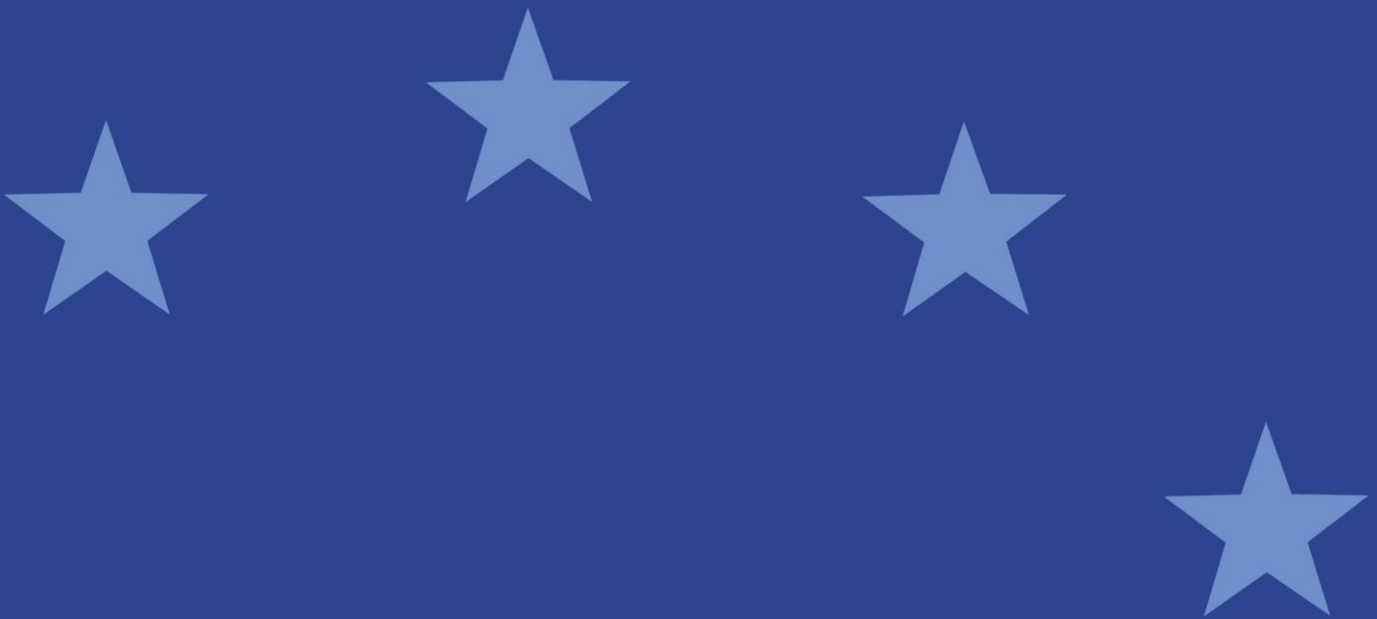




European Securities and  
Markets Authority

## **Reply form for the Consultation Paper on draft RTS on package orders for which there is a liq- uid market**



## Responding to this paper

The European Securities and Markets Authority (ESMA) invites responses to the specific questions listed in the ESMA Discussion Paper on the trading obligation for derivatives under MiFIR, published on the ESMA website.

### **Instructions**

Please note that, in order to facilitate the analysis of the large number of responses expected, you are requested to use this file to send your response to ESMA so as to allow us to process it properly. Therefore, ESMA will only be able to consider responses which follow the instructions described below:

- use this form and send your responses in Word format (pdf documents will not be considered except for annexes);
- do not remove the tags of type <ESMA\_QUESTION\_MIFID\_PO\_1> - i.e. the response to one question has to be framed by the 2 tags corresponding to the question; and
- if you do not have a response to a question, do not delete it and leave the text “TYPE YOUR TEXT HERE” between the tags.

Responses are most helpful:

- if they respond to the question stated;
- contain a clear rationale, including on any related costs and benefits; and
- describe any alternatives that ESMA should consider.

### **Naming protocol**

In order to facilitate the handling of stakeholders responses please save your document using the following format:

ESMA\_MiFID\_PO\_NAMEOFCOMPANY\_NAMEOFDOCUMENT.

e.g. if the respondent were ESMA, the name of the reply form would be:

ESMA\_MiFID\_PO\_ESMA\_REPLYFORM or

ESMA\_MiFID\_PO\_ESMA\_ANNEX1

### **Deadline**

Responses must reach us by **3 January 2017**.

All contributions should be submitted online at [www.esma.europa.eu](http://www.esma.europa.eu) under the heading ‘Your input/Consultations’.



### ***Publication of responses***

All contributions received will be published following the end of the consultation period, unless otherwise requested. **Please clearly indicate by ticking the appropriate checkbox in the website submission form if you do not wish your contribution to be publicly disclosed. A standard confidentiality statement in an email message will not be treated as a request for non-disclosure.** Note also that a confidential response may be requested from us in accordance with ESMA's rules on access to documents. We may consult you if we receive such a request. Any decision we make is reviewable by ESMA's Board of Appeal and the European Ombudsman.

### ***Data protection***

Information on data protection can be found at [www.esma.europa.eu](http://www.esma.europa.eu) under the headings 'Legal notice' and 'Data protection'.



## Introduction

***Please make your introductory comments below, if any:***

< ESMA\_COMMENT\_MIFID\_PO\_0 >

FIA EPTA members welcome the opportunity to provide comments on the ESMA Consultation Paper on draft RTS under MiFIR on package orders for which there is a liquid market. FIA EPTA is comprised of 29 principal trading firms (**PTFs**) that deal on own account in a wide range of financial instruments traded on trading venues across the Union and engage in manual, automated and hybrid methods of trading. (For more information on FIA EPTA, please visit [www.epta.fia.org](http://www.epta.fia.org)).

FIA EPTA members are a critical source of liquidity for trading venues, allowing those who use the capital markets to invest or manage their business risks to buy or sell financial instruments quickly and at low cost. FIA EPTA supports transparent markets that ensure equality of access and efficiently allocate capital.

In this regard, we would like to reiterate that the rationale for executing package transactions is to isolate specific risks of a financial instrument by combining it with one or more correlated financial instruments. The resulting package has lower variance than its components, which should result in narrower bid/ask spreads and/or larger size liquidity. For that reason, packages increase market efficiency and lower transaction costs for buy-side end users who use the financial markets for risk management or asset allocation purposes.

To achieve the goal of lowering execution costs and improving price discovery, FIA EPTA advises ESMA to carefully calibrate the framework for determining which packages are liquid. In our view, the initial proposed framework is a good start and ESMA has specifically highlighted many of the most common types of packages that are traded in the market. However, we believe certain improvements can be made, both with respect to eliminating overly restrictive criteria where appropriate and adding additional criteria where appropriate. Where possible, the framework should not be unnecessarily rigid and should instead take into account the continued evolution of the market.

Non-equity instruments are often transacted as part of a package, and therefore it is important that liquid and standardised packages are subject to the transparency requirements under MiFIR. At the same time, we agree that bespoke illiquid packages should not be subject to pre-trade transparency requirements. In addition, we support ESMA specifying that a package is not liquid if **all** of the components of a package are LIS.

< ESMA\_COMMENT\_MIFID\_PO\_0 >



**Q1. Do you agree with ESMA’s proposal to apply the SI obligations at the package order level where the investment firm is an SI in at least one component instrument of the package order? If not, please explain why and propose an alternative.**

<ESMA\_QUESTION\_MIFID\_PO\_1>  
TYPE YOUR TEXT HERE  
<ESMA\_QUESTION\_MIFID\_PO\_1>

**Q2. Do you agree with the proposed methodology based on qualitative criteria? Do you consider an alternative methodology as better suited for identifying liquid package orders as a whole?**

<ESMA\_QUESTION\_MIFID\_PO\_2>  
Yes we do. As it is not clear that ESMA could easily identify various types of package transactions in the current EU trade repository data, it would be extremely challenging to develop and apply appropriately calibrated quantitative criteria at this stage. Therefore, focusing on qualitative criteria is appropriate.  
<ESMA\_QUESTION\_MIFID\_PO\_2>

**Q3. Do you agree with the general criteria for identifying package orders that may be eligible for being liquid as a whole? Do you consider necessary to add further criteria or to remove any of the criteria proposed? Please explain.**

<ESMA\_QUESTION\_MIFID\_PO\_3>

Generally, yes. We agree that being available for trading on a trading venue indicates a certain level of standardisation.

We also agree that, for derivatives components, the availability of clearing is indicative of both standardisation and liquidity.

The separate requirement for package components to have “standardised contractual terms” should be removed as this cannot be objectively assessed and therefore market participants might not easily agree on which packages are included. All of the criteria should be able to objectively assessed so there is no confusion regarding which packages are assessed to be liquid.

We also recommend that ESMA include an additional general criterion to address LIS packages. Specifically, if **all** of the components of a package are LIS, then the package should not be considered liquid. This approach does not conflict with the waivers provided in the Level 1 text in Article 9 of MiFIR, as the LIS waiver in Article 9(1)(e)(ii) only suggests that packages with **one** component that is LIS may still be considered liquid as a whole. It does not prevent ESMA from specifying that a package where all components are LIS should not be considered liquid as a whole.

<ESMA\_QUESTION\_MIFID\_PO\_3>

**Q4. Do you consider it necessary to further specify the first criterion on the standardisation of components? If yes, which characteristics should be considered to specify the standardised components of packages?**

<ESMA\_QUESTION\_MIFID\_PO\_4>

See also our response to Question 3. We believe it is sufficient to require the package components to be traded on a trading venue and the derivatives components to be available for clearing.

<ESMA\_QUESTION\_MIFID\_PO\_4>

**Q5. Do you agree with the proposed interest rate derivatives specific criteria? If not, please explain why and present your preferred approach. Do you consider it necessary to add further criteria? If yes, please explain.**

<ESMA\_QUESTION\_MIFID\_PO\_5>

Some of these criteria are too restrictive in our view, as they do not reflect the fact that interest rate futures can be part of liquid packages. Interest rate futures have a non-benchmark duration that is determined by reference to the delivery date of the contract. Therefore, the current requirement for all package components to have benchmark tenors does not function for interest rate futures. ESMA should instead identify liquid packages containing interest rate futures and ensure these are appropriately subject to pre-trade transparency.

In addition, for interest rate swaps, certain tenors should be added to the list of eligible tenors, including 12, 15, and 20. These tenors can be part of liquid packages, such as interest rate swap curves and butterflies.

<ESMA\_QUESTION\_MIFID\_PO\_5>

**Q6. Do you consider that derivative components in other currencies (e.g. other EEA currencies, JPY) should be included? If yes, which ones?**

<ESMA\_QUESTION\_MIFID\_PO\_6>

At least CHF should be added in a European context. Other liquid G7 currencies (JPY, AUD, CAD) could be added as well.

<ESMA\_QUESTION\_MIFID\_PO\_6>

**Q7. Do you agree that only packages with derivative components with the above mentioned benchmark dates should be considered liquid? If not, please explain. Which other or additional benchmark dates do you suggest?**

<ESMA\_QUESTION\_MIFID\_PO\_7>

See our response to Question 5 -- for interest rate swaps, certain tenors should be added to the list of eligible tenors, including 12, 15, and 20. These tenors can be part of liquid packages, such as interest rate swap curves and butterflies.

As noted our response to Question 5, the requirement for interest rate derivative components of a package to have one of the listed benchmark tenors does not work for packages containing interest rate futures.

<ESMA\_QUESTION\_MIFID\_PO\_7>

**Q8. Do you consider that for certain types of packages derivative components that have broken dates (e.g. invoice spreads) or which are traded on IMM and MAC dates (e.g. rolls) have a liquid market?**

<ESMA\_QUESTION\_MIFID\_PO\_8>

Yes, IMM and MAC rolls are liquid. Certain invoice spreads (an interest rate swap and a future) are also liquid, such as those containing Bund and Gilt futures.

It is generally recognised that invoice spread packages containing Bund and Gilt futures are frequently traded by market participants. However, some concerns have been raised regarding how to apply pre-trade transparency to packages that include instruments that are traded on two different trading venues (given that the future must be reported into the Regulated Market following execution of the package).



Therefore, ESMA should clarify that, pursuant to the MiFID-II Quick Fix, pre-trade transparency applies at the package level. If an invoice spread package is determined to have a liquid market as a whole, pre-trade transparency should be provided at the time the price for the entire package is agreed to by market participants. Then, the futures leg can be reported to the Regulated Market pursuant to its rules and an additional pre-trade transparency requirement should not apply at this stage.  
<ESMA\_QUESTION\_MIFID\_PO\_8>

**Q9. Do you consider it necessary to specify criteria for non-derivative components of packages? If yes, which criteria would you suggest and why?**

<ESMA\_QUESTION\_MIFID\_PO\_9>

Yes, as certain spread overs (an interest rate swap and a sovereign bond) are liquid. For example, USD IRS vs. a US Treasury is very common. Therefore, ESMA must ensure that the framework does not fore-close the possibility for packages containing sovereign bonds to be determined liquid as a whole.

<ESMA\_QUESTION\_MIFID\_PO\_9>

**Q10. Do you agree with the proposed equity derivatives specific criteria? If not, please explain why and present your preferred approach. Do you consider it necessary to add further criteria? If yes, please explain.**

<ESMA\_QUESTION\_MIFID\_PO\_10>

No, we feel they are too restrictive. The rationale for package orders is often to isolate a specific risk aspect. Market participant will decide their preference for certain structures that fulfil their risk management and asset allocation needs and therefore it would not be appropriate to specify an arbitrary number of components. For example, strips of options contain more than four legs and can still be liquid in a spread with volatility or variance derivatives.

<ESMA\_QUESTION\_MIFID\_PO\_10>

**Q11. Do you consider that derivative components in other currencies (e.g. other EEA currencies, JPY) should be included? If yes, which ones?**

<ESMA\_QUESTION\_MIFID\_PO\_11>

In a European context, equity derivatives denominated in CHF are common.

<ESMA\_QUESTION\_MIFID\_PO\_11>

**Q12. Do you consider it necessary to specify that all components of the package order should have the same underlying? If yes, please explain.**

<ESMA\_QUESTION\_MIFID\_PO\_12>

The components of a package order do not necessarily need to have the same underlying. Most package orders exist because the components exhibit some sort of correlation. Components based on two correlated underlyings can be treated the same way as a single underlying package order.

<ESMA\_QUESTION\_MIFID\_PO\_12>

**Q13. Do you agree with the proposed credit derivatives specific criteria? If not, please explain why and present your preferred approach. Do you consider it necessary to add further criteria? If yes, please explain.**



<ESMA\_QUESTION\_MIFID\_PO\_13>

We are of the opinion that a package order can contain an off-the-run, on-the-run and/or the next maturity CDS index.

<ESMA\_QUESTION\_MIFID\_PO\_13>

**Q14. Do you agree that derivative components in USD, EUR or GBP should be considered sufficiently liquid for the purpose of this RTS? Do you consider that derivative components in other currencies (e.g. other EEA currencies, JPY) should be included? If yes, which ones?**

<ESMA\_QUESTION\_MIFID\_PO\_14>

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<ESMA\_QUESTION\_MIFID\_PO\_14>

**Q15. Do you consider it necessary to further specify the indices that are eligible? If yes, please specify which specific indices should be included. Do you consider it necessary to specify the maturity dates of the underlying indices?**

<ESMA\_QUESTION\_MIFID\_PO\_15>

The following CDS indices are already sufficiently liquid:

- CDX North America Investment Grade
- CDX North America High Yield
- Itraxx Europe
- Itraxx Europe Crossover
- Itraxx Europe Senior Financial
- Itraxx Europe Subordinate Financial

CDX Emerging Markets

It is not necessary to specify the maturity dates for underlying indices. Typically, these would be the latest off-the-run, the on-the-run, and the one that will be on-the-run six months later.

<ESMA\_QUESTION\_MIFID\_PO\_15>

**Q16. Do you agree with the proposed commodity derivatives specific criteria? If not, please explain why and present your preferred approach. Do you consider it necessary to add further criteria? If yes, please explain.**

<ESMA\_QUESTION\_MIFID\_PO\_16>

The criteria for commodity derivatives are restricted to time spreads in the same underlying. In the listed space, other structures of correlated commodities are commonly traded as a package, for example the WTI-Brent spread or the crack spread.

<ESMA\_QUESTION\_MIFID\_PO\_16>

**Q17. Do you consider that derivative components in other currencies (e.g. other EEA currencies, JPY) should be included? If yes, which ones.**



<ESMA\_QUESTION\_MIFID\_PO\_17>

The majority of the commodity market trades in USD, with a limited amount in EUR. The Indian and Chinese commodity markets are very liquid, but these are mostly traded domestically and less relevant in a European context.

<ESMA\_QUESTION\_MIFID\_PO\_17>

**Q18. In which types of contracts do package orders in commodity derivatives mostly occur? Do you consider it necessary to provide for asset class specific criteria that take option and future/forward contracts into account? If yes, please explain.**

<ESMA\_QUESTION\_MIFID\_PO\_18>

- Time spreads (trading the term structure of commodities), including butterflies
- Correlation structures, for example WTI-Crude or more complex combinations such as the crack spread (crude oil versus refined products) or the crush spread (e.g. soybean, soybean oil and soymeal).
- Exchange for physical (EFP)

On all in-scope asset classes options can be traded, and it is very common to trade options in a package with an underlying futures/forward/spot contract.

<ESMA\_QUESTION\_MIFID\_PO\_18>

**Q19. Do you consider it necessary to develop criteria at a more granular level (e.g. energy derivatives, agricultural derivatives) to better reflect the particularities of package orders in the different sub-asset classes? If yes, please explain.**

<ESMA\_QUESTION\_MIFID\_PO\_19>

No

<ESMA\_QUESTION\_MIFID\_PO\_19>

**Q20. Do you consider it necessary to specify that all components of the package order should have the same underlying? If yes, please explain at which level this concept of “same underlying” should apply (e.g. same asset class, same sub-asset class, same sub-class – as per Annex III of RTS 2 – or at or more granular level).**

<ESMA\_QUESTION\_MIFID\_PO\_20>

No, package orders exist whenever components are correlated. package orders of different but correlated underlyings are very common.

<ESMA\_QUESTION\_MIFID\_PO\_20>

**Q21. Are there package orders in other derivative asset classes that are in your view standardised and frequently traded and which should be eligible for having a liquid market as a whole? If yes, what asset class specific criteria do you suggest for those?**

<ESMA\_QUESTION\_MIFID\_PO\_21>



Equity variance swaps are relatively common, but could also be viewed as equity derivatives. It is likely that package orders that contain variance swaps on two correlated equity indices exist.  
<ESMA\_QUESTION\_MIFID\_PO\_21>

**Q22. Do you agree with the approach proposed for FX derivatives or do you consider it necessary to include an asset-class specific approach for FX derivatives?**

<ESMA\_QUESTION\_MIFID\_PO\_22>

The follow FX instruments can be a component of a package order:

- Spot FX
- FX forward (deliverable or NDF) or future
- FX option

<ESMA\_QUESTION\_MIFID\_PO\_22>

**Q23. How should ESMA deal with cross-asset class package orders? Should ESMA develop cross-asset class specific criteria? If yes, please specify those. Alternatively, should cross-asset class package orders be allocated to only one asset class? If yes, how?**

<ESMA\_QUESTION\_MIFID\_PO\_23>

Certain spread overs (an interest rate swap and a sovereign bond) are liquid. For example, USD IRS vs. a US Treasury is very common. These involve components in two asset classes under RTS 2. Therefore, ESMA should not foreclose the ability for these types of packages to be determined to be liquid as a whole or treat them differently from other type of package orders. In some situations time spreads in an asset class could be accompanied by an interest rate swap to neutralize the risk free rate effect on the price.

ESMA should ensure liquid packages are appropriately included within the framework.

Cross-asset class packages could be allocated to an asset class based on the derivatives component. For example, a spread over can be viewed as an interest rate product.

<ESMA\_QUESTION\_MIFID\_PO\_23>

**Q24. Do you agree that package orders where all components are subject to the trading obligation for derivatives should be considered to have a liquid market as a whole? If not, please explain.**

<ESMA\_QUESTION\_MIFID\_PO\_24>

Yes, in our view it is reasonable to determine that packages falling within this category are liquid as a whole. Market participants are familiar with the packages in this category as they are already subject to the U.S. trading obligation. In addition, in connection with being subject to the U.S. trading obligation, these packages are required to trade via RFQ-to-3 or on an Order Book. This is the U.S. version of pre-trade transparency and therefore it would be consistent to also apply pre-trade transparency under MiFIR.

<ESMA\_QUESTION\_MIFID\_PO\_24>

**Q25. Do you consider that package orders where at least one component is subject to the trading obligation and all other components are subject to the clearing obligation should be considered to have a liquid market as a whole? If not, please explain.**



<ESMA\_QUESTION\_MIFID\_PO\_25>

Yes, in our view it is reasonable to determine that packages falling within this category are liquid as a whole. Market participants are familiar with the packages in this category as they are already subject to the U.S. trading obligation. In addition, in connection with being subject to the U.S. trading obligation, these packages are required to trade via RFQ-to-3 or on an Order Book. This is the U.S. version of pre-trade transparency and therefore it would be consistent to also apply pre-trade transparency under MiFIR.

<ESMA\_QUESTION\_MIFID\_PO\_25>

**Q26. Do you agree that the categories of packages above should be considered as standardised and frequently traded for the purpose of this RTS empowerment? If not, please explain.**

<ESMA\_QUESTION\_MIFID\_PO\_26>

Yes, in our view all of the types of packages included in the list provided for interest rate and credit derivatives are standardised, frequently traded, and liquid. It is worth noting that the table includes invoice spread packages but describes these as only containing instruments with benchmark tenors. While we agree that invoice spread packages are liquid, the instruments will not be benchmark tenors since the future has a non-benchmark duration that is determined by reference to the delivery date of the contract and the interest rate swap will be forward-starting with its maturity date matching the maturity date of the cash bond underlying the future.

<ESMA\_QUESTION\_MIFID\_PO\_26>

**Q27. Are there any categories of packages missing in the above asset classes that should be considered for the purpose of this RTS empowerment? Are there in your view categories of packages in other asset classes that ESMA should consider?**

<ESMA\_QUESTION\_MIFID\_PO\_27>

Certain spread overs (an interest rate swap and a sovereign bond) are liquid. For example, USD IRS vs. a US Treasury is very common.

<ESMA\_QUESTION\_MIFID\_PO\_27>

**Q28. Do you agree with the draft RTS in annex IV? If not, please explain.**

<ESMA\_QUESTION\_MIFID\_PO\_28>

TYPE YOUR TEXT HERE

<ESMA\_QUESTION\_MIFID\_PO\_28>

**Q29. CBAQ1: Please identify, per asset class and per currency, the total nominal amount traded (including packages). Please also identify what % of this total trading is executed i) through packages (incl. EFPs) and ii) through packages (with only financial**

instruments as components), on trading venues and OTC. Reference period: September 2015–September 2016. If you are a trading venue, please fill in the trading venue columns only. If you are an investment firm, please fill in the trading venue and OTC columns as appropriate.

<ESMA\_QUESTION\_MIFID\_PO\_29>

	Total Nominal amount traded, including packages (in euros) Sept 2015-Sept 2016		% of packages (including EFPs)		% of packages (with only financial instruments as components)	
	Trading venues	OTC	Trading venues	OTC	Trading venues	OTC
<b>Interest rate derivatives</b>						
Euro						
USD						
GBP						
Other currencies (please specify)						
<b>Equity derivatives</b>						
Euro						
USD						
GBP						
Other currencies (please specify)						
<b>Credit derivatives</b>						
Euro						
USD						
GBP						
Other currencies (please specify)						
<b>Commodity derivatives</b>						
Euro						
USD						
GBP						
Other currencies (please specify)						

<ESMA\_QUESTION\_MIFID\_PO\_29>

**Q30. CBAQ2: Based on ESMA draft RTS, out of the package orders (comprised only of financial instruments) that you trade, which percentage of the volume traded do you**



**expect to be considered as having a liquid market as a whole? Please confirm which category the package orders you trade fall under:**

**1= less than 10% of the volume of package orders traded;**

**2= from 10% to 25% of the volume of package orders traded;**

**3= from 25% to 50% of the volume of package orders traded;**

**4= from 50% to 75% of the volume of package orders traded; or,**

**5= more than 75% of the of the volume of package orders traded.**

<ESMA\_QUESTION\_MIFID\_PO\_30>  
TYPE YOUR TEXT HERE  
<ESMA\_QUESTION\_MIFID\_PO\_30>

**Q31. CBAQ3: In which area do you anticipate the costs of complying with ESMA' draft RTS to stem from (e.g. IT, training)?**

<ESMA\_QUESTION\_MIFID\_PO\_31>  
TYPE YOUR TEXT HERE  
<ESMA\_QUESTION\_MIFID\_PO\_31>

**Q32. CBAQ4: Could you provide an indication of the expected implementation costs of ESMA' draft RTS (in euros) differentiating between (i) one-off costs and (ii) recurring costs (on an annual basis)?**

<ESMA\_QUESTION\_MIFID\_PO\_32>  
TYPE YOUR TEXT HERE  
<ESMA\_QUESTION\_MIFID\_PO\_32>

**Q33. CBAQ5: In relation to the size of your business, do you expect those costs to be:**

**very low;**

**low;**

**medium; or,**

**high.**

<ESMA\_QUESTION\_MIFID\_PO\_33>  
TYPE YOUR TEXT HERE  
<ESMA\_QUESTION\_MIFID\_PO\_33>



**Q34. CBAQ6: Do you expect any impact from ESMA's draft RTS on your business model/activity? If so, please explain the drivers and the expected changes to your business model/activity.**

<ESMA\_QUESTION\_MIFID\_PO\_34>  
 TYPE YOUR TEXT HERE  
 <ESMA\_QUESTION\_MIFID\_PO\_34>

**Q35. CBAQ7: Do you expect you expect broader market changes from the draft RTS in the short or medium term TO?**

<ESMA\_QUESTION\_MIFID\_PO\_35>  
 TYPE YOUR TEXT HERE  
 <ESMA\_QUESTION\_MIFID\_PO\_35>

**Q36. CBAQ8: If so, please explain**

<ESMA\_QUESTION\_MIFID\_PO\_36>

Expected Impact on	Yes/No/NA	Positive Impact	Negative impact
Market structure (changes in trading models, in trading strategies...)			
Liquidity (please explain how you measure liquidity)			
End users			
Other (specify)			

<ESMA\_QUESTION\_MIFID\_PO\_36>

**Q37. CBAQ9: Are their specific concerns regarding ESMA's draft RTS you would wish to highlight? Please be as specific as possible in your answer.**

<ESMA\_QUESTION\_MIFID\_PO\_37>  
 TYPE YOUR TEXT HERE  
 <ESMA\_QUESTION\_MIFID\_PO\_37>

**Q38. CBAQ10; Are there specific benefits arising from ESMA's draft RTS you would wish to mention?**

<ESMA\_QUESTION\_MIFID\_PO\_38>  
 TYPE YOUR TEXT HERE  
 <ESMA\_QUESTION\_MIFID\_PO\_38>

**For trading venues only**



**Q39. CBAQ11: Do you offer trading in packages?**

<ESMA\_QUESTION\_MIFID\_PO\_39>  
 TYPE YOUR TEXT HERE  
 <ESMA\_QUESTION\_MIFID\_PO\_39>

**Q40. CBAQ12: If so, please describe, per asset class, the categories of packages for which pre-trade transparency is currently provided. Please also state whether you consider those packages as liquid and the criteria taken into consideration (e.g. spreads, volume traded, number of transactions, number of market participants). If no sufficient space is available to respond, please provide the information in an annex.**

<ESMA\_QUESTION\_MIFID\_PO\_40>

Package Categories with pre-trade transparency	Currency	Tenor	Reference index	Other characteristics (please identify)	Liquidity assessment (Y/N) and underlying criteria
<b>Interest rate derivatives</b>					
<b>Equity derivatives</b>					
<b>Credit derivatives</b>					
<b>Commodity derivatives</b>					
<b>Others (please specify)</b>					

<ESMA\_QUESTION\_MIFID\_PO\_40>