Consultation paper - HK OTC Derivatives Reporting Regime (implementation date 29 Sep 2025)
4 proposals for OTC derviatives reporting obligation with proposed effective date on 29 Sep 2025

Last consultation in 2019

Other points:
UTI - Live legacy transactions with remaining maturity of more than 1 year need to be re-reported inHKTR in a new data format (xml)

	Proposals		Description (only the relevant sections are extracted, please refer to the material for details)	Questions
a.	Mandating the use of UTI (Unique Transaction Identifier)	18	Reporting entities should provide the UTI for each submitted reportable transaction to the HKTR on a mandatory basis.	1. Do we need to assign UTI for trade facing client (rather than counterparty) or facing a counterparty that is not a reporting entity ?
		32	If a UTI is not received from the UTI generating entity in sufficient time for reporting, it is proposed the reporting entity should generate its own UTI as an interim-UTI for reporting purposes, when the UTI is subsequent obtained, it should report the UTI no later than 2 biz days after obtinaing the UTI (pt. 32)	2. Shall we leave the UTI field blank rather than providing an interim UTI since it will be easier to track an empty field ? 3. For short-dated FX Swap product, the tenor of the near leg could be 1 day, if counterparty send us the UTI after T+1, since the near leg has already expired and cannot be update in TRS, the UTI will be inconsistent between the near leg and the far leg of the same FX swap.
b.	Mandating the user of UPI (Unique Product Identifier)	34	The UPI is a 12-character reference code to uniquely identify an OTC derivatives product reported to trade repositories. Each UPI code is mapped to a set of reference data elements with specific values that together describe the product.	4. What If we are not able to agree the UPI with counterparty as they may have different interpretation of the product, e.g. some counterparties classify Equity accumulator / decumulator as Equity Option
		35	Authorities and market participants may locate the UPI code in the reference data library with the UPI reference data elements and values that pertain to a particular product for reporting to trade repositories.	
		36	Examples of reference data stored in the UPI Reference Data Library include each OTC derivatives product's asset class, currency pair, delivery type, instrument type, option style, option type, underlying asset type and underlier ID.	
c.	Mandating the reporting of CDE (Critial Data Element)	41	The CDE is a set of derivatives transaction data elements (other than UTI and UPI) and formats and, where relevant, allowable value.	5. When SFC/HKMA can publish the AIDG and confirm the optional / mandatory fields for reporting ? 6. Apart from the key areas high lighted on section 47, can SFC / HKMA also identify those fields that will be changed as compared to the current version?
		44	The HKMA and the SFC propose to revamp the existing data fields to align with the definitions of and reporting requirements for data elements specified in the CDE Technical Guidance as closely as possible.	
		45	The data elements we propose for Hong Kong's reporting requirements are set out in Appendix B. They will replace the current set of data fields upon the implementation of CDE in Hong Kong.	
		47	The proposed major changes to the existing data elements include: (a) Adoption of data elements related to collateral and margins specified in the CDE Technical Guidance; (b) Adoption of data elements related to lifecycle events specified by the CDE Technical Guidance; (c) Substitution of asset class- or product-specific data elements with more generic, cross-asset class elements along with the implementation of UPI; and (d) Removal of a number of Party Type- and Party Name-related sub-fields to align with the CDE Technical Guidance and requirements proposed in other jurisdictions.	
d.	Mandating the adoption of the ISO20022 Standard	63	The HKMA and the SFC propose to adopt the ISO 20022 XML message format (i) for OTC derivatives reporting to the HKTR and (ii) at the same time when we implement the UTI, UPI and CDE in a "big bang" approach on the implementation date.	N/A