



## EBA Survey addressed to entities in scope of initial margin model authorisation under EMIR 3

### [EBA Survey addressed to entities in scope of initial margin model authorisation under EMIR 3](#)

#### Target participants

The survey is expected to be filled by entities currently subject to the requirement to exchange initial margin (IM) in accordance with Article 36 of the joint ESAs RTS on uncleared OTC derivatives<sup>1</sup>. All entities of a group that are subject to this requirement are expected to fill in the survey separately, at the entity level.

#### Information Note

The EBA, in cooperation with ESMA and EIOPA, is seeking, ahead of the publication of EMIR 3, general information on entities within the scope of the initial margin (IM) model authorisation, specific information relevant for the fee calculation as well as information on initial margins and IM models used.

This information will guide the EBA in the setup of its central validation function and inform the EBA's response to the EU Commission's Call for advice on a possible Delegated Act on fees. The information will also be used to develop proportionate requirements for entities within the scope of IM model authorisation, especially for smaller entities (the so called "Phase 5" and "Phase 6" entities) - as part of upcoming mandates under EMIR 3, in cooperation with ESMA and EIOPA (i.e. the revised draft RTS on IMMV and the Guidelines on the Application and Authorization Process).

#### Submission of responses

The deadline for submitting a response is 29 November 2024.

Responses should be submitted via the online tool that can be accessed under the following link: [EUSurvey - Survey](#). To access the survey, a password must be used, which can be obtained from trade associations and competent authorities. Non-supervised entities can contact [eba-immv@eba.europa.eu](mailto:eba-immv@eba.europa.eu). Likewise, please send a copy of your answers to the CNMV to the following email address: [documentosinternacional@cnmv.es](mailto:documentosinternacional@cnmv.es)

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<sup>1</sup> Commission Delegated Regulation (EU) 2016/2251 of 4 October 2016 supplementing Regulation (EU) No 648/2012 of the European Parliament and of the Council on OTC derivatives, central counterparties and trade repositories with regard to regulatory technical standards for risk-mitigation techniques for OTC derivative contracts not cleared by a central counterparty