

Post-Trade Transparency – the UK MiFIR designated reporter and the EU MiFIR designated publishing entity regimes July 2026

The recent review of [EU](#) and [UK](#) MiFIR has led to significant changes in markets regulation, including in relation to post-trade transparency (“PoTT”). One notable update addresses the designation of the counterparty to an OTC trade who is responsible for reporting for PoTT purposes.

In the UK, the Designated Reporters (“DR”) regime has been effective since 29 April 2024 and firms have registered as such to manage PoTT reporting. Similarly, in the EU, MiFIR Review has introduced the Designated Publishing Entity (“DPE”) status, which becomes operational on 3 February 2025 as per [ESMA statement](#) dated 22 July 2024.

What is changing?

- The introduction of the DR/DPE regimes means that there is no longer a link between the systematic internalisers (“SIs”) regime and PoTT reporting. Where the identification of the counterparty responsible for reporting an OTC trade for PoTT purposes was based on its SI status before, it is now solely dependent on whether a counterparty is a DR/DPE.

DR/DPE and OTC PoTT hierarchy		Buyer	
		DR/DPE	Other
Seller	DR/DPE	Seller	Seller
	Other	Buyer	Seller

- Investment firms can register as a DR/DPE regardless of their SI status. A counterparty’s DR/DPE status can be checked against registers maintained [by the FCA](#) in the UK and [by ESMA](#) in the EU.

What is Crédit Agricole CIB’s status?

Crédit Agricole CIB has already registered as a DR under UK MiFIR in all asset classes and as a DPE under EU MiFIR for specific asset classes, ensuring seamless post-trade reporting for clients unless they are themselves DR or DPE. As a result, Crédit Agricole CIB is responsible for PoTT obligations in all cases when trading OTC with clients who are not also registered as a DR in the UK or DPE in the EU.

Legal entity	LEI	UK MiFIR	EU MiFIR
		Designated reporter (UK branch)	Designated publishing entity
Crédit Agricole CIB	1VUV7VQFKUOQJSJ21A208	YES All asset classes	YES - Bonds - ETCs - ETNs - Interest rate derivatives - Structured finance products - Emission allowances

Additional questions?

Please contact Crédit Agricole CIB’s Regulatory Change team (GMRCRegulatoryChange@ca-cib.com) or your usual relationship contact person.

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