OPTIMA

Regulatory Alert

FCA Finalises Streamlined UK MiFIR Transaction Reporting Rules

OVERVIEW

On August 3, 2026, the FCA finalised reforms to the UK MiFIR transaction-reporting regime in Policy Statement PS26/15. The changes, which take effect on April 3, 2028, amend the reporting requirements under Article 26 of UK MiFIR and associated technical standards, which see three new chapters added to the Market Conduct sourcebook (MAR):

- MAR 13 Record keeping – orders and transactions
- MAR 14 Transaction reporting
- MAR 15 Financial instrument reference data

The reforms reduce the number of transaction-report fields from 65 to 52, remove FX derivatives from the transaction-reporting perimeter, and exclude approximately 7 million instruments traded solely on EU venues from reporting. The correction period for historic transaction-reporting errors will also be shortened from 5 years to 3 years.

WHICH FIRMS ARE IMPACTED

The changes are directly relevant to UK MiFID investment firms, including broker dealers, investment managers and other firms that execute reportable transactions. Although the rules simplify reporting obligations, firms remain responsible for ensuring that transaction reports are accurate, complete and submitted on time.

The FCA continues to position transaction reports as a core market-integrity data source. It states that UK MiFIR transaction reports are used daily for market monitoring, market-abuse surveillance and supervisory work. Reducing reporting scope should therefore be understood as a targeted recalibration of reportability and data requirements, rather than reduced FCA reliance on transaction-reporting data for surveillance.

The FCA will publish a draft schema, validation rules and new guidelines in October 2026. These new guidelines will form part of a new Transaction Reporting User Pack (TRUP).

KEY REGULATORY CHANGES

- **Transaction-reporting data fields will reduce from 65 to 52.** The FCA's stated objective is to remove duplicative or low-value data and improve consistency in the population of remaining fields. This is not simply a reduction in mandatory fields: firms will need to re-map reporting logic, data lineage, exception controls and ARM submission specifications against a new schema and validation framework.

- **The reportable-instrument universe will narrow.** Reporting will no longer be required for approximately 7 million financial instruments that are tradeable only on EU trading venues. This materially affects firms whose instrument-identification and eligibility logic currently captures EU-only instruments under UK MiFIR rules.
- **FX derivatives will be removed from UK transaction-reporting scope**. The FCA estimates that this change will reduce costs for more than 400 UK firms. Firms should distinguish this change from any separate reporting obligations under UK EMIR, UK SFTR, prudential reporting, trading-venue rules, or internal market-abuse surveillance arrangements. Removal from FCA transaction reporting does not eliminate the need to retain appropriate trading records or surveillance coverage where required under other rules.
- **The default back-reporting period will reduce from 5 years to 3 years.** This applies to the period for which firms may ordinarily need to resubmit historical transaction reports. The FCA estimates that the change will reduce the volume of back-reported transactions by one third. It is a reduction in remediation burden, not an indication that firms may shorten their record-retention periods; applicable MiFID organisational-recordkeeping and other legal retention requirements remain separately relevant.
- **The changes apply across the reporting chain**. The FCA identifies investment firms, trading-venue operators, approved reporting mechanisms (ARMs), and participants submitting transaction reports, instrument reference data or order-book data as affected parties. Outsourcing transaction reporting to an ARM does not transfer a reporting firm's responsibility for the completeness, accuracy and timeliness of its reports.
- **Technical implementation details remain outstanding**. The FCA will consult in October 2026 on the draft reporting schema, validation rules, new guidelines, transitional provisions and consequential Handbook amendments. Accordingly, PS26/15 establishes the policy direction and core scope changes, but firms should not treat current field specifications or reporting-engine build requirements as final until that consultation and the resulting FCA materials are issued.

SOURCES

https://www.fca.org.uk/publication/policy/ps26-15.pdf

https://handbook.fca.org.uk/technical-standards/provision/s120c1053sn0p1592

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