counterparty to have the necessary time to collect market value information of the collateral at the value date (available not before the closing of the reference market) and report it in an appropriate timeframe (the following day).

<ESMA_COMMENT_SFTR_1>

¹ Assogestioni is the trade body for Italian investment management industry and represents the interests of members who manage funds and discretionary mandates around € 1,926 billion (as of October 2016).

Q1: Do you agree with the above proposals? What else needs to be considered? What are the potential costs and benefits of those? Please elaborate.

<ESMA_QUESTION_SFTR_1>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_1>

Q2: Do you agree with the above proposals? What else needs to be considered? What are the potential costs and benefits of those? Please elaborate.

<ESMA_QUESTION_SFTR_2>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_2>

Q3: Do you agree with the above proposals? What else needs to be considered? What are the potential costs and benefits of those? Please elaborate.

<ESMA_QUESTION_SFTR_3>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_3>

Q4: Do you consider that the currently used classification of counterparties is granular enough to provide information on the classification of the relevant counterparties? Alternatively, would the SNA be a proper way to classify them? Please elaborate.

<ESMA_QUESTION_SFTR_4>
We disagree with the alternative classification system based on the standards of the United Nations System of National Accounts (SNA 2008).
<ESMA_QUESTION_SFTR_4>

Q5: Do you foresee issues in identifying the counterparties of an SFT trade following the above-mentioned definitions?

<ESMA_QUESTION_SFTR_5>
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<ESMA_QUESTION_SFTR_5>

Q6: Are there cases for which these definitions leave room for interpretation? Please elaborate.

<ESMA_QUESTION_SFTR_6>
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<ESMA_QUESTION_SFTR_6>

Q7: Based on your experience, do you consider that the conditions detailed in paragraph 105 hold for CCP-cleared SFTs? Please elaborate.

<ESMA_QUESTION_SFTR_7>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_7>

Q8: In the case of CCP-cleared SFT trades, is it always possible to assign and report collateral valuation and margin to separately concluded SFTs? If not, would this impair the possibility for the counterparties to comply with the reporting obligation under Article 4 SFTR? Please provide concrete examples.

<ESMA_QUESTION_SFTR_8>
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<ESMA_QUESTION_SFTR_8>

Q9: Would the suggested data elements allow for accurate reporting at individual SFT level and CCP-cleared position level? in line with approach described above?

<ESMA_QUESTION_SFTR_9>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_9>

Q10: If so, are there any specific issues that need to be taken into account to adapt the EMIR approach to the SFT reporting?

<ESMA_QUESTION_SFTR_10>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_10>

Q11: Do you agree with the proposed report types and action types? Do you agree with the proposed combinations between action types and report types? What other aspects need to be considered? Please elaborate.

<ESMA_QUESTION_SFTR_11>
As regard report types, we support the need to distinguish repo and buy/sell back trade in the reporting framework. In addition BSB/SBB trades, in the experience of Italian asset management companies, are always undocumented BSB/SBB and as an outright buy or sell there is never a further exchange of collateral.

In this sense, in presence of uncollateralized BSB/SBB it should be reported the exchange of the principal (securities/commodities) versus cash while information on "collateral data" are not applicable.

If our understanding is correct, the reporting schema should be amended accordingly. Please refer to our answer to Q38.

As regards action types, we support the limitation of the number of action types.
<ESMA_QUESTION_SFTR_11>

Q12: The modifications of which data elements should be reported under action type "Modification of business terms"? Please justify your proposals.

<ESMA_QUESTION_SFTR_12>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_12>

Q13: The modifications of which data elements should be reported under action type "Other modification"? Please justify your proposals.

<ESMA_QUESTION_SFTR_13>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_13>

Q14: Do you agree with the revised proposal to use the terms “collateral taker” and “collateral giver” for all types of SFTs?

<ESMA_QUESTION_SFTR_14>
We support the revised proposal
<ESMA_QUESTION_SFTR_14>

Q15: Are the proposed rules for determination of the collateral taker and collateral giver clear and comprehensive?

<ESMA_QUESTION_SFTR_15>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_15>

Q16: Are you aware of any other bilateral repo trade scenario? Are there any other actors missing which is not a broker or counterparty? Please elaborate.

<ESMA_QUESTION_SFTR_16>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_16>

Q17: Do you consider that the above scenarios also accurately capture the conclusion of buy/sell-back and sell/buy back trades? If not, what additional aspect should be included? Please elaborate.

<ESMA_QUESTION_SFTR_17>
We agree with the scenario, but we need some clarification when applied to funds.

It is not clear the example in case of UCITS/AIFs in the repo scenario 2 – bilateral trade with a broker acting on its own account.

Para 137. set “*This scenario 2 would also cover the case where the broker acts as a principal to the transaction, as a “matched principal” broker (but the “Broker” field should be left empty). For the case of UCITS/AIFs, these funds should be identified as Counterparties 1 and 2 with their LEI and the fund management company could be identified as Counterparty 3. In case of outsourcing, the “Broker” field shall also be filled in with the LEI of the portfolio management company*”.

In line with the reporting logic under EMIR, the fund management company is not a counterparty; rather it is the entity responsible for reporting on behalf and in the name of those UCITS/AIFs. The asset management company does not act as broker and it does not act as intermediary, even if the asset management company of a fund has delegated the portfolio management to a third party. In the latter case, the delegated company should not be identified as a “broker” nor as “intermediary” and should not be included as party in the reporting.

For the sake of clarity, when the portfolio management of UCITS X of investment company A is delegated to investment company B, in case of bilateral trade with the intermediation of a broker/agent, the investment company B will not appear as other actors participants to the trade.

<ESMA_QUESTION_SFTR_17>

**Q18: Are the most relevant ways to conclude a repo trade covered by the above scenarios?
Are the assumptions correct? Please elaborate.**

<ESMA_QUESTION_SFTR_18>

It should be clarified how the value of collateral should be calculated namely if it is net or gross of its haircut. Usually the collateralization is based on the value of assets net of their haircut. Also para. 151 which states that “the value of the collateral is the market value of the collateral used for collateral management purpose” appear to support this interpretation.

We notice that field n. 77 – “ Collateral market value” in table 2 of draft RTS simply states that it is the “fair value of the individual component expressed in price currency”.

<ESMA_QUESTION_SFTR_18>

**Q19: Are the most relevant ways to conclude a repo trade covered by the above scenarios?
Are the assumptions correct? Please elaborate.**

<ESMA_QUESTION_SFTR_19>

Are the most relevant ways to conclude a securities lending transaction covered by the above scenarios?
Are the assumptions correct? Please elaborate

In case a counterparty makes a securities lending transaction with an intermediary (lending agent) and the latter delegates the lending activity to a third party (a sub-agent), we assume that the delegated third party will not appear as other actor participant to the trade in the scenario 2 or 3.

<ESMA_QUESTION_SFTR_19>

Q20: Would it be possible to link the 8 trade reports to constitute the “principal clearing model” picture? If yes, would the method for linking proposed in section 4.3.4 be suitable?

<ESMA_QUESTION_SFTR_20>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_20>

Q21: In the case of securities lending transactions are there any other actors missing?

<ESMA_QUESTION_SFTR_21>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_21>

Q22: What potential issues do reporting counterparties face regarding the reporting of the market value of the securities on loan or borrowed?

<ESMA_QUESTION_SFTR_22>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_22>

**Q23: Do you agree with the proposal with regards to reporting of uncollateralised SFTs?
Please elaborate.**

<ESMA_QUESTION_SFTR_23>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_23>

Q24: Do you agree with the proposal with regards to reporting of SFTs involving commodities? Please elaborate.

<ESMA_QUESTION_SFTR_24>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_24>

Q25: Are there any obstacles to daily position reporting by margin lending counterparties? Do prime brokers provide information to their clients about intraday margin loans?

<ESMA_QUESTION_SFTR_25>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_25>

Q26: Which kind of guarantees or indemnifications exist in relationship to prime brokerage margin lending? Are there other parties possibly involved in a margin loan? Please provide an example.

<ESMA_QUESTION_SFTR_26>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_26>

Q27: What types of loans or activities, other than prime brokerage margin lending, would be captured in the scope of margin lending under the SFTR definition? Please provide details on their nature, their objective(s), the execution and settlement, the parties involved, the existing reporting regimes that these may already be subject to, as well as any other information that you deem relevant for the purpose of reporting.

<ESMA_QUESTION_SFTR_27>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_27>

Q28: Are there any obstacles to the collection of data on the amount of margin financing available and outstanding margin balance? Are there any alternatives to collect data on “Free credit balances”, as required by the FSB? Please provide an example.

<ESMA_QUESTION_SFTR_28>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_28>

Q29: Are there any obstacles to the reporting of (positive or negative) cash balances in the context of margin lending?

<ESMA_QUESTION_SFTR_29>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_29>

Q30: Are data elements on margin financing available and outstanding balances relevant for margin loans outside the prime brokerage context? Please provide examples.

<ESMA_QUESTION_SFTR_30>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_30>

Q31: Is the short market value reported to clients at the end of the day part of the position snapshot? What is the typical format and level of granularity included in the information communicated to clients?

<ESMA_QUESTION_SFTR_31>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_31>

Q32: Is the data element on short market value relevant for margin loans outside the prime brokerage context? Please provide examples.

<ESMA_QUESTION_SFTR_32>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_32>

Q33: Do you agree with the proposed structure of the SFT reports? If not, how you would consider that the reporting of reuse and margin should be organised? Please provide specific examples.

<ESMA_QUESTION_SFTR_33>
We suggest to clarify if no reuse of collaterals is in place, one is not obliged to submit any information within tables 4 (Re-use Data). Please refer also to our answer to Q64.
<ESMA_QUESTION_SFTR_33>

Q34: What are the potential costs and benefits of reporting re-use information as a separate report and not as part of the counterparty data? Please elaborate.

<ESMA_QUESTION_SFTR_34>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_34>

Q35: What are the potential costs and benefits of reporting margin information as a separate report and not as part of the counterparty data? Please elaborate.

<ESMA_QUESTION_SFTR_35>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_35>

Q36: Are there any fields which in your view should be moved from the Counterparty to the Trade-related data or vice-versa? If so, please specify the fields clarifying why they should be moved.

<ESMA_QUESTION_SFTR_36>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_36>

Q37: Is Triparty agent expected to be the same for both counterparties in all cases? If not, please specify in which circumstances it can be different.

<ESMA_QUESTION_SFTR_37>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_37>

Q38: Do you agree with the proposed fields included in the attached Excel document? Please provide your comments in the specified column.

<ESMA_QUESTION_SFTR_38>

BSB/SBB trades, in the experience of Italian asset management companies, are always undocumented BSB/SBB and as an outright buy or sell there is never a further exchange of collateral.

In this sense, in presence of uncollateralized BSB/SBB it should be reported the exchange of the principal (securities/commodities) versus cash while information on “collateral data” are not applicable.

If our understanding is correct, the reporting schema should be amended accordingly.

The field n. 64 – “Uncollateralised (SL) flag” of Table 2 of the draft annex VII (ITS) and VIII (RTS) now applicable only to securities lending transaction should be extended to include also BSB/SBB trades. Accordingly, the absence of the specific information on collateral data requested in the fields from 65 to 94, where applicable, should then be acceptable.

As regards the fields that would apply to BSB/SBB trades as indicated in the sheet “Loan&collateral data” of 2016-1409_sftr_tables_cp_version for BSB, the following issues should be considered :

- 9- Master agreement type: a further code, as for example “None”, should be foreseen to allow also for undocumented BSB/SBB.
 - 15 – Termination date: not applicable for all BSB/SBB trades. In our experience, early termination (partial or full) is not possible.
 - 18 – General collateral indicator: not applicable for BSB/SBB trades. Those trades are an outright buy/sell in cash of specific instruments/commodities and therefore are not subject to general/specific collateral arrangements.
 - 20 – Method used to provide collateral: not applicable for BSB/SBB trades.
- Collateral data:
- 65 – 94: not applicable for BSB/SBB uncollateralized trades. Should BSB/SBB be required to be treated as “collateralized” trade, a number of fields would be redundant as they would be a repeat (for example field 68 and field 9 for the Security identifier, 73 with 43 for the quantity or nominal amount).

More in general, a large number of newly introduced fields are introduced to gather more information than those required under EMIR. We would like to encourage ESMA to review whether the proposed granularity of data is necessary for the reporting under SFTR..

In addition as some fields in EMIR seems be possible to reuse also in SFTR, we encourage ESMA to ensure consistency for the reporting (different list values, different names or different formats).

<ESMA_QUESTION_SFTR_38>

Q39: Do you agree with the proposal to identify the country of the branches with ISO country codes?

<ESMA_QUESTION_SFTR_39>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_39>

Q40: Do you agree with the proposed approach with regards to the reporting of information on beneficiaries? If not, what other aspects need to be considered? Please elaborate.

<ESMA_QUESTION_SFTR_40>

We agree with the proposal, but it should be noted that since UCITSs and AIFs are financial counterparties and by definition also beneficiaries, it would be clarified that is not necessary to fill in the fields related to the beneficiary, as they would be redundant.

<ESMA_QUESTION_SFTR_40>

Q41: Would exempting CCPs from reporting the Report Tracking Number field would reduce the reporting burden on the industry.

<ESMA_QUESTION_SFTR_41>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_41>

Q42: Could you please provide information on incremental costs of implementing the proposal, taking into account that systems will have to be changed to implement the SFTR reporting regime in general?

<ESMA_QUESTION_SFTR_42>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_42>

Q43: Could you please provide views on whether you would prefer Alternative 1 (prior-UTI) over Alternative 2 (relative referencing solution)? Please provide relative costs of implementing both proposals.

<ESMA_QUESTION_SFTR_43>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_43>

Q44: Do you agree with the above rules for determining the entity responsible for the generation and transmission of the UTI? If not what other aspects should be taken into account? Please elaborate.

<ESMA_QUESTION_SFTR_44>

We deem UTI generation is a fundamental operating issue for SFTs trades where, at least for the time being, no automatic generation of a UTI exists as this types of trades are generally not conducted on platforms.

Therefore we support rules for determining the entity responsible for the generation and transmission of the UTI when counterparties to a trade are unable to agree whose responsibility it is to generate the UTI. However, we disagree with the proposed approach which foresees that at the end of the hierarchy process, the generation of the UTI have to be made by the collateral taker (cfr. flowchart para. 79).

In the proposed approach, an investment fund (UCITS or AIF) or pension funds, in case of absence of a global unique identifier endorsed by ESMA o a unique identifier agreed by the counterparties, is obliged to generate the UTI when is a collateral taker (e.g. when buying securities in a reverse repo or in a buy-sell back transactions and when lending the securities).

In general, the buy-side client such as for example UCITS/AIF/pensions funds should be exempted, from the obligation of generation at all. This obligation should be on the sell-side meaning credit institutions and investment firms (e.g. brokers/dealers). Article 3(2)(let. e)(point ii.) of the drafted ITS (Annex VII) should be changed accordingly.

As regards article 3(2) of the same drafted ITS ("*3. The counterparty generating the unique trade identifier shall communicate that unique trade identifier to the other counterparty in a timely manner so that the latter is able to meet its reporting obligation*"), we support the proposed article however i) it should be more precise regarding the timeline of the communication between counterparties and ii) it should include also an obligation on the generating party to deliver the UTI electronically to allow a more efficient handling .

More precisely, the party who is obliged to communicate to its counterparty a UTI : should do so as soon as possible and within the confirmation process at the latest; should provide the UTI in a standardized way and jointly with the trade confirmation instead of (i) requesting its counterparty to obtain the UTI from a website or (ii) communicating it via separate e-mail) (both, (i) and (ii) cannot be considered by the party receiving the UTI in an automated way).

Furthermore, some provisions should also consider the case of delays in the production of UTI where a counterparty fail to provide identifiers in a timely manner.

If a party is unable to communicate the UTI within the reporting deadlines, the receiver should be allowed to generate its own UTI in order to report. The TR should allow this provisional UTI to subsequently be amended once the final UTI is received

<ESMA_QUESTION_SFTR_44>

Q45: Do you agree with the logic and framework for reporting of margins for CCP-cleared SFTs? What other aspects should be taken into account? Please elaborate.

<ESMA_QUESTION_SFTR_45>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_45>

Q46: Would you agree with the definition of terms? If not, please explain.

<ESMA_QUESTION_SFTR_46>

Para. 248 (b) indicates that "collateral basket" or "collateral schedule" means a list of securities agreed to be eligible for delivery against a given SFT. Where the term "collateral basket" is primarily used in the repo market and the term "collateral schedule" is primarily used in securities lending.

It should also be noted that para. 269 implies that a collateral basket could be identified by a ISIN while the reporting logic is different depending on whether a basket is identified by a ISIN or not.

As the list of securities included in a basket may frequently change, even daily, we understand that in such a case the use of a specific identification for the basket would not be possible. We ask for a clarification.

<ESMA_QUESTION_SFTR_46>

Q47: Are the cases for which collateral can be reported on trade level accurately described? If not, please explain.

<ESMA_QUESTION_SFTR_47>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_47>

Q48: In addition to the exceptions listed above, when would the collateral for a repo trade that does not involve a collateral basket not be known by the reporting deadline of end of T + 1?

<ESMA_QUESTION_SFTR_48>
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<ESMA_QUESTION_SFTR_48>

Q49: Could the counterparties to a CCP-cleared cash rebate securities lending trade report an estimated value for the cash collateral in the markets in which the CCP calculates the initial cash value on the intended settlement date? If not, please explain.

<ESMA_QUESTION_SFTR_49>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_49>

Q50: Are the cases for which collateral would be reported on the basis of the net exposure accurately described? If not, please explain.

<ESMA_QUESTION_SFTR_50>

We agree that counterparties would report the collateral separately from the underlying trades when reporting the collateral for net exposure is not directly allocated to a trade but is provided for the SFTs between two counterparties.

In our view a broad range of type of SFT should be allowed to collateralize based on the net exposure, beyond open repo trades between two counterparty and some types of triparty repos (as para. 252 (b) states) or open securities lending trades collateralized through securities (as para. 252 (c) states).

In addition, we would comment on the reporting deadline on the collateral information when the trades involve a collateral not known by the reporting deadline at the end of T+1. We would like to encourage ESMA to review the deadline of collateral reporting. A further day (settlement date of opening leg + 1) would enable the counterparty to have the necessary time to collect market value information of the collateral at the value date (available not before the closing of the reference market) and report it in an appropriate timeframe (the following date).

<ESMA_QUESTION_SFTR_50>

Q51: Is the understanding of ESMA correct that CCP-cleared trades are excluded from the calculation of net exposures between two counterparties? If not, please explain.

<ESMA_QUESTION_SFTR_51>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_51>

Q52: Is the assumption correct that the counterparties can report the assets available for collateralisation in the collateral portfolio for margin lending with the balance of the outstanding loan? If not, please explain.

<ESMA_QUESTION_SFTR_52>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_52>

Q53: Are you aware of any scenarios that would require at the end of day the reporting of cash not only as principal amount, but also as cash collateral for repos? If yes, please describe.

<ESMA_QUESTION_SFTR_53>

The cash can be used as an alternative to securities on a temporary basis in the event that the counterparty has no collateral eligible securities available to be placed in collateral on that specific day. At that point the value of the collateral is temporarily integrated with the cash notwithstanding any contractual rules, provided it is for a limited time (overnight).

This practice should be taken into account for repo transaction other than security lending.

<ESMA_QUESTION_SFTR_53>

Q54: Would you foresee any specific challenges in implementing the proposed logic for linking? If yes, please explain.

<ESMA_QUESTION_SFTR_54>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_54>

Q55: In which case would counterparties need to provide a bilaterally agreed unique code to for linking trades to collateral? If yes, please explain.

<ESMA_QUESTION_SFTR_55>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_55>

Q56: Is there a case where more than one bespoke bilateral agreement is concluded between two counterparties?

<ESMA_QUESTION_SFTR_56>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_56>

Q57: Is it possible, for a pair of counterparties to have more than one master agreement or more than one bespoke agreement per SFT type? In these cases, please specify, how these agreements are identified between the counterparties? Please provide examples.

<ESMA_QUESTION_SFTR_57>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_57>

Q58: How costly would it be for your firm to report individual securities? If possible, please provide a quantitative estimation of the costs.

<ESMA_QUESTION_SFTR_58>

Section 4.3.6. describes appropriately the complexity of margin lending. As no specific individual portfolio securities is identifiable as a specific collateral, collect all information on the whole portfolio used as guarantee is burdensome. As an alternative, we would like to encourage ESMA to request only the value of the portfolio, without the details on the underlying.

<ESMA_QUESTION_SFTR_58>

Q59: Would the reporting of outstanding balances by asset class facilitate reporting? How costly would it be for your firm to develop and implement such a reporting? If possible, please provide a quantitative estimation.

<ESMA_QUESTION_SFTR_59>

No, we do not believe that an aggregate data reporting facilitates the reporting. Should the aggregation be required, it will enhance costs: initial cost for the development of the reporting and on-going cost for control procedures.

<ESMA_QUESTION_SFTR_59>

Q60: Are there other obstacles to collecting position-level data on funding sources for each prime broker? If this is the case, please provide an example, and whether there is a viable alternative.

<ESMA_QUESTION_SFTR_60>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_60>

Q61: What type of information or guidance would be required in order for funding sources to be reported consistently across all reporting counterparties?

<ESMA_QUESTION_SFTR_61>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_61>

Q62: Can data elements on funding sources be reported for margin loans outside the prime brokerage context? Please provide examples.

<ESMA_QUESTION_SFTR_62>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_62>

Q63: How are portfolio leverage ratios calculated? Please provide an example of the formulas typically used.

<ESMA_QUESTION_SFTR_63>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_63>

Q64: What are the potential costs of providing the re-use data as outlined in this section? Are there other options to link collateral that is re-used to a given SFT or counterparty? Please document the potential issues. Please elaborate.

<ESMA_QUESTION_SFTR_64>

The scope of collateral re-use reporting needs clarification.

In our understanding, article 4 of the draft RTS (Annex VIII) requires information in case of reuse on individual financial instruments received under a collateral agreement distinguishable from other assets, while in the RTS and ITS annex (of Annex VII and VIII), in light of FSB work, the scope of collateral re-use reporting appears to be wider. In this latter case, it is not clear whether the information of re-use of cash collateral

requested is limited to securities lending, as indicated in the SFTR-table available in the Excel file, or it applies to all SFTs.

The scope on re-use should be limited to the one requested by art. 4(9)(b) of SFT regulation.

Reporting data on re-use on financial instruments is a very complex task. Even more difficult in case of reinvestment of cash collateral (where not distinguishable from the other cash). From an operation and IT point of view, assets bought should then be linked with the cash arising from collateral and then this asset should be distinguishable from the other already included in the own portfolio.

We suggest ESMA should wait the outcome of FSB work before developing a position on the matter while following a gradual approach. The Annexes VII (ITS) and VIII (RTS) should be updated correctly. For example the type of collateral component (Table 4 – re-use data, field n. 5) should be limited only to securities in the drafted ITS. In addition, it should drop fields 10 to 12 requested for each cash-collateral component.

In any case, if the disclosure on re-use of cash collateral would be considered appropriate at this stage, it should be limited to cash collateral re-use linked to securities lending transactions.

We suggest to clarify also who should make the reporting of reuse of collateral: it is unclear whether it should be provided only by the reporting counterparty as the collateral taker or by both counterparties. Article 4 of the draft RTS (Annex VIII) is ambiguous on this point.

Finally, where the collateral re-use would be reported independently of the underlying trades and the counterparty receiving the financial instrument as collateral, it should be noted this would result in an excessive and unnecessary burden for UCITS funds and other similar funds where the re-use of a financial instrument is fully excluded by European or national provisions
<ESMA_QUESTION_SFTR_64>

Q65: Would it be easier to report collateral re-use in a separate message as proposed or, it will be better repeating the information as part of the counterparty data?

<ESMA_QUESTION_SFTR_65>

We support the reporting of the collateral re-use in a separate message

<ESMA_QUESTION_SFTR_65>

Q66: Would the effort of reporting re-use on a weekly or monthly basis reduce significantly the costs?

<ESMA_QUESTION_SFTR_66>

A monthly reporting on re-use will reduce the on-going cost, but no difference on the analysis and development costs that should be done anyway.

<ESMA_QUESTION_SFTR_66>

Q67: Are there cash re-investment programmes for agent lenders acting as principal?

<ESMA_QUESTION_SFTR_67>

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<ESMA_QUESTION_SFTR_67>

Q68: Do you agree that the term type and the way maturity is measured (e.g. weighted average maturity) are appropriate elements for the purpose of monitoring potential liquidity risks from maturity mismatch between the securities loan and the reinvestment of cash collateral?

Are there other elements you believe ESMA should consider collecting? Do you see any obstacles to the reporting of these elements, or their analysis? Please explain.

<ESMA_QUESTION_SFTR_68>

In line with our answer to Q64, we suggest dropping the information from the reporting framework information on the reinvestment of cash collateral

<ESMA_QUESTION_SFTR_68>

Q69: What is the methodology your firm uses to compute the weighted-average life and maturity of cash collateral portfolios? Do you expect this methodology to vary significantly across firms?

<ESMA_QUESTION_SFTR_69>

In line with our answer to Q64, we suggest dropping the information from the reporting framework information on the reinvestment of cash collateral.

<ESMA_QUESTION_SFTR_69>

Q70: Do you agree with the proposed approach? What other aspects need to be taken into account? Please elaborate.

<ESMA_QUESTION_SFTR_70>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_70>

Q71: Do you agree with the proposed approach? Please elaborate.

<ESMA_QUESTION_SFTR_71>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_71>

Q72: Do you agree with the proposed approach with regards to reporting of master agreements? What other aspects need to be considered? Please elaborate.

<ESMA_QUESTION_SFTR_72>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_72>

Q73: Do you agree with the proposed approach with regards to reporting of method of trading? What other aspects need to be considered? Please elaborate.

<ESMA_QUESTION_SFTR_73>

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<ESMA_QUESTION_SFTR_73>

Q74: In your view, what information on the nature of the indemnification (guarantee of the value, replacement of the securities, etc.), relevant for the monitoring of financial stability in relation to indemnifications could be reported? What type of data would be reported for each of the suggested elements reported e.g. values, percentages, other? Please elaborate.

<ESMA_QUESTION_SFTR_74>

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<ESMA_QUESTION_SFTR_74>

Q75: Do you agree with the proposed structure of the validation rules? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_75>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_75>

Q76: Do you agree with the proposed scope of the reconciliation process? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_76>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_76>

Q77: Do you consider that the proposed framework for collateral reconciliation process should take place in parallel with the reconciliation of the loan data? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_77>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_77>

Q78: Do you agree with the use of ISO 20022 for the purposes of ensuring common format and common encoding of files exchanged between TRs during the inter-TR reconciliation process? If not, what other common standard would you propose?

<ESMA_QUESTION_SFTR_78>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_78>

Q79: Do you agree with standardising the timeline for finalisation of the inter-TR reconciliation process? Do you agree with the proposed timeline for finalisation of the inter-TR reconciliation process? If not, what would be a most appropriate timeline? What other aspects should be taken into account? Please elaborate.

<ESMA_QUESTION_SFTR_79>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_79>

Q80: Do you agree with the fields proposed for reconciliation? Which other should be included, or which ones should be excluded? Please elaborate.

<ESMA_QUESTION_SFTR_80>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_80>

Q81: Do you agree with the proposed tolerance levels? Which other tolerance levels would you suggest? Please elaborate.

<ESMA_QUESTION_SFTR_81>
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<ESMA_QUESTION_SFTR_81>

Q82: What other fields are suitable for establishing tolerance levels? What should be the tolerance level for those fields? Should the tolerance level be linearly or logarithmically related to the values? What other aspects should be taken into account? Please elaborate.

<ESMA_QUESTION_SFTR_82>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_82>

Q83: Do you agree with the proposed logic for rejections messages? Do you agree with the proposed statuses of rejection messages? What other aspects should be taken into account? Please elaborate.

<ESMA_QUESTION_SFTR_83>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_83>

Q84: Do you agree with the proposed reconciliation statuses? What other aspects should be taken into account? Please elaborate.

<ESMA_QUESTION_SFTR_84>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_84>

Q85: Do you agree with the proposed end-of-day response to reporting counterparties, report submitting entities and entities responsible for reporting? What other information should be included? What are the potential costs of this information? Please elaborate.

<ESMA_QUESTION_SFTR_85>
We support the ESMA proposal according to which the TRs provide standardized response information to the reporting counterparties and the report submitting entities.
<ESMA_QUESTION_SFTR_85>

Q86: What other End-of-day reports can be provided to reporting counterparties, report submitting entities and entities responsible for reporting

<ESMA_QUESTION_SFTR_86>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_86>

Q87: Do you agree with the proposed aggregation criteria? What other aspects should be taken into account? Please elaborate.

<ESMA_QUESTION_SFTR_87>



TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_87>

Q88: Do you agree with the proposed technical aspects on aggregation of data? What other aspects should be taken into account?

<ESMA_QUESTION_SFTR_88>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_88>

Q89: Do you agree with the proposed timeline for keeping the data available on the website? Please elaborate.

<ESMA_QUESTION_SFTR_89>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_89>

Q90: At which point in time do you consider that the additional data elements regarding an SFT will be available for authorities? What are the potential costs of the inclusion of the above mentioned additional data elements? Please elaborate.

<ESMA_QUESTION_SFTR_90>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_90>

Q91: What other data elements could be generated by the TRs and provided to authorities? Please elaborate.

<ESMA_QUESTION_SFTR_91>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_91>

Q92: In case a preliminary reconciliation status report is provided, what elements it should include? Please elaborate

<ESMA_QUESTION_SFTR_92>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_92>

Q93: Considering the proposed termination of the inter-TR reconciliation process at 18:00, when at the earliest can a TR submit the reconciled data to the authorities?

<ESMA_QUESTION_SFTR_93>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_93>

Q94: What is the optimal delay for provision of SFT position-level reports? What are the potential costs of the generation of above mentioned position reports? What other reports would you suggest to be provided by the TRs? Please elaborate.

<ESMA_QUESTION_SFTR_94>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_94>

Q95: Do you consider that there should be one position report including both reconciled and non-reconciled data or that there should be two position reports, one containing only reconciled data and the other one containing only non-reconciled data? What are the potential costs of the separation of above mentioned position reports? What are the benefits of the separation above mentioned position reports? Please elaborate.

<ESMA_QUESTION_SFTR_95>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_95>

Q96: Do you agree with the proposal? What other aspects should be taken into account? Please elaborate.

<ESMA_QUESTION_SFTR_96>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_96>

Q97: Do you agree with the proposed approach to avoid double counting? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_97>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_97>

Q98: Do you agree with the proposed approach for single access per authority irrespective of the number of responsibilities and mandates it has? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_98>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_98>

Q99: Do you agree with the proposed way to establish transaction level access to data reported under EMIR? What are the costs of establishing such a level of access? Please elaborate.

<ESMA_QUESTION_SFTR_99>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_99>

Q100: Do you agree with the proposed way to establish transaction level access to data reported under SFTR? What are the costs of establishing such a level of access? Please elaborate.

<ESMA_QUESTION_SFTR_100>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_100>

Q101: Do you agree with the proposed functional approach under EMIR? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_101>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_101>

Q102: Do you agree with the proposed territorial approach under SFTR? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_102>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_102>

Q103: Do you agree with the proposed levels of access do data reported by branches included in section 6.5? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_103>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_103>

Q104: Do you agree with the proposed levels of access do data reported by subsidiaries under EMIR included in sections 6.5.1 – 6.5.5? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_104>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_104>

Q105: Do you agree with the proposed levels of access data reported by subsidiaries under SFTR included in sections 6.5.1 –6.5.5? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_105>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_105>

Q106: Is there any possible way to ensure the access to TR data from the perspective of commodities? Please elaborate.

<ESMA_QUESTION_SFTR_106>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_106>

Q107: Do you agree with the proposed access levels under SFTR for authorities competent for securities and markets? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_107>
TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_107>

Q108: Do you agree with the proposed access levels under SFTR for authorities supervising CCPs? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_108>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_108>

Q109: Do you agree with maintaining the current access levels under EMIR for ESCB issuer of the currency? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_109>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_109>

Q110: Do you agree with the proposed access levels under SFTR for ESCB issuer of the currency? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_110>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_110>

Q111: Do you agree with the proposed access levels under SFTR for authorities competent for takeover bids? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_111>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_111>

Q112: Do you agree with the proposed access levels under SFTR for ESMA and ESRB? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_112>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_112>

Q113: Do you agree with the proposed access levels under SFTR for ACER? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_113>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_113>

Q114: Do you agree with the proposed access levels under EMIR for EBA and EIOPA? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_114>

TYPE YOUR TEXT HERE

<ESMA_QUESTION_SFTR_114>

Q115: Do you agree with the proposed access levels under SFTR for EBA and EIOPA? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_115>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_115>

Q116: Do you agree with the proposed access levels under EMIR for ECB in carrying out its tasks within a single supervisory mechanism? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_116>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_116>

Q117: Do you agree with the proposed access levels under SFTR for ECB in carrying out its tasks within a single supervisory mechanism? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_117>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_117>

Q118: Do you agree with the proposed access levels under EMIR for national authorities competent for the prudential supervision under CRD IV and CRR which participate in the SSM? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_118>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_118>

Q119: Do you agree with the proposed access levels under SFTR for national authorities competent for the prudential supervision under CRD IV and CRR which participate in the SSM? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_119>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_119>

Q120: Do you agree with the proposed access levels under EMIR for national authorities competent for the prudential supervision under CRD IV and CRR which do not participate in the SSM? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_120>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_120>

Q121: Do you agree with the proposed access levels under SFTR for national authorities competent for the prudential supervision under CRD IV and CRR which do not participate in the SSM? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_121>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_121>

Q122: Do you agree with the proposed access levels under EMIR for national supervisory authorities under Solvency II? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_122>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_122>

Q123: Do you agree with the proposed access levels under SFTR for national supervisory authorities under Solvency II? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_123>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_123>

Q124: Do you agree with the proposed access levels under EMIR for national competent authorities under UCITS and AIFMD? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_124>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_124>

Q125: Do you agree with the proposed access levels under SFTR for national competent authorities determined under Solvency II? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_125>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_125>

Q126: Do you agree with the proposed access levels under EMIR for national resolution authorities? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_126>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_126>

Q127: Do you agree with the proposed access levels under EMIR for SRB? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_127>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_127>

Q128: Do you agree with the proposed access levels under SFTR for national resolution authorities? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_128>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_128>

Q129: Do you agree with the proposed access levels under SFTR for SRB? If not, what other aspects should be taken into account. Please elaborate.

<ESMA_QUESTION_SFTR_129>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_129>

Q130: Are there any other aspects that need to be included in the procedure to be put in place by the trade repository? Please elaborate.

<ESMA_QUESTION_SFTR_130>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_130>

Q131: Is there any additional information that needs to be included in the templates and tables? Please elaborate.

<ESMA_QUESTION_SFTR_131>
TYPE YOUR TEXT HERE
<ESMA_QUESTION_SFTR_131>