

Public hearing on MiFID Review

Panel V:

Data consolidation – fixing the failures and supporting best execution

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Panel V: MiFID Review - EFAMA position

- EFAMA commented on all CESR Consultations with respect to the MiFID revision underway
- Key concerns:
 - Non-equity transparency
 - Complex and non-complex instruments for the purpose of appropriateness requirements (UCITS)
 - Inducements
 - Advice
 - **Data consolidation and quality**
- Coordination with PRIPs, Insurance Mediation Directive and Prospectus Directive will be vital

Panel V: Data consolidation – EFAMA position (I)

1. Consolidation of transparency information:

- Improvement in data quality and in data consolidation necessary to foster best execution and portfolio/fund valuation

2. Regulatory framework for data consolidation:

- Introduction of Approved Publication Arrangements (APA) on a harmonised basis as a starting point for discussion
- Creation of a mandatory consolidated tape should be carefully considered as the details of the tape are not clearly solved (e.g. cost structure, governance, organisation etc.)
- A CESR/industry working group with buy side participation should develop a possible framework for a consolidated tape

3. Data consolidation in a Non-equity market

- Creation of a transparency regime (pre- and post-trade) should be deliberated, also with regard to costs / market impact

Panel V: Data consolidation – EFAMA position (II)

4. Best execution

- Quality of post-trade information is precondition for providing and monitoring best execution
- Current MiFID specifications for best execution do not raise concern for most EFAMA members

5. Standards

- Buy side supports the usage of ISO-standards for post-trade transparency (e.g. ISIN (ISO 6166), Currency-code (ISO 4217), MIC-Code (ISO 10383), BIC-Code (ISO 9362))
- A demonstrable commitment by all supervisors to enforce existing and proposed standards (format etc.)

THANK YOU FOR YOUR ATTENTION

**For information & feedback, please do not hesitate to
contact us**

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