

# INITIAL IMPACT OF MIFID II VENUE PERSPECTIVE

ECB BOND MARKET CONTACT GROUP

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# MiFID II Challenges & Concerns in Run Up to Jan 2018



#### Regulatory Conformance

 Market technical readiness & race to the starting line

#### Data gathering

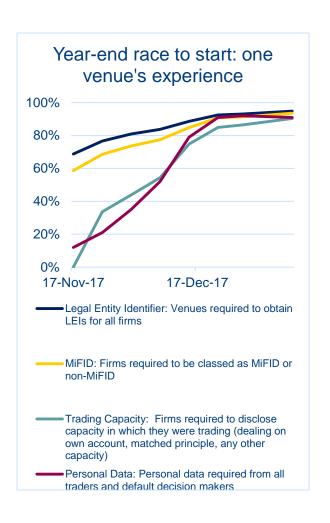
- Order Record Keeping
- Personally Identifiable Information (PII)
- •LEIs

## Transparency Reporting

- Number of Authorised Publication Arrangements (APAs) for reporting
- SI determination
- Late clarification and remaining open issues

# Market Fragmentation

- Possible effect on liquidity of non-MTF markets
- •Trading obligation and EU/US equivalence



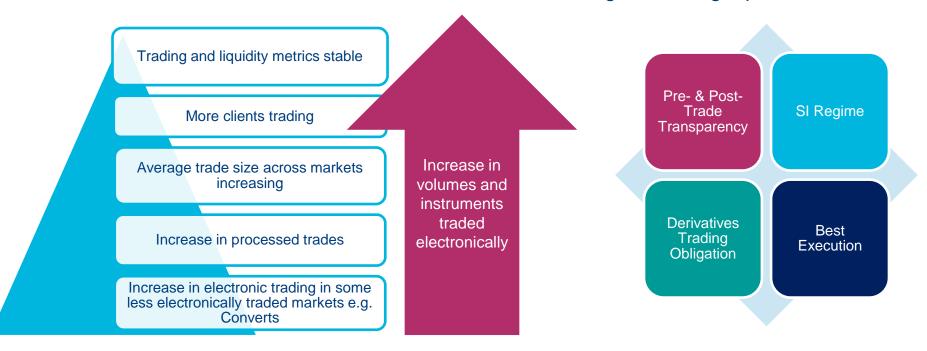
#### **Venue Observations**



Implementation and start of MiFID II went fairly smoothly:

- Venues saw increase in volumes e-traded, well beyond typical January seasonals
- Trading and liquidity metrics have been surprisingly stable (hit rate, quote rate, transaction cost and trade from mid, time to quote, number of dealers in an RFQ)
- Liquidity on and off- MTF similar

#### Looking ahead, big topics continue to be:



# MiFIR Transparency – early days



#### Overall level of transparency

- Pre- and post-trade transparency is published in real-time or waived/ deferred
- Significant real-time transparency in some asset classes (sovereign bonds) but almost non-existent in others (corporate bonds).
- Scope of bond transparency to grow quickly, but update of derivatives calibration only in June 2019

#### Real-time transparency

| Bonds                 | Transactions | Volume |  |  |  |  |
|-----------------------|--------------|--------|--|--|--|--|
| EU Govt bonds         | 53%          | 16%    |  |  |  |  |
| <b>GBP Govt bonds</b> | 81%          | 21%    |  |  |  |  |
| Corp bonds            | 1%           | 1%     |  |  |  |  |
| D                     | erivatives   |        |  |  |  |  |
| EUR IRS               | 28%          | 12%    |  |  |  |  |
| Credit index          | 69%          | 53%    |  |  |  |  |

%age of transactions/volume below post-trade SSTI

#### Usability of transparency

- Reference data challenges (e.g ToTV and ISIN)
- Wide variation of publication formats and level of access
- No consolidated view available (yet)

### MiFID II / MiFIR Timelines



|  | 2018   |   |     |     |     |     |     |     |     |     |   | 20                              | 19                     |       |      | 20   | 20    | 2021  |        |    |    |    |           |  |  |  |  |
|--|--|---|-----|-----|-----|-----|-----|-----|-----|-----|---|---------------------------------|------------------------|-------|------|------|-------|-------|--------|----|----|----|-----------|--|--|--|--|
|  | JAN  | FEB   | MAR | APR | MAY | JUN | JUL | AUG | SEP | ост | NOV   | DEC                             | Q1                     | Q2    | Q3   | Q4   | Q1    | Q2    | Q3     | Q4 | Q1 | Q2 | Q3 Q<br>4 |  |  |  |  |
| Pre- and<br>Post-Trade<br>Transparency | • ES   | Widening scope for bonds  • ESMA ITC to add Nov/Dec 2017 new issues  • Addition of new issues on a running basis  • Full bond liquidity TTC in May 2018 |     |     |     |     |     |     |     |     | <ul> <li>Annual TTC updates (from May/June 2019)</li> <li>Thresholds and liquid/illiquid across asset classes</li> <li>Review &amp; phase-in of certain variables of the regime (from 30/07/2019)</li> <li>Pre-trade SSTI thresholds, minimum number of trades, and minimum issuance sizes</li> </ul> |                                 |                        |       |      |      |       |       |        |    |    |    |           |  |  |  |  |
| SI Regime                              | • Vo   | <ul> <li>Voluntary opt-in</li> <li>1st September</li> </ul>   |     |     |     |     |     |     |     |     | nber: I   | mano                            | datoı                  | ry SI | dete | rmin | ation | (& vo | olunta |    |    |    |           |  |  |  |  |
| Derivatives<br>Trading<br>Obligation   | <ul><li>Category 1 &amp; 2 firms</li><li>Additional Clearing Obligations</li></ul> |   |     |     |     |     |     |     |     |     |   |                                 | Category 3 and 4 firms |       |      |      |       |       |        |    |    |    |           |  |  |  |  |
| Best                                   | From 30 April: 1st annual RTS 28 report (covering 2017)                            |   |     |     |     |     |     |     |     |     |   |                                 |                        |       |      |      |       |       |        |    |    |    |           |  |  |  |  |
| Execution                              | From 30 June: 1st quarterly RT   |   |     |     |     |     |     |     |     |     |   | TS 27 report (covering Q1/2018) |                        |       |      |      |       |       |        |    |    |    |           |  |  |  |  |

# Appendix: Mandatory Clearing Obligation Phase-In a Long Process



|               |       | 2016                                     |                                       |     |     |         |                  |         |        | 20       | 17   |          |     | 20 | 18 |         | 2019    |         |                  |    |
|---------------|-------|--|---------------------------------------|-----|-----|---------|------------------|---------|--------|----------|------|----------|-----|----|----|---------|---------|---------|------------------|----|
|               |       | JUN                                      | JUL                                   | AUG | SEP | ОСТ     | NOV              | DEC     | Q1     | Q2       | Q3   | Q4       | Q1  | Q2 | Q3 | Q4      | Q1      | Q2      | Q3               | Q4 |
| G4 Rates RTS  | Cat 1 | MCO:                                     | from 21                               | Jun |     |         |                  |         |        |          |      |          |     |    |    |         |         |         |                  |    |
|               | Cat 2 | FL: unt                                  | til 20 De                             | c*  |     |         |                  | MCO: f  | rom 21 | Dec      |      |          |     |    |    |         |         |         |                  |    |
|               | Cat 3 |  |                                       |     |     |         |                  |         |        |          |      |          |     |    |    |         |         | MCO: fr | om 21 Ju         | ın |
|               | Cat 4 |  |                                       |     |     |         |                  |         |        |          |      |          |     |    |    | MCO: fr | om 21 D | ec      |                  |    |
| EEA Rates RTS | Cat 1 |  | FL: 9 Oct – 8 Feb 17* MCO: from 9 Feb |     |     |         |                  |         |        |          |      |          |     |    |    |         |         |         |                  |    |
|               | Cat 2 |  |                                       |     |     | FL: 9 C | oct – 8 <i>P</i> | Aug 17* |        |          | MCO: | from 9 A | lug |    |    |         |         |         |                  |    |
|               | Cat 3 |  |                                       |     |     |         |                  |         |        |          |      |          |     |    |    |         |         | MCO: fr | om 21 Ju         | ın |
|               | Cat 4 |  |                                       |     |     |         |                  |         |        |          |      |          |     |    |    |         |         |         | MCO: fr<br>9 Aug | om |
| CDS RTS       | Cat 1 |  |                                       |     |     | FL: 9 C | oct – 8 F        | eb 17*  | MCO: 1 | from 9 F | eb   |          |     |    |    |         |         |         |                  |    |
|               | Cat 2 | FL: 9 Oct – 8 Aug 17* ** MCO: from 9 Aug |                                       |     |     |         |                  |         |        |          |      |          |     |    |    |         |         |         |                  |    |
|               | Cat 3 |  |                                       |     |     |         |                  |         |        |          |      |          |     |    |    |         |         | MCO: fr | om 21 Ju         | ın |
|               | Cat 4 |  |                                       |     |     |         |                  |         |        |          |      |          |     |    |    |         |         | MCO: fr | om 9 Ma          | у  |

| Category |                               |  |  |  |  |  |  |
|----------|-------------------------------|--|--|--|--|--|--|
| 1        | Clearing members              |  |  |  |  |  |  |
| 2        | FCs & AIFs (>€ 8bn threshold) |  |  |  |  |  |  |
| 3        | FCs & AIFs (<€ 8bn threshold) |  |  |  |  |  |  |
| 4        | NFC+                          |  |  |  |  |  |  |

FL = Front loading MCO = Mandatory clearing obligation

<sup>\*\*</sup> frontloading requirement is under proposal to be removed via a review of EMIR (Final text of EMIR review not yet finalised)