

European Securities and Markets Authority ESMA

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Submitted via the ESMA Website

15 December 2023, Zürich

**ISSA T+1 Global Impacts paper in response to Question 4 of Call for
evidence on shortening settlement cycle .**

Dear Sir/Madam

ISSA is a global securities services industry association. We have 143 members, over half from Europe, who are drawn from the securities industry including 50 Custodian banks and 47 CSDs and various other types of service providers to the industry.

ISSA is one of 17 global and European industry associations making up the “EU T+1 Industry Task Force”, organized by AFME, which has provided a response to ESMA’s “Call for Evidence on shortening the Settlement Cycle”. ISSA supports that response and appreciates the initiative by ESMA to study all implications to domestic and international industry participants of European markets potentially accelerating their settlement cycles to T+1 (or even potentially, at some point, to T+0).

ISSA will not be submitting its own full separate response to the Call for Evidence. However, earlier this year, we formed a working group on “T+1 Global Impacts”, focusing on what we feel have been under-emphasized implications to international investors and cross-border transactions of domestic markets accelerating their securities settlement cycles to T+1. That working group has just published a paper on that subject, and we attach it here as our response to Question Number 27 in Section 3.4 on “**Please elaborate about any other issue in relation to the shortening of the securities settlement cycle in the EU or in third-country jurisdictions not previously addressed in the Call for Evidence.**”.

We feel that the approach ESMA is taking on the Call for Evidence is consistent with the overall spirit of the recommendations ISSA makes in that paper to domestic markets that are contemplating an investigation to potentially accelerating their settlement cycles.

We are available at your convenience to discuss any of the issues discussed in the ISSA Paper.

Sincerely,

Colin Parry



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