

MEMO

# **Euronext's position on the Market Integration Package (MIP)**

**Delivering markets that are liquid, efficient and globally  
competitive**

March 2026



# Executive summary

European citizens and companies require capital markets that support them in their investment needs while more funding is necessary for the European Union's strategic objectives. We should therefore remove barriers that prevent scale and growth. In December 2025, the European Commission published the Market Integration Package (MIP) aiming to address these challenges.

Euronext has a long-standing commitment to the objectives of the Savings and Investments Union and European market integration as a whole. In fact, Euronext has developed from a small group of national exchanges into a leading diversified pan-European market infrastructure including:

- Eight regulated markets across Europe, with seven operating on one single trading platform<sup>1</sup>, having one single liquidity pool;
- The 3<sup>rd</sup> -largest CSD network in the EU with €7.8 trillion in assets under custody; and
- Euronext Clearing, a leading multi-asset European clearing house.

As the #1 equity listing venue in Europe with around 1,900 listed companies and €7.3 trillion in market cap, Euronext hosts the largest issuer community in Europe. With a total of around 55,000 bonds and over 3,600 ESG bonds listed, Euronext is also the #1 debt listing venue globally.<sup>2</sup>

In addition, Euronext operates a unique federal model, that combines proximity to local financial ecosystems with European scale: working with local market participants is an important part of this, providing investors via local brokers with access to a wide range of trading opportunities and supporting the scaling up of SMEs through initiatives such as IPOready and ELITE.

***"At this pivotal moment, Euronext plays a critical role in enabling European strategic autonomy. We need speed and scale to address the many challenges we as Europeans are collectively facing including the new geopolitical reality, climate change and the digital transition. To do so, we need capital markets that are liquid, efficient, transparent and globally competitive to support future generations."***

***Stéphane Boujnah, CEO and Chairman of the Managing Board***

The MIP package represents an important step toward integrating fragmented markets, improving scaling opportunities for EU financial market infrastructures and reducing cross-border barriers. **We support proposals aiming to increase liquidity, fair competition, investor choice and consolidation of markets.**

There are some further improvements we believe should be introduced to improve the functioning of markets and increase transparency and visibility to enhance attractiveness. In addition, we do not support the proposal to change the scope of the consolidated tape at this stage.

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<sup>1</sup> With ATHEX joining Euronext, the migration of Greek securities to Optiq, Euronext's trading platform, is foreseen to take place in 2027.

<sup>2</sup> All data and figures referenced in this paragraph are accurate as of February 2026.

## Enhancing EU market structure: the foundation for effective capital raising in Europe

Financial markets are pivotal to economic growth. Liquidity that is visible and accessible to all is a key driver of financial markets' attractiveness both from an issuer and investor perspective. Fostering this requires a fair and equitable regulatory framework that supports robust price formation, while recognising the complementary roles offered by various market models and participants.

In European equity markets, there is an increasing trend towards dark and bilateral trading which is negatively impacting price formation, impairing liquidity visibility, and preventing liquidity access. Bilateral trading<sup>3</sup> has now become the main trading modality for EU cash equities, including on systematic internalisers (SIs)<sup>4</sup>. In addition, multilateral trading is increasingly becoming opaque, including dark pools and semi-transparent models such as Frequent Batch Auctions (FBAs). Much of this trading is now executed at midpoint. These trends have developed at the expense of liquidity and price formation on multilateral lit venues, and thereby raise concerns over the ability for market participants and issuers to gauge existing liquidity. This has consequences in terms of overall market functioning, including enabling meaningful valuations. Whilst these are functionally market structure topics, they have a direct impact on primary markets and companies' financing.

The current regulatory framework is contributing to these developments given the more flexible and less stringent requirements, and the more lenient enforcement, that apply to certain execution venues, such as SIs and FBAs. While the current MIP proposals on market structure are very limited, they go in the right direction. However, they must be complemented with more impactful measures to address this negative trend and rebalance the framework to improve transparency of markets and level the playing field across execution venues. Moreover, having more listings and European IPOs is dependent on the existence of a genuinely liquid secondary market.

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<sup>3</sup> This covers systematic internalisers, OTC and off-orderbook on-exchange trading

<sup>4</sup> Investment firms that deal on own account in a specific manner.

**Proposed solutions:**

Address the regulatory distortion in the market and level the playing field across venues as follows:

1. Require SIs to be subject to the same requirements and enforcements as trading venues; SIs should:
  - Publish SI Rulebooks and trading protocols, explaining 1) participants / counterparty admission rules, and 2) matching logic including information of the bilateral trading model.
  - Provide proper pre-trade transparency with binding quotes by publishing all their quotes on liquid instruments below twice the standard market size including when planning to price improve.
  - Provide meaningful price improvement of at least one tick when dealing below large in scale levels.
2. Complement SIs' post-trade requirements with attribution (following an appropriate deferred time period) and improve transaction flag regime:
  - Enrich SI trade reports with the SI identifier after an appropriate time deferral that maintains a balance between SI anonymity in real-time and investors' need for attributed post-trade data in non-real-time.

- This will allow investors to get the most extensive and granular view possible on liquidity in EU equities.
  - It should also be the catalyst for a full data review on market structure and a true assessment of trading that contributes to price formation.
3. Apply the tick size regime consistently across all execution venues to ensure a level playing field:
    - The tick size should apply and be enforced on all execution venues, both multilateral and bilateral, at both the level of orders and transactions, to safeguard the orderly functioning of the market, and ensure full transparency and price comparability for investors.
    - Otherwise, there is a need to expand the volume cap to cover Frequent Batch Auctions and SI transactions executed at sub-tick.
  4. Task ESMA with reviewing the transparency regime to consider any enhancements required to reflect the latest developments in market models and trading systems.

# Strengthening the European post-trade landscape: supporting competition and enabling integration

In each EU Member State there is traditionally one CSD, with its own operational standards and settlement systems. This fragmented post-trade structure creates significant barriers to cross-border settlement, as market participants must navigate a patchwork of infrastructures and compliance requirements. However, as shown by a recent study by Oxera<sup>5</sup>, this situation could be remedied by applying simple solutions. As long as all CSDs are connected with each other, competition in the post-trade space can work and drive market-led consolidation. Today we already have the tools available to unify the post-trade landscape by using the common platform for securities settlement provided by TARGET2-Securities (T2S) operated by the European Central Bank.

The proposal by the European Commission to mandate connectivity to T2S is a big step in the right direction. We believe it is important to go further to ensure that the service is also de facto used, because if the only requirement is connection to T2S, the volumes necessary to further develop the platform are likely to remain in internal systems.

Moreover, we should aim to make the best possible use of this common platform to further strengthen

European capital markets by also enhancing the functionality of T2S.

The new provisions giving the right to market participants to designate a CSD for settlement aims to promote competition in the European post-trade space which is welcome. However, further clarification is needed for this to work in practice and to allow putting appropriate procedures in place.

## **Proposed solutions:**

- We support mandating not only the connection but also the actual use of T2S by CSDs in the currencies available on T2S.
- T2S should enable settlement of trades in currencies other than euros (e.g. USD) in central bank money or allow T2S standardised interactions with external T2S approved and openly accessible non-EUR payment systems.
- The right to designate a CSD by market participants is a welcome improvement. But the proposal lacks a process to establish connection between financial market infrastructures. Operational conditions could potentially be defined by ESMA.

<sup>5</sup> Oxera, "The design and functioning of CSD services in the EU", 22 October 2025, [[available here](#)].

## A new supervisory framework: a prerequisite for deeper integration

Euronext welcomes the Commission's ambition to deliver more effective and efficient supervision at the European level as it will ensure a more harmonised and fair approach. There is a clear need to address the current complexity stemming from divergent supervisory practices and fragmented oversight which is hindering the integration of EU markets.

The proposals to 1) create a new Pan-European Market Operator (PEMO) regime with one single authorisation under central supervision, and 2) allow regulated markets to operate branches across the EU under one licence without additional obligations are both very needed and positive developments. They will allow groups of exchanges – like Euronext – to optimise operations and fully benefit from synergies, leading to deeper integration of markets across the EU.

Euronext supports including significant financial market infrastructures (FMIs) under ESMA supervision. A level playing field is needed and FMIs of a similar size and scope should have the same supervisor.

However, refinement of these proposals is required, particularly in relation to the role of the National Surveillance Authority (NSA) in market surveillance, ensuring this is precisely framed and does not result in duplication, inefficiencies or additional costs for supervised entities. It should be made clear that this does not encroach on the remit of supervising FMIs in scope which would be firmly ESMA's role.

In addition, the central reporting database that will be maintained by ESMA is a helpful development that should increase efficiencies. Leveraging this also for regulatory data reporting purposes should be considered to streamline data reporting and create cost-effective solutions.

We support improvements to ESMA's governance structure and advocate for adding a competitiveness mandate.

### **Proposed solutions:**

- Recognition of Groups of FMIs needs to be fully embedded in the PEMO framework – the potential for local interpretation or gold-plating has to be removed.
- It is essential that a smooth transition is facilitated from current structures into the new PEMO regime.
- Ensure centralised supervision delivers efficiencies – there needs to be full clarity on the role of the NSA so there is no risk of duplication or additional costs. Clarifications are required in the text to ensure:
  - the role is not too broad and does not overlap with the supervisory role of ESMA; and
  - FMIs are not subject to dual fees.
- A competitiveness mandate should be introduced for ESMA to adapt to rapidly evolving developments and the competitive geopolitical environment.
- The central reporting database should also cover regulatory data reporting.

# Access between financial market infrastructures: enhancing connectivity while safeguarding financial stability

The MIP amends the rules governing access between trading venues and CCPs and aims to facilitate interoperable clearing. From Euronext's perspective, we are open to considering interoperability arrangements with a limited number of operators. However, these need to be subject to careful assessment. As shown by a report from the European Systemic Risk Board:

"Interoperability arrangements can have systemic risk implications, since the establishment of interoperable links introduces a significant element of complexity into the overall risk management system and adds a channel for direct contagion between two or more CCPs".<sup>6</sup>

We see it as crucial that we maintain a robust risk management system and do not import risk from other market participants that may be less resilient. Establishing a large number of connections would come with significant costs that should be motivated from a cost/benefit standpoint.

To avoid the risk of divergent practices and blind-spots, the same supervisor should supervise all entities in any interoperability arrangement. Without unified supervision, participating entities would be at risk of importing problems from other parts of the ecosystem. Supervision by a single supervisor of all parties involved should therefore be a fundamental condition.

We fully support the European Commission's policy choice to exclude

exchange-traded derivatives (ETDs) from the proposed new access rules. Distinguishing between derivatives markets and other asset classes is the correct approach given the fundamental differences between these markets. In derivatives markets, the link between the trading venue and clearing house is especially crucial to ensure correct risk management. The value proposition depends significantly on the CCP risk model and the cross-margining options in the default fund. Competition in ETDs is instead best ensured by efficient competition between integrated ETD markets (trading and clearing).

## **Proposed solutions:**

- Interoperability cannot be considered with any entity not subject to the same supervision. Single supervision of all involved parties is a fundamental condition.
- We would be open to consider interoperability with a small number of operators (1-2 other CCPs) based on cost/benefit and commercial assessment. FMIs should not have to connect to all possible operators as this would create significant costs with very limited added value while increasing risks.
- The exclusion of exchange-traded derivatives from the scope needs to be maintained.

<sup>6</sup> ESRB, "Report to the European Commission on the Systemic Risk implications of CCP interoperability arrangements", January 2016, [[available here](#)]

# New technologies: making the EU regulatory framework fit for purpose to support innovation

The MIP aims at improving the EU regulatory framework to enable the uptake of new technologies. In this context, we generally support proposals to enhance technological neutrality in CSDR, SFD and FCD, as well as to improve the usability of the DLT Pilot Regime, as these can enhance innovation.

We particularly support the proposal to allow MiCA E-Money Tokens (EMTs) – i.e. MiCA-regulated stablecoins – to be used as a settlement asset under CSDR. This would allow CSDs to meet growing market demand for DLT-based settlement in both Union and non-Union currencies. However, to fully unlock this opportunity for innovation, it is essential that the conditions for the use of EMTs (or tokenised cash in general) for settlement remain proportionate and do not undermine commercial viability, also in cases where the cash-leg is settled on the accounts of a designated credit institution.

To enhance the usability of the DLT Pilot Regime, we believe the proposals by the European Commission are going in the right direction. This is particularly the case regarding the time limit removal and the scope expansion, achieved by removing asset-specific thresholds and by expanding eligibility to any asset class.

However, more could be done to leverage the full potential of the DLT Pilot Regime, particularly in terms of aggregate threshold flexibility, currency-neutral settlement and regulatory clarity. Therefore, we suggest some solutions to ensure that the new version of the DLT Pilot Regime is fit-for-purpose, with a view of making Europe a more attractive environment for innovative projects in the DLT/tokenisation space.

## **Proposed solutions:**

- When settling on the accounts of a credit institution via EMTs under CSDR, remove the proposed capital surcharge and the requirement for the credit institution to only use its licence to offer services related to EMTs settlement.
- Remove the aggregate threshold for DLT Pilot participation from the level-1 text and empower ESMA to define it via level-2 rules, to ensure more flexibility and room for innovation.
- Remove the DLT Pilot requirement whereby, when settling via stablecoins, assets denominated in Union currencies must be settled via stablecoins referencing Union currencies.
- Integrate the “Simplified Regime” with the Regular DLT Pilot Regime, to avoid a “Pilot in the Pilot” situation – with related risks of fragmentation and compliance burden.
- Ensure appropriate regulatory clarity as regards the process for transition from the DLT Pilot into the standard CSDR and MiFIR/D regime.

# Consolidated Tape: fully assess experience of operation before considering any potential changes

By the end of 2026, Europe will have its first consolidated tape (CT) for equities. The CT will be a joint stream providing data from trading venues across Europe, giving visibility on activities across capital markets to the benefit of investors, including retail, while not intended to be used for trading purposes. Putting this flagship initiative in place has not been an easy feat, partly due to the fragmentation and geographical spread of the European trading landscape that present technical and operational challenges.

In the most recent MiFIR Review, ESMA was given a mandate to conduct the tender process for selecting a CT provider. A provider has now been found and the expectation is that the first tape will be up and running in the second half of 2026.

Given that the CT is currently under construction, we believe it is far too early to re-open this topic. According to the current provisions, ESMA will prepare a report for the European Commission reviewing the functionality of the CT – once operational – and the Commission already has the possibility to submit a legislative proposal at the appropriate juncture. The inclusion of the CT review in the MIP unnecessarily pre-empts this process without any experience of the current design or a robust ex-post impact assessment, which we believe is highly problematic.

We urge co-legislators to reject all proposed changes to the CT framework

contained in the MIP proposal. Instead, delivering a CT as agreed in the MiFIR Review should be the priority.

If the far-reaching proposals relating to the CT are maintained within the MIP, this must inevitably spark necessary in-depth reflection on all CT parameters. The design of the CT today is an equilibrium and order book depth topics and lifting of anonymity cannot be taken in isolation without paying due attention to all features and considerations that would need to be accounted for in the EU's CT design. These topics include for example, the revenue model, geographical coverage, lessons from the US and the theme of value-added services.

## **Proposed solutions:**

- All proposed changes to the CT framework contained in the Commission proposal should be rejected.
- Once the CT is operational and experience has been gained, ESMA could properly evaluate it ex-post through an in-depth impact assessment.
- Importantly, this would not require any legislative adjustment to the framework at this stage.