GUIDE ON DAILY COMMODITY DERIVATIVES POSITION REPORTING TO CNMV

Index

REPORTING INSTRUCTIONS FOR TRADING VENUES AND INVESTMENT FIRMS SUBMITTING DAILY COMMODITY DERIVATIVES POSITION REPORTS TO CNMV

1. INTRODUCTION

CNMV has created this document to provide instructions for entities which will submit commodity derivative position reports to CNMV for processing in application of Article 58(1)(b) and 58(2)

Article 58(1)(b) of MiFID II requires Trading Venues (TV) to report a daily breakdown of the positions held by all persons (till the end-client) on that venue in commodity derivatives and emission allowances or their derivatives. Similarly, Article 58(2) of MiFID II requires investment firms (IFs) trading in commodity derivatives or emission allowances (or their derivatives), outside a trading venue, to report positions traded on TVs, as well as, their Economically Equivalent OTC (EEOTC) positions, as well as the positions of their clients through to the end-client.

Since positions held by investment firm clients, traded on Spanish TVs, will have already be sent to CNMV by those TVs, IFs shall only report the EEOTC positions of their clients.

Commission Implementing Regulation (EU) 2017/1093[1] establishes a common standard XML format for the daily position reports prescribed by Article 58(2) of MIFID II. This format and content shall also be applied for the TVs to comply with the reporting obligations set by Article 58(1)(b) as set out in the attached OPERATIONAL GUIDE OF THE DAILY COMMODITY DERIVATIVES POSITION REPORTING TO CNMV.

These reports will enable CNMV to aggregate positions for every holder (in instruments traded on a TV, as well as EEOTC) and determine eventual breaches of position limits.

2. REQUIREMENTS FOR USE OF THE SERVICE

CNMV has established, in the Sede Electrónica, a service for the receipt of daily position reports. Access to this new service will require prior registration of the user in CNMV's Sede Electrónica by following the steps set out below:

- Those requesting access to the service must complete an initial form by following the instructions and validations included in it. It will be necessary to provide an e-mail address that will be used for communications made in relation to the request. Whether the entity is registered for the CIFRADOC/CNMV service must be indicated in the form and, if so, the corresponding user who will be submitting the daily position reports, so that CNMV can enable the procedure for that user.

- After completing the form properly, the user will have to enter a security code (CAPTCHA-type), and then submit the form through CNMV's Sede Electrónica.

- If all the data entered are correct, the notifying entity will receive a "validation code" by e-mail which must be entered on the subsequent form. Conversely, if there is a problem on this first screen (the user has not filled in an obligatory field or has completed a field incorrectly – e.g., the field format) the registration will be rejected and access will have to be requested once again.

- After entering the validation code, CNMV will receive the user's registration and carry out checks regarding the identity (entity, contact person, contact phone number and corporate e-

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[1] Commission Implementing Regulation (EU) 2017/1093 of 20 June 2017, laying down implementing technical standards with regard to the format of position reports by investment firms and market operators.

mail address) of the person who registered on the previous screen. This verification will usually be carried out by phone.

- If the verification is satisfactory, the notifying entity will receive an e-mail in which it will be informed of its registration on the system. The procedure will be enabled if the entity is registered for CIFRADOC/CNMV or, if it is not, it will be assigned access credentials (a username and password), which must be used later to submit the daily position reporting files.

- Those registered for CIFRADOC/CNMV will be able to send position reports either through the Sede or through SFTP (Secure File Transfer Protocol) Files must be signed in both cases. For those Investment Firms (IF) gaining access with a username and password, reports will be sent through SFTP.

- Connection to CNMV's SFTP server and file submission is free of charge for those entities subject to position reporting obligations.

- Instructions for file submission and file sharing between CNMV and an IF subject to reporting obligations, naming conventions and error management are described below in the attached OPERATIONAL GUIDE OF THE DAILY COMMODITY DERIVATIVES POSITION REPORTING TO CNMV.

3. REPORTING TIMELINE

The specific steps and timings (hours considered in Central European Time, CET) for position reporting are set out in the table below:

Step	Event	Date and Time (Madrid CET)	Comments
1	End of trading day T.	Day T (End of Trading Venue Day for T).	TVs must provide position reports on positions on their market as at the end of their trading day.
2	Instrument reference data (FIRDS File) for day T - Legal Entity Identifier (LEI), Market Identifier Code (MIC) and International Securities Identification Number (ISIN) – will be incorporated to a CNMV internal database in order to validate the content of position reports.	ESMA will provide access to instrument reference data for T Day as from Day T+1 – 08:00, although CNMV's internal process for data incorporation will finish at some point from 10:00 to 13:00 except for exceptional circumstances.	CNMV will launch a first validation cycle for the reports of Day T submitted by TVs and IFs subject to reporting obligations at 13:30 of Day T+1, once the updating of the internal database with instrument reference data for day T is completed. TVs, IFs and other National Competent Authorities (NCAs) will receive messages of confirmation or error reports resulting from this first validation cycle from Day T - 14:00.
3	Submission of position reports for day T from TVs and IFs (IFs only for EEOTC).	Reports can be submitted from T+1 0:00[1] till T+1 – 23:00.	First validation cycle will be performed on the last available[2] version of the daily report submitted by each TV and/or IF. Until T+1 – 23:00 submitters may update their reports of Day T and solve errors detected in the previous validation cycle. Second validation cycle will be performed at 23:30 and those IFs and TVs that had submitted a new report for positions on Day T, after the first validation cycle, will receive messages of confirmation or error reports resulting from this second validation cycle from Day T+2 – 00:00.

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[1] Position reports for day T must be submitted after Day T+1 – 00:00, because it is only from that hour that it will have finished the second validation cycle of the position reports of the previous day (positions of Day T-1) that will have been validated within the content of the FIRDS file of T-1, that will have been incorporated to the CNMV database during the morning of day T. If position reports for day T were submitted before T+1 – 0:00 they would be also validated in the same validation process, thus within the FIRDS file of T-1, generating "false" validation errors resulting from comparing positions in the contracts on Day T and a the FIRDS file which was not updated for Day T.

[2] If prior to the first validation cycle, or between the first and second validation cycle, a position report for Day T was submitted more than once with an identical name (for example, because the submitter has become aware of some mistake made in the file prior to the validation cycle of CNMV) the last version of the file, with an identical name, would substitute previous files with same name and this last file would be the only one to be validated. If the same TV or IF submitted various files with different names (for example, position reports from previous days that would have been rejected in both validation cycles of "their" Day) all the files from this TV or IF would proceed to be validated and generate their respective confirmation messages or error reports.

Step	Event	Date and Time (Madrid CET)	Comments
4	Position limit breaches identified and notification sent to position holders.	From Day T+2 – 08:00.	CNMV applies position limits to persons' positions and sends breach notification to the position holder and/or to its ultimate parent entity.
5	CNMV takes action against position limit breaches.	Day T+2 onwards.	CNMV will consider further action where position holders do not reduce their position below position limits.

In summary, the validation process for the reports of positions of Day T will begin at T+1 –13:30, once the updating of the CNMV internal database, with instrument reference data for day T is completed. This first validation cycle will be performed on all the reports submitted through the FTPS by each TV or IF, or on the last version of the report received from each TV or IF in case any of those entities had submitted more than one position report with the same name before the first validation cycle.

CNMV will accept position reports submitted from TVs and IFs of Day T until Day T+1 – 23:00. CNMV will only use the latest, valid reports received, from every submitter up until this time to calculate persons' positions.

Where the submitter identifies an error in a report which has been submitted and accepted, the entity shall submit another report, as soon as possible, to amend or cancel the previous mistaken report. If this new report were submitted before T+1 – 23:00, it will be incorporated in the CNMV database for the second validation cycle and, if validated, the positions in the report will be checked against the limits on T+2.

For errors identified in positions that had already been validated and checked against limits, CNMV will accept amendments or cancellations to position reports, which have previously been submitted for up to five years, after the trading day to which the report refers. Amended reports are expected to be submitted as soon as possible, following the identification of such errors. This enables CNMV to have as complete and accurate position report data as possible, if we wish to re-run any reports to re-calculate positions in the future.

CNMV will forward SCDPRs from Spanish TVs to other NCAs where relevant after completion of all validation checks have been successfully passed. This will happen after T+2 – 01:00 in one batch.

II. OPERATIONAL GUIDE OF THE DAILY COMMODITY DERIVATIVES POSITION REPORTING TO CNMV

1. SUBMISSION OF FILES

Submission through CNMV's SFTP server for entities registered for the CIFRADOC/CNMV service

Once the XML file is generated and compressed by the entity using Winzip, it must be signed electronically using the entity's own means and sent to CNMV. The signature must be done using the CIFRADOC/CNMV service with a Legal Person representative certificate.

The signature must comply with the following characteristics:
❖ Format: CAdES-BES

❖ Signature algorithm: SHA-512

❖ Extension: .SIGN

The steps to take are the following:

- Sign the file using the method previously described. The file must have the name of the XML original and its extension will be .ZIP.SIGN.

- Connect to the CNMV FTPS server ftpserver.cnmv.es with an FTP Client, the FTP access parameters are provided by the CNMV website on registration to the service, and upload the file to the "\Inbox" folder.

- Upon its reception an acknowledgement of receipt by CNMV will be sent to the email address or addresses provided by the entity on registration. This receipt only implies that the file has been received and its entry has been registered and under no circumstances does it means that the information within is valid; that will be verified in a future step.

- If an error occurs during reception or the initial validation of the file, an email will be sent containing the information about the error arising and the procedure will be complete.

- Once the contents of the file have been verified by CNMV, an email will be sent with the feedback file attached; indicating if the information received was correct or had any errors. In the latter case, detailed information about the detected errors will be provided and the entity should correct them as soon as possible. Additionally, a copy of the feedback file will be available in the "\Outbox" folder of the FTPS server.

Submission through CNMV SFTP server for users not registered in the CIFRADOC/CNMV service

Once the XML File is generated and compressed by the entity using Winzip, it must:

- Connect to the CNMV FTPS server ftpserver.cnmv.es with an FTP Client, the FTP access parameters are provided by the CNMV website on registration to the service, and upload the file to the "\Inbox" folder.

- Once the contents of the file have been verified by CNMV, an email will be sent with the feedback file attached; indicating if the information received was correct or had any errors. In the latter case, detailed information about the detected errors will be provided and the entity should correct them as soon as possible. Additionally, a copy of the feedback file will be available in the "\Outbox" folder of the FTPS server.

2. DATA VALIDATION

The CNMV system (MDP) will run data validation on all position report files received irrespective of the report's origin (TVs, IFs – either Spanish or foreign - and NCAs).

The system will process the submitted files continuously and perform automated data validation to ensure compliance with the rules in place. The system will also send a feedback file to the submitting entities regardless of, whether or not, the submitted position report file contains errors or not.

The system may reject a submitted file or an individual record in a valid file, depending on the type of error. If there are no errors, MDP will send to the submitting entities a feedback file stating that the submitted file is fully accepted.

Following successful validation of the file transmission and format, content validation will only take place if reference data pertaining to that trading day is available. If at least one error for a specific record has been identified, the system will generate a feedback message for that record, detailing all error codes and error messages that have been detected. This will be repeated for each record within the file (see Annex 3 – Content Validation Rules).

If reference data pertaining to that trading day is not yet available, the position report will be held until the reference data becomes available (see section Data Content Errors).

The feedback file Extensible Mark-Up Language (XML) messages are covered in section 3 – Feedback Files Fields.

CNMV will be ensuring that there is uniqueness within submissions by creating a unique key for the position report combining fields such as report reference number, date of trading day, venue product code and position holder ID.

Data transmission errors

When a TV (Trading Venue)/IF (Inversion Firm) uploads a file to the system, the MDP Gateway uses filename pattern matching to validate incoming filenames. Filenames that do not match the expected patterns will be rejected at the Secure File Transfer Protocol (SFTP) level and a standard 'Access Denied' error will be returned.

The correct file-naming conventions can be found in Annex 2 – Submitting Entity to MDP.

Data format and file errors

When the data transmission validations are passed successfully, the MDP will check that the submitted file complies with the file and format validation specification. Trading Venues and Investment Firms shall only submit files after having performed successful XML-validation against the XML-schema defined by us (Annex 1: XML Schemas). Additionally, the MDP will perform XML validation of files received. The schema enforces a limit of 500,000 records per file. If the file submission contains more than 500,000 records, it will have to be split into separate file submissions so as to avoid breaching this record limitation number.

If an error is identified at this stage then the processing stops, all records contained in the file are rejected, and a feedback message explaining the reason for rejection is sent to the submitting entity. The submitting entity must rectify the XML validation errors and resubmit all the records.

Annex 3 – File Validation Rules, for the applicable format and file validation rules, and how different file statuses are used in conjunction with different file errors.

Correcting an invalid file

As soon as the MDP begins file validation, the filename of the zip file is persisted in the system. After this point in processing, the filename cannot be reused without being considered a duplicate filename and being rejected (FIL-107).

Strict file sequencing is enforced through time of receipt and the file naming conventions, (refer to Annex 2: File Naming Conventions) with each file explicitly referencing its predecessor. Where a submission fails a file validation rule, all subsequent submissions will be processed in order of receipt until a file with an acceptable filename, referencing the last file successfully processed, is found.

If a file has been rejected with a file error, none of the position reports within that file will have been processed by the MDP. If the submitting entity determines the file should be resubmitted to the MDP then, where possible, the filename on the original submission should be used with an incremented version number. If resubmission becomes overly complex – for example errors relate to the version number – it is advisable to restart the process by using a new sequence number, provided that the previous-sequence-number refers to the sequence number in the last successfully processed file.

The example below (Figure 1) shows a series of position report submissions in the order they were received by the MDP. It shows how the MDP will respond to file and gateway errors, and how submitting entities should rename files on resubmission to avoid triggering further file errors due to incorrect filenames.

See Annex 3 – File Validation Rules for details of position report file errors and for details of which file statuses are associated with those file errors.

Image 1 - Examples of invalid file correction

	Filename	File status	File error	Comments
A	TXMPL_DATCPR_ NCAES_000004-0-000003_18	ACPT	-	File accepted without issues
B	TXMPL_DATCPR_ NCAES_000005-0-000004_18	CRPT	FIL-101	Decompression issue
C	TXMPL_DATCPR_ NCAES_000006-0-000005_18	RJCT	GBX-020	A file with sequence number 000005 was received, but 000005, was not the sequence number of the last successfully accepted file
D	TXMPL_DATCPR_ NCAES_000008-0-000007_18	RMDR	FIL-109	000007 sequence number was never received and processed successfully by the MDP; it was rejected at FTP level; therefore, it cannot be used in the previous sequence number
E	TXMPL_DATCPR_ NCAES_000005-0-000004_18	RJCT	FIL-107	Decompression issue has been fixed but filename has been received before
F	TXMPL_DATCPR_ NCAES_000005-1-000004_18	ACPT	-	Incremented version number means that the filename is unique
G	TXMPL_DATCPR_ NCAES_000006-1-000005_18	ACPT	-	Incremented version number means that the filename is unique
H	TXMPL_DATCPR_ NCAES_000007-0-000006_18	ACPT	-	The filename for submission D never persisted in the MDP, so this filename is not considered duplicated
I	TXMPL_DATCPR_ NCAES_000008-2-000007_18	RJCT	GBX-030	Version number has incremented by 2, rather than by 1, compared to the last submission processed with that filename
J	TXMPL_DATCPR_ NCAES_000009-0-000007_18	ACPT	-	Erroneous version number on previous file cannot be easily rectified. Submitter uses a new sequence number to restart processing

Data Content Errors

If the data transmission and data format tests are passed successfully, the MDP will perform automated data content validations including validations against ESMA and CNMV reference data.

If an error is identified during content validation, the affected records will be rejected. The system will send feedback to the submitting entity on the erroneous records and the reason, or reasons, for the rejection. The submitting entity must fix the source of the errors and resubmit the corrected records in a new file.

A common reference data set for all MiFID II instruments representing the previous calendar day is compiled by ESMA and published daily by 08:00 CET. As such, if a position related to trading day 'T' is also reported on the same day 'T,' it shall be validated against the reference data published at 08:00 CET on day 'T+1'. Additionally, CNMV will maintain internal reference data in order to validate Venue Product Codes.

Note that it is only possible for the MDP to undertake content validation when the reference data for the trading day, relating to the reported position, has been made available (i.e., from 08:00 CET on day 'T+1'). The record will be considered as "held" until reference data is available and the "RCVD" (received) record status code will be reported in the message statistics of the status advice file.

Once reference data has been successfully ingested by the MDP, the held records will be processed. A final feedback file will confirm if the record has been accepted or rejected.

See Annex 3 – Content Validation Rules for the applicable content validation rules and record-level statuses.

Correcting accepted records

Where a position report is accepted as valid, and the submitting entity later discovers that the submitted information is incorrect, the report should be corrected as soon as possible. The MDP will accept corrections for up to five years after the trading day to which the report relates.

The corrective action required will depend on the scenario. Only those corrections that are received and accepted before the deadline for that trading day will be automatically included in the position calculations for that trading day.

If the record was submitted with a mistake, then the submitting entity should resend the report with a CANC Report Status in order to cancel the report.

If the record needs to be amended and the updates relate to fields that make up the unique key (namely, report reference number, date of the trading day, venue product code, and position holder ID) for a position report, then the entity should resend the report with a CANC Report Status in order to cancel the report. Provided the cancellation is accepted, the entity can then submit the correct version of the record with a NEW Report Status.

If the record needs to be amended and the amendments do not affect the data that was originally reported – in any of the fields that make up the unique key for a position report – then the entity should resend the report with the relevant corrections with an AMND Report Status. There is no upper limit for the number of times that a report can be amended within the five-year timeline.

Feedback files fields

The table below describes how the feedback files received by the submitting entity will be constructed.

This includes details of the file status statistics showing position counts by status for the submission and the message report identifier.

Note that it will be necessary to use the message report identifier attribute [MsgRptIdr], within the status advice [MsgStsAdvc], to determine the original submission file for any position reports that have reported errors.

The 'MsgRptIdr' attribute of the 'MsgStsAdvc', shall identify the submission using the file name, components <SequenceNo> <Version>_<Year> from the submission file name (which is defined to uniquely identify the submission to the submitter). For example: 'MsgRptIdr' 000234-0_18.

Field name	Reporting instruction	XPath BizData/Pyld/ Document/…
Message Status [Mandatory]	The Message Status details the status of the whole report received from a Submitting Entity. Possible file statuses include: • ACPT - File accepted with no errors • CRPT – Corrupt file • RJCT - File rejected due to file errors or because all records were rejected • RMDR - Reminder • PART - Partially Accepted, in case some record does not pass the Content validations	FinInstrmRptgStsAdvc/ StsAdvc/MsgSts/RptSts
Validation Rule [Unbounded]	The Validation Rule provides the details of the rule that could not be validated by the system. The ID will contain the Error Code field described in the tables from Annex 3.	FinInstrmRptgStsAdvc/ StsAdvc/MsgSts/VldtnRule
Record Status [Unbounded]	The Record Status provides per record status on the submitted report. The same record can be reported multiple times where different elements of the record have an issue.	FinInstrmRptgStsAdvc/ StsAdvc/RcrdSts
Original Record Identification [Mandatory]	The field describes a unique and unambiguous technical identification of the original data record. This will be a concatenation of the record number and report reference number, delimited by a colon. The record number is the physical row number in the file. The record number is assigned during ingestion by the MDP.	FinInstrmRptgStsAdvc/ StsAdvc/RcrdSts/ OrgnlRcrdId

Status [Mandatory]	This field defines the status of the reported record. ACPT Accepted RJCT Rejected		FinInstrmRptgStsAdvc/ StsAdvc/RcrdSts/Sts
Validation Rule [Unbounded]	The Validation Rule provides the details of the rule that could not be validated for the record. The ID will contain the Error Code field described in the tables from Annex 3.		FinInstrmRptgStsAdvc/ StsAdvc/RcrdSts/VldtnRule

3. Position report upload specifications

Overview of the data to be reported

The following table represents the FCA's template for position reports which is based on the draft implementing technical standards on position reporting.

Field #	Field name	Field format	Details
1	Date and time of report submission	{DATE_TIME_FORMAT}	The date and time when the report is submitted.
2	Report reference number	{ALPHANUM-52}	Unique identifier given by the submitter. Field to be populated with the unique identifier given by the submitter, unambiguously identifying the report to both submitter and receiving competent authority. The FCA will ensure uniqueness across all submitters by combining this field with others in the report. For more details please refer to Annex 2.
3	Date of the trading day of the reported position	{DATEFORMAT}	The date on which the reported position is held at the close of the trading day on the relevant trading venue.

Field #	Field name	Field format	Details
4	Report Status	'NEWT' – New 'CANC' – Cancellation 'AMND' – Amendment	Indication of whether the report is new, a cancellation or an amendment of a previously submitted report. Where a previously submitted report is cancelled or amended, a report which contains all the details of the original report and uses the original Report Reference Number should be sent and the 'Report status' should be flagged as 'CANC'. For amendments a new report that contains all the details of the original report and using the original Report Reference Number, with all necessary amended details, should be sent and the 'Report status' should be flagged as 'AMND'.
5	Reporting entity ID	{LEI} OR {NATIONAL_ID}	Identifier of the reporting entity. This may be a trading venue, an investment firm. As mentioned in section 2 – Reporting Principles, depending on the outcome of CP 17/08, there may be a potential role for third-party service providers to report on behalf of a TV or IF, or for an IF to delegate the submission of reports to a TV. Our proposed approach in both cases is that the entity which is outsourcing or delegating retains responsibility for the completeness and accuracy of the report. Legal Entity Identifier code (LEI) for legal entities or NATIONAL_ID for natural persons that do not have an LEI.
6	Position holder ID	{LEI} OR {NATIONAL_ID}	Identifier of the position holder. Legal Entity Identifier code for legal entities or NATIONAL_ID for natural persons that do not have an LEI. Note: if the position is held as a proprietary position of the reporting firm, this field will be identical to the "Reporting entity ID" field above.

Field #	Field name	Field format	Details
7	Email address of position holder	{ALPHANUM-256}	Email address for notifications of position related matters. Please provide a business email address.
8	Ultimate parent entity ID	{LEI} OR {NATIONAL_ID}	position holder when positions of group entities are aggregated. Legal Entity Identifier code for legal entities or NATIONAL_ID for natural persons that do not have an LEI. This field may be identical to the "Reporting Entity ID" or "Position Holder ID" if the ultimate parent entity holds its own positions or drafts its own reports.
9	E-mail address of ultimate parent entity	{ALPHANUM-256}	Email address for correspondence in relation to aggregated positions. Please provide a business email address. In the event that the entity does not have a parent entity, this field should be populated with the same address as provided in Field 7 "Email address of position holder".
10	Parent of collective investment scheme status	'TRUE' – the position holder is a collective investment undertaking that makes independent investment decisions 'FALSE' - the position holder is not a collective investment undertaking that makes independent investment decisions	Field to report on whether the position holder is a collective investment undertaking that makes investment decisions independently from its parent as set out by Article 4(2) of RTS 21 Submitting entities should note that the reference to "collective investment scheme" in the field name for this row of the template should be interpreted as including "collective investment undertaking". Collective investment undertakings would comprise entities which are a UCITS as defined in Article 1(2) of Directive 2009/65/EC, or an AIF as defined in Article 4(1)(a) of Directive 2011/61/EU.

Field #	Field name	Field format	Details
11	Identification code of contract traded on trading venue	{ISIN}	Identifier of the commodity derivative, emission allowance or derivative thereof. See field "Trading venue identifier" below for treatment of OTC contracts that are economically equivalent to contracts that are traded on trading venues.
12	Venue product code	{ALPHANUM-12}	Unique and unambiguous alphanumeric identifier used by the trading venue, grouping together contracts with different maturities and strike prices in the same product.
13	Trading venue identifier	{MIC}	Identifier for the trading venue on which the position is held. Field to be populated with the ISO10383 segment MIC. Where the segment MIC does not exist, use the operating MIC. Use MIC code XXXX for off-venue positions reported in economically equivalent OTC contracts. Use MIC code XOFF for listed derivatives traded off-exchange.
14	Position type	'OPTN' – Options, including separately tradable options on FUTR, SDRV or OTHR types, excluding products where the optionality is only an embedded element. 'FUTR' – Futures 'EMIS – Emission allowances and derivatives thereof 'SDRV' – Commodity derivative defined under point (c) of Article 4(1)(44) of Directive 2014/65/EU 'OTHR' – any other contract type	Field to report whether the position is in either futures, options, emission allowances, or derivatives thereof, commodity derivatives defined under point (c) of Article 4(1)(44) of Directive 2014/65/EU (e.g. securitised derivatives) or any other contract type (e.g. a C10 contract of Annex I of the Directive 2014/65/EU).
15	Position maturity	SPOT: Spot month, including all positions in position types EMIS and SDRV OTHR: All other months	Indications of whether the maturity of the contracts comprising the reported position relates to the spot month or to all other months. Note: separate reports are required for spot months and all other months.

Field #	Field name	Field format	Details
			RTS 21 Article 2 provides a definition of "spot month contract" as being the commodity derivative contract in relation to a particular underlying commodity, whose maturity is the next to expire in accordance with the rules set by the trading venue. Additionally, an "other months" contract is defined as any other commodity derivative contract that is not a spot month contract.
16	Position quantity	{DECIMAL – 15/2}	Field to be populated with the net position quantity held in the commodity derivative, expressed either in lots (when the position limits are expressed in lots) or units of the underlying. This field should be populated with a positive number for long positions and a negative number for short positions. If the position is in commodity derivatives defined under point (c) of Article 4(1)(44) of Directive 2015/65/EU (e.g., securitised derivatives) this field shall be populated with the number of units held. As indicated in section 2 of this guide, positions for both spot and other months should be reported on a net basis, whereby all long and short positions in the spot month are aggregated together and likewise for the other months.
17	Notation of the position quantity	LOTS – if the position quantity is expressed in lots {ALPHANUM-25} – a description of the units used if the position quantity is expressed in units of the underlying UNIT – if the position quantity is expressed in units	Field to be populated with the units used to report the position quantity

Field #	Field name	Field format	Details
18	Delta equivalent position quantity	{DECIMAL-15/2}	If the Position Type is OPTN or an option on EMIS then this field shall contain the delta equivalent quantity of the position reported in the Position Quantity field. This field should be populated with a positive number for long calls and short put options, and a negative number for long puts and short calls. Option positions should be converted into positions in their respective future contracts positions, on the basis of the current delta, to arrive at a delta equivalent futures position. Long delta equivalent positions on calls and short delta equivalent positions on puts should be added to long positions on futures. Short delta equivalent positions on calls and long delta equivalent positions on puts should be added to short positions on futures. If available, position holders should use the delta value published by the trading venue or the CCP to report their positions in options. In the absence of a published delta value, position holders may use their own calculation. Position holders should be able to demonstrate, on demand, to the National Competent Authority responsible for the application of the position limit that their calculations correctly reflect the value of the option.
19	Indicator of whether the position is risk reducing in relation to commercial activity	'TRUE' – the position is risk reducing 'FALSE' – the position is not risk reducing	Field to report whether the position is risk reducing in accordance with Article 7 of RTS 21.

The following table describes the field formats for each field in the position report template.

Symbol	Data type	Definition
{ALPHANUM-n}	Up to n alphanumeric characters	Free text field
{DATEFORMAT}	ISO8601 date format	Dates shall be formatted in the following format: YYYY-MM-DD
{DATE_TIME_FORMAT}	ISO8601 date and time format	Dates and times shall be formatted as follows: YYYY-MM-DDThh:mm:ss.ddddddZ Where YYYY is the year MM is the month DD is the day T means the letter T shall be used hh is the hour mm is the minute ss.dddddd is the second and its fraction of a second Z is UTC time zone Dates and times shall be reported in UTC
{ISIN}	12 alphanumeric characters	ISIN codes as defined in ISO6166
{LEI}	20 alphanumeric characters	Legal Entity Identifier as defined in ISO17442
{MIC}	4 alphanumeric characters	Market Identifier Code as defined in ISO10383
{NATIONAL_ID}	35 alphanumeric characters	The ID is that set out in Article 6 and ANNEX II of RTS 22 on transaction reporting obligations, under Article 26 of Regulation (EU) No 600/2014.
{INTEGER-n}	Integer number of up to n digits	Numeric field for both positive and negative integer values
{DECIMAL-n/m}	Decimal number up to n digits in total, of which m digits can be fraction digits	Numerical field for both positive and negative values. Decimal separator is '.' (full stop); negative numbers are prefixed with '-' (minus). Where applicable, values are rounded up and not truncated.

Business data submission file

The business data submission file encapsulates the Business Application Header (BAH), Message Header (MHD) and Business Fields (BF), and contains:
• The Business Application Header under "BizData/Hdr"

- The Message Header and Business Fields under "BizData/Pyld"

For correct submission of files, the following namespaces need to be defined when creating the XML message:

- <BizData xmlns="urn:iso:std:iso:20022:tech:xsd:head.003.001.01" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xsi:schemaLocation="urn:iso:std:iso:20022:tech:xsd:head.003.001.01 head.003.001.01.xsd">

  Available at: https://sede.cnmv.gob.es/ov/esquemas/CDP/head.003.001.01.xsd

- <AppHdr xmlns="urn:iso:std:iso:20022:tech:xsd:head.001.001.01" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xsi:schemaLocation="urn:iso:std:iso:20022:tech:xsd:head.001.001.01 head.001.001.01_ESMAUG_1.0.0.xsd">

  Available at: https://sede.cnmv.gob.es/ov/esquemas/CDP/DRAFT5auth.031.001.01_ESMAUG_Reporting_1.0.2.xsd

- <Document xmlns:xsi="http://www. w3.org/2001/XMLSchema-instance" xsi:schemaLocation="urn:fca:org:uk:xsd:comp osrpt.001.09 composrpt.v1_9.xsd">

  Available at: https://sede.cnmv.gob.es/ov/esquemas/CDP/composrpt.v1_9.xsd

Business Application Header (BAH)

The table below shows the mandatory BAH elements which should be included in all position report data messages, and how they should be populated.

Element	Generic description	Content created by submitting entities (DATCPR file type)	Content received by submitting entities (FDBCPR file type)
From	Identifies the organisation sending the message.	LEI of the submitting entity.	**ES**
To	Identifies the organisation receiving the message	**ES**	<From> used by the submitting entity in received submissions
Business Message Identifier	Unambiguously identifies the Business Message to the Messaging Endpoint.	<Sequence No>-<Version>_<Year> of the name of the Zip file to be sent. (Please refer to File Naming Conventions Annex 2)	<Sequence No>-<Version>_<Year> of the name of the Zip file to be sent. (Please refer to File Naming Conventions in Annex 2).
Message Definition Identifier	Identification of the type of the message (ISO 20022 message identifier or CNMV message identifier).	Identifier of the relevant CNMV message. composrpt.v1_9.	Identifier of the relevant ISO 20022 message. Auth.031.001.01

Element	Generic description	Content created by submitting entities (DATCPR file type)	Content received by submitting entities (FDBCPR file type)
Creation Date	Date and time when this Business Message was created.	UTC Date and time in ISO 8601 format.	UTC Date and time in ISO 8601 format.
Related	Specifies the Business Application Header of the Business Message to which this Business Message Relates	Not used	Where the feedback file is in response to a single submission, this will hold a copy of the BAH of the data message referred to. Where the feedback file contains details relating to more than one submission (e.g., feedback following re-processing of held reports), this attribute will contain the BAH from the latest submission for which feedback is being provided.

Abbreviations

BAH	Business Application Header
CCA	Central Competent Authority
CET	Central European Time
EEOTC	Economically Equivalent Over The Counter
ESMA	European Securities and Markets Authority
ETD	Exchange Traded Derivative
GLEIF	Global Legal Entity Identifier Foundation
IF	Investment Firm
ISIN	International Securities Identification Number
LEI	Legal Entity Identifier
MDP	Market Data Processor
MIC	Market Identifier Code
NCA	National Competent Authority
SCDPR	Same Commodity Derivative Position Reports
SFTP	Secure File Transfer Protocol
TV	Trading Venue
UTC	Coordinated Universal Time
VPC	Venue Product Code
XML	Extensible Mark-Up Language
XSD	XML Schema Definition

Annex 1: XML Schemas

Description of XML messages description

All inbound and outbound files to the MDP will follow a standard structure, comprising a Business Message Header XML Schema Definition (XSD), which encapsulates a Business Application Header XSD and a single Business Fields XSD.

The Business Message Header XSD and the Business Application Header XSD are ISO 20022 compliant.

The Business Fields XSD for commodity derivative position report data submissions has been developed by the FCA based on the fields specified by ESMA. Where possible, we have aligned this XSD to ISO 20022 standards.

All incoming and outgoing files will be validated against the XML schema corresponding to the submission's file type as per the table below.

Message component	Submission file type	Direction from the MDP system point of view	ISO 20022 base message definition identifier/CNMV identifier
Business Application Header	All	Incoming/Outgoing	head.001.001.01
Business Message Header	All	Incoming/Outgoing	head.003.001.01
Commodity Derivative position Report Data	DATCPR	Incoming	composrpt.v1_9
Information file	FDBCPR	Outgoing	auth.031.001.01

XPaths

The table below describes how Xpaths align to the reporting fields for the position report submission.

Field No.	Field name	Xpath base /FinInstrmRptgTradgComPosRpt/CPR/NEWT or /FinInstrmRptgTradgComPosRpt/CPR/AMND or /FinInstrmRptgTradgComPosRpt/CPR/CANC
1	Date and time of report submission	/CPRBody/RptDt
2	Report reference number	/ReportRefNo
3	Date of the trading day of the reported position	/CPRBody/BusDt

Field No.	Field name	Xpath base /FinInstrmRptgTradgComPosRpt/CPR/NEWT or /FinInstrmRptgTradgComPosRpt/CPR/AMND or /FinInstrmRptgTradgComPosRpt/CPR/CANC
4	Report Status	/FinInstrmRptgTradgComPosRpt/CPR/NEWT/ or /FinInstrmRptgTradgComPosRpt/CPR/CANC/ or /FinInstrmRptgTradgComPosRpt/CPR/AMND/
5	Reporting entity ID	/CPRBody/RptEnty/NationalID/Othr/SchmeNm/Prtry (values can be CONCAT or NIDN or CCPT) /CPRBody/RptEnty/NationalID/Othr/Id (values per the definition of CONCAT or NIDN or CCPT) or /CPRBody/RptEnty/LEI (value per the definition of an LEI)
6	Position holder ID	/CPRBody/PstnHldr/NationalID/Othr/SchmeNm/Prtry (values can be CONCAT or NIDN or CCPT) /CPRBody/PstnHldr/NationalID/Othr/Id (values per the definition of CONCAT or NIDN or CCPT) or /CPRBodyPstnHldr/LEI (value per the definition of an LEI)
7	Email address of position holder	/CPRBody/PstinHldrCntctEml
8	Ultimate parent entity ID	/CPRBody/PstnHldr/NationalID/Othr/SchmeNm/Prtry (values can be CONCAT or NIDN or CCPT) /CPRBody/PstnHldr/NationalID/Othr/Id (values per the definition of CONCAT or NIDN or CCPT) or /CPRBodyPstnHldr/LEI (value per the definition of an LEI)
9	E-mail address of ultimate parent entity	/CPRBody/ParentPstinHldrCntctEml
10	Parent of collective investment scheme status	/CPRBody/PstinHldrIsIdpdtInd
11	Identifying code of contract traded on trading venue	/CPRBody/ISIN
12	Venue product code	/CPRBody/VenProdCde
13	Trading venue identifier	/CPRBody/TrdngVenID
14	Position type	/CPRBody/PstnTyp
15	Position maturity	/CPRBody/PstnMtrty

Field No.	Field name	Xpath base /FinInstrmRptgTradgComPosRpt/CPR/NEWT or /FinInstrmRptgTradgComPosRpt/CPR/AMND or /FinInstrmRptgTradgComPosRpt/CPR/CANC
16	Position quantity	/CPRBody/PstnQty
17	Notation of the position quantity	/CPRBody/PstnQtyUoM /CPRBody/PstnQtyUoMDesc
18	Delta equivalent position quantity	/CPRBody/DeltaPstnQty
19	Indicator of whether the position is risk reducing in relation to commercial activity	/CPRBody/RiskRdcInd

XML messages

The business fields XSD for commodity derivative position reports are included:

composrpt.v1_9.xsd

The ISO 20022 XSD are:

- For the feedback

DRAFT5auth.031.001.01_ESMAUG_Reporting_1.0.2.xsd

- For the header:

head.001.001.01_ESMAUG_1.0.0.xsd   head.003.001.01.xsd

Annex 2: File naming conventions

Submitting entity to MDP

The filename of the XML files submitted to the CNMV must comply with the following naming convention:

<Sender>_<FileType>_<Recipient>_<SeqNo>-<Version>-<PreviousSeqNo>_<Year>.xml

The submitting entity archives this XML file into a ZIP file and uploads it into the appropriate folder (DATCPR) within the 'Inbound' folder of the MDP system. Its name must match the archived file and comply with the following naming convention:

<Sender>_<FileType>_<Recipient>_<SeqNo>-<Version>-<PreviousSeqNo>_<Year>.zip[4]

Component	Definition	Value
<Sender>	Identifier of the entity submitting the file to the CNMV. Where the submitter is an investment firm, this shall be the entity's LEI prefixed with an I. Where the submitter is a trading venue, this shall be the ISO10383 MIC of that venue prefixed with a T.	Ixxxxxxxxxxxxxxxxxxx Txxxx
<FileType>	A 6-character attribute identifying the type of information contained within the file. For position reports this will be DATCPR.	DATCPR
<Recipient>	A 5-character attribute identifying the recipient NCA. For the CNMV this will be NCAES	NCAES
<SeqNo>	A 6-digit sequence number, left padded with zeroes to uniquely identify the submission to the submitter. The first submission shall be 000001 and incremented for subsequent submissions. (From 999999 this will roll over to 000001). The sequence restarts each year.	nnnnnn e.g. 000042
<Version>	A single digit number to indicate the version of the submission. This should always be 0, unless the previous submission file has been rejected, in which case the resubmission shall increment the version by 1.	n
<PreviousSeqNo>	The 6-digit sequence number of the previous submission. This is used to ensure strict submission sequence processing. Note: when a submission fails and has been resubmitted with an incremented version number, the	nnnnnn

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[4] In accordance with ITS 4, 'trading venue' must be interpreted as "Segment MIC for the positions reported in respect of on-venue contracts. Where the segment MIC does not exist, use the operating MIC".

Component	Definition	Value
	<PreviousSeqNo> must match that of the failed submission, i.e., represent the last accepted submission. The first <PreviousSeqNo> will be 000000 and this will not be used again	
<Year>	The last two digits of the year when the file was generated. For example for a file created during 2018, the year will be 18	nn

MDP to submitting entity

The MDP system will generate a feedback file for each correctly named submission received. This will follow the naming convention:

<Sender>_<FileType>_<Recipient>_<SeqNo>_<Year>.zip

Inside the .zip file will be a single XML file of the same name:

<Sender>_<FileType>_<Recipient>_<SeqNo>_<Year>.xml

Component	Definition	Value
<Sender>	A 5-character attribute identifying the recipient NCA. For the CNMV this will be NCAES	NCAES
<FileType>	A 6-character attribute identifying the type of information contained within the file. For position report feedback this will be FDBCPR	FDBCPR
<Recipient>	Identifier of the entity submitting the original file to the CNMV. This will be the <Sender> of the submission(s) to which the feedback relates. Where the submitter is an investment firm, this shall be the entity LEI prefixed with an I. Where the submitter is a trading venue, this shall be the ISO10383 MIC of that venue prefixed with a T	Ixxxxxxxxxxxxxxxxxxxx Txxxx
<SeqNo>	A 6-digit sequence number to uniquely identify the feedback file.	nnnnnn e.g. 000042
<Year>	The last two digits of the year when the file was generated. For example, for a file created during 2018, the year will be 18	nn

Annex 3: Content Validation Rules

File validation rules

The table below details the file validation rules that will be applied to commodity derivative position report submissions. The rules will be executed in the order listed in the table.

Receiving a file error reference (FIL-XXX) in the feedback file indicates that the MDP has kept the name of the zip file. If the same filename is used for resubmission, then the submission will be rejected due to duplication of the filename (FIL-107).

Control	Error reference	Error message	Corrective action
The file cannot be decompressed	FIL-101	The file cannot be decompressed	Check compression and resubmit
The decompressed file does not contain exactly one xml file	FIL-102	The file contains more than one XML file	Correct the file structure and resubmit
The name of the XML file within the zip does not match the name of the zip file	FIL-103	The name of the XML file is not consistent with the name of its zip container	Correct the file naming and resubmit
The file cannot have the same filename as a file already sent	FIL-107	File <Filename> has already been submitted once	Correct the filename and resubmit
Previous sequence number was not the last sequence number successfully processed	GBX-020	Previous sequence number was not the last sequence number processed	Check the file naming sequence and correct file name
The submission referred to in the previous sequence number must have been received. This also means that the first submission received and/or accepted must have a previous sequence number of 000000	FIL-109	The corresponding file for the PreviousFileSequenceNumber has not been received	Determine the reason for missing file and take appropriate actions – e.g., resubmit the missing file or resubmit the file with the correct PreviousFileSequenceNumber

Control	Error reference	Error message	Corrective action
Version number in a corrected submission is not larger than the last version processed Or the version number received the first time a filename is submitted is not zero	GBX-030	Previous version number was not the last version number processed.	Determine the correct version number and correct the filename
Only one version of any submission can be accepted	FIL-108	A previous version of the file has been accepted	Determine whether the content has been included in an earlier accepted file; otherwise resubmit in a new file instead of using the option 'Check the result of the validation'
Validate that the file received fits to the corresponding XML schema.	FIL-105	The file structure does not correspond to the XML schema : [result of XML validation]	Check the result of the validation, it should correspond to formats defined in the reporting instructions, and resend the file

Control	Error reference	Error message	Corrective action
The FCA or ISO 20022 Message Identifier in the BAH (*.xsd) is not valid.	FIL-104	The ISO 20022 Message Identifier in the BAH must refer to the latest schema approved	Correct the Message Identifier according to the latest XSD schema

The table below describes which file status will be used in conjunction with file errors in order to populate the feedback file.

File status	Definition	Supplementary information
ACPT	Accepted	The file has been accepted, all content has been validated successfully
PART	Partially accepted	The file has been accepted but not all of the content has been validated successfully. (Some position reports may be held or may have been rejected)
RJCT	Rejected	The complete file has been rejected and none of the content has been processed. This file status is associated with the following file error codes: FIL-102, FIL-103, FIL-104, FIL-105, FIL-107, FIL-108, GBX020, GBX-030. This status is also used if all position reports in the file have been rejected following content validation. In this case, there will be no associated file error codes.
CRPT	Corrupt file	The file cannot be opened. This file status is associated with the following file error code: FIL-101.
RMDR	Reminder	This status is used if the MDP has not received a file with the corresponding PreviousFileSequenceNumber. This file status is associated with the following file error code: FIL-109

Content validation rules

The table below describes the content validation rules that will be applied to all commodity derivative positions submitted in a valid file.

Field	Validation rule	Error code	Error text
1	The submission date/time must be the same or before the system date/time.	CPR-901	The date of report submission cannot be a future date
1	The submission date cannot be earlier than the MiFID II go live date of 03/01/2018	CPR-902	The date of report submission cannot be earlier than 03/01/2018
3	Trading date must be the same or before the system date	CPR-903	The date of the trading day cannot be a future date
3	Trading date cannot be earlier than the MiFID II go live date of 03/01/2018	CPR-904	The date of the trading day cannot be earlier than 03/01/2018
3	Trading date cannot be earlier than five years before the current date	CPR-905	The date of the trading day cannot be more than five years old
4	The new (NEWT) status can only be used for the first submission of a position report, or when the last report successfully processed with the same unique key as the NEWT had a cancelled status (CANC)	CPR-906	The (NEWT) value in the Report Status field is invalid
4	The amended (AMND) status can only be used where the last report successfully processed with the same unique key as the AMND had a status of NEWT or AMND	CPR-907	The (AMND) value in the Report Status field is invalid
4	The CANC status can only be used when the last report, successfully processed with the same unique key as CANC has a NEWT or AMND status	CPR-908	The (CANC) value in the Report Status field is invalid
5	If a LEI is used, this field will be populated with an accurately formatted LEI and within the LEI database, included in the Global Legal Entity Identifier Foundation (GLEIF) database maintained by the Central Operating Unit. 1. The status of the LEI shall be 'Issued', 'Lapsed', 'Pending transfer' or 'Pending archival'. 2. The Initial Registration Date of the LEI will be equal or before the trading date. 3. The Entity Status is to be active. If the Entity Status is inactive, the Last Update Date will be equal or after the trading date.	CPR-909	The LEI of the reporting entity is invalid, or is not valid for the trade date
5	If national identifier is used, the first 2 characters of the national identification code should be an ISO 3166 country code that was valid at the trading date	CPR-910	The reporting entity national identification code does not include a valid country code

5	In case the CONCAT code is used, only the following characters are allowed: Latin capital letters, numbers, #. It should be a string of exactly 20 characters, where first two characters are letters, the next 8 characters are numbers and the remaining characters are letters or #, where the 11th and 16th characters are letters. In case national the identification number or passport number is used, only the following characters are allowed: Latin capital letters (A-Z), numbers (0-9), as well as "+", and "-" in case the identifier starts with "FI" and "-" when the identifier starts with "LV". It can be a string of 3 to 35 characters, where the first two characters are letters	CPR-911	The format of the reporting entity identification code is incorrect
6	If a LEI is used, this field shall be populated with an accurately formatted LEI and in the LEI database, included in the GLEIF database, maintained by the Central Operating Unit. 1. The status of the LEI shall be 'Issued', 'Lapsed', 'Pending transfer' or 'Pending archival'. 2. The Initial Registration Date of the LEI will be equal or before the trading date. 3. The Entity Status shall be Active or if the Entity Status is Inactive, the Last Update Date shall be equal or after the trading date	CPR-912	The LEI of the position holder is invalid or is not valid for the trade date
6	If national identifier is used, the first 2 characters of the national identification code should be an ISO 3166 country code that was valid at the trading date	CPR-913	The position holder national identification code does not include a valid country code
6	In case the CONCAT code is used, only the following characters are allowed: Latin capital letters, numbers, #. It should be a string of exactly 20 characters, where the first two characters are letters, the next 8 characters are numbers and the remaining characters are letters or #, where the 11th and 16th characters are letters. In case national the identification number or passport number is used, only the following characters are allowed: Latin capital letters (A-Z), numbers (0-9), as well as "+", and "-" in case the identifier starts with "FI" and "-" when the identifier starts with "LV". It can be a string of 3 to 35 characters, where the first two characters are letters.	CPR-914	The format of the position holder identification code is incorrect

8	If an LEI is used, this field shall be populated with an accurately formatted LEI and in the LEI database, included in the GLEIF database maintained by the Central Operating Unit. 1. The status of the LEI shall be 'Issued', 'Lapsed', 'Pending transfer' or 'Pending archival'. 2. The Initial Registration Date of the LEI will be equal or before the trading date. 3. The Entity Status is to be active. If the Entity Status is inactive, the Last Update Date will be equal or after the trading date.	CPR-915	The LEI of the Ultimate Parent is invalid or is not valid for the trade date
8	If national identifier is used, the first 2 characters of the national identification code should be an ISO 3166 country code that was valid at the trading date	CPR-916	Ultimate Parent national identification code does not include a valid country code
8	In case the CONCAT code is used, only the following characters are allowed: Latin capital letters, numbers, #. It should be a string of exactly 20 characters, where first two characters are letters, the next 8 characters are numbers and the remaining characters are letters or #, where the 11th and 16th characters are letters. In case national the identification number or passport number is used, only the following characters are allowed: Latin capital letters, numbers (0-9), as well as "+", and "-" in case the identifier starts with "FI", and "-" when the identifier starts with "LV". It can be a string of 3 to 35 characters, where the first two characters are letters.	CPR-917	The format of the ultimate parent identification code is incorrect
11	The reported identifying code of the contract must be valid for the reported trading day	CPR-918	The ISIN of the contract is invalid or not valid for the trade date
13	The MIC code should be a valid ISO 10383 MIC code, indicating a trading venue that was active at the trading date. This rule does not apply to special MIC codes 'XXXX' and 'XOFF	CPR-921	The MIC of the Trading Venue is invalid or is not valid for the trade date
15	Position Maturity must be equal to SPOT if Position Type is one of the following values: "EMIS" or "SDRV"	CPR-922	The Position Maturity of EMIS and SDRV contracts should be reported as SPOT
17	If the notation of the position quantity is not UNIT or LOTS then an alternative value must be provided	CPR-923	A notation must be provided
17	The free text {ALPHANUM-25} option for notation must not equal "UNIT" or "LOTS"	CPR-924	Notation provided for position quantity is invalid
17	The free text {ALPHANUM-25} option for notation must be unpopulated if the notation is "LOTS" or "UNIT"	CPR-927	Only one notation should be provided

18	Delta equivalent position quantity must be populated if Position Type is "OPTN". The field is optional where Position Type is EMIS and should be provided where the instrument is an option on an emission security.	CPR-925	The Delta Equivalent Position Quantity field must be populated where the Position Type is OPTN
18	Delta equivalent position quantity must be blank if Position Type is any of the following values: "FUTR","SDRV" or "OTHR"	CPR-926	The Delta Equivalent Position Quantity field must be blank where the Position Type is FUTR, SDRV or OTHR

The table below describes possible record statuses used to populate the commodity derivative position report feedback.

Status code	Name	Definition	Usage in reporting by submitting entities
ACPT	Accepted	Report has been accepted	Not used
RJCT	Rejected	Report has been rejected	Used in case the position report is incorrect. Error codes indicating validation rules that failed should be provided in the RcrdSts complex element (codes CPR-NNN).
RCVD	Received	Report has been received and is awaiting validation	Used in case the position report cannot be validated because the reference data is not yet available for the trading day to which the position relates (reference data for day T is provided on day T+1). RCVD status code is reported only in the message statistics of the status advice file.