



Global Technical Committee

EMIR Report Tracking Number Extension

August 15, 2023

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Document History

| Revision | Date | Author | Revision Comments |
|----------|--------------|-------------------------|---------------------|
| 0.1 | Aug 15, 2023 | FIX GTC | Initial draft |
| | Aug 30, 2023 | FIX GTC Technical Admin | Pre-assigned values |
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1 Introduction

Following a further extensive evaluation by the European Commission, a set of revisions to EMIR were published in the Official Journal of the European Union on 28 May 2019 ((EU) No. [2019/834](#)¹) and entered into force on 17 June 2019, the so-called EMIR Refit.

The Report Tracking Number (RTN) under the EMIR reporting format is a unique number assigned to the execution and common among a group of reports related to the same execution.

2 Business Requirements

2.1 Regulatory Background

The Report Tracking Number (RTN) was introduced as of 1 November 2017 by the Commission Implementing Regulation (EU) [2017/105](#)² of 19 October 2016 amending Commission Implementing Regulation (EU) No [1247/2012](#)³ laying down implementing technical standards with regard to the format and frequency of trade reports to trade repositories according to Regulation (EU) No [648/2012](#)⁴ of the European Parliament and of the Council on OTC derivatives, central counterparties and trade repositories.

The relevant field is Field 13 in the Table 2 in the Annex of [2017/105](#).

| | | | |
|----|------------------------|---|--|
| 13 | Report tracking number | An alphanumeric field up to 52 characters | |
|----|------------------------|---|--|

The RTN's predecessor in the EMIR reporting scheme was the Transaction Reference Number (TRN), also applicable under the MiFID reporting scheme.

The reasons for the replacement of the Transaction Reference Number (TRN) in EMIR reports with the Report Tracking Numbers have been explained by ESMA in their Consultation Paper, *Review of the technical standards on reporting under Article 9 of EMIR* of 10 November 2014 ([ESMA/2014/1352](#)⁵):

- 36. *The current Table 2 Field 9 "Transaction Reference Number" was intended to mirror the equivalent field in a transaction report created according to Article 25 MiFID. As this logic has been amended further to ESMA clarification of ETDs reporting, it now conflicts with the concept of Transaction Reference Number within MiFID transaction reporting. For the avoidance of confusion and in order to better reflect the purpose of this field, it is proposed to rename the field to "Report Tracking Number" while maintaining its population logic, i.e. unique code assigned to the execution and common among a group of reports related to the same execution.*

¹ See <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019R0834>.

² See <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32017R0105>.

³ See <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32012R1247>.

⁴ See <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32012R0648>.

⁵ See https://www.esma.europa.eu/sites/default/files/library/2015/11/esma-2014-1352_consultation_paper_on_the_review_of_emir_reporting_standards_under_article_9_0.pdf

Chapter 4.8 *Reporting of on-venue derivatives* of ESMA's [Q&As⁶](#) on EMIR provides the following directives for the RTN:

- 158. *The Report Tracking Number (RTN) is a unique code assigned to the execution and common for a group of reports related to the same execution. It is a conditionally mandatory field for action type 'POSC' at the trade level (required when trade is executed on a trading venue). RTN should not be populated at position level.*
- 159. *There is no one-to-one link between the Trading Venue Transaction Identification Code (TVTIC) required under MiFIR and the Report Tracking number (RTN). TVTIC is an individual transaction identification code for each transaction resulting from the full or partial execution of an order disseminated to both the buying and the selling parties. The RTN is a unique number assigned to the execution and common among a group of reports related to the same execution, in order to allow for identification of reports relating to the same execution. Due to the fact that a systemic internaliser is not considered as a trading venue under the Directive 2014/65/EU (MiFID II) and a RTN is generated by a trading venue, the population of the field RTN when trades are concluded on a SI is not required.*
- 160. *The investment firms, the clearing members or the CCPs should provide to the reporting counterparties the respective RTNs. Likewise, the reporting counterparties should transmit the RTNs to their counterparties to allow them to fulfil their reporting obligations.*

2.2 Proposed Extension

FIX provides the component [RegulatoryTradeIDGrp](#) to convey one or more trade identifiers. The field [RegulatoryTradeIDType\(1906\)](#) defines the type of identifier in [RegulatoryTradeID\(1903\)](#). The existing value "5" is used for a trading venue transaction identifier (e.g. TVTIC). However, the TVTIC serves a different purpose than the Report Tracking Number (RTN).

It is proposed to add a new value for the RTN to the [RegulatoryTradeIDType\(1906\)](#) field as follows:

6=Report tracking number [Elaboration: In the context of EMIR this is a "unique code assigned to the execution of an order and common for a group of reports related to the same execution" (see §36 in https://www.esma.europa.eu/sites/default/files/library/esma74-362-2281_final_report_guidelines_emir_refit.pdf). Also referred to as the RTN.]

⁶ See https://www.esma.europa.eu/sites/default/files/library/esma74-362-2281_final_report_guidelines_emir_refit.pdf.

3 Issues and Discussion Points

NONE

4 Proposed Message Flow

NONE

5 FIX Message Tables

NONE

6 FIX Component Blocks

NONE

7 Category Changes

NONE

8 FIX Specification Errata

To be used only by GTC Project Management.

| Jira Item | Affected EP/Version | Synopsis of change. |
|-----------|---------------------|---------------------|
|-----------|---------------------|---------------------|

Appendix A - Data Dictionary

| Tag | FieldName | Action | Datatype | Description | FIXML Abbreviation | Add to / Deprecate from Message type or Component block |
|------|-----------------------|--------|----------|--|--------------------|---|
| 1906 | RegulatoryTradeIDType | CHANGE | int | <p>Specifies the type of trade identifier provided in RegulatoryTradeID(1903).</p> <p>Supported values: ... 5=Trading venue transaction identifier 6=Report tracking number [Elaboration: In the context of EMIR Refit this is a "unique code assigned to the execution of an order and common for a group of reports related to the same execution" (see Q28 in https://www.esma.europa.eu/sites/default/files/library/esma74-362-2281_final_report_guidelines_emir_refit.pdf). Also referred to as the RTN.]</p> | @Typ | |
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Appendix B - Glossary Entries

| Term | Definition | Field where used |
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Appendix C - Abbreviations

| Term | Proposed Abbreviation | Proposed Messages, Components, Fields where used |
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Appendix D - Usage Examples

[Examples may be entered below this line]

Appendix E – Disposition of Public Comments

E.1. Public comments from [forum user] on [date of post]

GTC Resolution:

E.2. Public comments from [forum user] on [date of post]

GTC Resolution: