

Submitted via Qualtrics

(Anonymous)

Company / Organisation view

Consultation Question 1(a):

Do you support the proposed arrangements on trade amendment under the T+1 settlement cycle across the Cash Market trade lifecycle?

Please give reasons for your views.

No, reasons and considerations as follows

We are not in a position to analyse and comment on the trade amendment process however to the extent that it influences the downstream timelines, we ask HKEX to review with the relevant stakeholders on the necessity and timing.

Consultation Question 1(b):

Do you support the proposed arrangements on post trade under the T+1 settlement cycle across the Cash Market trade lifecycle?

Please give reasons for your views.

No, reasons and considerations as follows

Further to our response to last year's Discussion Paper from HKEX, [REDACTED] is supportive of a shift to T+1 settlement cycle across global markets including Hong Kong. We recognise the widely-known benefits that a reduction in the settlement cycle can bring, and believe it is the right direction for global markets.

While our position on T+1 includes the Hong Kong market, there are many unique specificities about the Hong Kong securities market that we would like to highlight in our response to this Consultation Paper ("Paper").

With regard to the proposed arrangements set out in the Paper, we have held extensive discussions with our clients in respect of our collective activities, and have significant concerns regarding several of the arrangements in their current iteration. We believe that it is necessary to further deep-dive into a number of areas with key players and investors, in order to be fully prepared for this transition.

In respect of the procedures proposed in the Paper, we would like to highlight the following key aspects of concern for us and points for consideration:

Schedule of the Final Clearing Statement (FCS)

The FCS is arguably the most critical report for any clearing participant (in particular for GCPs with multiple NCPs), and essentially kicks off the clearing process, funding positions and subsequent pre-settlement activities.

In contrast, the PCS is of less consequence to be able to ascertain our final positions because it does not include a critical component, the final options conversions of our clients. The PCS however, is

needed by our NCP clients to reconcile, investigate/fix discrepancies earlier, and prepare their funding and settlement instructions to us as their GCP.

We note that the options component is rapidly increasing in weight due to the introduction of single-stock options in the market and growth in market marking activity.

In view of the above, we do not believe it is feasible for the FCS to be delivered at 8pm on Trade Date, because it does not allow for any meaningful post trade processing to take place on T, that will be even more essential to pre-settlement preparations under an accelerated cycle.

Instead, we would like to suggest a significantly earlier deadline of 5.30 pm for the FCS to be released in place of the second Provisional Clearing Statement. An FCS delivery later than 5.30 pm will clash with the market's Stock Connect post-trade activities (see footnote*), and importantly the FCS for SC as well. As FCS files are very large, integrating them places a heavy load on system resources, however they are essential for clearing participants to be able to prepare for clearing and settlement with the market and each of their clients.

The timing of the FCS has been a key focus of our analysis of the timetable and workflows set out in the Paper. In analysing the current workflows leading up to the release of the final margin call (DPO) and FCS on T+1 to CPs, we understand that the timings are influenced in large part by the current options conversion window.

Our conclusion is that a delivery at 5.30pm of the FCS will, by definition, necessitate an in-depth study of the options conversion process that extends up to several hours after the end of trading and a review of the timings thereof. The market should also examine any other activities that influence the timely production of the FCS. We would be glad to participate in any such workshops with our SMEs.

(Footnote: *We wish to highlight our concerns about any encroachment into the daily Stock Connect post-trade activities)

Settlement Schedule in T+1

We note that the Paper sets out no changes proposed to the settlement schedule for securities and money settlement.

We strongly suggest an earlier settlement batch to be conducted in the morning of the new Settlement Date. Following the activities overnight, we believe the addition of a batch at 9.30 a.m. would be extremely beneficial, because it will help brokers and CPs receive shares from SIs earlier, essentially moving the entire settlement process earlier, and relieving the current pressure on the second-last and last batches.

Although there has been very little time to fully analyse all the possible scenarios, our general sense is that any earlier batch than 9.15 a.m. would be too early to be of much benefit.

Extension of SI matching until 10:00pm T+0

We do not object to having an extension of the SI input window advocated by many participants to support clients in other timezones, and recognise that there will be an inevitable need by many parties to process beyond the normal hours for the market.

However, on the contrary we believe that a change of this magnitude necessitates a full re-examination and re-education from front-to-back, starting from the buy-side to the sell-side, such that with proper automation and preparation, the allocation and confirmation process with brokers is timely and clean, leading consequently to correct and timely settlement instructions to custodians and clearing participants in Hong Kong.

In short, T+1 should be the catalyst for an industry-wide change in approach, rather than just a compression of the timeframes leading to clearers and custodians bearing the full burden of material increases in costs (resources, staffing, funding etc) and above all, of operational risk. To support this view, please see the following highlights of the US and EU markets' T+1 journeys.

US T+1 Observations

We would like to draw on the US T+1 experience which, though not perfect, involved a systematic plan involving the regulators, exchanges, CCPs and CSDs, local market participants and finally the investors spanning more than three years, with the market workshops and education process taking a full year prior to go-live.

Another observation from the US market has been that although custodians and clearers made available extended support windows for investors, overall usage of after-hours support has been low, as investors have simply prepared for and managed the early affirmations. However we also note that complex trades and non-US participants have been particularly affected, facing higher costs per trade due to out-of-hours coverage, lack of automation stemming from unpreparedness with a less impactful decrease in margin. We should therefore be mindful of the same in a HK transition, especially if this clashes with Europe's T+1, preventing foreign participants from fully preparing for it.

Ongoing European T+1 Learnings

Likewise, the European T+1 planning is spanning 3 or so years and has gone through various phases at industry level with very important Governance and Industry task forces implemented through all dimensions of the Trade Flow Value Chain (Trading, Scope, Allocation/Matching/Trade Confirmation, Corporate Actions, Settlement, Clearing, ETF, SBL, Asset Managers, Funding/FX, Regulatory etc.)

We suggest drawing on this project in which the numerous consultations and industry workstreams mentioned have resulted in changes being enshrined into law or market rules as needed.

A key aspect of the work in Europe has been to address SSI workflows and processes, with strong industry recommendations, including the establishment of standardization in the storage and

transmission of SSIs which for years have been adhoc by email, pdf or other means. There continues to be concern that this should take a much broader view to include global requirements to prevent markets building their own standards, resulting in the same fragmentation and inefficiencies that exist today. (N.B. we have therefore made recommendations in the Supplemental Questions to cross-reference the work being done in Europe and the US for standardization)

Another example is work on the securities lending markets that have huge challenges in terms of recall of securities, real time inventory management, collateral movements that need to be analysed in detail, automation and earlier cut off time for SBL recalls (N.B. recalls being a major factor for fails in HK for foreign investors).

Given the size, time zone and added risks of fail penalties of Hong Kong, a similar and detailed planning process is imperative and we would be happy to make available our global teams to discuss their thoughts and observations with HKEX.

Consultation Question 1(c):

Do you support the proposed arrangements on risk management under the T+1 settlement cycle across the Cash Market trade lifecycle?

Please give reasons for your views.

No, reasons and considerations as follows

Delay of Daily Payment Obligation (DPO) to 10pm

While the impact to the funding costs of HKSCC clearing participants' Marks & Margin payments can be expected to improve, especially since Marks and Margin currently covers 2 days' outstanding positions, as stated in our Discussion Paper response, it is important to note that "unlike US and European markets where there is optionality for cash/non-cash, all collateral paid in here is in HKD cash, as substantial haircuts on non-HKD cash make delivering other currencies impractical. There is no non-cash option allowed for the HK securities market.

One of the factors mentioned above that needs to be addressed in the future model, is therefore that margin collateral needs to be more easily managed, with non-cash collateral also accepted, and the cost for non-HKD cash margins aligned with market pricing. For example, using a third-party agent model for non-cash collateral would provide the flexibility, cost-effectiveness and importantly timeliness in achieving margin calls by the CCP for its clearing participants."

The current final DPO i.e. margin call at 8.30 to 9.00 p.m. is already highly inefficient and past the daily HKD banking cut off times, forcing Clearing Participants like us to place excessive cash buffers with our Designated Bank account.

We have increasing concerns over this process for the following reasons:

- a) The cash that we borrow from our treasury is at a material cost to the business , whilst we earn no compensating interest with our Designated Bank;

- b) As there is no way to scientifically calculate the amount of the margin call as it is subject to the options conversions, the buffers are a “best-guess” and generally hugely over-inflated in order to err on the conservative;
- c) We increasingly run the risk of the margin call exceeding the buffer amount, and running a real overdraft for one or more days at excessive OD costs.
- d) In an extreme scenario, if the margin call exceeds both our cash buffer plus intraday overdraft limit, the Designated Bank could reject the CCASS debit, causing us to be in default with the CCP

While the above concerns tended to be across monthly options cycles, this risk is now heightened and happening on a weekly basis due to the growing activity of our market maker clients on weekly single stock options, a trend which is only increasing.

We therefore strongly urge HKEX and the regulators to review the current options conversion procedures not only to improve the timings on downstream activities (mentioned in our section on FCS), but also to find a way to mitigate these risks and costs associated with the late DPO to GCPs like ourselves.

In the short to medium term (and even prior to the implementation of T+1), we ask the exchange to consider the following:

- i. Allow Clearing Participants to pay their margins the next morning on T+1 (note this is allowed by CCPs in other markets); and/or;
- ii. Extend the HKD payment cut-off times at all Designated Banks to match the final Daily Payment Obligation (not preferred as depends on resourcing and market liquidity); and/or,
- iii. Accept non-cash collateral such as G7 government bonds;

with the ultimate aim to provide the DPO (and indeed the FCS) prior to the 5pm banking cut off time to enable CPs to mitigate the increasing risks they face.

In summary, the compression of the T+2 timeframe into a longer Trade Date in order to compensate for the loss of one settlement day is unrealistic and unfair on CPs and GCPs who bear the increasing burden of risk and costs.

Consultation Question 1(d):

Do you support the proposed arrangements on other processes (including reporting, corporate actions, stock conversion arrangement and stamp duty arrangement) under the T+1 settlement cycle across the Cash Market trade lifecycle?

Please give reasons for your views.

No, reasons and considerations as follows

Please note that we have selected No here in order to reflect our comments relating to stamp duty.

Corporate Actions

As our corporate actions processing is already designed to handle tasks on T+1, the shift to T+1 settlement is not expected to introduce any major challenges, however the increase in fails may create more inefficiency, increasing the operational workload.

We would like to request for extensions to the deadlines for voluntary corporate actions especially the morning deadlines to a late afternoon cut off allowing corporate actions staff to better plan their work on T+1.

As with our preceding points, we feel it is necessary to re-look at the corporate actions process in the market to establish a more efficient and straight-through model for the market. We suggest that a separate working group be re-established based on the CAMS project to address its deficiencies, to design a future model which mitigates the existing risks in corporate actions in Hong Kong.

Stamp Duty:

We would like to highlight that stamp duty calculations for SD-1 for EPs are performed based on the Final Clearing Statement which contains the final record of executed trades. Currently, this is done after the FCS is available on T+1 afternoon and filed by 11 a.m. on T+2.

As there is a dependency on the FCS (as well as on SD-4 and SD-6/SD6A for market makers), with the late delivery of the FCS under the current proposals (and even if the FCS is delivered at 5.30 p.m.), there is little leeway for participants to perform the calculation and reconciliation work between T+0 evening to early morning on T+1, especially since the morning of T+1 will now be taken up with settlement and ETF processing activity.

As such, we are concerned about the feasibility of the proposed time for stamp duty submissions and payments, and would like to suggest a delay until the late afternoon, preferably no earlier than 4pm on T+1.

OTC stamp duty

We would also like to request the same for stamp duty payments for OTC transactions, especially as our clients will likely instruct such payments in the morning of T+1. The timeframe and operational risk is once again borne by the custodians to manually prepare the physical documents (e.g. cheques, contract notes, perform callbacks etc), as late or incorrect payments are subject to penalties.

USM and the stamp duty process

Furthermore, we note that USM project documents suggest that stamp duty submissions will be done on CCASS (rather than via physical cheques), it is unclear whether trades that are OTC and not settling through CCASS (e.g. internal movements between two clients of the custodian) can also be submitted via CCASS. If these cannot be captured under the CCASS flow, we envisage a two-speed solution (some submissions via CCASS while others not) which again will potentially require more time to handle such payments.

This T+1 project should also be used as trigger to properly re-design the stamp duty process, to cover all transaction types and all current manual/paper report submissions and payments, including small cheque payments to register market makers' for various stamp duty exemptions. We recognise that this may not strictly fall within the scope of the T+1 project but the inefficiencies of the stamp duty process clearly have a bearing on our operational capacity.

Consultation Question 2:

Do you have any comments on the assessment of the implications for Exchange Traded Products (ETPs) and Stock Options under the proposed T+1 settlement cycle? In particular, please comment on:

- Guiding principles for the ETP primary market;
- Buy-in considerations for ETPs; and
- Stock options (including exercise and assignment).

Please give reasons for your views.

Yes, comments (optional) as follows

Please note that we have selected No to this question in view of the comments we have in particular on stock options.

ETPs

As mentioned in our Discussion Paper, the ETP end-to-end process is one of the most fragmented and manual segments of our activity. The existence of two operational frameworks involving different and numerous contractual parties, timings and workflows.

Under these two frameworks, it has not been possible to achieve economies of scale for market players and we have significant amount of staffing around the morning hours to service ETFs. In the T+1 scenario, the ETF morning processing "crunch" will now coincide with the new HK market processes. As such, in addition to increased fails and buy-ins in a T+1 scenario, we ask HKEX to consider that participants like us will now have to stretch the same staff and deploy them to handle HK market settlements at the same time.

██████████ continues to advocate for more work on a simplification of the workflows both for ETPLink and the many active ETFs on the legacy "Trustee Model", whose processes are manual, paper-based and inefficient.

ETPLink

We also recognise that HKEX has worked to introduce improvements to the workflow using ETPLink for its Service Agent model. We hope that more work is done at ground level that involves the input of its key players on the approach of this platform as we have found that the approach to ETPLink has created new issues as we would like to explain here.

HKEX has not adopted ETPLink as the wholesale market platform but instead requires each PD or PD Agent to sign up on a direct contractual basis with the third-party vendor. Due to the strict IT security standards that most banks are subject to, this creates a third-party IT management burden such as annual due diligence and certifications, security etc, which can be avoided if the platform were considered to be a market infrastructure platform. While a PD or PD Agent can choose not to adopt ETPLink, it then cannot benefit from the overall improvement in the workflow for which it was intended.

In contrast with this approach is that adopted by CMU for fixed income, where they have adopted a third-party tokenised settlement and custody platform on a white-labelled basis, such that participants who sign up to use the platform face CMU and not the third-party vendor and are not required to sign any new contractual terms other than CMU's own rules. It would be positive to see HKEX adopt this simplified approach for ETPLink.

In addition, ETPLink currently requires PD Agents to perform additional steps to what they are currently doing, thereby adding to the workload and time constraints on our operations. We hope this can be easily addressed in a future release of ETPLink's features for PDs.

We reiterate our ask (from our Discussion Paper response) for the following:

- i. Standardisation of operational procedures as far as possible, regardless of operational framework
- ii. Inter-operability between managers' and trustee platforms as well as that of the Conversion Agent
- iii. Strict settlement and timing discipline around the delivery of units or shares to PDs by trustees
- iv. Netting of orders for the same ISINs per PD by trustees or the Conversion Agent
- v. Review of buy-in rules for the market to ease the burden on CPs

Options Market Processes – please refer to our comments in Q1.

Consultation Question 3:

Do you have any comments that consequential amendments should be made to the Listing Rules to reflect the arrangements proposed under the T+1 operating model?

We do not have a view on this topic at present however given the short deadlines for submissions may not have been able to sufficiently review this point with the relevant SMEs.

Consultation Question 4:

In assessing your circumstances for a T+1 transition, are there any other key topics, perspectives or types of market participants which you believe are relevant to highlight, that have not been covered in Exhibit 1 and paragraphs 110-113?

Please share your views.

Yes, suggestions and considerations as follows

Please see the following additional points.

1. CRITICAL DEPENDENCY ON READINESS FOR ORION CASH PLATFORM DEVELOPMENTS

In addition to operational issues that we have described, we reiterate that the OCP project running concurrently to the T+1 project is on the critical path to readiness for T+1.

□ API connectivity and planned removal of Participant Gateway. Participants were not able to budget for this development prior to 2025, having received the final requirements early in 2026. With global resources focused on T+1 in Europe, making it challenging to extract scarce IT resources at late notice, delivery of the enhancement will take time; as such we believe there is insufficient time for testing prior to having to take on not just a critical migration of this size, but also a move to T+1 almost immediately afterwards.

□ Real Time SI matching. We are greatly encouraged by this development. However as a GCP of brokers with a combination of back-to-back clients and market makers behind them, we have raised a critical request to include certain mandatory matching fields to ensure the correct matches are achieved before the launch of this functionality, without which we will see a large rise in SIs matched with the wrong counterparties for the wrong end-clients. We have shared several options with the OCP Project team and ask HKEX to fully consider the change before launch.

We stress that readiness for both these OCP developments by market participants is therefore critical to the success of T+1, as the risks of system instability, inadequately prepared participants, significant increase in fails and buy-ins to ourselves and our clients could be significant.

2. CONFLICT WITH STOCK CONNECT. As mentioned in Q1 (including footnote 1) and in our Discussion Paper, we are concerned about the extension of the HK post-trade processes in T+1. Any extension of the HK market will encroach on Stock Connect processing and will create additional pressure on operational staff and significant additional risk to brokers and clearers.

3. BUY IN EXEMPTIONS. We believe the current buy-in exemptions process needs to be reviewed and streamlined, in particular the buy-in quota monitoring, buy-in exemptions for market makers that create workload for GCPs. Deadlines should also be reviewed as these increase pressures with a later day-end and again conflict with the critical Stock Connect processing day.

4. RESOURCES AND STAFFING. Even if the market is able to make some meaningful changes to existing processes, a compression of numerous processes both for investors and brokers/clearers must occur leading to an inevitable extension of the pre-settlement and settlement day for the whole market. Although larger buy-side firms, banks and brokers may have operational capabilities in the Asian timezone, there are many players who may not and will struggle to put in place sufficient resources to meet an end-2027 timeframe. The same may be said even for participants with processing hubs in Asia, increasing these resources and working hours will still take time and planning.

5. SECURITIES BORROWING AND LENDING. Please refer also to our response in Q1 sharing the European T+1 transition points on SBL.

While we are not focusing in detail on SBL issues in this response (having contributed separately via the appropriate industry group e.g. Securities Finance Association Asia Pacific), SBL processes in Hong Kong are often manual and, in the case of fail coverage, are time critical in order to cover the very buy-ins such trades are meant to prevent. In addition, recalls account for most of the fails of our investor community (refer to our comments in Q1 above which mention SBL initiatives European T+1 project).

For easy reference, we have summarised here high-level concerns with respect to the plan T+1 settlement change for the Hong Kong market in respect to Stock Borrow and Lending (SBL):

- ☐ Recalls Management: Need for more efficient and automated processes to manage recalls and returns in a T+1 environment.
- ☐ Standardized Recall Notification: Requirement for a standardized recall notification request with a liability deadline on trade date (T) (exact timing to be discussed by the industry)
- ☐ Return Notification Deadline: Return notification deadline for recalled securities to be set before the return settlement deadline on T+1 (exact timing to be discussed by the industry)
- ☐ Auto-Partialling: Auto-partialling should be applied by default to reduce settlement fails and improve efficiency.
- ☐ Automated Pre-Matching: Automated pre-matching of all SBL instructions on trade date (T) is recommended to reduce settlement fails and improve efficiency.
- ☐ Buyer Protection Processing: Need to automate buyer protection functionality to ensure timely and efficient processing of buyer protection instructions in a T+1 environment.
- ☐ Recall Capture Enhancement: Need for recall capture enhancement, including split management efficiency and automation, as well as integration with third-party tools.
- ☐ Higher Impact on Recalls: T+1 settlement change will have a higher impact on recalls due to the automated buy-in rule.
- ☐ Collateral Management: Need to broaden the range of acceptable and eligible collateral accepted by HKEX to support SBL activities.
- ☐ Intra-Day Repo Funding: Creation of intra-day repo funding facilities by the HKMA to support market liquidity and SBL activities

6. FX, CLS AND FUNDING. Our clients and internal businesses have raised repeatedly the issue of funding and liquidity in T+1 which will create challenges in the management of FX and funding.

Most investors use third party FX services and will need time to consider a shift to new FX models. In addition, there is widespread use of CLS in the community to mitigate the counterparty risk of large daily nominal FX sizes for global investors. The disconnect in settlement cycles is of some concern and will force investors to move towards bilateral gross settlement, increasing costs and counterparty risk. We also understand investors may consider prefunding as an option, which not only is extremely unpopular and adds to the cost of trading, but also brings the Hong Kong market backwards.

At this stage however, most have commented that they lack sufficient information and time to assess how to address these issues properly.

We have also mentioned before the possibility that global clients may increasingly move to contract in USD or EUR to resolve their FX challenges, pushing this to their brokers/GCPs in Hong Kong to manage on their behalf on Settlement Date. This has possible impacts on deadlines for settlement, cash instructions, funding issues on US holidays and again, a transference of the risks and time pressures to the GCPs.

7. CENTRALISED LENDING FACILITY. We have received suggestions from our clients regarding the establishment of such a facility for fails coverage. While we agree that this could be beneficial in preventing fails, any such facility should be offered with benefits such as exclusion from buy-ins as well as strict pricing guidelines (noting a similar facility exists in Singapore however at extremely uncompetitive pricing).

Consultation Question 5:

Do you consider the timeframe to be sufficient for you to prepare for T+1 to become effective in Q4 2027, given the advance visibility and lead time provided? Do you have any comments on the discussion and implementation approach?

Please share your views on the proposed approach and timeline.

No, reasons and considerations as follows

Because the nature of the global post-trade workflow is sequential, it is necessary to go back through several upstream layers of intermediaries to correct instructions, with local participants (CPs and custodians) on the wrong side of the time zone difference. As there will not be sufficient time to be able to absorb the overnight lag in resolving issues, we foresee a T+1 cycle leading to higher overall fail rates.

As a GCP acting for large NCPs/broker dealers, we are downstream in this process, have these problems multiplied by several times as a result and are frequently forced to manually handle clients trades in order to prevent large scale buy-ins.

In view of these issues described, we believe the timeframe of 4Q2027 suggested for the move to T+1 will not be achievable without the introduction of significant additional risk to participants and investors alike, or inadvertent negative impacts on trading and market activity.

As described in our Discussion Paper, the issues we have expressed here “are exacerbated by a number of factors specific to Hong Kong such as its aging post-trade market infrastructure and rules, unique market practices, risks of punitive buy-ins, as well as the misalignment of the securities and payments infrastructure and timings, leading to challenges in FX and funding both for investors as well as brokers and their GCPs.

In addition, there are knock-on impacts of the change caused by the inter-connectedness with other products in the market, such as ETFs, options market making and securities borrowing and lending, which could hinder the activity of participants, investors and liquidity providers.

The Hong Kong equities market has in the past, for a large part relied on itself to “cobble” together solutions for new products such as ETFs, Single Tranche Multiple Counter (dual counter), third-party clearing, true DVP settlement, without wholesale involvement of other critical market segments...”

Finally, it is worth highlighting the key success factors in the US transition from our Discussion Paper response, with the European transition largely following the same path (albeit with much more complexity):

- Market engagement and lead time. There needs to be a significant amount of open dialogue between investors, participants, various associations, the regulatory authorities and committees, culminating in detailed and meticulous plans set out in advance of the transition.
- Investment in automation. The US transition focused, quite rightly, on the timings and processes around the immediate window of activity following execution, namely that of speeding up allocations and affirmations prior to settlement. Over the lengthy readiness planning period, the industry implemented enhancements into integrating their front-middle-back office systems to enable speedier and straight-through processing.
- Investor education and rigorous testing. Given the lead time and open engagement, participants took the lead in client engagement to cascade materially important details and requirements to their clients downstream over a lengthy period. This was followed by rigorous testing of numerous test cases over almost a year prior to the cutover.
- Changes to Workflows. In addition to the IT investments mentioned above, cross-border investors and market participants alike implemented changes to their processes, infrastructure, working hours and FX activity in order to facilitate their activity.

In summary, the change in settlement cycle is not in itself the single driver of enhancing Hong Kong’s competitiveness and vibrancy. The transition needs to contemplate a unique set of convergent factors around front, middle and back-office, clearing house, regulatory framework, legacy post-trade, funding workflows and infrastructure. These issues need to be simultaneously addressed in order for an orderly transition experience that future-proofs the market rather than setting it back.

We should be cautious in our expectations that T+1 in itself will be able to deliver the maximum potential benefits for the market, unless the fundamental challenges expressed by the market can be properly mitigated. As such, the industry needs to be extremely well-coordinated in order to achieve optimal preparedness for the transition.

We are not at this point suggesting a timeline, choosing instead to focus on the areas which we consider are critical to be addressed with the industry prior to readiness. We suggest a timeline should be worked on in subsequent workshops with participants first including in a roadmap the areas of concern highlighted by the industry.