

Regulatory Change Impact File

From policy text to operational delta

A reviewer-first template for tracing a regulatory publication to source status, scope, verified change, potential workflow impact, evidence requirements and a qualified human owner.

Use this file as a review handoff, not an implementation engine. A regulatory publication is not yet proof that an operational control must change. Keep evidence found, requirement identified, control changed, control verified effective and compliance established as separate states.

Source status last checked: 21 September 2026 | Illustrative examples use real official sources; organization-specific workflows, control hypotheses and implementation states are synthetic / illustrative.

One-page reader card

Step	Required record	Stop condition
1. Source	Authority, jurisdiction, exact title/version, direct URL, section/page and date.	Stop if source identity or version is uncertain.
2. Proposition status	Classify both the publication type and the proposition-level legal/supervisory status.	Stop if document type is being used as a substitute for legal force.
3. Scope	Map entity x instrument x activity x jurisdiction, including named limits/exclusions.	Stop if applicability is assumed rather than evidenced.
4. Delta	Compare a verified prior proposition with the current proposition.	If the prior baseline is missing or incomparable, record: change not established.
5. Dates	Keep publication, adoption, entry into force, application/compliance, transition and consultation dates separate.	Never copy the publication date into another date field without evidence.
6. Potential impact	Describe the workflow that may need review and label assumptions/hypotheses clearly.	Stop if an internal hypothesis is presented as an authority requirement.
7. Evidence	Name the exact document, policy, contract, test, reconciliation or decision record needed.	Evidence found is not evidence that a control is effective.
8. Owner	Name the operational reviewer and the qualified legal/other decision owner.	Stop if an unresolved legal/accounting/risk question has no qualified owner.

Blank template

Complete only what the evidence supports. Use “Not established”, “Not observed”, “Not applicable” or “Pending qualified review” instead of inventing a value.

1. Identification and source identity

Record ID	
Version	
Status	intake evidence review applicability review implementation review closed internal review
Research cutoff	
Authority	
Jurisdiction	
Document title	
Document number / version	
Direct URL	
Section / page	
Publication / update date	
Publication type	law regulation/rule supervisory guidance statement feedback statement consultation speech press release roadmap decision other
Proposition-level status	established requirement supervisory expectation clarification/reaffirmation respondent view proposal planned work not established
Legal-force evidence and limits	

2. Applicability

Relevant entity	
Instrument	
Activity	
Jurisdictional nexus	
Named exclusions / limits	

Applicability questions	
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3. Verified comparison

Verified prior source / proposition	
Current source / proposition	
Comparison basis	
Missing baseline flag	true false
Delta type	new norm amendment clarification/reaffirmation supervisory expectation consultation feedback planned work no relevant change identified unresolved
Scoped change summary	
What did not change / is not established	

4. Dates - do not collapse these fields

Publication date	
Adoption date	
Entry into force date	
Application / compliance date	
Transition end	
Consultation deadline	
Evidence for each date	

5. Potential operational impact

Potentially affected workflow	
Current operating assumption	Label synthetic / illustrative when applicable
Authority-required requirement	Only if confirmed
Possible impact / control hypothesis	Keep separate from authority requirement

6. Evidence, ownership and closure

Evidence required for review	Exact document / policy version / contract / test / reconciliation / decision record
Evidence available	
Unresolved legal / accounting / risk question	
Qualified owner role	
Proposed response type	information/watchlist assess applicability seek counsel draft internal change proposal no change identified subject to review
Operational owner	
Reviewer	
Legal / specialist reviewer	
Decision owner	
Target review date and basis	
Next trigger / revalidation condition	
Evidence of implementation	Not observed unless evidenced
Verification result	Not observed pending observed result
Decision reference	
Closure evidence	
Public-use limitations	
What this file does not prove	

Worked example A - OSFI / Canada

Illustrative use only. Official-source facts are real; the organization-specific workflow and control response are synthetic.

Source identity

Authority	Office of the Superintendent of Financial Institutions (OSFI)
Jurisdiction	Canada / federal financial-institution perimeter
Document	Statement on Tokenized and Other Digitally Represented Deposits
Date	10 September 2026
Publication type	Statement
Proposition status	Clarification/reaffirmation + stated supervisory expectations
Direct URL	https://www.osfi-bsif.gc.ca/en/news/statement-tokenized-other-digitally-represented-deposits
Legal-force limit	The statement explains OSFI's technology-neutral stance and points institutions to applicable legislation/guidance. This file does not determine statutory classification for a specific product.

Verified comparison and scope

- Relevant entity: federally regulated FI under the cited federal FI legislation; illustrative case assumes a bank product team.
- Instrument/activity: proposed tokenized deposit; design/delivery of a novel deposit product; technology/cyber, third-party and supervisory-engagement review.
- Current proposition: OSFI says technology does not determine legal nature; tokenized deposits are not legally distinct merely because they are tokenized; applicable law/guidance continues to apply; advance lead-supervisor engagement is expected for novel products/services.
- Prior position: B-13 (2022) and B-10 (2023) are pre-existing guidance. A tokenized-deposit-specific prior public OSFI baseline was not established in the source pack.
- Delta type: clarification/reaffirmation. A new obligation from the 10 September statement itself is not established.
- Dates: publication 10 September 2026; a new entry-into-force/application date from this statement itself is not established.

Potential review path - synthetic / illustrative

- Potentially affected workflow: new-product governance / technology-risk / third-party-risk / regulatory-engagement review.
- Evidence to request: legal classification memo; product terms; entity/branch map; relevant B-13 technology/cyber assessment; relevant B-10 third-party evidence; supervisory-engagement record if applicable.
- Qualified owner: Canadian regulatory counsel plus the responsible compliance/supervisory/product owner.
- Does not prove: product legality, regulator approval, compliance, control effectiveness or launch readiness.

Worked example B - FCA / Bank of England / UK

Illustrative use only. Official-source facts are real; the program-specific workflow and control response are synthetic.

Source identity

Authority	Financial Conduct Authority; joint tokenisation workstream with the Bank of England
Jurisdiction	United Kingdom / wholesale markets
Document	FS26/1: Tokenisation in wholesale markets
Date	14 September 2026
Publication type	Feedback Statement
Proposition status	Mixed: respondent feedback; authority response/reaffirmed principles; planned work; current-framework reminder
Direct URL	https://www.fca.org.uk/publications/feedback-statements/fs26-1-tokenisation-wholesale-markets
Legal-force limit	FS26/1 is not treated as a new general rulebook. Product/activity-specific duties require mapping to the applicable underlying rules.

Verified comparison and scope

- Relevant audience includes banks, investment firms, asset managers, FMIs, trading venues/post-trade providers and tokenisation technology firms; illustrative case assumes a wholesale-tokenisation programme.
- May 2026 baseline: joint Call for Input - authority thinking and questions, not a prior binding rule.
- September 2026 publication: Feedback Statement summarising 123 responses, reiterating principles, recording authority responses and feeding a joint roadmap planned later in 2026.
- Delta type: feedback + clarification/reaffirmation + planned work. A new general obligation from FS26/1 itself is not established.
- Current-source status: the FCA page rechecked on 21 September 2026 still states that the joint roadmap will be developed later in 2026.
- Dates: publication 14 September 2026; a new entry-into-force/application date for FS26/1 itself is not established.

Potential review path - synthetic / illustrative

- Potentially affected workflow: regulatory-change intake for a wholesale-tokenisation programme.
- Useful task: map entity, instrument and activity to current applicable rules; separate current requirements from roadmap/watchlist items; require underlying-rule links before implementation tasks are issued.
- Evidence to request: perimeter/applicability memo; applicable FCA/PRA/BoE/UK rules; settlement/custody/safeguarding sources if relevant; contracts/design; decision record.
- Qualified owner: UK regulatory counsel plus responsible compliance/FMI/product owner.
- Does not prove: legality, authorisation, settlement finality, safeguarding sufficiency, control effectiveness or compliance.

Quick review checklist

- Is the exact official source identified and linked?
- Is the publication type separated from the legal/supervisory status of the proposition?
- Is applicability mapped by entity x instrument x activity x jurisdiction?
- Is a defensible prior baseline established before claiming a change?
- Are publication, entry-into-force and application dates kept separate?
- Are authority requirements separated from internal control hypotheses?
- Does the file identify exact evidence needed for review and implementation verification?
- Is every unresolved high-stakes question routed to a qualified human owner?
- Are implementation and control-effectiveness claims marked Not observed unless evidenced?
- Is there a clear revalidation trigger for successor publications, corrections or rule changes?

Evidence ladder: evidence found $\neq$ requirement identified $\neq$ control changed $\neq$ control verified effective $\neq$ compliance established.

Official sources used for the illustrative examples

OSFI - Statement on Tokenized and Other Digitally Represented Deposits

<https://www.osfi-bsif.gc.ca/en/news/statement-tokenized-other-digitally-represented-deposits>

OSFI - Guideline B-13: Technology and Cyber Risk Management

<https://www.osfi-bsif.gc.ca/en/guidance/guidance-library/technology-cyber-risk-management>

OSFI - Guideline B-10: Third-Party Risk Management

<https://www.osfi-bsif.gc.ca/en/guidance/guidance-library/third-party-risk-management-guideline>

FCA - FS26/1: Tokenisation in wholesale markets

<https://www.fca.org.uk/publications/feedback-statements/fs26-1-tokenisation-wholesale-markets>

FCA - FS26/1 Feedback Statement PDF

<https://www.fca.org.uk/publication/feedback/fs26-1.pdf>

FCA / Bank of England - Joint Call for Input PDF

<https://www.fca.org.uk/publication/call-for-input/future-tokenisation-joint-vision-authorities-uk-wholesale-financial-markets.pdf>

Bank of England / FCA - May 2026 shared-vision announcement

<https://www.bankofengland.co.uk/news/2026/may/fca-and-boe-set-out-shared-vision-for-tokenisation-in-uk-wholesale-markets>

Public-use boundary

This template is educational public-source issue spotting. It does not determine the legal classification of a specific product, establish licence sufficiency, prove settlement finality, approve a control design, establish compliance, or replace jurisdiction-appropriate qualified review. Source status and current-rule applicability should be revalidated after material updates.