



**Association of National Numbering  
Agencies BV/SRL**

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**Topic:** *Consultation Paper “Review of RTS 22 on transaction data reporting under Art. 26 and RTS 24 on order book data to be maintained under Art. 25 of MiFIR”*

Dear ESMA,

The [Association of National Numbering Agencies \(ANNA\)](#) appreciates the opportunity to respond to ESMA’s consultation paper on the Review of RTS 22 on transaction data reporting specifying certain requirements.

The Association of National Numbering Agencies (ANNA) is a global member association of National Numbering Agencies (NNAs). ANNA has 133 members and partners, representing key market infrastructures, including Stock Exchanges, CSDs, Central Banks, Data Vendors, and Regulatory Bodies.

- Question **23Q** highlights several international developments and standards that are considered for the development of the Review of RTS 22 on transaction data reporting under Art. 26 and RTS 24 on order book data to be maintained under Art. 25 of MiFIR on transaction reporting. The NNAs actively contribute to the development, adoption, promotion, and implementation of global financial standards. They allocate International Securities Identification Numbers (ISIN - ISO 6166), Classification of Financial Instruments (CFI - ISO 10962), and Financial Instrument Short Name (FISN - ISO 18774) across more than 200 jurisdictions. Additionally, under the International Organization for Standardization (ISO), ANNA serves as the Registration Authority for ISIN and FISN and strongly supports other ISO financial standards, notably the Legal Entity Identifier (LEI - ISO 17442) and the Digital Token Identifier (DTI - ISO 24165).

To address broader crypto-asset identification, the ISO standard (ISO 24165) for the Digital Token Identifier (DTI) has been developed and implemented. The DTI, which represents the

technical attributes of a token on a DLT, complements the ISIN standard (ISO 6166), which has been used for over 40 years to uniquely identify financial and referential instruments.

In the 2021 revision of the ISIN standard, language was added to clarify that ISINs are assigned regardless of the technology used, including tokenized instruments. The broader assignment of ISINs to include crypto assets was pursued because these can serve as referential instruments for other financial instruments. The data elements of an ISIN, used to uniquely identify an instrument, are based on the asset's characteristics, making ISIN and DTI complementary. Additionally, the inclusion of CFI, FISN, and LEI in the dataset accompanying the ISIN integrates three additional ISO standards into the overall model for identifying, classifying, and describing instruments at the asset level.

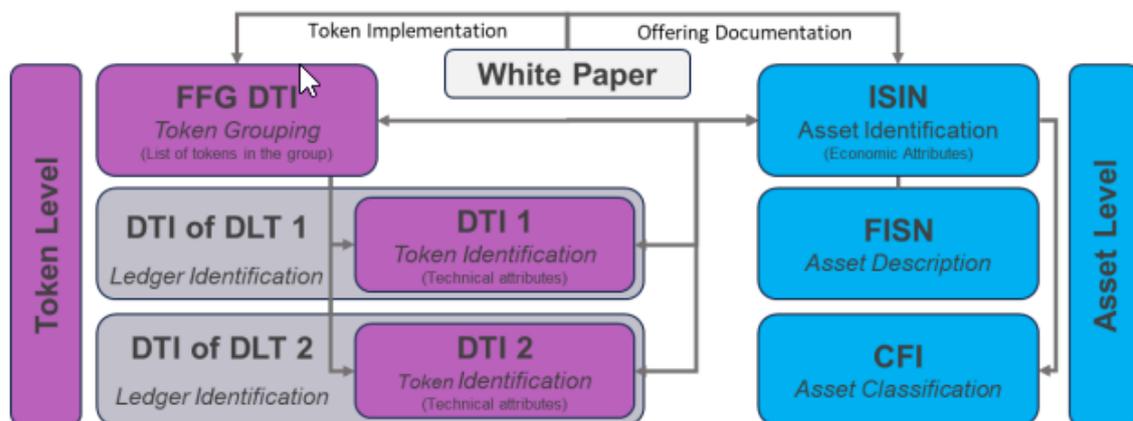
ANNA and the [Digital Token Identifier Foundation](#), established a joint Task Force in April 2021 to collaborate and ensure a complementary relationship between ISIN and DTI standards across all digital assets.

The Task Force has progressed to introduce ISINs assigned by ANNA, recognized by a new XT ISIN prefix and based on DTI identifiers. These ISINs are documented in the DTI record and accessible in the [DTI register](#). ISINs and linked DTIs, including those assigned by NNAs with linked DTIs for financial and referential instruments, are published and downloadable on the [ANNA website](#) until they can be made available in the ANNA Service Bureau as the golden source for ISINs.

- **Question 29Q** “Complementary Use of ISIN and DTI”

On 06.12.2024 ANNA designated Etrading Software Ltd. (ETS) as the numbering agency for XT ISIN for digital assets.

The two complementary, interoperable identifiers, with different functions but intrinsically linked, work together. ISIN identifies the asset, while DTI uniquely identifies the implementation of the token on a DLT. This integration aims to reduce operational complexity and industry costs, providing a clear link between an asset and its related digital tokens. The following diagram illustrates the relationship between the ISIN at the asset level and the associated DTIs at the token level:



ANNA supports the use of DTI for identifying tokens on transaction data reporting. Together with ISIN, these two ISO standard identifiers can provide the highest level of transparency for market participants regarding crypto assets.

ISO standards have global recognition and a proven governance framework to ensure they evolve with user requirements. Within the financial services industry, these standards drive market efficiency, reduce operational risk, and contribute to the proper functioning of securities markets. ISO Standards are crucial for enhancing transparency, improving data quality, and providing greater data analysis opportunities for both public authorities and market participants.

Thank you for the opportunity to provide feedback and highlight the beneficial and complementary nature of two important ISO standards. Do not hesitate to contact us if you wish to further discuss any aspects of our response.

Kind regards,

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