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T+1 Settlement Efforts: Canadian Outlook and Considerations

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As Director of Product Management, Lou is part of a team responsible for developing products and services that meet the sophisticated and evolving needs of CIBC Mellon's clients.

Shortening the settlement cycle produces a number of benefits, including mitigating operational and systemic risk by reducing exposure between the parties to a trade, between the counterparties and central clearinghouses, and in terms of harmonization among various markets. Canadian and U.S. market stakeholders including U.S. and Canadian central depositories, the Canadian Capital Markets Association, and industry participants including CIBC Mellon are preparing to shorten the settlement cycle in Canada to T+1, the day after trade date.

Given the substantial volume of cross-border trading activity between Canada and the United States, Canadian regulators and the Canadian Capital Markets Association (CCMA) are working to align the Canadian market timelines to those of the U.S.

The Depository Trust & Clearing Corporation (DTCC) provided consulting support to the Securities Industry and Financial Markets Association, Investment Company Institute and Deloitte for the latest publication, "<u>T+1 Securities</u> <u>Settlement Industry Implementation Playbook</u>." The Playbook outlines a detailed approach to identifying the potential impacts, implementation activities, implementation timelines, dependencies, and risk impacts, that market participants should consider in order to prepare for the impending transition to a T+1 settlement cycle.

Shortening the settlement cycle produces a number of benefits, including mitigating operational and systemic risk by reducing exposure between the parties to a trade, between the counterparties and central clearinghouses, and in terms of harmonization among various markets. In addition, sell-side firms are expected to see an overall reduction in collateral that they need to post to the depository on a daily basis. Buy-side firms are expected to be able to complete their transactions sooner, meaning that funds on sales will be available to them one day earlier.

THE CANADIAN CAPITAL MARKETS ASSOCIATION

66 The CCMA and its industry partners are working together on the T+1 project. Aligning with the U.S is critical for Canada, but this also means that the industry will have new challenges around this initiative to deal with. For instance, there will be a misalignment with settlement dates in Europe that will need to be managed. The current National Instrument (NI) 24-101 - Institutional Trade Matching and Settlement has a matching deadline of T+1 at noon, and will need to be adjusted. The transition to T+2 in 2017 had market participants essentially doing post trade-activities faster than in T+3, with effectively two overnight batch processing cycles to ensure that trades were ready to settle. That included reporting the trades, reconciling the trades, allocating block trades, and confirming the trade details. Now, in T+1, all of these activities should be done on trade date, or in the overnight batch, between T and T+1.



-Keith Evans, Executive Director, Canadian Capital Markets Association

Canadian financial services members have been involved in discussions of a reduced settlement cycle with U.S. counterparts since early last year. U.S. industry leads have now formally announced efforts to accelerate the securities settlement cycle to T+1 from T+2, with a date for the change to be confirmed later this year.

The CCMA led national industry-wide efforts to reduce the settlement cycle to T+3 from T+5 in 1995, and to T+2 from T+3 in 2017, on the same day as the U.S. given Canada's and the U.S.'s highly inter-related capital markets. After the latest transition, CCMA members completed a T+2 Project – Post-Mortem Report (2018), which provides guidance for CCMA members working on the T+1 project.

For more information, and to keep up to date on the CCMA's newsletters and FAQs, visit http://www.ccma-acmc.ca/

SECURITIES LENDING IMPLICATIONS

As the industry continuously looks to improve the efficiency and resiliency of securities lending markets, standardization, digitization and governance will remain key focus areas.

Given T+1's direct effect on securities finance, it will likely be at the forefront of many standardization initiatives. There is anticipation of more pressure in the warm and hard-to-borrow space. Often, the agent lender will receive the sale notification either late in the day or even on the following day, resulting in the recall being processed a day later than needed for a T+1 settlement. Under T+1, the recall would have to be sent out on T – trade date – or the borrower will not have time to source additional supply elsewhere or to buy back the position. Agent lenders may have to hold back larger buffers to accommodate late sales in less liquid names, thereby reducing maximum revenue generation on the total position.

With less time to instruct foreign exchange movements, compounded by diverging standard securities (T+1) and foreign currency (T+2) settlement cycles, there will be extra pressure to confirm / match transaction details on the trade date.

The industry as a whole may need to look to modify deadlines for accepting and processing recalls, which may need to be extended into the evening. Beneficial owners will likely be required to explore ways to provide notifications more efficiently to their agent lender, whether that is through automation or some sort of improved or more frequent batch facility.

BENEFITS TO CLIENTS AND SECURITIES FIRMS

Of the range of benefits of the shortened cycle, arguably the most important are the certainty, safety and increased soundness of Canadian capital markets for participants. T+1 will promote reduced counterparty risk, reduced margin requirements, and decreased clearing capital requirements. The Canadian and U.S. market structure will also work to improve safety and efficiency for investors.

IMPACTED SECURITIES THAT WILL SETTLE ON T+1

Some examples of securities impacted by the settlement switch to T+1 include:

- Stocks/equities
- Corporate bonds/debentures
- Federal, provincial and municipal government bonds
- Convertible bonds

For a finalized list as at July 31, 2022, please see the <u>CCMA's website</u>.

BENEFITS OF SHORTENING THE SETTLEMENT CYCLE:



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CIBC MELLON AND T+1

CIBC Mellon is playing an active role in the readiness and consultations taking place across the industry leading up to the T+1 implementation. On top of creating a project team to assess the operational impacts of T+1, CIBC Mellon employees actively participate in various T+1 working groups with key industry stakeholders in order to stay at the forefront of regulatory and industry changes. In establishing a comprehensive team of knowledgeable professionals, we can not only ensure our readiness but ensure we are supporting clients through this transition by means of providing localized insights.

CIBC Mellon participated actively on the T+2 project in 2016-2017. We are and expect to stay involved as the T+1 discussion happens in Canada in the months and years ahead. CIBC Mellon's custody system is currently settling trading activities across a wide range of settlement cycles. We are ready and able to handle T+1 settlement following implementation in the United States. We bring considerable settlement experience – in addition to our daily settlement activities, a number of CIBC Mellon employees were active participants during Canada's previous, successful shortening of the settlement cycle to T+2 from T+3 in 2017.

We are also taking steps with the relevant market utilities and entities to affirm that our technology and operational procedures are appropriately updated.

66 T+1 will promote reduced counterparty risk, reduced margin requirements, decreased clearing capital requirements and continued settlement harmonization with the U.S. The Canadian and U.S. market structure will also work to improve safety and efficiency for investors.





CIBC Mellon Industry Perspectives

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CIBC Mellon Industry Perspectives

An Update on T+1 Settlement Plans: Canadian Outlook and Considerations



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Keith Evans Executive Director, Canadian Capital Markets Association

In this episode of CIBC Mellon Industry Perspectives, Lou Lesnika, Director of Product at CIBC Mellon, hosts a discussion with Keith Evans, Executive Director of the Canadian Capital Markets Association (CCMA) on T+1 settlement plans in Canada, including operational considerations. For more information, listen to our <u>podcast</u>.

For more information

We will continue to provide clients with updates as they relate to T+1 settlement in Canada and CIBC Mellon's supportive efforts. If you have any questions, please reach out to Lou Lesnika or your Relationship Manager.



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