

# Summary of practical initiatives by ICMA

The purpose of this section of the Quarterly Report is to summarise recent and current practical initiatives by ICMA with – and on behalf of – members.

## Primary markets

- 1 *Public debt sustainability:* The Public Sector Issuer Forum met on 15 June 2021, with two main items on the agenda. The first was public debt sustainability, introduced by Carmen Reinhart, Vice President and Chief Economist at the World Bank. The second was the European Commission's debt issuance: sovereign or supra? This was introduced by Niall Bohan, Director, Asset and Financial Risk Management at the European Commission.
- 2 *UK Prospectus Regulation and listing regime:* ICMA responded to the UK Treasury's consultation on the UK Prospectus Regulation. The consultation proposed structural changes to the UK prospectus regime. ICMA members' overarching concern is to ensure that the currently well-functioning and efficient pan-European primary wholesale bond market is not disrupted or subjected to unnecessary additional costs. ICMA also responded to the FCA's Primary Markets Effectiveness Review, focusing primarily on the questions relating to the current structure of the UK listing and admission to trading regime. ICMA also responded to a UK Treasury consultation on a power to block listings on national security grounds.
- 3 *Retail markets and PRIIPs:* ICMA responded on 3 August 2021 to a European Commission consultation on a retail investment strategy for Europe, on 24 September to the retail aspects of a UK Treasury consultation on its Wholesale Markets Review and on 30 September to a UK FCA consultation on the PRIIPs regime.
- 4 *New issue processes:* On 7 May 2021, ICMA responded to a Hong Kong Securities and Futures Commission consultation on its potential code on bookbuilding and placing. In Europe, ICMA has been working to help underwriters to transition to a new method for recording allocation justifications in the context of MiFID II/R.
- 5 *Audit in capital markets:* On 8 July 2021, ICMA responded to a UK Department of Business, Energy and Industrial Strategy (BEIS) consultation on restoring trust in audit and corporate governance.
- 6 *Post-trade:* ICMA is working on the primary market implications of various emerging post-trade initiatives, including: the ECB AMI-SeCo Collateral Management Harmonisation Task Force consultation on corporate action harmonisation; ECB Debt Issuance Market Contact Group (DIMCG) discussions; and reforms to the ICSD syndicated closing process following CSDR implementation.
- 7 *ESG disclosure in primary markets:* The ICMA Legal & Documentation Committee (LDC) ESG Working Group contributed to ICMA's response to FCA CP 21/18 on enhancing climate-related disclosures by standard listed companies and seeking views on ESG topics in capital markets. The LDC contribution related specifically to a Task Force on Climate-related Disclosures (TCFD)-aligned disclosure rule for issuers of debt and debt-like securities and specific requirements for use of proceeds bonds in the UK Prospectus Regulation. ICMA's Corporate Issuer Forum also responded to certain aspects of this consultation paper.
- 8 *ICMA Primary Market Handbook:* ICMA is in the process of updating the ICMA Primary Market Handbook to include its post-Brexit standard language and certain other updates.
- 9 *Corporate Issuer Forum Newsletter:* The third edition of ICMA's Corporate Issuer Forum (CIF) Newsletter was released in October 2021. The CIF Newsletter provides a periodic snapshot of the CIF's key priorities, initiatives and workstreams, including insights into sustainable finance, primary market activities, FinTech, ICMA Commercial Paper Committee, upcoming meetings and events.
- 10 *China domestic bond market guides:* On 24 September 2021, ICMA and National Association of Financial Market Institutional Investors (NAFMII) jointly published two publications intended to encourage understanding and participation by international institutions in China's interbank bond market: *Investing in China's Interbank Bond Market: A Handbook* and *Panda Bonds: Raising Finance in China's Bond Market (Case Studies)*. The Handbook contains an overview of developments in China's bond market and the case for international investment; descriptions of the market infrastructure and oversight; and details of the process required for international investors to access the market via the three different channels Bond Connect, CIBM Direct and the QFI regime. The panda bond case studies present successful transactions by international issuers in the panda bond market.
- 11 *Primary markets technology and consultations:* ICMA's directory covers existing and emerging technology solutions in primary markets and was initially launched in December 2018. It is reviewed regularly and the latest amendments were incorporated in July 2021. The aim is to help inform ICMA members and thereby create greater transparency. The directory is available on the ICMA website. On 30 July, ICMA also responded, on English law bearer bonds, to a UK Law Commission consultation on digital assets.

## Secondary markets

- 12 *Consolidated tape for EU bond markets*: Following ICMA's 2020 report into considerations surrounding the establishment of an EU consolidated tape for bond markets, on 20 January 2021 DG FISMA announced that, in conducting a further review of MiFID II/R, this would include plans to design and implement a consolidated tape for corporate bonds. ICMA's MiFID II Working Group submitted a practical proposal for the MiFID II/R bond market transparency regime, with the EU bond consolidated tape as the vehicle for transparency, to the European Commission in early October.
- 13 *MiFID II/R responses*: Recently, ICMA's MiFID II Working Group has been working on responses to two consultations. first, the [response to HMT Wholesale Markets Review](#) and second, the [response to ESMA's consultation on RTS 2 review](#).
- 14 *ICMA Industry Guide to Definitions and Best Practice for Bond Pricing Distribution*: There is keen market interest in how pre-trade bond pricing information is distributed, because it is a vital source of data for bond traders. The way in which information has been distributed is not uniform and has caused concern among buy-side market participants. ICMA's guide to best practice for bond pricing distribution sets out standards and definitions agreed by ICMA's buy-side, sell-side and trading venue members in the hope that the Guide will be adopted by the market.
- 15 *CSDR mandatory buy-ins*: In February 2021, ICMA submitted its response to the European Commission's targeted consultation on CSDR. ICMA's response focused primarily on the mandatory buy-in (MBI) element and argued that this should not be implemented as currently designed and scheduled before undertaking a detailed market impact analysis. ICMA also held the pen for a cross-association letter to the European Commission further outlining concerns about the current implementation schedule in light of its CSDR Review. More recently, ICMA has held meetings with a number of public authorities to push the case for a delay to MBIs. ICMA understands that ESMA and the co-legislators are currently exploring such a delay, and in September 2021 ESMA wrote to the European Commission supporting a postponement of the MBI regime and requesting urgent action to clarify that this was being considered. Meanwhile, ICMA continues to work with members and other associations to provide contractual solutions to support compliance with the go-live date of February 2022, in the event that MBIs are not delayed.
- 16 *ICMA Secondary Market Rules & Recommendations (SMR&Rs)*: ICMA is in the process of finalising a member consultation framework for updating its Buy-in and Sell-out Rules (part of the ICMA SMR&Rs) to align with and support implementation of the CSDR mandatory buy-in provisions. The consultation has been put on hold pending the CSDR Review and the possibility of a delay to mandatory buy-ins.
- 17 *Bond market transparency directory*: ICMA has expanded its bond market transparency directory to include pre-trade reporting obligations, in addition to post-trade obligations, across multiple jurisdictions from Europe, the Americas and Asia-Pacific. The purpose of the mapping is to provide a consolidated view to compare both regulatory rules and best practice guidance on bond trade reporting transparency regimes, as well as details on reporting fields and exceptions.
- 18 *ETP directory*: ICMA's directory of electronic trading platforms (ETPs) lists electronic trading venues, execution and order management systems (EMS/OMS) and information networks available for cash bonds. It is intended to help market participants compare the capabilities of different solutions to determine which platforms best suit their investment and/or trading strategies. The latest amendments were published in September 2021 and are available on ICMA's website.
- 19 *Developments and trends in Asian international bond markets*: In March 2021, ICMA published a report that examines the growth and development of the Asia cross-border corporate bond market. The report was produced in collaboration with the Hong Kong Monetary Authority, who approached ICMA with the initiative.
- 20 *IOSCO-AMCC Bond Market Liquidity Working Party*: ICMA proposed and is now chairing a Bond Market Liquidity Working Party consisting of members of the IOSCO Affiliate Members Consultative Committee. The purpose of the Working Party is to support and complement the work being undertaken by IOSCO, in coordination with the FSB, on global bond market structures. This is part of the broader IOSCO-FSB workstream on non-bank financial intermediaries (NBFIs) following the 2020 COVID-19 market turmoil. The first deliverable of the Working Party was a compendium of AMCC member research covering how COVID-19 impacted global corporate bond markets in March-April 2020. This was submitted to IOSCO in May 2021. In September 2021, the Working Party launched a global survey targeted at market participants to support the second phase of IOSCO's work, which is focused on corporate bond market micro-structures and stakeholder behaviours.
- 21 *IOSCO FSEG Corporate Bond Market Liquidity Working Group*: The IOSCO Financial Stability Engagement Group (FSEG) is leading a workstream on global corporate bond market liquidity and microstructures. The workstream leaders joined the meeting of the ICMA Secondary Market Practices Committee (SMPC) on 15 September 2021 to update members on this initiative as well as to solicit input from the Committee. A dedicated follow-up session for the SMPC and the IOSCO FSEG is scheduled for 11 October 2021.

22 *CSDR-SD technology directory*: To help market participants prepare for CSDR implementation, ICMA published in July a directory of technology solutions aimed at managing the requirements under CSDR Settlement Discipline. The initial focus of ICMA's CSDR-SD technology directory is on those solutions which help firms to manage cash penalties. The directory is intended to provide a consolidated overview of the functionalities of market solutions, such as calculation, aggregation, reconciliation, invoicing, reporting, and appeals or claims management processes.

## **Repo and collateral markets**

23 *Repo and sustainability*: On 22 April 2021, the ICMA European Repo and Collateral Council (ERCC) published a consultation paper on the role of repo in green and sustainable finance, exploring the sustainability aspects of repo and collateral as well as assessing the existing opportunities and potential risks in this area. The consultation closed on 4 June. Having reviewed the responses, on 20 September ICMA published a summary report of the feedback.

24 *GMRA and CSDR mandatory buy-ins*: ICMA is coordinating with other trade associations on how to progress contractual solutions (covering both repo and cash bonds) for day one compliance, while waiting for clarification of the regulatory implementation schedule.

25 *SFTR implementation*: ICMA continues to work with members of the ERCC's SFTR Task Force to improve the quality of the data reported under SFTR and resolve outstanding issues. ICMA maintains a log of the key reporting issues encountered by firms which is regularly shared with ESMA and the FCA. In parallel, ICMA's extensive best practice guide, the *ICMA Recommendations for Reporting under SFTR*, continues to evolve to reflect the discussion as well as new regulatory guidance.

26 *SFTR public data*: ICMA continues on a weekly basis to collect, aggregate and publish the SFTR public data released by the trade repositories (TRs), covering both UK SFTR and EU SFTR. On 28 September, ICMA published a more detailed report analysing the public data for the first full year of SFTR reporting.

27 *ECB AMI-SeCo*: The ERCC is represented on the ECB's Advisory Group on Market Infrastructure for Securities and Collateral (AMI-SeCo) and is playing an active role on its Collateral Management Harmonisation Task Force (CMH-TF).

28 *Settlement efficiency*: The ERCC is leading an industry effort to explore ways to improve settlement efficiency in Europe. Further to a targeted update of the ERCC *Guide to Best Practice* released in March 2021, the ERCC has held a series of workshops to explore a number of other possible measures to support settlement efficiency, focusing in particular on the use of partial settlement and auto-partialling, shaping of settlement instructions and auto-borrowing functionality. Based on the outcome of the workshops, the ERCC plans to communicate more detailed recommendations on those topics in the autumn.

29 *Operations FinTech directory for repo and cash bonds*: The directory currently lists over 200 solutions across 10 categories comprising collateral management, corporate actions, exposure agreement, intraday liquidity monitoring and reporting, matching, confirmation and allocation, and reconciliations, but also ancillary areas such as static data and SSI workflow and communication and KYC onboarding. The directory is available on ICMA's website. An updated version was published on 6 October.

30 *Repo trading technology directory*: In light of increasing electronification of repo markets, ICMA periodically reviews its directory of electronic trading solutions for repo. The directory is intended to help market participants understand what execution venues and other technology solutions are available for repo trading, product scope, as well as differences in trading protocols, clearing and collateral configurations. The directory is available on ICMA's website. An updated version was published on 6 October.

31 *ICMA Asia-Pacific repo market report*: ICMA is preparing a report on developed and emerging repo markets in Asia-Pacific by jurisdiction, with summaries of regulatory landscape, infrastructure, market size and liquidity, and relevant law and regulation.

32 *Asia-Pacific Repo Survey*: ICMA, in partnership with ASIFMA, is conducting a survey of G3 currency Asia-Pacific repo markets as of June 2021 using a methodology similar to that of the ICMA ERCC European repo survey. The survey responses are currently being processed and a final report is expected to be published in Q4 2021.

33 *Repo in emerging markets*: ICMA and Frontclear have released a series of webinars on repo market developments in a number of African countries, including Uganda, Nigeria and Ghana. These webinars have been extremely well attended and have provided a great opportunity to showcase to an international audience the success of cross-agency collaboration in promoting regulatory and legislative reform. Future webinars will focus on Kenya and Ethiopia.

34 *ERCC events*: On 13 October 2021, the ERCC will hold its autumn General Meeting as a virtual event. After a break in 2020, this year ICMA will also again hold its annual Professional Repo and Collateral Management Workshop, the repo industry's principal education forum. The course took place over four mornings on 27 and 28 September, and 4 and 5 October.

## **Short-term markets**

35 *ICMA Commercial Paper Committee*: In March 2021, ICMA reconstituted its ECP Committee to include the broader commercial paper market, including financial and corporate issuers, dealers, investors and infrastructures. This initiative follows an ICMA workshop, *The Commercial Paper Market Reimagined*, which was held in November 2020. On 29 September 2021, the ICMA Commercial Paper and Certificates of Deposit Committee (CPC) published a

white paper that maps the current structure of the market, analyses the March-April 2020 market turmoil and provides recommendations for market development.

36 *Meeting with the FSB to discuss short-term markets:* On 1 September 2021, Edwin Schooling Latter of the UK FCA joined a meeting of the CPC to discuss how the short-term European markets performed during the COVID-19 turmoil in 2020. He is co-chairing the FSB's Working Group on Dealer Behaviour.

## *Sustainable finance*

37 *Green Bond Principles 2021 Version:* The Annual General Meeting (AGM) of the Principles was held virtually on 10 June 2021 during which the [GBP's 2021 Version](#) was released. It notably features: (i) two key recommendations on the bond frameworks and external reviews designed to increase transparency alongside the four core components; (ii) a recommendation of heightened transparency for issuer-level sustainability strategies and commitments; (iii) encouragement to supply information, if relevant, on the degree of alignment of projects with official or market-based taxonomies; (iv) promotion of transparency on issuer processes to identify and manage perceived and known social and/or environmental risks; (v) links and references to the complementary guidance of the Climate Transition Finance Handbook, the Harmonised Framework for Impact Reporting, the Guidelines for External Reviews, which are supplemented by the Guidance Handbook. Similar revisions were also made to the SBP and the SBG while a number of other additional deliverables were released during the 2021 AGM.

38 *ICMA's response to the US Securities Exchange Commission's Climate Change Disclosures:* On 15 June 2021, ICMA submitted its [response](#) to the US SEC [consultation](#) on climate-related disclosures, in which ICMA supported SIFMA's [letter](#) and emphasised important points relating to a global coordinated approach, principles-based materiality, safe-harbour protection and a handful of other issues.

39 *FCA's consultations on sustainability disclosures:* On 22 June 2021, FCA opened two consultations ([CP21/17](#) on climate-related disclosures by asset managers, life insurers and FCA-regulated pension providers and the [CP21/18](#) on enhancing climate-related disclosures by standard listed companies). ICMA has submitted responses to these two consultations within the deadline of 10 September 2021.

40 *ICMA's analysis of the proposed EuGB Regulation:* On 6 July 2021, the European Commission published its proposal for a [Regulation on European green bonds](#) (EuGBs), which will be negotiated in the European Parliament and among Members of the Council of the European Union as part of the co-legislative process. While welcoming the proposed voluntary nature for the EuGB, ICMA noted the areas of concern that are likely to hinder the success of the label. The full ICMA analysis of the draft EuGB Regulation can be found [here](#).

41 *ICMA's analysis & commentary on the EU's Strategy for Financing the Transition to a Sustainable Economy:* On 6 July 2021, the European Commission published its [new sustainable finance strategy](#) which aims to support the financing of the transition to a sustainable economy by proposing action in four number of areas: transition finance, inclusiveness, resilience and contribution of the financial system and global ambition. ICMA's analysis and commentary on the new strategy can be accessed [here](#).

42 *EU Platform on Sustainable Finance's Reports on the expansion of the Taxonomy:* On 12 July 2021, the EU PSF published its [reports](#) on the potential development of a Social Taxonomy as well as the potential extension of the Taxonomy to Significantly Harmful and No Significant Impact Activities. ICMA submitted its feedback on the Taxonomy's [extension](#) on 3 September 2021 and on the [Social Taxonomy Report](#) on 6 September 2021.

43 *ICMA AMIC response to IOSCO's Recommendations:* On 13 August 2021, AMIC [responded](#) to IOSCO's [Recommendations on Sustainability-Related Practices, Policies and Disclosure in Asset Management](#).

44 *Singapore Exchange consultation:* On 27 September 2021, ICMA responded to the Singapore Exchange's [Consultation Paper on Climate and Diversity](#). ICMA's response was limited to issues related to climate-related disclosure addressed in the Green Bond Principles and related guidance.

45 *ICMA appointment to Southeast Asia Industry Advisory Panel:* In southeast Asia, ICMA has been appointed to the Industry Advisory Panel established by the ASEAN Capital Markets Forum and the ASEAN Working Committee on Capital Market Development as their core industry interaction point on the ASEAN sustainable finance agenda and initiatives.

## *Asset management*

46 *AMIC podcasts:* ICMA has continued to stream a series of monthly podcasts in which Robert Parker, Chair of the ICMA Asset Management and Investors Council (AMIC), has reviewed market events in the context of the recovery from the COVID-19 pandemic, with a specific focus on central bank policy measures, economic data and the impact on investors.

47 *AMIC responses to ESMA and FSB consultations on potential reforms for Money Market Funds (MMFs):* AMIC's responses, published on 30 June and 13 August 2021 respectively, explain that most of the measures envisaged under the ESMA and FSB consultations would either threaten the viability of prime MMFs (eg liquidity exchange facilities, minimum balance at risk, capital buffers, eligible assets) or have a limited effect (eg swing pricing, liquidity fees) during the very short period when investors were searching for liquidity and most markets experienced illiquidity and stress. The AMIC responses therefore call for a focus on measures to enhance the functioning and resilience of underlying markets (such as CP and CD markets), rather than an overhaul of the regulatory framework governing MMFs. Some targeted measures such

as the decoupling of regulatory thresholds from suspensions, gates and fees, which could indeed attenuate the first mover advantages, would however be welcome.

- 48 *AMIC co-signature of a joint letter on the AIFMD review*: The letter addressed on 15 July 2021 to European Commissioner McGuinness calls for regulatory stability for investment funds in the context of the AIFMD review. In particular, the letter highlights the benefit of preserving the current delegation model and, more broadly, points out the overall resilience of AIFs during the pandemic (eg none had to suspend redemptions, according to an ESMA study); and it also draws attention to the fact that the industry is already focused on key amendments to AIFMD, notably in the context of the sustainable finance action plan and the digital finance agenda.
- 49 *AMIC response to the IOSCO consultation on Sustainability-Related Practices, Policies, Procedures and Disclosure in Asset Management*: In its response submitted on 13 August 2021, AMIC expressed its support for IOSCO's recommendations and emphasised that the key priority is the need to address the risk of market fragmentation, mitigate data gap challenges and ensure global alignment across jurisdictions.
- 50 *AMIC response to the UK FCA CP 21/17: Enhancing Climate-Related Disclosures by Asset Managers, Life Insurers and FCA Regulated Pension Providers*. In its response submitted on 10 September, AMIC welcomed the FCA's proposals and noted that the sequencing of the disclosure requirements should be first on the issuer side at international level (upcoming IFRS standard), followed by the buy side, and that in the meantime the proposed approach is applied on a "as far as they are able" approach, with accepted use of proxies and estimated data.
- 51 *AMIC response to the European Commission Review of the EU Securitisation Regulation (SECR)*. In its response submitted on 17 September, AMIC highlighted that the low level of securitisation issuances since the entry into application of the SECR is mainly due to the accommodative monetary policies of central banks, but that there is still merit in introducing amendments to the SECR and related prudential rules measures to grow both the investor and the issuer base and contribute to the CMU's objectives.
- 52 *MOU on the CDM*: On 2 August 2021, ICMA, ISDA and ISLA signed a Memorandum of Understanding (MOU) to strengthen collaboration between them on the future development of the CDM, the single, common digital representation of trade events and actions across the lifecycle of financial products. The MOU establishes a framework for closer collaboration between the three Associations on the CDM, providing a path for joint governance and setting out arrangements in relation to the open-source components of the CDM and associated intellectual property for market-specific components.
- 53 *FinTech Advisory Committee (FinAC)*: Strategic priorities for 2021 are twofold: (i) promoting common data standards to enable process automation along the securities lifecycle, and (ii) tokenisation of bonds and digital currency, understanding the implications for market practice and adoption challenges. The fifth meeting was held on 23 September and focused on digital currencies, latest developments and implications for the international debt capital markets, as well as FinTech and sustainability.
- 54 *ECB FinTech Task Force*: The Task Force, a sub-group of the AMI-Pay and AMI-SeCo, published in April 2021 the report, *The Use of DLT in Post-Trade Processes*, to which ICMA contributed. The report concludes that, while there is no clear business case for the use of DLT, interoperability and sound governance are key to realise the benefits of DLT and avoid the risk of further fragmentation. The ECB FinTech Task Force ceased its activities following the publication of the report.
- 55 *IOSCO FinTech Network*: ICMA continues to participate in the IOSCO FinTech Network. However, membership of the Decentralised Finance (DeFi) workstream is limited to regulators only. ICMA expects to participate through AMCC stakeholder engagement.
- 56 *ICMA virtual roundtable on data standards in primary markets*: A key take-away from the roundtable held in December 2020 with relevant stakeholders was that a "common data dictionary" or common language would lay the foundation for interoperability, facilitate on-boarding and communication, whilst promoting competition in primary bond markets. ICMA held a follow-up roundtable on 30 March 2021 with relevant law firms to discuss the potential scope of such a "common data dictionary", current market initiatives, and implementation considerations. ICMA is considering next steps, in particular the potential of the CDM to enable interoperability.
- 57 *ICMA virtual roundtable on FinTech and sustainable bond markets*: Following a roundtable held in December 2020, including issuers, investors, underwriters and technology/data providers, ICMA published an article in the Quarterly Report Q1 2021 which explores how technology can be leveraged to further sustainability in bond markets, key trends and drivers, but also challenges and opportunities.

## ***FinTech in capital markets***

- 52 *Common Domain Model (CDM) for repo and bonds*: ICMA, together with its CDM Steering Committee and REGnosys, completed the initial phase of the CDM for repo and bonds in July 2021. The project delivered an extension of ISDA's CDM covering execution, clearing and settlement of a fixed-term repo transaction, as well as a bond transaction, in machine-readable and executable form. A showcase event was held on 21 July featuring demonstrations of the CDM in action, as well as a panel discussion with members of ICMA's CDM Steering Committee. The recording, background materials and instructions on how to view and download the CDM are available on ICMA's [CDM webpage](#).

- 59 *DLT regulatory directory*: ICMA's DLT regulatory directory covers new regulatory and legislative developments, national blockchain initiatives, publications and consultation papers. The directory was initially published in December 2019 and seeks to provide a non-exhaustive overview of developments in selected jurisdictions across Europe, North America, and Asia-Pacific. Latest updates were included in September 2021 and are available on ICMA's website.
- 60 *FinTech Newsletter*: ICMA's FinTech Newsletter, launched in June 2020, provides a summary of ICMA's cross-cutting technology initiatives across its key market areas. It also provides insights into regulatory updates, consultation papers, news and other publications, and upcoming meetings and events. It is published on a 4-6 weekly basis.
- 61 *FinTech regulatory roadmap*: ICMA has updated its FinTech regulatory roadmap, a compilation of key regulatory, legislative and innovation initiatives relevant to debt capital markets at global, EU and national level. The latest version includes updates from September 2021 and is available on ICMA's website.
- 62 *FinTech and sustainable finance library*: ICMA has compiled a non-exhaustive list of recent publications on FinTech and sustainable finance, with a focus on bond markets. The library intends to complement ICMA members' resources and help inform broader discussions on this topic. The library aims to highlight the current views from academic, market, and official sector studies on the potential of FinTech to further sustainable debt capital markets. It can be found on ICMA's website.

### ***Transition from LIBOR to risk-free rates***

- 63 *Official sector sponsored working groups*: ICMA continues to participate in the Working Group on Sterling Risk-Free Reference Rates (and to chair the Bond Market Sub-Group), the Working Group on Euro Risk-Free Rates (as an observer) and the National Working Group on Swiss Franc Reference Rates. ICMA is also in regular contact with the ARRC FRN Group in the US and national working groups in Asia.
- 64 *Tough legacy proposals*: ICMA has continued to engage with various official sector contacts and members in relation to the "tough legacy" proposals put forward by authorities in the US, the UK and the EU. On 16 June, ICMA responded to the UK FCA consultation on the exercise of its new powers related to use of critical benchmarks; and on 25 August, ICMA responded to the UK FCA consultation on the exercise of its new powers related to sterling and yen LIBOR.
- 65 *Communication with members*: ICMA continues to keep members up to date with its work on the transition to risk-free rates via a [dedicated webpage](#), the ICMA Quarterly Report, regular ICMA committee and working group meetings and e-mails to the ICMA Benchmark Group.

- 66 *RFR Webinar*: On 13 September, ICMA held a webinar for the Arab Federation of Exchanges focused on the reasons for the cessation of LIBOR across the main international LIBOR jurisdictions, and the need to transition to risk-free rates, including the relevant timelines.
- 67 *Official sector RFR panel*: ICMA has moderated another official sector panel on the transition from LIBOR to risk-free rates. This was launched by ICMA on 2 June 2021 and involved senior representatives from the UK FCA, the Federal Reserve Bank of New York, the Swiss National Bank and the European Central Bank.
- 68 *Coordination with other trade associations*: ICMA continues to participate in regular calls of the Joint Trade Association LIBOR Working Party established by the LMA, as well as regular calls of the APAC Benchmark Working Group established jointly by ICMA, ASIFMA, ISDA and APLMA.

### ***Other meetings with central banks and regulators***

- 69 *ICMA Regulatory Policy Committee (RPC)*: Jean-Paul Servais, Vice-Chair of IOSCO, joined the virtual meeting of RPC on 3 June for a discussion with members. Natasha Cazenave, the new Executive Director of ESMA, joined the virtual meeting of RPC on 30 September.
- 70 *Other official groups in Europe*: ICMA continues to be represented, through Martin Scheck, on the ECB Bond Market Contact Group and on the ESMA Securities and Markets Stakeholder Group; through Nicholas Pfaff on the European Commission Platform on Sustainable Finance; through Lee Goss on the ECB Debt Issuance Market Contact Group (DIMCG); through Charlotte Bellamy on the Consultative Working Group on ESMA's Corporate Finance Committee; and through Alexander Westphal on the Consultative Working Group of ESMA's Post-Trading Standing Committee.