

Preparing for EMIR Refit

Are firms ready?

Overview

With EMIR Refit slated to go live on 29 April 2024 and the UK following on 30 September 2024, market participants are continuing to prepare for the new standard that will introduce various changes to the EMIR reporting landscape. So, what progress has been made in the past three months?

In Q1 2023, LSEG Post Trade polled the marketplace to assess how EMIR Refit preparations are progressing. From the **68** responses, we found that the majority (**65%**) of market participants had already started planning for the new legislation, with **14%** having a plan in place and **12%** already far along in the implementation phase. However, a small minority (**8%**) had not begun thinking about their preparation or implementing plans.

Since then, we have seen market participants make significant progress in their preparedness. Those who had started the planning process had dropped to **43%**, with **28%** having a plan in place and **22%** in the implementation phase. There were still a few (**7%**) who had not started thinking about it yet, perhaps those with a UK reporting obligation only; however, even for those firms, it's vital to move along the curve to prevent unnecessary disruption to their workflows and operations.

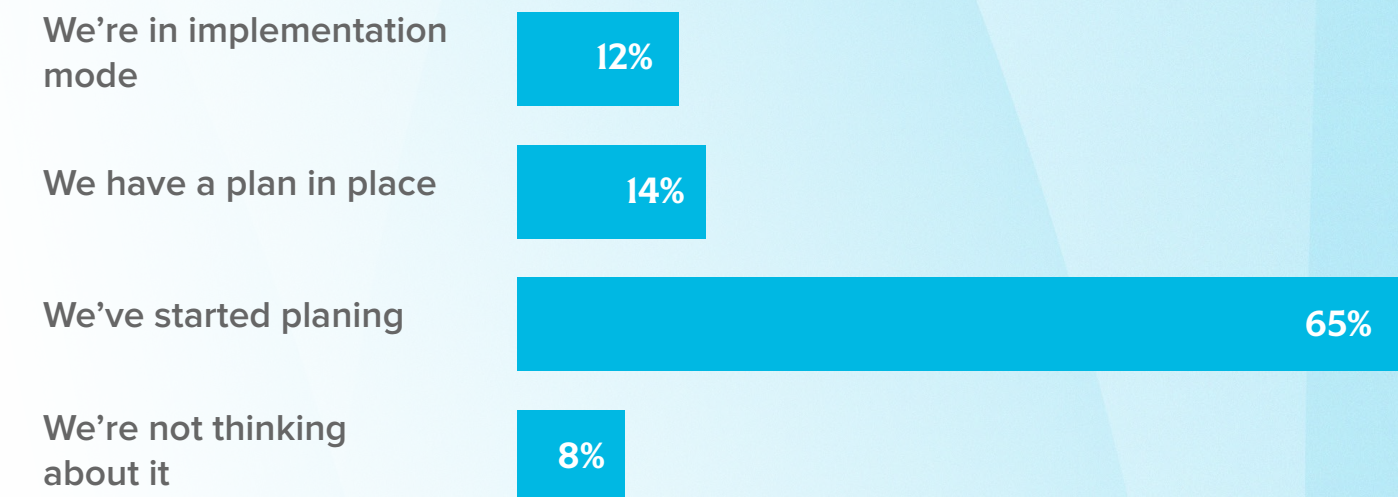
While these results were not unexpected given that we're closer to the deadline, they also matched with the feedback we have been receiving from our customers and the market. For instance, the number of questions we've received on how market participants should start preparing for EMIR Refit have reduced dramatically. Instead, customers' questions have become a lot more qualitative, focusing on specific aspects of the new legislation, data fields and workflow processes, suggesting that they are further along in their EMIR Refit journey when compared to earlier in the year.

That being said, various customers are still working through collecting various data points for their EMIR Refit reporting obligations.

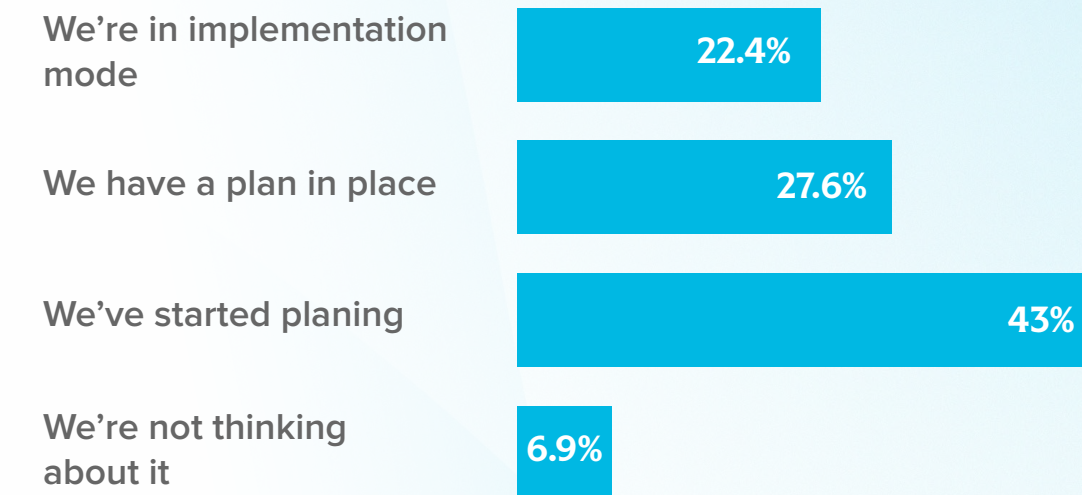
The feedback we have received is that the majority of customers aren't ready for their User Acceptance Testing (UAT) and are not yet in a position to simulate and test their EMIR Refit reporting process. This includes UAT activity of our EMIR Refit ISO 20022 XML Converter tool, which allows financial institutions to report and manage EMIR Refit transactions in Excel/CSV instead of having to build to the XML schema. Given the infancy of the UAT process, what's been keeping firms up at night as they continue their EMIR Refit journey?

In our next blog, we'll explore this and dive into what regulators are looking for when transactions are reported to an approved trade repository. Stay tuned.

Poll Results - March 2023



Poll Results - June 2023



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